

27<sup>th</sup> Oct 2022

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

Clerk of learned counsel for the appellant seeks adjournment on the ground that learned counsel is not available today. Adjourned as a last chance to argue the case on the next date, failing which the case will be decided on the available record without arguments on 25.11.2022 before D.B at camp court D.I.Khan. P.P given to the respondents.



(Rozina Rehman)  
Member(J)



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

30<sup>th</sup> June 2022

Neither appellant nor her counsel present. Mr. Farhaj Sikandar, District Attorney for respondents present.

Niether appellant nor her counsel could be served, therefore, let it be fixed on the date already fixed i.e on 27.07.2022 for arguments before D.B at camp court D.I.Khan.



(Mian Muhammad)  
Member(E)



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

27/07/2022

Due to Summer vacation  
come up 28/08/2022  
Reader

28<sup>th</sup> Sept 2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for respondents present.

Learned counsel for the appellant seeks adjournment to prepare the case. Last chance is given to argue the case on the next date. To come up for arguments on 27.10.2022 before D.B at camp court D.I.Khan.




(Salah Ud Din)  
Member(J)



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

24.01.2022

Tour is Cancelled, therefore, case is adjourned to  
23.05.2022 for the same as before.

  
Reader.

23.05.2022

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

Previous date was changed on Reader Note, therefore,  
notice for prosecution of the appeal be issued to the appellant as  
well as her counsel through registered post and to come up for  
rejoinder, if any, as well as arguments on 27.07.2022 before the  
D.B at Camp Court D.I.Khan.



(Rozina Rehman)  
Member (J)  
Camp Court D.I.Khan



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

S.A No. 11961/2020

22.11.2021

Learned counsel for the appellant present. Mr. Mehmood Azam, ADO (Litigation) alongwith Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Written reply on behalf of respondents submitted, which is placed on file and copy of the same is handed over to learned counsel for the appellant. Adjourned. To come up for rejoinder, if any, as well as arguments before the D.B on 24.01.2022 at Camp Court D.I.Khan.



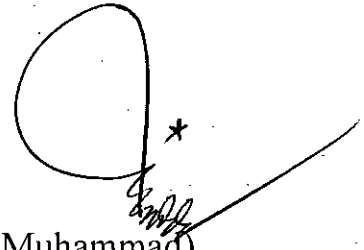
Chairman  
Camp Court D.I.Khan

25.03.2021

Junior to counsel for the appellant present. Mr. Muhammad Rashid, DDA for respondents present.

Written reply not submitted. Notices be issued to the respondents for submission of written reply/comments.

Adjourned to 22.06.2021 before S.B at camp court D.I.Khan.



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

22.6.21

*due to COVID-19, the case is adjourned to 26.10.2021 for same.*




26.10.2021

Nemo for parties.

Asif Masood Ali Shah learned Deputy District Attorney present.

Reply on behalf of respondents was not submitted. Preceding date was adjourned on a Reader's note, therefore, notice be issued to both the parties with direction respondents by way of last chance, to furnish reply/comments, positively. To come up for written reply/comments on 22.11.2021 before S.B at Camp Court, D.I.Khan.



(Rozina Rehman)  
Member(J)  
Camp Court, D.I.Khan

Form- A





FORM OF ORDER SHEET

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

Case No.-

**11961**

/2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/10/2020	<p>The appeal of Mst. Rukhsana Bibi received today by post through Mr. Shah Fahad Ansari 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-	11-11-20	<p>This case is entrusted to touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>25-11-2020</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	25.11.2020	<p>Appellant present through counsel. Preliminary arguments heard. File perused.</p> <p>Points raised need consideration. Admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for written reply/comments. To come up for written reply/comments on 27.01.2021 before S.B at Camp Court, D.I.Khan.</p>
	<p>Appellant Deposited Security Process Fee</p> <p>27.1.2021</p>	<p style="text-align: right;"> (Rozina Rehman) Member (J) Camp Court, D.I.Khan</p> <p><i>Due to COVID 19, the case is adjourned to 25-3-2021 for the same.</i></p> <p style="text-align: right;"></p>

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR.

In Re.S.T.A. No. 11961 of 2020.

Rukhsana Bibi

VERSUS

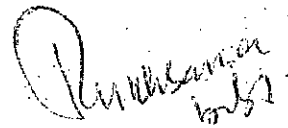
Govt. of KPK etc.

Appellant

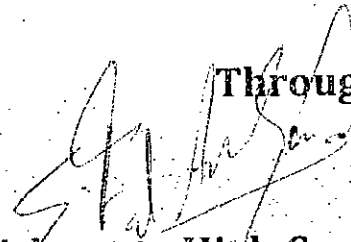
Respondents

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S No	Description of Documents	Annex	Page
1	Memo & grounds for S.T.A. with memo of address		1-4
2	Copy of NIC	A	5-6
3	Copy of Domicile Certificate	B	7-8
4	Copy of Appointment Order dated 10-05-2017	C	9-11
5	Copy of Order dated 12-03-2018 for regularization of service	D	12-15
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Appellant



Through Counsel

Advocate High Court DIKhan

Date: 19-10-2020

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR. 1

Service Tribunal Appeal No. \_\_\_\_\_ of 2020.

Rukhsana Bibi wife of Javed Zaman r/o Sheikh Uttar Tehsil and District Tank Now at Madina Colony DIKhan.

Appellant

VERSUS

1. Govt. of KPK through Secretary Elementary and Secondary Education Peshawar.
2. Secretary Elementary and Secondary Education KPK Peshawar.
3. Director Elementary and Secondary Education KPK Peshawar.
4. District Education Officer Female Tank.
5. SDEO Female Tank.

*Signature*  
U/S 4 Service Respondents.  
Tribunal Act 1974

SERVICE TRIBUNAL APPEAL AGAINST THE ORDER DATED 22-11-2019 PASSED BY THE DISTRICT EDUCATION OFFICER FEMALE TANK WHEREBY THE APPELLANT WAS REMOVED FROM HER SERVICE AS PST GGPS SHEIKH UTTAR DISTRICT TANK WITH EFFECT FROM 05-05-2019.

PRAYER. ON ACCEPTANCE OF THE INSTANT APPEAL TO SET ASIDE THE IMPUGNED ORDER OF THE DISTRICT EDUCATION OFFICER FEMALE TANK AND TO REINSTATE THE APPELLANT IN HER SERVICE AS PST GGPS SHEIKH UTTAR DISTRICT TANK WITH EFFECT FROM 05-05-2019 AND TO PAY ALL BACK BENEFITS TO THE APPELLANTS.

*Signature*  
RESPECTFULLY SHEWETH.

1. That the appellant is permanent resident of village Sheikh Uttar Tehsil and District Tank and now a days is temporary residing at Madina Colony Tehsil and District DIKhan. The copies of NIC and Domicile Certificate are enclosed as Annexure A and B.
2. That on the recommendations of Departmental selection committee the appellant was appointed as PST (School Based) in BPS-12 on adhoc basis on contract under the existing policy of the provincial govt. in teaching cadre and was posted at GGPS Sheikh Uttar District Tank vide order dated 10-05-2017 issued by the District Education officer Tank. The copy of the order is enclosed



3. That in recognition of her excellence performance the appellant was regularized in her service vide order dated 12-03-2018 issued by the District Education Officer Female Tank. The copy of the order is Annexure D.
4. That the service Book of the appellant was prepared by the office of SDEO Female Tank and necessary entries were made therein. The copy of service book is Annexure E.
5. That the appellant was performing her duties regularly and had never absented herself from her duties when in the month of July the appellant learnt that she has been removed from her service by the District Education Officer Female Tank on false and fabricated grounds.
6. That the appellant thereafter obtained a copy of the order whereby she was removed from her service and immediately preferred an appeal before the Director elementary and secondary education KPK Peshawar on 10-07-2020 and requested for her reinstatement in her service. The copy of the impugned order is enclosed as Annexure F.
7. That although a period of 3 months has elapsed to the filing of the departmental appeal by the appellant but no reply has so far been furnished to the appellant. The copy of the departmental appeal is enclosed as Annexure G.
8. That the appellant has now come before this honorable service tribunal for the redressal of her grievances on following grounds.  
**GROUND.**
  1. That the impugned order of the District Education Officer Female Tank is against facts law and justice.
  2. That the DEO(F) Tank exercised her jurisdiction illegally and has committed material irregularity.
  3. That the perusal of record would show that the appellant was appointed as PST on adhoc basis on 10-05-2017 and after completion of her probation period for a period of one year the service of the appellant was regularized on 12-03-2018 by the District Education Officer Female Tank. Thus the appellant was a regular and permanent employee having a qualified service for more than two years and was not expected to absent her from her service.
  4. That the case of the appellant was required to be dealt with under the civil servants service rules/Act but this legal aspect of the case was altogether ignored in the case of the appellant and the appellant was removed from her service with a single stroke of pen without attending the codal formalities. Thus the impugned order is nothing in the eye of law and is of no legal sanctity.

