



16.06.2022

Counsel for the appellant present.

Muhammad Adeel Butt learned Additional Advocate General for the respondents present.

Former submitted rejoinder with a request for adjournment in order to prepare the brief. Adjourned by way of last chance. To come up for arguments on 17.08.2022 before D.B at Camp Court Abbottabad.


(Fareeha Paul)
Member (E)
Camp Court A/bad


(Rozina Rehman)
Member (J)
Camp Court A/bad

17.08.2022

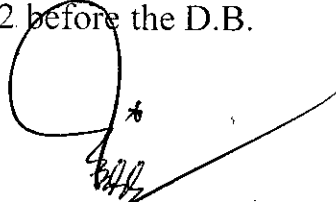
Due to summer vacations, the case is adjourned to 19.10.2022 for the same as before.


READER

19.10.2022

Nemo for the appellant. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issue to the appellant as well as her counsel through registered post and to come up for arguments on 26.12.2022 before the D.B.


(Mian Muhammad)
Member (E)


(Salah-Ud-Din)
Member (J)

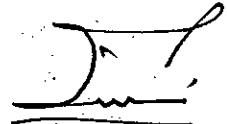
19.01.2022

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

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Abbottabad Bench. Adjourned. To come up for arguments on 21.04.2022 before the D.B at Camp Court Abbottabad.



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



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

21.04.2022

Appellant alongwith his counsel present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not prepared the brief of the instant appeal. Adjourned. To come up for arguments on 16.06.2022 before the D.B at Camp Court Abbottabad.



(Rozina Rehman)
Member (J)
Camp Court Abbottabad



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

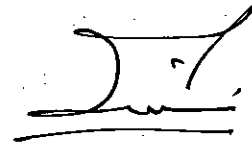
20.09.2021

Nemo for the appellant. Mr. Asar Jan, ADEO alongwith Mr. Riaz Ahmed Paindakhel, Assistant 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 and to come up for arguments before the D.B on 15.11.2021 at Camp Court Abbottabad.



(ATIQ-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)
CAMP COURT ABBOTTABAD



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT ABBOTTABAD

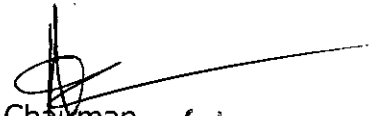
15.11.2021

Counsel for the appellant and Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG for the respondents present.

Counsel for the appellant requests for adjournment. Request is accepted. To come up for arguments on 19.01.2022 before the D.B at Camp Court, Abbottabad.



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



Chairman
Camp Court, A/Abad

21.01.2021

Due to COVID-19, the case is adjourned for the same on 16.02.2021 before D.B.


READER

16.02.2021

Nemo for appellant.

Riaz Khan Paindakheil learned Assistant Advocate General alongwith Asar Jan ADEO for respondents present.

Preceding date was adjourned on a Reader's note, therefore, notice be issued to appellant/counsel for 19.04.2021 for arguments, before D.B at Camp Court, Abbottabad.



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



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

19.4.2021

Due to covid-19, The case is adjourned to 20/9/2021 as before.


Reader

17.09.2020

Mr. Raja Sajjad Ali, Advocate for appellant is present. The main emphasis of the learned counsel was laid on the point that without fulfillment of mandatory provision of the law and rules on the subject appellant has been proceeded against which culminated into removal from service which order has been impugned herein to have been passed without having no authority to do so. It was incumbent upon the authority at the helm of affairs to have issued show-cause notice alongwith statement of allegations followed by conducting of full-fledged inquiry, issuing of final show-cause notice resulting into the making of final order but nothing of the sort was done thus resulting into infringement of his rights.

The points agitated at the bar needs consideration. The instant appeal is admitted for 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 the respondents for written reply/comments for 18.11.2020 before S.B at Camp Court, Abbottabad.

Appellant Deposited
Security & Process Fee

(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

18.11.2020

Counsel for appellant is present. Mr. Usman Ghani, District Attorney and Mr. Asar Jan, for the respondents are also present.

Representative of the department submitted written reply on behalf of respondents No. 1 to 3, which is made part of record. File to come up for rejoinder and arguments on 21.01.2021 before D.B at Camp Court, Abbottabad.

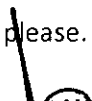
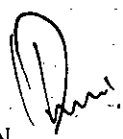

(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1972/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/12/2019	<p>The appeal of Mst. Safia Bibi received today by post through Mr. Raja Ali Sajjid 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 19/12/19</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>21-02-20</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to covid ,19 case to come up for the same on / / at camp court abbottabad.</p> <p style="text-align: right;">Reader</p> <p>Due to summer vacation case to come up for the same on <u>9/1/20</u> /17 at camp court abbottabad.</p> <p style="text-align: right;"> Reader</p>

The appeal of Mst. Safia Bibi d/o Gul Zareen PST GGPS Sangabad Sher Kot Palas Kohistan received today i.e. on 06.12.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- 2- Annexures-A & C of the appeal are illegible which may be replaced by legible/better one.
- 3- Address of appellant and respondent no. 3 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.

No. 2133 /S.T,

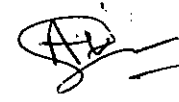
Dt. 10-12- /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Raja Ali Sijad Adv. A. Abad

Sir,

Appeal is re-submitted.
Para no 2 & 3 has been rectified
as desired. However, the dept
did not charge sheet, statement
of allegation, show cause notice,
enquiry has also not been conducted.


RAJA ALI SAJJAD
ADVOCATE
HIGH COURT (ATD)

OFFICE # 32, New
Lawyer Plaza # II
Adjacent District Bar
Room (ATD)

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

Service Appeal No. 1972 /2019

Safia Bibi daughter of Gul Zareen PST GGPS Sangabad, Sher Kot Palas Kohistan, District Kohistan.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

INDEX

S. #	Description	Page #	Annexures
1.	Service appeal alongwith affidavit	1 to 7	
2.	Copy of appointment order dated 01/12/2006	8 to 9	"A"
3.	Copy of impugned removal from service order dated 20/04/2019	10 to 11	"B"
4.	Copy of departmental appeal dated 10/08/2019	12	"C"
5.	Wakalatnama	13	

سافیا بی بی
...APPELLANT

Through

Dated: 05/12 /2019


(RAJA ALI SAJJAD)
Advocate High Court, Abbottabad.

1

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA
PAKHTUNKHWA PESHAWAR

Diary No. 1784

Dated 06/12/19

Service Appeal No. 1972 /2019

Safia Bibi daughter of Gul Zareen PST GGPS Sangabad, Sher Kot Palas Kohistan, District Kohistan.

...APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Peshawar.
2. Director Elementary & Secondary Education Government of Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer E&SE (Female) Kohistan District Kohistan.

....RESPONDENTS

Filed to-day

Registrar
6/12/19

**Re-submitted to -day
and filed.**

Registrar
19/12/19

SERVICE APPEAL UNDER SECTION 4 OF
KPK SERVICE TRIBUNAL ACT, 1974, FOR
DECLARATION TO THE EFFECT THAT THE
APPELLANT WAS SERVING AS PST
TEACHER IN GOVERNMENT GPS
SANGABAD SHER KOT PALLAS KOHISTAN,
BUT RESPONDENT NO. 3 HAS ILLEGALLY

REMOVED THE APPELLANT FROM SERVICE VIDE IMPUGNED ORDER ENDST NO. 1198-1210 DATED 20/04/2019. DURING THE WINDER VACATION AND WITHOUT ADOPTING CODAL FORMALITIES PRESCRIBED BY LAW. BESIDES THE APPELLANT HAS NOT BEEN PROVIDED OPPORTUNITY OF PERSONAL HEARING AND FINAL SHOW CAUSE NOTICE WAS ALSO NOT ISSUED WHICH IS PERVERSE, DISCRIMINATORY, AGAINST THE LAW, AND IMPUGNED TERMINATION ORDER DATED 20/04/2019 IS LIABLE TO BE SET-ASIDE.

PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEALS, REMOVAL FROM SERVICE ORDER ENDST NO. 1198-1210 DATED 20/04/2019 MAY GRACIOUSLY BE DECLARED ILLEGAL AND MAY BE SET-ASIDE. ANY OTHER RELIEF WHICH THIS HONOURABLE TRIBUNAL DEEMS APPROPRIATE ACCORDING TO THE

CIRCUMSTANCES OF THE CASE MAY ALSO
BE GRANTED TO THE APPELLANT.

Respectfully Sheweth:-

1. That the appellant got appointment as PST on 01/12/2006 and served the department with complete devotion and dedication and left no stone unturned in the smooth functioning of the school. Copy of appointment order dated 01/12/2006 is attached as Annexure "A".
2. That the appellant has been removed from service by respondent No. 3, on the report of IMU, when the school was closed during winter vacation vide impugned removal from service order Endst. No. 1198-1210 dated 20/04/2019 which was received by the appellant on 31/07/2019. Copy of impugned removal from service order dated 20/04/2019 is attached as Annexure "B".
3. That feeling aggrieved the appellant filed departmental appeal on 10/08/2019 which is yet to be replied by the department. Copy of

departmental appeal dated 10/08/2019 is annexed as Annexure "C". Hence, the instant service appeal is filed, inter-alia on the following grounds;-

GROUNDS:-

- a) That impugned removal from service order dated 20/04/2019 is against the law and is the result of without explanation, show cause notice, statement of allegation, final show cause notice, and inquiry under E&D rules 2011; Therefore, the impugned removal from service order is liable to be set-aside.
- b) That the school of the appellant was closed due to winter vacation, therefore, IMU report and other narrative of impugned order dated 20/04/2019 is baseless without lawful justification.
- c) That as per precedent case law no employee can be removed from service until or unless proper show cause notice, inquiry report,

statement of allegation prescribed by E&D rules is satisfied; Therefore, the impugned removal from service order is liable to be set-aside.

- d) That respondent NO. 3 did not provide opportunity of personal hearing and no final show cause notice was served prior to the removal from service order of appellant which is against the law.
- e) That respondent No. 3 even did not consider the pensionable service of the appellant and used the sledge of removal from service, which has destroyed the service career of the appellant.
- f) That the valuable rights of the appellant are involved.
- g) That there is not other prompt and efficacious remedy available to the appellant except the invocation of jurisdiction of this Honourable Tribunal.


- h) That others grounds shall be urged at the time of arguments.

It is therefore, most humbly prayed that on acceptance of instant service appeals removal from service order Endst No. 1198-1210 dated 20/04/2019 may graciously be declared illegal and may be set-aside. Any other relief which this Honourable Tribunal deem appropriate according to the circumstances of the case may also be granted to the appellant.

اپیڈی
...APPELLANT

Through

Dated: 05/12 /2019


(RAJA ALI SAJJAD)
Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of foregoing appeal are true and correct to the best of our knowledge and belief and nothing has been concealed therein from this Honourable Court.

اپیڈی
...APPELLANT

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

Service Appeal No. _____/2019

Safia Bibi daughter of Gul Zareen PST GGPS Sangabad, Sher Kot Palas Kohistan, District Mansehra.

...APPELLANT

VERSUS

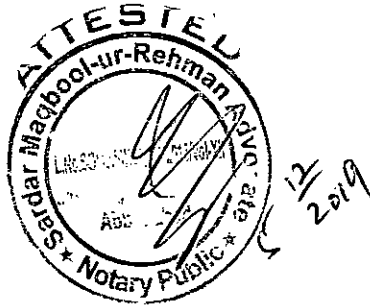
Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Safia Bibi daughter of Gul Zareen PST GGPS Sangabad, Sher Kot Palas Kohistan, District Mansehra, do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



Safia Bibi
DEPONENT

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

Service Appeal No. _____/2019

Safia Bibi daughter of Gul Zareen PST GGPS Sangabad, Sher Kot Palas Kohistan, District Kohistan.

...APPELLANT

VERSUS

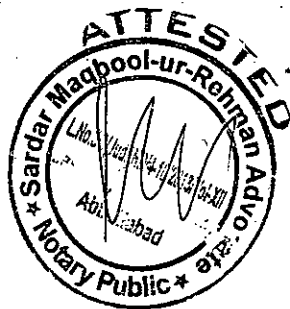
Government of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Safia Bibi daughter of Gul Zareen PST GGPS Sangabad, Sher Kot Palas Kohistan, District Kohistan, do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



18/12/2019

Safia Bibi
DEPONENT

ANNEXTURE-A**OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS AND
LITERACY KOHISTAN AT DASSU.****APPOINTMENT ORDER.**

Consequent upon the approval of departmental Selection Committee the competent authority has been pleased to appoint the following (Female) Middle Passed Untrained candidates fresh of Tehsil Palas (Union Council wise) against the vacant Posts of PTC in BPS-04 (Rs,2345,100-5345) Fixed plus Usual Allowances as admissible under the rules on contract basis for a period of three years according to the Merit policy issued by the Government of NWFP Schools & Literacy Department in the schools noted against each with immediate effect in the interest of public service.