*[Handwritten signature]*

5. That the District Education Officer Female Tank had made no sincere efforts to procure the attendance of the appellant and in case the service of the appellant was not possible through ordinary means the District Education Officer Female Tank was legally obliged to have got published a proclamation in a widely circulated news paper in the country to procure the attendance of the appellant but no such proclamation was ever got published in this respect in any newspaper and therefore the appellant remained quite ignorant about the process of removing her from her service. The impugned order is nothing but a one sided show.
6. That neither any explanation nor any show cause notice about the alleged absence of the appellant from her service nor any inquiry as required under the rules has been conducted in the case of the appellant. Non adherence of the legal requirements vitiates the entire proceedings and make the process of removal of the appellant from her service highly doubtful.
7. That the impugned order of the DEO Female Tank is very harsh and is coram non judicie.
8. That no opportunity for personal hearing was ever afforded to the appellant which was other wise mandatory.
9. That the appellant was a permanent employee of the education Department Tank but no codal formalities were applied in her case which shows malafide on the part of the competent authority.

In wake of the submissions made above it is respectfully prayed that on acceptance of this appeal the impugned order of the District Education Officer Female Tank may graciously be set aside and the appellant may please be reinstated in her service as PST and all back benefits may be paid to the appellant to meet the ends of justice.

Your humble appellant

Mst. Rukhsana Bibi Through Counsel

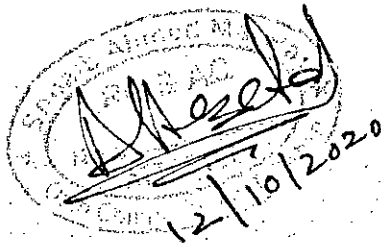
Shah Fahad Ansari

Date. 10-10-2020

Advocate High Court DIKhan

**AFFIDAVIT**

I, Rukhsana Bibi wife of Javed Zaman r/o Sheikh Uttar District Tank Now at Madina Colony DIKhan, do hereby solemnly affirm & declare on oath that the contents of the accompany petition are true & correct to the best of my knowledge & belief & that nothing has been concealed from this Honorable Service Tribunal.



*Rukhsana Bibi*  
**Deponent**

Identified by

*Shah Fahad Ansari*  
**Shah Fahad Ansari**

**Advocate High Court DIKhan**

**Date: 12-10-2020**

5

PAKISTAN National Identity Card

Name  
Rukhsana



Husband Name  
Javed Zaman

Country of Stay  
Pakistan

Identity Number  
12101-6997373-6

Date of Birth  
24.11.1986

Date of Issue  
24.08.2017

Date of Expiry  
24.08.2027

*Handwritten signature*

*Handwritten signature*  
Divisional Manager  
MSPD Punjab  
Pakistan

6

B.C. 1643/15

12:01-6597373-6



مستند نمبر: 1643/15  
تاریخ: 15/01/2016

Umar M. Malik  
Registrar General of Pakistan

10101055355

گندہ کارڈ ملے پر قریبی لیڈ بکس میں ڈال دیں

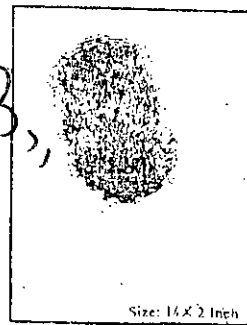
S.No.

443

0347-0800041



Ann: B



7

# CERTIFICATE OF DOMICILE

The Pakistan Citizenship Act, 1951 (Act, II of 1951)

Rules made thereunder (vide Rule No. 23)

I رضوان Son / Daughter / Wife of کاویزبان

Declare that I was born of parents who are permanently domiciled in Khyber Pakhtunkhwa Province having belonged to it by birth/settled in it.

I belong by birth to Village سنگ او تاد

Mohallah سنگ او تاد Tehsil سنگ او تاد District Tank.

رضوان  
Signature/Thumb Impression of Applicant

Dated \_\_\_\_\_ / \_\_\_\_\_ / 20

Pursuance to the declaration dated \_\_\_\_\_ filed by

Mr./Mrs./Miss رضوان S/O, D/O, W/O کاویزبان

CNIC No \_\_\_\_\_ domiciled in the Khyber Pakhtunkhwa

Province. It is hereby certified that the said رضوان

is born of parents who are permanent residents of Khyber Pakhtunkhwa Province having belonged to it by birth / settled in it. I have satisfied myself from personally / through my relevant source that the above declaration is true and duly certified overleaf.

This 27 th Day of Sep 2016  
No 4712/20 Date 27 9 2016

Attested



DEPUTY COMMISSIONER  
DISTRICT TANK

[Signature]  
Divisional Accounts Officer  
District Tank

میں اس بات کی تصدیق کرنا کرتی ہوں کہ اس سے پہلے میں نے کسی بھی ڈسٹرکٹ / این آر / قبائلی ایجنسی کا ڈومیسائل سرٹیفکیٹ حاصل نہیں کیا۔

8

دستخط ان کو خطا درج ذیل

تصدیق کی جاتی ہے کہ کسی اسماء \_\_\_\_\_ دوسرا زب \_\_\_\_\_ ولد/اختر ازوج \_\_\_\_\_ صاحبہ درج ذیل

\_\_\_\_\_ (سٹی/ضلع/حصہ حاصل) \_\_\_\_\_ محلہ گاؤں اشہر \_\_\_\_\_ شریعہ امتداد حاصل ہے۔

\_\_\_\_\_ کا اکی رہائشی و پیدائشی ہے اور اس کے والدین اشہر بھی علاقہ مذکورہ کے رہائشی و پیدائشی باشندگان ہیں اور اچھے پاکستانی ہیں

میں ان کو ذاتی طور پر جانتا جاگتی ہوں۔

21702-6275428=1

تصدیق کنندہ کا نام و پتہ حاضرہ نمبر \_\_\_\_\_ (کراچی/لاہور/راولپنڈی) \_\_\_\_\_ شناختی کارڈ نمبر \_\_\_\_\_

\_\_\_\_\_ تصدیق کنندہ کا دستخط و مہر

Director Registration Authority  
Dist. Tank

تاریخ \_\_\_\_\_

**ڈومیسائل سرٹیفکیٹ ... حصول کیلئے ضروری ہدایات**

ڈومیسائل سرٹیفکیٹ حاصل کرنے کیلئے عمر کی کوئی قید نہیں بلکہ امیدوار کسی بھی وقت اور کسی ہی کلاس میں زیر تعلیم کیوں نہ ہو ڈومیسائل سرٹیفکیٹ حاصل کر سکتا ہے۔

والدین کو چاہئے کہ وہ اپنے بچوں کے ڈومیسائل بروقت بنوائے۔

ایک امیدوار ایک وقت میں صرف ایک ڈومیسائل بنوانے کا حقدار ہے۔

ایک سے زیادہ ڈومیسائل رکھنا قانوناً جرم ہے۔

جن امیدواروں کے پاس ایک سے زیادہ ڈومیسائل سرٹیفکیٹ موجود ہوں ان کو چاہئے کہ وہ نوری طور پر ان میں سے صرف ایک اپنے پاس رکھیں جس کا وہ

قانونی طور پر حقدار ہوں۔ بالفاظ دیگر جس امیدوار کا حقیقی طور پر جس ضلع سے تعلق ہو اسی ضلع کا وہ ڈومیسائل سرٹیفکیٹ اپنے پاس رکھنے کا مجاز ہے۔

ایک سے زیادہ جعلی ڈومیسائل سرٹیفکیٹ رکھنا قانونی جرم ہے۔

اگر کوئی امیدوار ایک سے زیادہ جعلی ڈومیسائل رکھنے کے الزام میں پایا گیا۔ تو نہ صرف اُس امیدوار کے خلاف، بلکہ اُس کے والدین اور تصدیق کنندہ

کے خلاف بھی قانونی کارروائی کی جائیگی۔

ڈومیسائل سرٹیفکیٹ فارم میں دیئے گئے کوآف کی تصدیق مندرجہ ذیل افراد/انحصیات میں سے کسی ایک سے کروانا لازمی ہے۔

(1) سینئر

(2) ڈکن قومی اسمبلی (حلقہ این اے \_\_\_\_\_ ضلع \_\_\_\_\_)

(3) صوبائی اسمبلی (حلقہ این اے \_\_\_\_\_ ضلع \_\_\_\_\_)

(4) گنڈا آفیسر (BPS-17/BPS-17) (5) سیکریٹری یونین کونسل (6) جنرل کونسلر (7) مستند حلقہ دار (8) مستند علاقہ نمبر دار

امیدوار کو چاہئے کہ اپنا حتمی وقت بچانے کیلئے جلد از جلد ڈومیسائل سرٹیفکیٹ حاصل کرے تاکہ میٹرک کا امتحان پاس کرنے کے بعد انہیں ڈومیسائل کے حصول کیلئے

انتظار اور رش کا سامنا نہ کرنا پڑے۔

امیدوار کی سہولت کی خاطر ڈومیسائل سرٹیفکیٹ کی تصدیق کیلئے حکومت (9) مجاز حکام تعین کر دیئے ہیں جن میں کسی سے بھی تصدیق کی جاسکتی ہے۔



**APPOINTMENT ORDER:**

Consequent upon the recommendations of the Departmental Selection Committee, appointments of the following candidates are hereby appointed against the post of PST (school based) in BPS-12 (Rs. 11140-800-35140) @ 11140/- fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policy of the Provincial Government in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge.

**Union Council .... Tank City-II**

S#	Roll#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Address	Merit Position	Place of Posting
1	9335000075	Rabia	Muhammad Ramzan	11/04/1986	12201-7641031-0	Wapda Colony Tank	1	GGPS Rahim Korona Tank

**Union Council .... Gul Imam**

S#	Roll#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Address	Merit Position	Place of Posting
1	6032000663	Zainab Bibi	Khush Dil Khan	06/03/1988	12201-5688771-2	Village Darraki	1	GGPS Darraki
2	9331000049	Shakeela Bibi	Amam Allah	14/04/1990	12201-6750399-2	Village Darraki	2	GGPS Pasham Khan
3	2331000052	Sapna Sheikh	Azim Khan	08/03/1996	12201-7047811-4	Village Gul Imam Tank	4	GGPS Wanda Shri Ali
4	6032000009	Shahreen Akhtar	Muhammad Azam	01/05/1986	17301-9668229-4	Village Gul Imam Tank	5	GGPS Darraki

**Union Council .... Mullazai**

S#	Roll#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Address	Merit Position	Place of Posting
1	2332000013	Humaira Anwar	Muhammad Anwar	23/03/1992	12201-2521426-6	Village Mullazai	1	GGPS Gul Ahmad Korona
2	9817000117	Farhat Zaman	Shah Khalid	10/03/1993	12201-8539961-4	Village Mullazai	2	GGPS Mani Khan

**Union Council .... Ama Khei**

S#	Roll#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Address	Merit Position	Place of Posting
1	2332000426	Rahila Faiz	Faiz Ullah Khan	12/11/1987	12101-3531212-4	Village Ama Khei Tank	1	GGPS Wanda Khan Mir

**Union Council .... Pai**

S#	Roll#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Address	Merit Position	Place of Posting
1	9331000066	Shabana Bibi	Gul Zaman	15/12/1993	12201-4444387-8	Village Tajori Tank	1	GGPS Sharbati
2	2331000274	Rehana Ali	Ali Bahadar	02/05/1994	12201-5281359-6	Village Pai Tank	2	GGPS Jamia Hizbi Quran
3	2333000709	Maria	Muhammad Salim	06/06/1996	12201-9841896-2	Village Pai Tank	3	GGPS Pai
4	2331000320	Kalsom Ali	Ali Bahadar	07/05/1993	12201-8997373-0	Village Pai Tank	4	GGPS Wanda Zah

**Union Council .... Shah Alam**

S#	Roll#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Address	Merit Position	Place of Posting
1	9333000099	Aqal Mina	Abdul Qayyum	03/09/1993	12201-4726915-2	Village Pathan Kot	3	GGPS Kot Kat



## Union Council .... Tatta

S#	Roll#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Address	Merit Position	Place of Posting
1	9332000033	Nadia Bibi	Haji Noor Alam	19/05/1997	12201-1203400-2	Village Chessan Kach Tank	1	GGPS Kirri Umar Khan

## Union Council .... Warraspoon

S#	Roll#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Address	Merit Position	Place of Posting
1	9333000068	Kainat Bittani	Zahir Shah	24/04/1996	12101-9025756-6	Village Kirri Haidar Tank	1	GGPS Sharbat Khan
2	2333000079	Andleeb Khan	Muhammad Ishaq	14/02/1993	12101-6687285-4	Village Ali Khel	2	GGPS Bahadar Khan
3	2332000291	Nabila Bittani	Said ud Din	04/11/1988	12201-3102410-8	Village Kirri Haidar	4	GGPS Kirri Niaz Ali
4	9332000066	Afsana	Muhammad Ayub	04/03/1996	12201-2920847-4	Village Kirri Haidar Tank	7	GGPS Warooki

## Union Council .... Ranwal

S#	Roll#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Address	Merit Position	Place of Posting
1	2331000354	Sadaf Afreeen	Muhammad Hashim	01/10/1990	12201-5421810-6	Village Bara Khel Tank	1	GGPS Maqsood Ali
2	2335000335	Syeda Nargis Bukhari	Syed Tanveer Hussain	16/03/1997	12201-6061929-2	Village Ranwal Tank	2	GGPS Tariq Korrana

## Union Council .... Sheikh Uttar

S#	Roll#	Name of Candidate	Father's Name	Date of Birth	CNIC No	Address	Merit Position	Place of Posting
1	2333000447	Hina Alam	Essa Khan	02/04/1994	12101-1651856-0	Village Mamraiz Pathan	1	GGPS Mamraiz Pathan
2	2331000375	Samia Naz	Hikmat Ullah	23/03/1993	12102-4583687-2	Village Sheikh Uttar	2	GGPS Kot Habib Ullah
3	2335000293	Rukhsana	Javed Zaman	24/11/1986	12101-6997373-6	Moh: Dost Muhammad	3	GGPS Sheikh Uttar

TERMS & CONDITIONS

- No TA/DA etc is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- Appointment is purely on adhoc & purely on school based initially for one year from the date of issuance.
- They should not be handed over charge if he exceeds 35 years or below 18 years of age. Age relaxation case may be submitted to competent authority (If required)
- Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by this office, anyone found producing bogus certificate will be reported to the law enforcing agencies for further action. Expenditure on verification will be borne by the appointee & their services will be terminated.
- Their services are liable to terminate on one month notice from either side. In case of resignation without notice their one-month pay/allowances shall be forfeited to the Government.
- Pay will not be drawn until and unless a certificate regarding verification of his documents is issued by this office.
- They should join their post within 10 days of the issuance of this notification. In case of failure to join the post within stipulated period, their appointment will stand expired automatically and no subsequent appeal etc shall be entertained.
- Health and Age certificate should be produced from the Medical Superintendent before taking over charge.

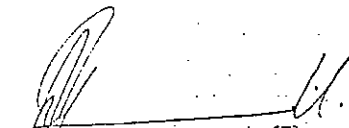
10. Before handing over charge, they will have to sign an agreement with the Department otherwise this order will not be valid.
11. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. Their services shall be terminated at any time, in case his performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
13. Their appointment is made on school based, they will have to serve at the place of posting and their service is not transferable to any other station.
14. Before handing over charge, once again their documents may be checked by the DDO concerned, if they have not the required relevant qualifications as per rules or in case of any degree/certificate issued after 30/09/2016 against which they claimed score for merit they may not be handed over charge of the post.

(MRS. AZRA BIBI)  
District Education Officer (F)  
District Tank

Endst. No. 3057-63 /NTS Appointment/2017 Dated Tank the 10/05/2017

Copy forwarded for information & necessary action to:-

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner Tank.
3. The District Accounts Officer, Tank.
4. The Sub-Divisional Education Officer (Female) Tank.
5. DMO, IMU Tank.
6. The Head Teacher Schools Concerned.
7. The Candidates Concerned.

  
District Education Officer (F)  
District Tank

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Telephone & Fax: 0943-510380  
 Email: deoftank@gmail.com  
 Facebook: deoftank

Regularization Order (F) Tank

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) TANK**

12

**NOTIFICATION:**

In pursuance of the Government of Khyber Pakhtunkhwa Elementary & Secondary Education (Appointment & Regularization of Services) Act, 2017 (Khyber Pakhtunkhwa Act No. 1 of 2018) and Elementary & Secondary Education Department Govt. of Khyber Pakhtunkhwa Notification No. SO (S/F) E&SED/3-2/2018/SITT/Contract dated 22/02/2018, service of the following Primary School Teachers (PSTs) appointed through NTS on adhoc basis on contract are hereby regularized in B-12 on the same post in Teaching Cadre on the Terms and Condition given below with effect from the date of their 1<sup>st</sup> appointment as per detail given against each in the interest of public service.

Sr	Roll No	Name	Address	Total Marks	School	Year	Appointment order No and dated	Extension order No and dated if any
1	3360608	Nasreen Bibi	Village Ranwal Tank	119.65	GGPS Gara Shahbaz	2014	No. 3122-27 dated 16/05/2014	No. 3166-72 dated 07/05/2015, No. 3070-76 dated 06/06/2016, No. 5158-63 dated 21/09/2017
2	3360471	Farhat Nosheen	Moh: Khudrian Wala Tank	115.89	GGPS Wapda Colony			
3	1766529	Kalsoom Bibi	Village Mullazai Tank	100.67	GGPS Aman Abad			
4	3360583	Bibi Zainab	Village Mullazai Tank	97.54	GGPS Aman Abad			
5	3360480	Anjuman Shaheen	Village Dabbara Tank	93.11	GGPS Urdu Kaley			
6	3360427	Rahila Ramzani	Village Gomai Bazar	85.66	GGPS Noor Badshah			
7	3360592	Imam Bibi	Village Kirri Haidar Tank	84.69	GGPS Jandar			
8	3360536	Sadaq Faizullah	Village Murtaza Tank	77.34	GGPS Kot Zangbar			
9	3360501	Alia Jabeen	Village Toran Nau Tank	74.85	GGPS Noor Chirri			
10	3360444	Rani Gul	Village Toran Nau Tank	74.19	GGPS Kot Mahsondar			
11	3360571	Salma Bibi	Village Kot Nawaz Tank	48.65	GGPS Kot Zangbar	2015	No. 2204-09 dated 31/03/2015	No. 3864-69 dated 06/06/2016 & No. 5167-70 dated 21/09/2017
12	931700258	Zaheera Bibi	Village Shahbaz Tank	123.2	GGPS Cheena			
13	931700218	Shaheen Bihi	Moh: Khudrian Wala Tank	122.44	GGPS Muhammad Ali Korri			
14	93170036	Aysha Bibi	Village Gul Imam Tank	117.37	GGPS Andari			
15	931700002	Imrana Bibi	Village Andari Tank	110.77	GGPS Akbari			
16	931700302	Rehana Gul	Village Chadrar	87.20	GGPS Halim Korri: Gara Budha			
17	931700341	Ambreena Bibi	Village Kot Nawaz Tank	90.71	GGPS Haleem Koroona			
18	231700155	Maryum Shaheen	Village Gul Imam Tank	118.95	GGPS Gul Imam			
19	232300026	Huzafa Gul	Village Gul Imam Tank	108.87	GGPS Sardari Khel			
20	931700028	Shabana Bibi	Village Gomai Bazar Tank	105.97	GGPS Qila Bin Yamin			
						2016	No. 2245-50 dated 01/04/2015	No. 5167-70 dated 21/09/2017
						2016	No. 2197-2202 dated 28/03/2016	No. 5172-76 dated 21/09/2017
							No. 2167-72 dated 28/03/2016	