S. No	Name of Candidates	Father's Name	Residence/ U/C	Apptt as	School where posted		Remarks
1	Shakira	Abdul Shakoor	Bataira	PTC	GGPS	Gulababad No. 1	Agst V.Post
2	Rakhshanda	Sadam Khan	Bataira	PTC	GGPS	Darra M. Khel	Agst V.Post
3	Yasmin Bibi	Sher Zada	Bataira	PTC	GGPS	Mahroon	Agst V.Post
4	Gul Samina	Sher Zada	Bataira	PTC	GGPS	Mahroon	Agst V.Post
5	Dibi Khobano	Hazarat Wali	Botail	PTC	GGPS	Dafia Darraa	Agst V.Post
6	Taj-un Nissa	Haroot	Haran	PTC	GGPS	Dusham Abad	Agst V.Post
7	Ruqia Bibi	Chaloo	Gufbagh	PTC	GGPS	Nawazabad	Agst V.Post
8	Masra Bibi	Qadam Khan	Haran	PTC	GGPS	Jhoom Gali	Agst V.Post
9	Tasleem Bibi	Chaloo	Haran	PTC	GGPS	Haiderabad	Agst V.Post
10	Hasleem Bibi	Chaloo	Haran	PTC	GGPS	Bahadarabad	Agst V.Post
11	Zannab Bibi	Mohammad Sherin	Haran	PTC	GGPS	Datt	Agst V.Post
12	Noshaba	Nazeer	Gaddar	PTC	GGPS	Gulibagh	Agst V.Post
13	Parveen Bibi	Mohammad Sirtaj	Gaddar	PTC	GGPS	Gulibagh	Agst V.Post
14	Basmeen Bib	Safoor	Khotakot	PTC	GGPS	Kgaro Gaddar	Agst V.Post
15	Bushra Bibi	Abdul Qadir	Kareen	PTC	GGPS	Safia Darra	Agst V.Post
16	Gul Nasim	Amir Zada	Kolal	PTC	GGPS	Mahreen	Agst V.Post
17	Rohina	Amir Zada	Koli	PTC	GGPS	Mahreen	Agst V.Post
18	Gul Zaroon	Amir Zada	Koli	PTC	GGPS	Mahreen	Agst V.Post
19	Shabana Khan	Banaras Khan	Kuz Paro	PTC	GGPS	Nawazabad	Agst V.Post
20	Sekina Bibi	Mohd Nazeer Shah	Kuz Paro	PTC	GGPS	Unna	Agst V.Post
21	Khalida	Qutab Din	Kuz Paro	PTC	GGPS	Unna	Agst V.Post
22	Gul Shah Naz	Miskeen	Kuz Paro	PTC	GGPS	Shuman Kot	Agst V.Post
23	Samina Bibi	Mohd Nazeer Shah	Kuz Paro	PTC	GGPS	Shuman Kot	Agst V.Post

ATTESTED

 Raja Ali Sajjad
Advocate
High Court Abbottabad

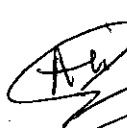
18/12/19

24	Safina Bibi	Abdur Rehman	Kuz Paro	PTC	GGPS	Zarafkot	Agst V.Post
25	Hussan Bibi	Mohd Nazeer Shah	Kuz Paro	PTC	GGPS	Sadbar Kot	Agst V.Post
26	Saira Bibi	Abdul Qayoum	Kuz Paro	PTC	GGPS	Sadbar Kot	Agst V.Post
27	Safia Bibi	Gul Zareen	Bar Paroo	PTC	GGPS	Kolal	Agst V.Post
28	Shumaila	Mohammad Nazir	Hukamabad	PTC	GGPS	Kolal	Agst V.Post
29	Nabila Qureshi	Abbdul Hanan	Peech Bela	PTC	GGPS	Khizarabad	Agst V.Post
30	Bibi Rehana	Shamal	Hukum Abad	PTC	GGPS	Khizarabad	Agst V.Post
31	Zainab Mustafa	Mohd Mustafa	Kuz Shrial	PTC	GGPS	K.K Jahmra	Agst V.Post
32	Nadia	Mustafa	Kuz Shrial	PTC	GGPS	Huarabad	Agst V.Post
33	Rashida Jabeen	Khanizaman	Kuz Shrial	PTC	GGPS	Shilkhanabad	Agst V.Post
34	Hussan Pari	Malik Haider	Shalkhan Abad	PTC	CMS	Shilkhanabad	Agst V.Post
35	Nusrat Begum	Pir Dad	Shalkhan Abad	PTC	GGPS	Shilkhanabad	Agst V.Post
36	Begum Bibi	Daleel	Shalkhan Abad	PTC	GGPS	Shilkhanabad	Agst V.Post
37	Bibi Hajira	Habat Khan	Shalkhan Abad	PTC	GGPS	Shilkhanabad	Agst V.Post
38	Bibi Halima	M. Gulfraz	Shalkhan Abad	PTC	GGPS	Shilkhanabad	Agst V.Post
39	Bushra Hayat	Hayat Mohammad	Shalkhan Abad	PTC	GGPS	Shilkhanabad	Agst V.Post
40	Aisha Bibi	Gul Fraz	Shalkhan Abad	PTC	GGPS	Shilkhanabad	Agst V.Post
41	Tasleem Bibi	Qalandar	Bar Sheyal	PTC	GGPS	Datt	Agst V.Post
42	Kiran Mustafa	M. Mustafa	Bar Sheyal	PTC	GGPS	Shilkhanabad	Agst V.Post
43	Misal Jan	Rokhan	Bar Sheyal	PTC	GGPS	Sabirabad	Agst V.Post
44	Sadaf Bibi	M. Mustafa	Bar Sheyal	PTC	GGPS	Sabirabad	Agst V.Post
45	Saima Hanif	Mohd Hanif	Bar Sheyal	PTC	GGPS	Sharakot	Agst V.Post
46	Gul Safia	Mian Gul	Bar Sheryal	PTC	GGPS	Sharakot	Agst V.Post
47	Gul Fam	Abdul Qadeer	Bar Sheryal	PTC	GGPS	Sharakot	Agst V.Post

CONDITIONS:-

1. Their appointments are purely on temporary basis and liable to termination at any time / stage with out assigning any reason/notice.
2. Their Certificates if not verified curlier, should be verified by the DDO (M) i.e Mr. Abdur Rehman I/C Dy: DO (F) S&L Kohistan before handing over their charge.
3. Charge reports should be submitted to all concerned.
4. No TA/DA is allowed to any one.