13

22	931700005	Maimoona Kundi	Village Darraki Tank	105.73	GGPS Maman Gul
23	232500103	Rehana Malik	Village Pat Tank	103.72	GGPS Haji Inqbal Korr:
23	932300033	Iram Javed	Village Shahbaz Tank	102.16	GGPS Diyaf Jamal
24	932300031	Samrina Rehmat Ullah	Village Dabbara Tank	101.60	GGPS Dabbara
25	232200043	Shezana Bibi	Village Mamraiz Pathan Tank	101.09	GGPS Sheikh Sultan
26	932500040	Razla Sultana	Village Kot Hayyat Ullah Tank	97.92	GGPS Ajmal Khan
27	931700007	Marla Ramzan	Village Gomai Bazar Tank	97.00	GGPS Gomai Bazar
28	232200046	Shazia Nageen	Village Ranwal Tank	96.58	GGPS Kahu
29	931700001	Sehrish Rafiq	Village Mullazai Tank	96.25	GGPS Mullazai
30	232200051	Naila	Village Mullazai Tank	96.11	GGPS Mullazai
31	932500035	Tehseen Bibi	Village Pirwana Tank	94.47	GGPS Kot Mahsoodan
32	931700034	Nighat Siraj	Village Sheikh Uttar Tank	94.37	GGPS Sheikh Uttar
33	932300013	Syeda Shehraz	Village Shah Alam Tank	93.47	GGPS No.2 Gara Azami
34	932500048	Mussarat	Village Janaki Tank	93.27	GGPS Gulistan Korr:
35	932300032	Nasima Rehmat Ullah	Village Dabbara	92.57	GGPS Garwaki Michan Khel
36	932500023	Ruqia Khatun	Village Pathan Kot Tank	91.49	GGPS No.1 Gara Azami
37	932300001	Amlna Bibi	Village Naurang Tank	88.92	GGPS Toran Nau
38	231700129	Binesh Alam	Village Mamraiz Pathan Tank	88.78	GGPS Gara Shada
39	932500012	Gul Mina	Village Kot Pathan Tank	86.88	GGPS Alla ud Din Korr:
40	931700216	Sitara Sabeen	Village Gomai Bazar Tank	83.57	GGPS Atta Muhammad
41	232200040	Sumaira Kundi	Village Mamraiz Pathan Tank	83.04	GGPS Kot Ruban
42	231700186	Robina Alam	Village Mamraiz Pathan Tank	81.60	GGPS Gara Matta
43	932400056	Shazia Khan	Village Toran Nau Tank	81.55	GGPS Audal
44	931700011	Shabnam	Village Gomai Bazar	76.22	GGPS Kot Azam
45	932400039	Salma Amin	Village Bazai Tank	74.83	GGPS Ali Nawaz
46	932300034	Rehana Rehmat Ullah	Village Dabbara Tank	73.91	GGPS Rafiq Koroona
47	931700008	Asma Bibi	GGPS Kot Hakim Tank	73.6	GGPS Jamai ud Din Korr: Kot Karyanl
48	932300017	Saina Gul	Village Bazai Tank	70.94	GGPS Kirri Umar khan
49	932400024	Mumtaz Bibi	Village Kirri Ahmad Shah	68.05	GGPS Zaman Korr:

No. 2197-2202 dated 28/03/2016

No. 5172-76 dated 21/09/2017

No. 2189-94 dated 28/03/2016 (Disable Quota)

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50	932500018	Fatima Bibi	Village Kot Nawa Tank	66.13	GGPS Kot Ghulam	2016	No. 4346-51 dated 27/06/2016.	No. 5151-56 dated 21/09/2017
51	932300040	Sajida Kundi	Village M. Akbar Tank	92.42	GGPS Abizar		No. 4372-77 dated 02/07/2016	No. 5144-49 dated 21/09/2017
52	6032000663	Zainab Bibi	Village Darraki Tank	126.667	GGPS Darraki	2017	No. 3057-63 dated 10/05/2017	--
53	2332000426	Rahila Faiz	Village Ama Khel Tank	118.557	GGPS Hakim Khan			--
54	2332000013	Humaira Anwar	Village Mullazai Tank	113.085	GGPS Gul Ahmad Korr			--
55	9331000049	Shakeela Bibi	Village Darraki	111.585	GGPS Darraki			--
56	8817000117	Farhat Zaman	Village Mullazai Tank	105.185	GGPS Mani Khan			--
57	2331000052	Sapna Sheikh	Village Gul Imam Tank	105.139	GGPS Wanda Sher Ali			--
58	9331000066	Shabana Bibi	Village Tajori Tank	103.55	GGPS Sharbati			--
59	9331000060	Kalbat Hattani	Village Kirri Haidar Tank	101.110	GGPS Sharbat Khan			--
60	2331000354	Sadaf Afreen	Village Bara Khel Tank	101.121	GGPS Maqsood Ali Korr			--
61	9333000099	Aqal Mina	Village Pathan Kot	97.909	GGPS Pirwana			--
62	2331000274	Robina Ali	Village Pai Tank	97.131	GGPS Jamia Hifz ul Qran Pai			--
63	2333000447	Hina Alam	Village Mamraiz Pathan Tank	95.255	GGPS Mumraiz Pathan			--
64	2333000079	Andleeb Khan	Village Ali Khel Tank	95.187	GGPS Bahadar Koroon			--
65	2332000291	Nabila Bittani	Village Kirri Haidar Tank	93.785	GGPS Kirri Niaz Ali			--
66	2333000709	Maria	Village Pai Tank	93.713	GGPS Pai			--
67	2331000320	Kalsoom Ali	Village Pai Tank	93.445	GGPS Wanda Zabo			--
68	2331000375	Samla Naz	Village Sheikh Uttar Tank	92.359	GGPS Kot Habibullah			--
69	2335000293	Rukhsana	Moh: Dost Muhammad Tank	87.00	GGPS Sheikh Uttar			--
70	2335000335	Syeda Nargis Bukhari	Village Ranwai Tank	80.443	GGPS Tariq Koroon			--
71	9332000033	Nadia Bibi	Village Chessan Kach	74.373	GGPS-Kirri Umar Khan	--		
72	9331000092	Shazia Azeem	Village Darraki	87.00	GGPS Wanda Dost Muhammad	No. 3381-87 dated 26/05/2017		
73	9332000052	Mehwish Gul	Moh: Sheikhan Wala Tank	111.617	GGPS Nursses	--		
74	9333000045	Samreen Darakhshan	Moh: Sheikhan Wala Tank	109.643	GGPS Kot Kat	--		
75	9331000031	Sumaira Anam	Moh: Sheikhan Wala Tank	107.367	GGPS Bultan Alami	--		
76	2332000136	Naveen Abbas	Village Mullazai Tank	100.447	GGPS Garwaki Michan Khel	No. 4061-67 dated 26/07/2017		
77	9333000057	Shehnaz Bibi	Village Gul Imam Tank	88.403	GGPS Gola Korai	--		
78	2335000200	Zubaida Khanum	Village Darraki Tank	88.328	GGPS Sheran	--		
79	9332000051	Ulfat Ghazala	Moh: Khudrian Wala Tank	87.089	GGPS Urdu Kaley	--		

00	9333000110	Sarah Sayyed	Moh: Maidan Tank	84.457	GGPS Haleem Koroon	2017	No. 4061-67 dated 26/07/2017	..
01	9335000006	Zulekha Bibi	Village Wareokl Tank	72.934	GGPS Wareokl		No. 4061-67 dated 26/07/2017	..