ATTESTED

 Raja Ali Sajja
Advocate
High Court Abbottabad

18/12/19

5. They will be governed by such rules and regulations enforced and as prescribed by the Government from time to time or the category of the Government Servants to which they.
6. In case any of the above candidates failed to assume the charge of their posts within fifteen days. Their appointments will automatically stand cancelled.
7. They should not be allowed to take over charge if their age is less than 18-years and above 35-years.
8. They should produce age and health certificate from EDO Health Kohistan before taking of charge.
9. They should not be handed over charge and their salaries should not be drawn by drawing & Disbursing Officers concerned till verification of their Degrees/ certificates e.t.c from the concerned Universities/Board/institutions by the concerned DDO'S.

**Executive District Officer
School & Literacy Kohistan**

Endst No. st.99-tt/Appt/PTC's(MJU/C Wise Merit 2006/ dated Kohistan the 1/12/2006

Copy of the above is forwarded to.

1. Director Schools & Literacy NWFP Peshawar.
2. P/S to Minister of Education NWFP Peshawar.
3. P/S To Secretary Government of NWFP (S&L) Department Peshawar.
4. District Nazim Kohistan.
5. District Coordination Officer Kohistan with reference your notification No. 10232-36 dated 20/11/2006 & 10407 dated 24/11/2006.
6. District Account Officer Kohistan.
7. District Officer School & Literacy Kohistan.
8. Deputy District Officer (F) S&*L Kohistan.
9. Candidates concerned.

**Executive District Officer
School & Literacy Kohistan**

ATTESTED

AV
Rajatal Sajja
Advocate
High Court Abbottabad

18/12/19

8

ANNEXURE - A

OFFICE OF THE EXECUTIVE DIRECTOR OFFICE OF SCHOOLS AND LITERACY
KOHAT DISTRICT

APPOINTMENT ORDER

Consequent upon the approval of Departmental Selection Committee, the competent authority has been pleased to appoint the following (Female) Middle Passed Untrained candidates Fresh of Tehsil Passes (Lib on Govt. wise) against the vacant Posts of PTC in BPS-04 (Rs. 2345-100-\$345) Fixed plus Usual Allowances as admissible under the rules on contract basis for a period of three years according to the merit policy issued by the Government of NWFP Schools & Literacy Department in the Schools noted against each with immediate effect in the interest of public service.

S. No	Name of candidate	Father's Name	Residence/UrC	Appnt as	School where posted	Remarks
1	Shahara	Abdul Shakoor	Bataira	PTC	GGPS Gulababad No.1	Agst V Post
2	Rakhshanda	Sadam Khan	Bataira	PTC	GGPS Darra M Khet	Agst V Post
3	Yasmin Bibi	Shah Zada	Bataira	PTC	GGPS Mahreen	Agst V Post
4	Gul Samina	Shah Zada	Bataira	PTC	GGPS Mahreen	Agst V Post
5	Sub. Khobana	Hazrat wal	Bataira	PTC	GGPS Safia Darra	Agst V Post
6	Rajun Nissa	Harezi	Itaran	PTC	GGPS Dusham Abad	Agst V Post
7	Nuqra Bibi	Qasim Khan	Itaran	PTC	GGPS Nawazabad	Agst V Post
8	Masra Bibi	Qasim Khan	Itaran	PTC	GGPS Jhoom Gah	Agst V Post
9	Tasleem Bibi	Chaiyo	Itaran	PTC	GGPS Italerabad	Agst V Post
10	Tasleem Bibi	Chaiyo	Itaran	PTC	GGPS Bahadarabad	Agst V Post
11	Zanab Bibi	Mohammad Shorn	Itaran	PTC	GGPS Datt	Agst V Post
12	Noshaba	Nazeer	Gaddar	PTC	GGPS Gulbagh	Agst V Post
13	Parveen Bibi	Mohammad Sirtaj	Gaddar	PTC	GGPS Gulbagh	Agst V Post
14	Basmeen Bibi	Saloor	Khotakot	PTC	GGPS Kgoro Gaddar	Agst V Post
15	Bushra Bibi	Abdul Qadir	Karoon	PTC	GGPS Safia Darra	Agst V Post
16	Gul Nasim	Amir Zada	Kolai	PTC	GGPS Mahreen	Agst V Post
17	Robina	Amir Zada	Kolai	PTC	GGPS Mahreen	Agst V Post
18	Gul Zeroon	Amir Zada	Kolai	PTC	GGPS Mahreen	Agst V Post
19	Shabana Khan	Banaras Khan	Kuz Paro	PTC	GGPS Nawazabad	Agst V Post
20	Sekina Bibi	Mohd Nazeer Shah	Kuz Paro	PTC	GGPS Unna	Agst V Post
21	Khafida	Qutab Din	Kuz Paro	PTC	GGPS Unna	Agst V Post
22	Gul Shah Naz	Niskeen	Kuz Paro	PTC	GGPS Shuman Kot	Agst V Post
23	Samina Bibi	Mohd Nazeer Shah	Kuz Paro	PTC	GGPS Shuman Kot	Agst V Post
24	Safina Bibi	Abdur Rahman	Kuz Paro	PTC	GGPS Zarakot	Agst V Post
25	Hussan Bibi	Mohd Nazeer Shah	Kuz Paro	PTC	GGPS Sadbar Kot	Agst V Post
26	Saira Bibi	Abdul Qayoum	Kuz Paro	PTC	GGPS Sadbar Kot	Agst V Post
27	Safia Bibi	Gul Zareen	Bar Paroo	PTC	GGPS Kolai	Agst V Post
28	Shumaila	Mohammad Nazir	Hukamabad	PTC	GGPS Kolai	Agst V Post
29	Nabila Qumshi	Abdul Hanan	Peech Bela	PTC	GGPS Khizarabad	Agst V Post
30	Bibi Rehana	Shamal	Hukum Abad	PTC	GGPS Khizarabad	Agst V Post
31	Zainab Mustafa	Mohd Mustafa	Kuz Shrial	PTC	GGPS K.K Jahmra	Agst V Post
32	Nadia	Mustafa	Kuz Shrial	PTC	GGPS Hujarabad	Agst V Post
33	Rashida Jabeen	Khanizaman	Kuz Shrial	PTC	GGPS Shilkanabad	Agst V Post
34	Hussan Pari	Malik Haidar	Shalkan abad	PTC	CMS Shilkanabad	Agst V Post
35	Nusrat Bequm	Pir Dad	Shalkan abad	PTC	GGPS Shilkanabad	Agst V Post
36	Begum Bibi	Daleel	Shalkan abad	PTC	GGPS Shilkanabad	Agst V Post
37	Bibi Hajira	Habal Khan	Shalkan abad	PTC	GGPS Shilkanabad	Agst V Post
38	Bibi Halima	M.Gulfray	Shalkan abad	PTC	GGPS Shilkanabad	Agst V Post
39	Bushra Hayat	Hayat Mohammad	Shalkan abad	PTC	GGPS Shilkanabad	Agst V Post
40	Aisha Bibi	Gul Fraz	Shalkan abad	PTC	GGPS Shilkanabad	Agst V Post
41	Tasleem bibi	Qalandar	Bar Sheyal	PTC	GGPS Datt	Agst V Post
42	Kiran Mustafa	M.Mustafa	Bar Sheyal	PTC	GGPS Shilkanabad	Agst V Post
43	Misal Jan	Rokhan	Bar Sheyal	PTC	GGPS Sabirabad	Agst V Post
44	Sadaf Bibi	M.Mustafa	Bar Sheyal	PTC	GGPS Sabirabad	Agst V Post
45	Saima Hanif	Mohd Hanif	Bar Sheyal	PTC	GGPS Sharakot	Agst V Post