**TERMS & CONDITIONS**

1. Their services shall be governed by the Khyber Pakhtunkhwa Civil Servants Act, 1973, the Khyber Pakhtunkhwa (Appointment, Deputation, and Posting & Transfer of Teachers, Lecturers, and Instructors & Doctors) Regulatory Act, 2011, and such rules & regulation as may be issued from time to time by the government.
2. Their pay shall be released subject to verification of academic documents / testimonials from the concerned board / university by the District Education Officer concerned.
3. Their services shall be considered regular and they shall be eligible for pension / deduction of GP fund in terms of the Khyber Pakhtunkhwa Civil servants Act, 1973 as amended in 2013.
4. Their services are liable to termination on one month's notice from either side. In case of resignation without notice, their one month's pay / allowances shall be forfeited to the Government.
5. They shall possess the same qualification and experience required for a regular post.
6. They shall have not resigned from their services or terminated from services on account of misconduct, inefficiency or any other ground before the commencement of this Act.
7. Their regularization shall not affect the promotion quota of existing holders of posts in respective service cadres.
8. They shall rank junior to all other employees belonging to the same cadre who are in service on regular basis on the commencement of this Act and shall also rank junior to such other persons if any, who, in pursuance of the recommendation of Khyber Pakhtunkhwa Public Service Commission made before the commencement of this Act are to be appointed to the cadre, irrespective of their actual date of appointment.
9. Their seniority shall be determined on the basis of their continuous service in cadre, provided that if the date of continuous service in the case of two or more employees is the same, the employee older in age shall rank senior to the younger one.

*sd*  
District Education Officer (F)  
District Tank

Endst: No. 2670-79/ Dated Tank the 12/03/2018

Copy to the:

1. Director, Elementary & Secondary Education Peshawar.
2. Deputy Director (Establishment) Elementary & Secondary Education Peshawar.
3. Deputy Commissioner Tank.
4. Nazim, District Government Tank.
5. District Accounts Officer Tank.
6. DMO, IMU Tank.
7. SDEO-F Tank.
8. ADEO (Establishment) Local Office.
9. Head Teacher schools concerned.
10. Officials concerned.

*sd*  
District Education Officer (F)  
District Tank

Amn, Es, 16

# SERVICE

# BOOK

سروس بک

Name:

Rukhsana PST

Father's Name

S.P.S. Sh. Khan

Qualifications

P.No. 869326

Designation:

PST

Department:

Edu.

Address:

- 1- Name (نام) Mrs Rukhsana Biki 17
- 2- Nationality and Religion Pakistani (Islam)
- 3- Residence (قومیت اور مذہب) Moul: Dost Muhammad Kailash Tank  
(مستقل رہائش)
- 4- Father's name and residence Muhammed Akbar  
(والد کا نام اور پتہ)
- 5- Date of birth by christian era as 24-11-1986 (Twenty fourth  
nearly as can be ascertained Nov: NH Bishly Gid)  
(تاریخ پیدائش مطابق سن عیسوی) according to his CNIC & Medical Report
- 6- Exact height by measurement 5' - 5"  
(قد و قامت)
- 7- Personal mark of identification NIL  
(نشان شناخت)

8. Left hand/right hand thumb and finger-impressions of (Non-gazetted officer)

(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger

(چھنگلیا)

Ring Finger

(چھنگلیا کے ساتھ کی انگلی)

Middle Finger

(انگشت میانیہ)

Fore Finger

(انگشت شہادت)

Thumb

(انگوٹھا)

9. Signature of Govt. Servent

(سرکاری ملازم کے دستخط)

*Rukhsana*

*Attested*

10. Signature and designation of the Head of the Office or other Attesting officer

(تصدیق کنندہ افسر کے دستخط اور مہر)

Sub Divn: Eou Officer (F)  
Pry: Tank

Note: The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need no be taken after every 5 years under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہیے۔

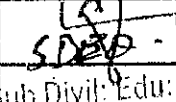
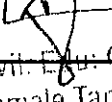

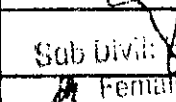
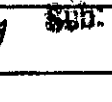
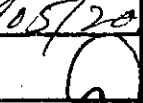

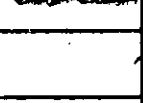
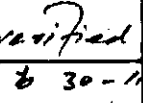
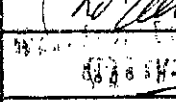
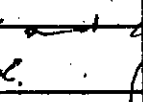
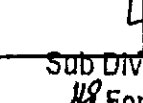
انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں



1 Name of Post درجہ ملازمت	2 Whether Substantive or officiating and whether permanent or temporary عارضی مستقل یا یا قائم مقام	3 If officiating state- (i) substantive appointment or (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II اگر عارضی ہے تو رول کے مطابق پیش کیا سستی ہے؟	4 Pay in substantive position تنخواہ بطور ارضی ملازمت Rs. Ps.		5 Additional pay for officiating زائد تنخواہ بطور قائم مقام Rs. Ps.		6 Other emoluments falling under the term pay. ماسوائے تنخواہ دیگر الائزس	7 Date of appointment تاریخ تقرری	8 Signature of Government servant دستخط سرکاری ملازم
BPS-12 (11140-800-35140) PS: 11140/2017					Rs. 11140/-		11/05/2017		
BPS-12 (13320-960-42120) PS: 13320/2017					Rs. 13320/-		01/7/2017		
do					Rs. 14280/-		01/12/2017		

*Handwritten signature and initials*

167/2017  
OFFICES  
12/12/2017

9	10	11	12	13		14	15
Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal)	Signature of the head of the office or other Attesting officer	Nature and duration of leave taken	Ancection of period of leave of average pay up to four months (or earned leave net exceeding 120 days) to which leave salary is debitable to another Government چار ماہ تک کی رخصت کے لئے اوسط تنخواہ کا تعین	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment or censure, reward or praised of the Government servants سزایا جازا یا غیر مناسب کارکردگی کا ریکارڈ
					Period عرصہ	Government to which debitable گورنمنٹ جسے رقم ادا ہوگی	
 افسر مجاز دستخط	تاریخ 30/11/2017 انقطاع ملازمت	وجوہات انتقال ملازمت ترقی تدارک یا برطرفی	 افسر مجاز دستخط	رخصت کی نوعیت و معیار		دستخط افسر مجاز	
 Sub Divit. Edu: Officer Female Tank		Sub Divit. Edu: Officer Female Tank				APPOINTED as P.T.E on Adhoc School base	
 Sub Divit. Edu: Officer Female Tank	30/11/2017		 Sub: Divit. Edu: Officer (F) P.T. Tank			BPS-12 vide DBO (F) TANK order no-3057- 63/NTS/APPD/2017 dt. 10/05/2017	
T-89 7/12		From order of 14/11/17				 Sub Divit. Edu: Officer (F) P.T. Tank	
on a/c of P.T. Tank w.e.f 11/12/17						 Sub Divit. Edu: Officer (F) P.T. Tank	
12/2017						 Sub Divit. Edu: Officer Female Tank	
Service verified w.e. from 11-5-2017 to 30-11-2017 from P.T. Tank and other office record.						 Sub Divit. Edu: Officer Female Tank	
Attested 						 Sub Divit. Edu: Officer Female Tank	
Service of N.T.S on adhoc basis on contracts are hereby Regularized from the date of appointment vide District education officer (F) Tank notification Endst No. 2670-79 Dated 12/3/18						 Sub: Divit. Edu: Officer (F) P.T. Tank	



Telephone & Fax: 0963-510380  
Email: deoftank@gmail.com  
Facebook: deoftank  
Twitter: deofemaletank

20  
OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) TANK

**ORDER:**

WHEREAS you Ms. Rukhsana, while serving as PST at GGPS Sheikh Uttar Tank was proceeded for having committed the gross irregularities as noted below, which constitute inefficiency under Rule 3 Sub Rules (a), (b), (d) of the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules 2011.

AND WHEREAS an absent report was submitted by SDEO-F Tank vide her No. 1380 dated 13/11/2019.

AND WHEREAS it is communicated that you did join the school on the odd occasions in April, 2019 & remained absent continuously since 05/05/2019.

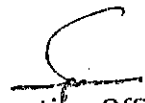
AND WHEREAS an explanation was served upon you vide SDEO-F Tank vide her No. 1228 dated 09/10/2019 but you didn't respond to it.

AND WHEREAS concerned circle's ASDEO submitted a report regarding your willful absence and also endorse you to proceed under the rules for a strict action.

AND WHEREAS your school's Head Teacher also confirmed your absentee since mentioned date.

AND WHEREAS you were a trainee of induction program and didn't submit the Tablet issued to you despite of repeated communications.

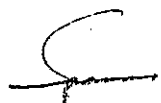
Now therefore the Competent Authority in exercise of the power conferred upon me under sub rules 4-b (iii) and 9 of Govt: of Khyber Pakhtunkhwa, Establishment & Administration Department 2011 has been pleased to order the "Removal from Service" of Ms. Rukhsana PST GGPS Sheikh Uttar w.e.f 05/05/2019.

  
District Education Officer (F)  
District Tank

Endst: No. 8687-B1 Dated Tank the 22/11/2019

Copy to the:

1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. District Accounts Officer Tank.
3. Deputy District Education Officer Female Tank
4. DMO, IMU Tank.
5. SDEO-F Tank with the remarks that the entry of removal from service should be recorded in her Service Book & recovery be made for her entire absence period & be submitted to Govt: Treasury through Challan.
6. Assistant Programmer / Focal Person OAMIS.
7. Official concerned.