ATTESTED

Raja Ali Sajjad
Advocate
High Court Abbottabad

5/12/19

Contd: P-02

District Officer
Revenue & Local

Handwritten signature and notes at the bottom of the page.

46	Gul Safia	Mian Gul	Umar Sheryal	PTC	GGPS	Sharahot	Agst V Post
47	Gul Fam	Abdul Qadeer	Umar Sheryal	PTC	GGPS	Sharahot	Agst V Post

CONDITIONS:-

- 1 Their appointments are purely on temporary basis and liable to termination at any time / stage without assigning any reason/notice.
- 2 Their Certificates if not verified earlier, should be verified by the DDO (IA) to Mr. Abdur Rehman UC Dy:DO (F) S&L Kohistan before handing over their charge.
- 3 Charge reports should be submitted to all concerned.
- 4 No TADA is allowed to any one.
- 5 They will be governed by such rules and regulations enforced and as proscribed by the Government from time to time for the category of the Government Servants to which they belong.
- 6 In case any of the above candidates failed to assume the charge of their posts within fifteen days, their appointments will automatically stand cancelled.
- 7 They should not be allowed to take over charge if their age is less than 18-years and above 35-years.
- 8 They should produce age and health certificate from EDO Health Kohistan before taking of charge.
- 9 They should not be handed over charge and their salaries should not be drawn by Drawing & Disbursing Officers concerned till verification of their Degrees/ Certificates e.t.c from the concerned Universities/ Boards/ Institutions by the concerned DDO's

Executive District Officer
Schools & Literacy Kohistan

Endst. No. 0155-11 / AppuPTC's (MJUC Wise Merit /2006 Dated Kohistan the 11/11 /2006.

- 1 Director Schools & Literacy NWFP Peshawar.
- 2 P/S to Minister of Education NWFP Peshawar.
- 3 P/S to Secretary Government of NWFP (S & L) Department Peshawar.
- 4 District Nazim Kohistan
- 5 District Coordination Officer Kohistan with reference your Notification No.10232-36 dated 20/11/2006 & 10407-10 dated 24/11/2006.
- 6 District Accounts Officer Kohistan.
- 7 District Officer Schools & Literacy Kohistan.
- 8 Deputy District Officer (F)S&L Kohistan.
- 9 Candidates concerned.

Executive District Officer
Schools & Literacy Kohistan

ATTESTED

Raja Ali Sajjad
Advocate
High Court Abbottabad

5/12/19

District Officer
Revenue & Land
Kohistan

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

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

[Signature]
 DISTRICT EDUCATION OFFICER
 (F) KOHISTAN

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

Copy for information to:

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

Attested
[Signature]
 Raja Ali Sajjad
 Advocate
 H-11 Kohistan

[Signature]
 DISTRICT EDUCATION OFFICER
 (F) KOHISTAN

5/12/19

ANNEXTURE - C

Better Copy

بکھنور جناب ڈائریکٹر ایجوکیشن ایلیمینٹری اینڈ سیکنڈری ایجوکیشن KPK

درخواست برائے بحالی ملازمت

جناب عالی!

گزارش ہے کہ ساکنہ بحیثیت PST پوسٹ GGPS سنگ آباد شراشرا کورٹ پالس کوہستان میں میں اپنے فرائض منصبی سرانجام دے رہی ہے۔ منسٹرنے بھی میرے سکول کا وزٹ کیا ہے اور نہ DEO فی میل آیا ہے اور 30 ستمبر سے 20 مارچ تک تعطیل ہے۔ تعطیل کے دوران میں ٹرمینٹ کی گئی ہوں مجھے کوئی Show Cause Notice بھی دیا ہے۔ بحوالہ آرڈر نمبر 1198-1210 dated 20/04/2019 میری ٹرمینیشن ہوئی ہے جو کہ میرے ساتھ سراسر ظلم ہوا ہے۔


لہذا استدعا ہے کہ آپ مہربانی کر کے میری ملازمت بحال کرنے کا حکم صادر فرمائیں۔

مورخہ 10/08/2019

العارضہ

صفیہ زرین ولد گل زرین PST جی جی پی ایس سنگ آباد

ATTESTED


Raja Ali Sajjad
Advocate
High Court Abbottabad

18/12/19

KPK
بجضور جناب ڈائریکٹر انچارج کیشن انٹیلجی (ایڈمنسٹریٹو) /
درخواست برائے بحالی ملازمت

جناب عالی!
گزارشیں 2 سائلہ جسٹس پیسٹ پیسٹ پوسٹ
PS-14 سنگ اباد سٹراکٹ پالیس کو عسما
میں ایک فراٹھ منظمی سرانجام دے رہی
منظمی سرانجام دے رہی
(F) DEO آجیہ اور 30 دسمبر سے 20 مارچ
تک تعطیل ہے۔ تعطیل کی دوران میں ٹریننگ
کی گئی ہوں۔ بچے کوئی شو کاڈ نوٹس بھی نہیں دیا
ہوئی ہے۔ جو کہ میں لکھا ہے 2004
کہ اس سلسلے کے آجیہ میں باقی کئی ملازمت بحال
کرنے کا حکم صادر ہوا ہے۔

10/8 مورخہ
19/10
ATTESTED

Raja Ali Sallad
Advocate
High Court Abbottabad

صبر زین ولد گل زین آسٹریٹڈ
صبر زین ولد گل زین آسٹریٹڈ
صبر زین ولد گل زین آسٹریٹڈ

کورٹ فیس

وکالت نامہ

بعدالت جناب سروس ٹریبونل خیبر پختونخواہ پشاور
 عنوان: صفیہ بی بی نام گورنمنٹ آف خیبر پختونخواہ وٹیرہ
 منجانب: ایڈووکیٹ
 نوعیت مقدمہ: سروس ایبل

باعث تحریر آنکہ میں نے

مقدمہ مندرجہ میں اپنی طرف سے واسے پیروی و جواب دہی کل کاروائی متعلقہ آس مقام
 راجہ علی سجاد ایڈووکیٹ ہائی کورٹ ایبٹ آباد

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کے پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

بمقام: ایبٹ آباد
 المرقوم: 

accept
 Raja Ali Sajjad
 Advocate
 High Court Abbottabad


"B"

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

No.

713

Appeal No. 1972 of 20 14

..... Safia Bibi Appellant/Petitioner

Versus

..... Through Secy. Edu. Dept. Pesh. Respondent

Respondent No. 3

Notice to: —

Distt. Education Office, Pesh. Secy.
Education (2) Islamabad Distt. Kalistan

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.....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.....29/12.....

Day of.....8ep.....2020

at Camp Court A. Abad

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. **TB**

No.

~~1992~~ 19

Appeal No. *Sgt. Ali Bhatti* of 20

Appellant/Petitioner

Through Sgt. Ali Bhatti Versus *Edm. A. M. Khan*
Respondent

Respondent

Govt. of K.P. Respondent No. *1992*
Education Peshawar

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.....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.....

29/11/20

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

Day of.....20

at Camp Court A. Abad

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.

1

**BEFORE THE KYBER PAKHTUNKHWA
SERVICE TRIBUNAL, KPK PESHAWAR.**

Service Appeal No. 1972/2019

Safia Bibi

APPELLANT.

Versus.

Govt: of Khyber Pakhtunkhwa through Secretary Elementary &
Secondary Education Peshawar & others.

RESPONDENTS

INDEX

S.NO	Description of Document	Annexure	Pages
1	Para wise comments with affidavit		1 - 4
2	Show Cause Notice	A	5
3	News Paper cutting	B	6-7
4	Termination Order	C	8

De

**BEFORE THE HONOURABLE SERVICE
TRIBUNAL, KPK PESHAWAR.**

Service Appeal # 1972/2019

Safia BibiAPPELLANT

VERSUS

1. Secretary (E&SE) Govt: of Khyber Pakhtunkhwa & others
2. Director Elementary & Secondary Education KPK Peshawar
3. District Education Officer (Female) Kolai Pallas Kohistan.

..... RESPONDENTS

PARAWISE COMMENTS OF BEHALF OF RESPONDENT NO.1,2 & 3.

Respectfully Sheweach,

Preliminary Objections.

1. That the Appellant has neither got a cause of action nor locus standi to file the instant Appeal.
2. That the instant appeal is time barred, hence liable to be dismissed in liminal.
3. That the Tribunal has no jurisdiction to adjudicate the matter.
4. That the Appellant has concealed the material facts from this Honorable Tribunal, but also twisted the truth.
5. That the appellant has been estopped by her own conduct to file the appeal.
6. That the appellant has not preferred any departmental appeal against her removal order. Hence, the instant appeal is not maintainable.
7. That the appellant has been come to the tribunal with unclean hands.

REPLY ON FACTS.

1. That Para No.1 to the extent of appointment of appellant is correct, rest of the Para is incorrect. Appellant often remained absent from her duties and her work remained unsatisfactory.
2. Para No.2 is incorrect and strongly denied. Further stated that the appellant was reported absent by Assistant Sub-Divisional District Education officer (Female) and Independent Monitoring Unit from

De


her school duty since long. A Show cause notice was served by DEO (F) vide this office Endstt: No.312 dated 01-02-2019 and sent to her on the available home address through register post No. 205 dated 01-02-2019 but appellant neither filed reply to show cause notice nor made any personal appearance. The appellant also failed to resume her duty. Thereafter final show cause notice was served through two leading News Papers i.e Roznama Hazara News and Daily Akhbar Abbottabad News Paper dated 26-2-2019 & 27-02-2019. The appellant was directed to appear before the competent authority for personal hearing through Newspaper but the appellant failed to avail the opportunity. The appellant neither attended the school duty nor submitted convincing reply to the authority within the stipulated period mentioned in the newspaper. Therefore, after fulfillment all codal formalities, the appellant was terminated.

(Copy of Show Cause notice, News paper cutting & Removal Order is annexed as Annexure "A", "B" & "C")

3. That Para No.3 is incorrect; appellant has not filed any appeal. The annexed application is after thought and has never been received by department. Even otherwise the application /representation is also time barred.

The instant service appeal may be dismissed on the following grounds.

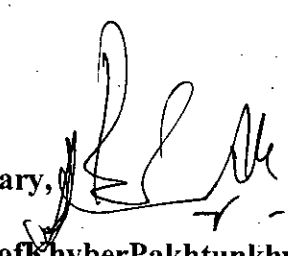
GROUND.

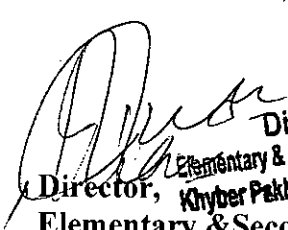
- a) That, Para "a" of the grounds of appeal is incorrect, appellant has been terminated after fulfillment of codal formalities.
- b) That, Para "b" of the grounds is incorrect; detail reply has already been given in para "2" of facts of reply. 
- c) That, Para "c" of the grounds is incorrect and denied, Appellant was given number of opportunities in the form of show cause notice but she failed to reply or make personal appearance. Furthermore, failed to resume her duty. She was terminated by the competent authority after fulfillment all codal formalities.

- d) That, Para "d" is incorrect and denied. Detail reply already given in proceeding Para's.
- e) That, Para "e" is incorrect, hence denied. As replied above.
- f) That, Para "f" is incorrect. Appellant was liable to be dismissed as per law and rule.
- g) Para "g" requires no reply.
- h) The respondents seek leave to raise additional ground during arguments.

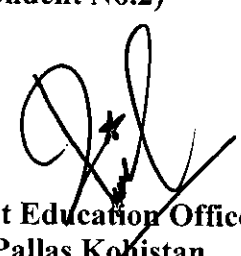
In view of the above made submissions, this Hon'able Tribunal may very graciously be requested to dismiss the instant appeal in favor of the Respondents in the interest of equity and justice.