  
District Education Officer (F)  
District Tank



22

مختصہ عدالت عالیہ پاکستان اسلام آباد

Condonation of delay - دائری حکمانہ ریل

ص 104 سے منسلک ذیل لفٹیں ہیں

1- یہ کہ منسلک کو 22/11/2020 کو PST سے  
پر خامت کیا گیا تھا۔ جبکہ کورن وائرس کے پیش نظر حکومت  
پاکستان نے منسلک سے منسلک کو ریسٹریکشن سے بروقت اطلاع  
دیا اور اس سے منسلک ریسٹریکشن سے منسلک کے گورنر کے  
Termination order

2- یہ کہ منسلک کو ص 07 سے  
03 کو حکم لکھ کر اس  
سے اطلاع درج ذیل حوالے کے  
تحتیاتی دیکھو - یہ منسلک  
Date of knowledge کے اندر  
رہا۔ کو ریل حکمانہ دائری

3- یہ کہ منسلک نے جان بوجھ کر حکمانہ ریل میں  
بیک حکمانہ غلط اور نامی کے  
Time barred ہوا

4- یہ کہ اس وقت کے  
کو ریل حکمانہ دائری

کے اندر منسلک نے منسلک کے  
حکمانہ ریل کو در نظر رکھا اور  
منسلک سے منسلک

dated: 10-07-2020  
PST

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR.

23

Service Tribunal Appeal No. \_\_\_\_\_ of 2020.

**MEMO OF ADDRESS**

Rukhsana Bibi wife of Javed Zaman r/o Sheikh Utar Tehsil and District Tank Now at Madina Colony DIKhan.

Appellant

VERSUS

1. Govt. of KPK through Secretary Elementary and Secondary Education Peshawar.

2. Secretary Elementary and Secondary Education KPK Peshawar.

3. Director Elementary Secondary Education KPK Peshawar.

4. District Education Officer Female Tank.

5. SDEO Female Tank.

Respondents.

Your humble appellant

*Rukhsana Bibi*

Mst. Rukhsana Bibi Through Counsel

*Shah Fahad Ansari*

Shah Fahad Ansari

Date: 10-10-2020

Advocate High Court DIKhan.

RGL51998366

No. 1393

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. Ps.

397

RGL51998370

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. Ps.

Received a registered\* addressed to \_\_\_\_\_ Date Stamp \_\_\_\_\_

Received a registered\* addressed to \_\_\_\_\_ Date Stamp \_\_\_\_\_

Initials of Receiving Officer \_\_\_\_\_ \*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Initials of Receiving Officer \_\_\_\_\_ \*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_

Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_

If insured. Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ (in words) \_\_\_\_\_ Weight \_\_\_\_\_ Kilo \_\_\_\_\_ Grams \_\_\_\_\_ Name and address of sender \_\_\_\_\_

If insured. Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ (in words) \_\_\_\_\_ Weight \_\_\_\_\_ Kilo \_\_\_\_\_ Grams \_\_\_\_\_ Name and address of sender \_\_\_\_\_

No. 1394

RGL51998367

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. Ps.

50

Received a registered\* addressed to \_\_\_\_\_ Date Stamp \_\_\_\_\_

Initials of Receiving Officer \_\_\_\_\_ \*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_

If insured. Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ (in words) \_\_\_\_\_ Weight \_\_\_\_\_ Kilo \_\_\_\_\_ Grams \_\_\_\_\_ Name and address of sender \_\_\_\_\_

No. 1395

RGL51998368

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. Ps.

50

Received a registered\* addressed to \_\_\_\_\_ Date Stamp \_\_\_\_\_

Initials of Receiving Officer \_\_\_\_\_ \*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_

If insured. Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ (in words) \_\_\_\_\_ Weight \_\_\_\_\_ Kilo \_\_\_\_\_ Grams \_\_\_\_\_ Name and address of sender \_\_\_\_\_

No. 1396

RGL51998369

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Rs. Ps.

50

Received a registered\* addressed to \_\_\_\_\_ Date Stamp \_\_\_\_\_

Initials of Receiving Officer \_\_\_\_\_ \*Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) \_\_\_\_\_ (in words) \_\_\_\_\_

If insured. Insurance fee Rs. \_\_\_\_\_ Ps. \_\_\_\_\_ (in words) \_\_\_\_\_ Weight \_\_\_\_\_ Kilo \_\_\_\_\_ Grams \_\_\_\_\_ Name and address of sender \_\_\_\_\_



Shah Fahad Ansari Advocate High Court



Ch. M. Ayub Arbab Gujjar General Secretary

25  
وکالت

کورٹ  
فیس

ایبٹ روپیہ

سرور سرد مول خیر محمد ذراہ لیسٹور

مجاہب رضوانہ کالی  
گورنمنٹ کالج لاہور

دعویٰ یا جرم  
تفصیل دعویٰ یا جرم  
ایجنٹ تریسٹنگس 4 سرور سرد مول خیر محمد ذراہ لیسٹور 1974

باعث تحریر آئنگے

Diu

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے جرم کی درخواست دی برہمنہ عرض یا تعجب مقدمہ نام  
شان خیر محمد ذراہ لیسٹور

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں پیشی پر خود یا ذرا بذریعہ رو 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 مظہر حاضر نہ ہو اور مقدمہ میری 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 پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکھری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے پر مظہر کوئی انتہا نہ پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا محنت نہ واجب کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ کو کل ساختہ پر وادعت صاحب موصوف مثل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض ڈاؤی یا جواب ڈاؤی یا درخواست اجراء اسمائے ڈگری نظر ثانی اجیل مگرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر مائٹی یا راضی نامہ و فیصلہ برطرف کرنے اقبال ڈاؤی کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکور بیرون از پکھری صدر بیرونی مقدمہ مذکور نظر ثانی اجیل و مگرانی و برآمدگی مقدمہ یا مسدوفی ڈگری یک طرفہ یا درخواست حکم استثنائی یا قرتی یا گرفتاری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ ضمانت بیرونی کا اختیار ہو گا اور تمام ساختہ پر وادعت صاحب موصوف مثل کردہ از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مذکورہ یا اس کے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اجیل مگرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے وکیل یا بیرسٹر کو اپنے بہانے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور دینے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواہ پڑے 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 پروی 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 12 ماہ 1974  
مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Attested  
Accepted  
S. Fahad Ansari

رضوانہ کالی زعفران و زمان  
X.PST-105-12  
گورنمنٹ کالج لاہور

Dhulian Diu



**BEFORE THE HONOURABLE KHYBER PAKHTUKHWA**  
**SERVICE TRIBUNAL PESHAWAR CAMP COURT D.I.KHAN**

Service Appeal No. 11961 of 2020

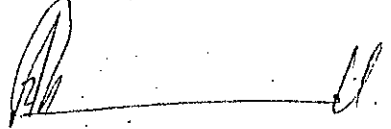
Mst: Rukhsana Bibi

vs

Govt: Of Khyber Pakhtunkhwa

**INDEX**

S.No	Description of Documents	Pages
1	Para wise comments /Reply	1-3
2	Affidavit	4
3	Annexures	5-10
4	Authority letter	11-12

  
Respondents

①

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**  
**CAMP COURT D.I.KHAN**

Service Appeal No. 11961/2020

Rukhsana Bibi

Versus

Govt. of K.P.K

**REPLY ON BEHALF OF RESPONDENTS NO.2,3,4,5**

**RESPECTFULLY SHEWETH:**

**PRELIMINARY OBJECTIONS**

1. That the appellant has got no cause of action and locus standi.
2. That the appellant is estopped to sue due to her own conduct.
3. That the appeal is badly time barred.
4. That the appeal is not maintainable in its present form.
5. That the appeal is bad for mis-joinder and non-joinder of necessary and proper parties.
6. That the appellant deliberately concealed the material fact from this honorable Tribunal.
7. That the appellant have not come to this Honorable Tribunal with clean hands.
8. That the appellant is not entitled for any relief from this Honorable Tribunal.

REPLY ON FACTS

1. That Para No.01 pertains to record.
2. That Para No.02 is correct.
3. That Para No.3 pertains to records.
4. That Para No.4 also pertains to record.
5. That Para No.05 is incorrect. Appellant was not performing duty regularly. She remained absent from her duties w.e.f 01/04/2019 to 31/05/2019 and after summer vacations w.e.f 01/09/2019 to 05/10/2019 continuously without any information / permission. (Copy of attendance Register is annexed as "A").

The Head teacher of GGPS submitted report to the ASDEO (Circle) that her teacher (Rukhsana Bibi) is absent from 5<sup>th</sup> May 2019 to 01/10/2019 continuously. (Copy of Head teacher report is annexed as "B").

Similarly the ASDEO (Circle) submitted absentee report to SDEO-F (Primary) that the appellant was absent in September 2019 when she visited the school on 21/09/2019 and appellant was also absent in the month of April and May of 2019. The ASDEO (Circle) added that appellant was also absent in October 2019. (Copy of ASDEO Circle Report is annexed "C").