Secretary,


Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Deptt:
Peshawar.
(Respondent No.1)


Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Elementary & Secondary Education
Peshawar.
(Respondent No.2)


District Education Officer (Female)
Kolai Pallas Kohistan
(Respondent No.3)

BEFORE THE KYBER PAKHTUNKHWA SERVICE
TRIBUNAL, KPK PESHAWAR.

Service Appeal No. 1972/2019

Safia Bibi

Appellant.

Versus.

Govt. of KPK etc:

Respondent

AFFIDAVIT

I, Mr. Asar Jan, ADEO (litigation) Kolai Pallas Kohistan do hereby solemnly affirm and declare that the contents of the accompanying para wise comments are true and correct to the best of my knowledge and belief.


DEPONENT

(61.)
OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (F) PALLAS

20

S/No.	EMIS Code	School Name	School Status	Remarks By ASDEO
1	30665	GGPS Sertay	Permanent Non Functional	Post was Vacant (Teacher is proposed to functionalize the School)
2	30512	GGPS Jhoom Gali Kuz Palas	Permanent Non Functional	Post was Vacant (Teacher is proposed to functionalize the School)
3	38396	GGPS Kolai	Permanent Non Functional	Post was Vacant (Teacher is proposed to functionalize the School)
4	30642	GGPS Bhadar Abad	Permanent Non Functional	Post was Vacant (Teacher is proposed to functionalize the School)
5	30665	GGPS Southa Khil Midan	Permanent Non Functional	Post was Vacant (Teacher is proposed to functionalize the School)
6	30642	GGPS Kuz Saire	Permanent Non Functional	Post was Vacant (Teacher is proposed to functionalize the School)
7	30611	GGPS Kuch Bura	Permanent Non Functional	Post was Vacant (Teacher is proposed to functionalize the School)
8	30635	GGPS Kundul Bar Palas ✓	Permanent Non Functional	(1) Gul Naz PST ✓ (2) Sabia Rubani PST ✓
9	30638	GGPS Bhatti Kuz Shiryal ✓	Permanent Non Functional	(1) Gul Naz PST ✓
10	30649	GGPS Madakhail Abad ✓	Permanent Non Functional	(1) Bushra Hafiz PST ✓ (2) Fahimda PST ✓
11	38727	GGPS Momin Abad ✓	Permanent Non Functional	(1) Rukhsana PST ✓
12	30535	GGPS Bar Gabair ✓	Permanent Non Functional	(1) Seema Bibi ✓ (2) Yasmin Gulab ✓
13	30696	GGPS Habib Abad ✓	Permanent Non Functional	(1) Farveen Sartaj PST ✓
14	38728	GGPS Bar Sair Sharaid ✓	Permanent Non Functional	(1) Aisha Qureshi ✓ (2) Hanifa Bibi ✓
15	41423	GGPS Shanga Abad	Permanent Non Functional	(1) Mehnaz PST ✓ (2) Rukhsana Zaman PST ✓
16	30663	GGPS Shamial Majwar Abad	Permanent Non Functional	(1) Nahid Sartaj PST ✓ (2) Safia Zaveer PST ✓

ASDEO
Issue show cause
as per Dasse
file today
27/1/19

#12
do as directed
27/1/19

Zuhra Bibi PST GGPS Kharza Khel	Dassu	01/01/2018	20/1/2019	1/2 /2019
Nagina	SDEO (F) Dasse	03/01/19	Final Show cause E. No 255 dated 26/1/19	1203

36



OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER

FEMALE PALLAS KOHISTAN

E-mail: sdecofemalepallas@gmail.com

List of Non-Functional School For the Month of October 2018 and November 2018

S.No	Name of School	Circle Name	EMIS Code	Reason of Non functional
01	GGPS Bahdar abad	Pallas	30644	Post Vacant
02	GGPS Dalii abad	Pallas	30654	Show cause issued and pay stopped.
03	GGPS Maidan Bar Parow	Pallas	32693	Salary Stopped
04	GGPS Bar Gabiar	Pallas	30535	Deduction and Showcase
05	GGPS GGPS Kolai	Kolai	30596	Post Vacant
06	GGPS Bar Sair Sharid	Pallas	38728	Deduction and Showcase
07	GGPS Kuz Ser Pallas	Pallas	30642	Deduction and Showcase
08	GGPS Dalii abad	Pallas	30654	Deduction and Showcase
09	GGPS Bar Gabair	Pallas	30535	Deduction and Showcase
10	GGPS Habib abad	Pallas	30606	Salary already Stopped
11	GGPS Bahdar abad	Pallas	30644	Post Vacant
12	GGP Shanga abad	Pallas	41423	Salary Stopped and Showcase issued

[Signature]
 07/11/19
 SUB-DIVISIONAL EDUCATION OFFICER
 FEMALE PALLAS KOHISTAN

ADB
Put up to DBO
For further N/A.
21/11/19

ADB

1802
23/11/19

1803
7/11/19



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) KOHISTAN

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FINAL SHOW CAUSE NOTICE

I, Mr. Khurshid Ahmed, District Education Officer, (Male) Kohistan, being a competent authority under the Khyber Pakhtunkhwa Govt: Servants (E&D) Rules, 2011, do hereby serve you Mst: Safia Zareen PST GGPS Sangu Abad as follows:

1. That consequent upon the report of IMU, your school was found closed & non-functional since long. You remained absent from your School duties willfully.
2. I am satisfied that you have committed the following acts/omissions specified in rule 3 of the said rules:
 - (i). Guilty of habitually absenting herself from duty without prior approval of leave.
4. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the major penalty under rule 4 (b) of the said rules.
5. You are therefore, required to finally show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desired to be heard in person.
6. If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defense to put in and in that case an ex-parte action shall be taken against you.

Endstt: No 312 /Dated Kohistan the 01/02 /2019
Copy of the above is forwarded to the:-

1. Mst: Safia Zareen PST
GGPS Sangu Abad

COMPETENT AUTHORITY
(District Education officer)
(F) Kohistan

Stamp: 205

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.

Received a registered* addressed to Mst. Safia Zareen Date Stamp 01/02/2019

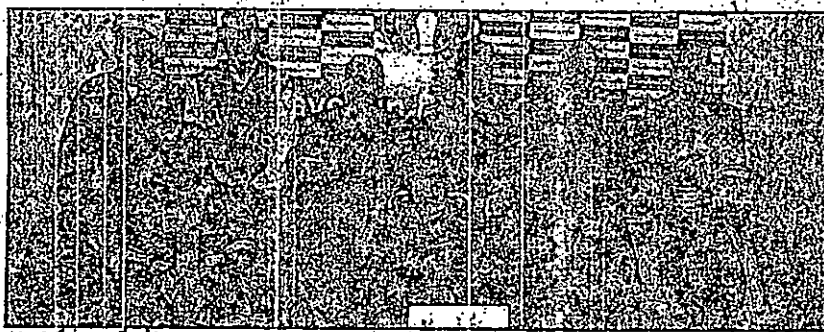
Initials of Receiving Officer Mst. Safia Zareen Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured fee Rs. 32 (in figures) Weight 32 (in words) Kilo Grams

Name and address of sender

سربراہانِ چٹان / اجلاسِ کابلی اراچی و گلزار گیلکی قرارداد منظور

سربراہانِ چٹان (گورننگ بڈ) نے اجلاس کے دوران سربراہانِ اراچی، گلزار گیلکی اور کراچی کے ساتھ ساتھ دیگر سربراہان کے ساتھ بھی ملاقات کی اور ان کے مسائل سے آگاہ کی اور ان کے مسائل کو حل کرنے کے لیے اقدامات کیے۔



سربراہانِ چٹان نے اجلاس کے دوران سربراہانِ اراچی، گلزار گیلکی اور کراچی کے ساتھ ساتھ دیگر سربراہان کے ساتھ بھی ملاقات کی اور ان کے مسائل سے آگاہ کی اور ان کے مسائل کو حل کرنے کے لیے اقدامات کیے۔

خصوصی

آپ کو اطلاع دینا چاہتا ہوں کہ سربراہانِ چٹان نے سربراہانِ اراچی، گلزار گیلکی اور کراچی کے ساتھ ساتھ دیگر سربراہان کے ساتھ بھی ملاقات کی اور ان کے مسائل سے آگاہ کی اور ان کے مسائل کو حل کرنے کے لیے اقدامات کیے۔

نمبر	نام	نمبر	نام	نمبر	نام
1	PST لاہور	20	PST راولپنڈی	38	PST گلزار گیلکی
2	PST سرگودھا	21	PST کراچی	39	PST کراچی
3	PST راجہ پور	22	PST سکس	40	PST سکس
4	PST فارمنگٹن	23	PST سکس	41	PST سکس
5	PST فریڈ ہل	24	PST سکس	42	PST سکس
6	PST ٹاؤن	25	PST سکس	43	PST سکس
7	PST گال	26	PST سکس	44	PST سکس
8	PST ٹریٹ	27	PST سکس	45	PST سکس
9	PST ٹونڈی	28	PST سکس		
10	PST ڈیہلی	29	PST سکس		
11	PST ناگپور	30	PST سکس		
12	PST گنڈاپور	31	PST سکس		
13	PST گنڈاپور	32	PST سکس		
14	PST گنڈاپور	33	PST سکس		
15	PST گنڈاپور	34	PST سکس		
16	PST گنڈاپور	35	PST سکس		
17	PST گنڈاپور	36	PST سکس		
18	PST گنڈاپور	37	PST سکس		
19	PST گنڈاپور	38	PST سکس		

INFRAD 43

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میرزا محمد رفیع / جی ایم ایم / جی ایم ایم / جی ایم ایم

آپ
آپ کی طرف سے
خلاف D
نمبر شمار

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پیشکش ٹیکنالوجی پر
اعلیٰ کوالٹی پر
50311

19

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN

NOTIFICATION

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

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

And whereas final show cause notices were issued through two leading newspapers i.e. Daily "Hazara News" Mansehra and Daily "Akhbaar" Abbottabad dated 26/02/2019 in which teachers were directed to assume their duties and submit reason (s) of their wilful absence but neither they attended their schools nor submitted convincing replies before the committee within the stipulated period mentioned in the newspaper. Now in view of the above facts I, Mr. Khurshid Ahmed, being competent authority, as District Education Officer (female) Kohistan, is fully satisfied to impose major penalty of REMOVAL FROM SERVICE upon the teachers under rule 45(iii) of E&D Rules 2011 with effect from the dates mentioned against each.

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

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

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

DISTRICT EDUCATION OFFICER
(F) KOHISTAN

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

Copy for Information to:

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

DISTRICT EDUCATION OFFICER
(F) KOHISTAN

"A"

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

7B

No.

APPEAL No. 1972 of 2019.

Safia Bibi

Appellant/Petitioner

Versus

Through Secy. Edm. & P. Sh.

RESPONDENT(S)

Notice to Counsel Appellant/Petitioner

Raja Ali Sajjad
Advocate High Court
at Abbottabad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 19-4-2021 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 A. Abud

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

"A"

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

No.

APPEAL No..... of 20 113
1972 19

Safia Bibi

Appellant/Petitioner

Versus

Through Secy: Edm: KPK Pesh. RESPONDENT(S)

Notice to Appellant/Petitioner

*Safia Bibi d/o Gul Zaman
PST, GGPS, Sangabad
Sher Kat Palas Kohistan
Distt. Kohistan*

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

19-4-2021 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.

at Camp Court A. Abad.

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

713

APPEAL No. 1972 of 20 19

Safia Bibi

Appellant/Petitioner

Versus

Through Secy: Edm. KPk. Pr. Sh.

RESPONDENT(S)

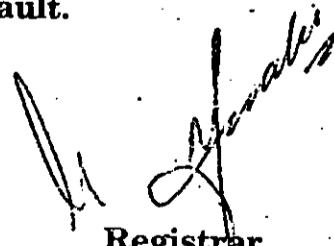
Counsel
Notice to Appellant/Petitioner

Raja Ali Sajjad
Advocate High Court
Abbottabad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record arguments/order before this Tribunal on 15/11/202 at 15/11/202

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 Abbottabad



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 1972 of 20 TB
19

Safia Bibi
Appellant/Petitioner

Versus

Through Sayy. Edu. KPLC Pesh.
RESPONDENT(S)

Notice to Appellant/Petitioner Safia Bibi D/O Gul Zareem
PST, G.G.P.S. Sangrabad
Sheerkhat Pata's Kharistan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 15/11/2021 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 Road

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

"A"

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

11/15
10/19

No.

1972

APPEAL No..... of 20

19

Safia Bibi

Appellant/Petitioner

Versus

Muzaffar Saq: Educ: Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner

Safia Bibi D/O Gul Zureen

PST GQPS Sangabad

Shah Kot Palas Kohistan

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 15/11/21 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

At Adict

[Signature]

[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

No.

APPEAL No. 1972 of 20

TRB
19
AA Badli
~~TRB~~

Safia Bibi

Appellant/Petitioner

Versus

Imran Singh Edu. Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner

Raja Ali Sajad

Adv.

High Court A/A Badli

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 15/11/21 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
A/A Badli


Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.