The SDEO-Female Primary (Respondent No.5) called explanation from appellant on 09/10/2019 that "you were found absent during the visits of ASDEO (Circle) on 21/09/2019 & 05/10/2019 and also in report of Head teacher. You (appellant) is directed to clarify your position within 3 days and if fails, strict disciplinary action will be taken against you under KPK civil servants (Efficiency & Discipline Rules) 2011". The appellant did not appear before the competent authority to explain her position. Therefore, the respondent No.4, being a competent authority have pass the order of the "Removal from Service". Of Mst: Rukhsana Bibi PST GGPS Sheikh Uttar with effect from 05/05/2019.(copy of explanation letter and Removal order are annexed as D"& E").

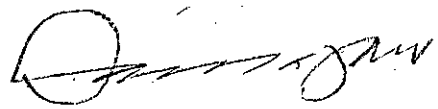
6. That Para No.08 is incorrect & not admitted. The appellant was removed from service on 05/05/2019 and she preferred departmental appeal on 10/07/2020, which is badly time barred.
7. That Para No.07 is incorrect. The appellant presented departmental appeal after long period of more than one year which is badly time barred.
8. That the instant service appeal is barred by law and not maintainable.

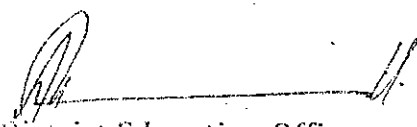
REPLY ON GROUNDS.


1. That Para No.1 is incorrect and not admitted. The order passed by respondent No.4 is according to rules and regulations.
2. That Para No.2 is incorrect .The respondent No.4 followed the procedure and not committed any irregularity.
3. The para No.3 is incorrect. The Detail reply is given in para 5 of facts.
4. That Para No.4 is incorrect and not admitted .The appellant was absent from her duties continuously and an opportunity was given to her to explain her position but she failed to justify her position. Therefore, appellant was removed after fulfilling the codal formalities.
5. That Para No.5. is incorrect and not admitted .Appellant was continuously absent from many months.
6. That Para No. 6 is incorrect .The competent authority served explanation letter on 09/10/2019. Details reply already given in paras ibid.
7. That Para No. 7 is incorrect. Detail reply already given above.
8. That Para No.8 is incorrect. As stated in Para No.4 of grounds.
9. That Para No.9 is incorrect. All the codal formalities were fulfilled and impugned order was passed in accordance with law /rules.

It is humbly prayed that the service appeal of appellant may please be dismissed with cost.

  
 Secretary E&SE Department  
 Khyber Pakhtunkhwa, Peshawar  
 (Respondent No.02)

  
 Director Elem: & Secondary Education  
 Khyber Pakhtunkhwa Peshawar  
 Respondent No.03

  
 District Education Officer  
 (Female) Tank  
 Respondent No. 04

  
 Sub: Divisional Education Officer  
 Female (Primary) Tank  
 Respondent No. 05

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
D.IKHAN BENCH**

Service Appeal No.11961/2020

Rukhsana Bibi

VS

Government of Khyber Pakhtunkhwa

**AFFIDAVIT**

I Mahmood Azam Assistant District Education Officer(Litigation) o/o District Education Officer (Male) Tank do hereby solemnly affirm and declared on the oath that the Para wise comments are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honourable Tribunal.



**DEPONENT**  
12201-0313189-7

JAN FEB MAR APR  
MAY JUN JUL AUG  
SEP OCT NOV DEC

رجسٹر حاضری مدرستین

روزنامہ / روزانہ / اضافہ / نکتہ سرانج / وقت / کلاس / نام

Table with columns for days of the week and attendance status (Present, Absent, Night, etc.). Rows contain handwritten entries for each day, including dates like '23/12/20' and '24/12/20'.

Summary table with columns for 'Total' (مجموعہ) and 'Days' (روزانہ) for each month, with handwritten data.

دستخط ہیڈ ماسٹر

Handwritten mark or signature.

Handwritten number 5/101

H	A	N	E	E	D	M	A	R	A	R	K
MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC				

اساتذہ کرام

No.	روزانہ		روزانہ		روزانہ		H.T.
	P	T	P	T	P	T	
1	P	P	Absent	التوا	التوا	التوا	
2	P	P	Absent	التوا	التوا	التوا	12.35 7.30
3	P	P	Absent	التوا	التوا	التوا	12.35 7.30
4	P	P	Absent	التوا	التوا	التوا	12.35 7.30
5	P	P	Absent	التوا	التوا	التوا	12.35 7.30
6	P	P	Absent	التوا	التوا	التوا	11.00 7.30
7	P	P	Absent	التوا	التوا	التوا	12.35 7.30
8	P	P	Absent	التوا	التوا	التوا	12.35 7.30
9	P	P	Absent	التوا	التوا	التوا	12.35 7.30
10	P	P	Absent	التوا	التوا	التوا	12.35 7.30
11	P	P	Absent	التوا	التوا	التوا	12.35 7.30
12	P	P	Absent	التوا	التوا	التوا	12.35 7.30
13	P	P	Absent	التوا	التوا	التوا	12.35 7.30
14	P	P	Absent	التوا	التوا	التوا	12.35 7.30
15	P	P	Absent	التوا	التوا	التوا	12.35 7.30
16	P	P	Absent	التوا	التوا	التوا	12.35 7.30
17	P	P	Absent	التوا	التوا	التوا	12.35 7.30
18	P	P	Absent	التوا	التوا	التوا	12.35 7.30
19	P	P	Absent	التوا	التوا	التوا	12.35 7.30
20	P	P	Absent	التوا	التوا	التوا	12.35 7.30
21	P	P	Absent	التوا	التوا	التوا	12.35 7.30
22	P	P	Absent	التوا	التوا	التوا	12.35 7.30
23	P	P	Absent	التوا	التوا	التوا	12.35 7.30
24	P	P	Absent	التوا	التوا	التوا	12.35 7.30
25	P	P	Absent	التوا	التوا	التوا	12.35 7.30

اساتذہ	مال	مال	مال	مال	مال	مال	مال	مال	مال

ASDEO (F)  
21/10/19

دستخط ہیڈ ماسٹر

MASTER BOOK CENTER, 16 URDU SAZAR, LAHORE. Ph: 7232205

5/10/19

7 "B"

خدمت حساب ASDSO صاحبہ سے ایجوکیشن آفیسر کے لئے درخواست

جناب عالی

تذاریت کے لئے درخواست پھر زخمانہ کے لئے لیکن آج

مورخہ 10.10.2019 تک بغیر کسی اطلاع یا Leave کے سلائے غیر حاضر

ہے جس کے لئے سب سے پہلے پھر پھر پھر پھر پھر پھر پھر

G.G.P.S شیخ انار کے لئے دفتر کے پھر پھر پھر پھر پھر پھر

محمد ذاریت کے لئے

العارضہ

محمد ناصر صاحب

G.G.P.S

شیخ انار

Nahced Akhtax

W.S.H.T (P3-12)  
W.S.C.P.S. Sui, Uthar  
Distt Tank.

5/10/19



عنوان - ٹیچر غیر حاضری۔

گورنمنٹ گریڈ پرائمری سکول

شیخ آباد کی PST ٹیچر احسان مہر ۲ روز

کے دوران ۱۱/۱۰/۱۹ کو غیر حاضری تھی۔ ستمبر کے

پورے مہینے میں Absent رہی ہے اور ستمبر اور اگست

کے مہینے میں بھی Absent رہی ہے ابھی آگوست

میں بھی آج تاریخ تک Absent ہے۔ ٹیچر صاحب

غیر حاضر ہیں۔ H.T کے دن بھی یہی Absenter

کی رپورٹ دی ہے جو سائوف ہے اور عطلوں

حصہ کے Page بھی سائوف میں۔

لینڈ دستر خدا سے اس ٹیچر کے خلاف ایکشن

لینے کی سفارش کی جا رہی ہے۔

(F) SDEO  
S/10/19

9

'D'

OFFICE OF THE  
SUB DIVISIONAL EDUCATION OFFICER (F) TANK.

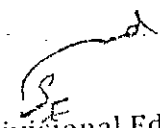
No. 1228 / Dated Tank the 09/10/2019.

To: Mst: Rukhsana PST  
CGPS Sheikh Uttar Tank.

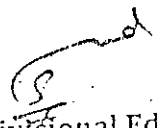
SUBJECT: EXPLANATION

Memo: It is to say that you were found absent from your duties since long during the visit of the ASDEO Circle on Dated 21-09-2019, 05/10/2019 & also report of Head Teacher concerned.

You are therefore, directed to clarify your position with factual words within 03 days after the issuance of this letter that why a disciplinary action may not be taken against you. If fail, competent authority will be requested to take strict action will be initiated under Khyber Pakhtunkhwa Govt: Servant Servants (Efficiency & Discipline Rule), 2011.

  
Sub Divisional Education Officer (F)  
(Female) District Tank

Encls: No. 229  
Copy to the  
02-District Education Officer(F) Tank.

  
Sub Divisional Education Officer  
(Female) District Tank.



Telephone & Fax: 0963-510380  
Email: deofbank@gmail.com  
Facebook: deofbank  
Twitter: deofemaletank

10  
'E'

**OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) TANK**

**ORDER:**

WHEREAS you **Ms. Rukhsana**, while serving as PST at GGPS Sheikh Uttar Tank was proceeded for having committed the gross irregularities as noted below, which constitute inefficiency under Rule 3 Sub Rules (a), (b), (d) of the Khyber Pakhtunkhwa Govt: Servants (Efficiency & Discipline) Rules 2011.

AND WHEREAS an absent report was submitted by SDEO-F Tank vide her No. 1380 dated 13/11/2019.

AND WHEREAS it is communicated that you did join the school on the odd occasions in April, 2019 & remained absent continuously since 05/05/2019.


AND WHEREAS an explanation was served upon you vide SDEO-F Tank vide her No. 1228 dated 09/10/2019 but you didn't respond to it.

AND WHEREAS concerned circle's ASDEO submitted a report regarding your willful absence and also endorse you to proceed under the rules for a strict action.

AND WHEREAS your school's Head Teacher also confirmed your absentee since mentioned date.

AND WHEREAS you were a trainee of induction program and didn't submit the Tablet issued to you despite of repeated communications.

Now therefore the Competent Authority in exercise of the power conferred upon me under sub rules 4-b (iii) and 9 of Govt: of Khyber Pakhtunkhwa, Establishment & Administration Department 2011 has been pleased to order the "**Removal from Service**" of Ms. Rukhsana PST GGPS Sheikh Uttar w.e.f 05/05/2019.

  
District Education Officer (F)  
District Tank

Endst: No. 8687-B/

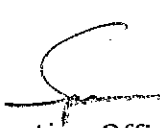
Dated Tank

the

22 / 11 / 2019

Copy to the:


1. Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. District Accounts Officer Tank.
3. Deputy District Education Officer Female Tank
4. DMO, IMU Tank.
5. SDEO-F Tank with the remarks that the entry of removal from service should be recorded in her Service Book & recovery be made for her entire absence period & be submitted to Govt: Treasury through Challan.
6. Assistant Programmer / Focal Person OAMIS.
7. Official concerned.

  
District Education Officer (F)  
District Tank

**OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE DISTRICT  
TANK**

**AUTHORITY LETTER**

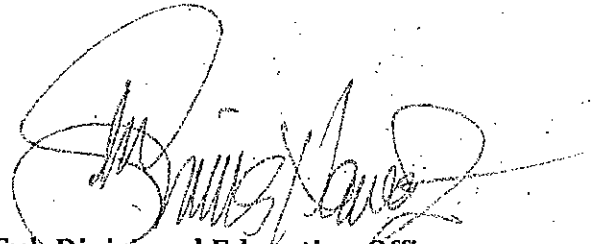
Mr. Mahmood Azam Assistant District Education Officer (Litigation) o/o District Education Officer (Male/Female) is hereby authorized to attend the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar in S/A No. 11961 /2020, titled as "Rukhsana Bibi Vs Govt. of Khyber Pakhtunkhwa" on behalf of the undersigned.

  
District Education Officer  
(Female) Tank

**OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER**  
**(FEMALE) TANK**

**AUTHORITY LETTER**

Mr. Mahmood Azam, Assistant District Education Officer (Litigation) o/o District Education Officer (Female) is hereby authorized to attend the Honorable Khyber Pakhtunkhwa Service Tribunal Camp Court D.I.Khan in S/A No. 11961/2021 titled as "Rukhsana Bibi Vs Govt. of Khyber Pakhtunkhwa" on behalf of the undersigned.



**Sub-Divisional Education Officer**  
**(Female) Tank**

**"B"**

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

No.

Appeal No. .... of 20 13

11961

20

Appellant/Petitioner

*Ruiz Samra* versus *Khan*

Respondent

*through Secy. Edu: KPIS*  
Respondent No. ....

Respondent No. ....

Notice to: —

*Distt: Education Officer (Female)*

WHEREAS an appeal/petition under the <sup>provision</sup> of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....20

*Dec:*

*20*

*3rd*

*at Camp Court D.I. Khan*

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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

**"B"**

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

No.

113

Appeal No. 113 of 2021

Pooch Sharma Bhatia Appellant/Petitioner

Versus

through lawyer: Edna A.P.C. Pesh. Respondent

Respondent No. 5

Notice to:

SDEO, (Female) Tank.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 27/1/2021 at 8.00 A.M. If you wish to urge anything against the appellent/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. .... dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 3/1/21

Day of Dist. 2021

at Camp Court D. I. Khan

[Signature]  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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

**"B"**

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

No.

713

Appeal No. 11961 of 20 20

Rubina Sana Bibi Appellant/Petitioner

Versus

Through Secy. Edu. Dept. Pesh. Respondent

Respondent No. 3

Notice to:

Director, Edu. Sec. Education  
Govt. of KP Peshawar.

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 27 July 2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. .... dated .....~~

Given under my hand and the seal of this Court, at Peshawar this 3rd .....

Day of July 20 20

at Cassip Court D.I. Khan

10/12/20

[Signature]  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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



**"B"**

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

No.

TIB

Appeal No. 11961 of 2020

Rukhsana Bibi Appellant/Petitioner

Versus

Through Secy. Edm: K.P.C. Pesh. Respondent

Govt. of K.P.K. Through Secy. Edm: Peshawar Respondent No. I

Notice to: —

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 2-1-2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this 3rd

Day of Decr 2020

at Camp Court D.I. Khan

W. M. M. M. M.  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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

19/12

**"B"**

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

No. 113

Appeal No. 113/2020 of 20 20

Rukhsana Bibi Appellant/Petitioner

Versus

Through Secy. Educ. Dept. Pesh. Respondent  
Respondent No. 2

Notice to: Secy. Edu. & Soc. Education Dept. Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 27/12/2020 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. .... dated .....~~

Given under my hand and the seal of this Court, at Peshawar this 3rd.....

Day of Dec 20 20

at Camp Court D. I. Khan

[Signature]  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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

14/12

"A"

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

No.

TB

APPEAL No.....11961..... of 2020

Rakhsana Bibi

Appellant/Petitioner

Versus

Through Soyf Education Dept Pesh.  
RESPONDENT(S)

Res: No. 4

Notice to Appellant/Petitioner

Distt. Education Officer  
(Female)  
Tank.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 22-6-2021 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.

at Camp Court D.I. Khan

[Signature]  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"A"**

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

18

No.

APPEAL No.....11961..... of 20 20

Rukhsana Bibi

Appellant/Petitioner

Versus

Through Secy. Edn: 15 Pk Pk Sh:

RESPONDENT(S)

Res: No. 5

Notice to Appellant/Petitioner

SDEO,

Female

Tank.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 22-6-2021 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.

at Camp Court D.I. Khan

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"B"**

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

TB DIK

No.

Appeal No. 11961 of 2020

Rukhsana Bibi Appellant/Petitioner

Versus

Sery: Edu Pesh Respondent

Respondent No. 4

Notice to:

Education  
District officer F, Tank

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 22/11/2021 at 8.00 A.M. If you wish to urge anything against the appelland/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of Wed .....20

D I Khan

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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

**“B”**

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

No.

TB D I K

Appeal No. 11961 of 20 20

Rukhsana Bibi Appellant/Petitioner

Versus

Sy Edw Pasha Respondent

Respondent No. 5

Notice to:

- S D E O (Female) Tank

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 22/11/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. .... dated.....

Given under my hand and the seal of this Court, at Peshawar this 10.....

Day of 11 2021

at court court

D I Khan




Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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

"A"

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

No.

APPEAL No.....

1196

TB D.K  
of 20  
20

Rukhsana Bibi

Appellant/Petitioner

Versus

Sery: Edu: Peshawar

RESPONDENT(S)

Notice to Appellant/Petitioner

Rukhsana Bibi w/o  
Fazal Zaman R/o Sheikh utar  
Feh 8 Dist. Tank Now at Madina Colony,  
Dikhan

Take notice that your appeal has been fixed for Preliminary hearing,  
replication, affidavit/counter affidavit/record/arguments/order before this Tribunal  
on 22/11/21 at 8:00 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.

at camp court

Dikhan

9

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

47

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

No.

APPEAL No. .... of 20 .....

Appellant/Petitioner

Verdict

RESPONDENTS

Notice to Appellant/Petitioner

Take notice that your appeal has been fixed for Preliminary hearing  
at the Tribunal on the 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.

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.

No.

APPEAL No. .... 11961 ..... of 20

TB D1K  
20

Rukhsana Bibi

Appellant/Petitioner

Versus

Sarg. Edul Pasha

RESPONDENT(S)

Notice to Appellant/Petitioner

Counsel

Shah Fahad Ansari

(Advocate)

High Court D1Kw

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 22/11/24 at 8.00 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.

at court

D1Kw

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"B"**

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

No.

Appeal No. 11961 of 20 20

Rukhsana Bibi Appellant/Petitioner

Versus

Imran Bary: Edu: Pesh Respondent

Respondent No. 1

Notice to: - Govt of KPK Imran Secretary  
Education Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed, that the said appeal/petition is fixed for hearing before the Tribunal \*on 22/11/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 9

Day of..... 12th Feb

at court  
D/Ken

[Signature]  
Registrar,

**Khyber Pakhtunkhwa Service Tribunal,**  
**Peshawar.**

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