

30<sup>th</sup> Sept 2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, DDA alongwith Mr. Muhammad Imran, Sr. SS for respondents present.

Representative of the respondents seek some time for filing of reply contending that no notice of this appeal was issued to them. Let them file reply within fifteen days with the direction to provide copy to the appellant and her counsel. To come up for reply/preliminary hearing on 24.10.2022 before S.B at camp court D.I.Khan.



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

24.10.2022

Appellant present through representative.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

Reply not submitted. Learned AAG requested for time to submit reply/comments. Last opportunity is granted. To come up for reply/preliminary hearing on 21.11.2022 before S.B at Camp Court, D.I.Khan.



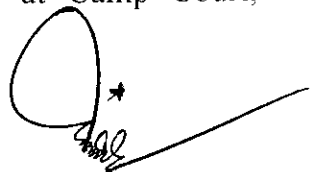
(Rozina Rehman)  
Member (J)  
Camp Court, D.I.Khan

S.A No. 872/2022

28.06.2022

Mr. Mohsin Ali, Advocate for the appellant present.

Learned counsel for the appellant contended that the appellant is aggrieved of the impugned Notification dated 27.04.2017 whereby respondent No. 3, declared the services of appellant as null and void from the date of taking over charge. The appellant submitted departmental appeal to respondent No. 2 on 23.11.2021 which was not decided within the statutory period hence the instant service appeal was filed in the Service Tribunal on 16.05.2022. When attention of the learned counsel for appellant was drawn towards the limitation issue for about 04 years; lapsed between the impugned order and departmental appeal, he could not justify the delay except that it was during pendency of the W.P. before Honourable Peshawar High Court, D.I.Khan Bench, that the appellant came to know about the impugned order dated 27.04.2017. It is observed that application for condonation of delay has been submitted but no specific reason(s) for justification has been mentioned in the said application. Moreover, no specific date is mentioned to establish that the impugned order in question had been communicated to the appellant. In the circumstances, it deems appropriate to issue pre-admission notices to the respondents at this stage for submission of reply/comments. To come up for reply/comments as well as preliminary hearing on 28.07.2022 before S.B at Camp Court, D.I.Khan



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

Form- A

FORM OF ORDER SHEET

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

Case No.- 872/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/06/2022	<p>The appeal of Mst. Arshia Latif resubmitted today by registered post through Mr. Muhammad Mohsin Ali 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 <sup>CU</sup> 2/6/2022</p>
2-	6.6-22	<p>This case is entrusted to touring Single Bench at D.I.Khabn for preliminary hearing to be put there on <u>28-6-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

Case Title: Aysha Latif vs Govt. of KP

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

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

Name: Muhammad Mohsin Ali  
Advocate Supreme Court -  
D. I. Khan.

Signature: [Signature]

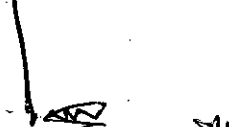
Dated: 30/05/2022

The appeal of Mst. Arshia Latif Daughter of Abdul Latif resident of Mohallah Ustad Qadirabad Wala Muryali Tehsil & District Dera Ismail Khan received today i.e. on 16.05.2022 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Check list is not attached with the appeal.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Memorandum of appeal may be got signed by the Counsel.
- 4- Annexures of the appeal may be attested.
- 5- Page no. 17 & 39 of the appeal are illegible which may be replaced by legible/better one.


No. 1069 /S.T,

Dt. 18-05 /2022

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Muhammad Mohsin Ali Adv.  
Supreme Court of Pakistan  
District Court D.I.Khan

Respected Sir,  
Resubmitted. after removing the  
objections.

  
Muhammad Mohsin Ali  
Advocate Supreme Court  
D. I. Khan  
31/05/2022

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**

**PESHAWAR.**

Appeal No. 872 /2022

Mst. Arshia Latif

.....APPELLANT

**VERSUS**

Govt. of KPK and others

.....RESPONDENTS

**INDEX**

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<b>2</b>	Copies of testimonials of the appellant	<b>A</b>	8-16
<b>3</b>	Copy of Appointment order alongwith attendance register etc.	<b>B</b>	17-26
<b>4</b>	Copy of Writ Petition No. 609-D/2015 alongwith comments and Order dated 27.10.2021	<b>C</b>	27-35
<b>5</b>	Copy of Impugned office order alongwith relevant documents	<b>D</b>	36-39
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Dated: \_\_\_/05/2022

Humble Appellant

*Arshia Latif*

Arshia Latif

Through Counsel

*Muhammad Mohsin Ali*  
**Muhammad Mohsin Ali**  
Advocate Supreme Court,  
District Courts, D.I.Khan.

(1)

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

Appeal No. \_\_\_\_\_/2022

Mst. Arshia Latif daughter of Abdul Latif resident of Mohallah Ustad Qadirdad Wala, Muryali, Tehsil & District Dera Ismail Khan.

.....APPELLANT

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary Education Govt. of K.P.K, Peshawar.
2. Director Education (Elementary & Secondary), Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female), Dera Ismail Khan.
4. S.D.E.O (Female), Education Department, Dera Ismail Khan.

.....RESPONDENTS

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**APPEAL UNDER SECTION 4 OF KPK**

**SERVICE TRIBUNALS ACT, 1974**

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**PRAYER;** On acceptance of this appeal this august court may be pleased to DECLARE the office order / Notification No. 5583-89 dated 27.04.2017 issued by respondent No. 3 (vide which the service of the appellant was declared null & void) as illegal, without lawful authority, without jurisdiction, void *ab initio* and ineffective upon the rights of the appellant and is liable to be set aside/quashed and to reinstate the appellant against the subject post with all back benefits on the grounds appearing hereinafter;

**OR**

**GRANT** any other relief considered just and appropriate under the given circumstances of the case.

**Respectfully sheweth;**

1. That the appellant is permanent resident of Mohallah Ustad Qadirdad Wala, Muryali Tehsil & District Dera Ismail Khan.
2. That the respondent advertised the posts of different categories of teachers for District Dera Ismail Khan and being qualified candidate, the present appellant applied for the post "PST (BPS-12)", and appeared in Test & Interview for the said post. The process of recruitment was completed, and the appellant was appointed against the vacant post of PST in Govt. Girls Primary School Muryali, Dera Ismail Khan vide officer order Endst: No. 8128-34/PST/F dated 22.08.2014 on the recommendation of Departmental Selection Committee on the basis of adhoc policy. After getting the medical fitness certificate, the appellant submitted the arrival report and started her official duty. Copies of Testimonials of the appellant and appointment order alongwith attendance register etc. are enclosed as **Mark-A & B** respectively.
3. That the appellant was receiving her monthly pay regularly, but in the month of July, 2015 the monthly salary of the appellant was stopped and the service of the appellant was also not extended. Thereafter, the appellant approached to Honourable Peshawar High Court, Dera Ismail Khan Bench through Writ Petition No. 609-D/2015 for redressal of her grievances. During pendency of writ petition, the respondent No. 3 submitted the comments, wherein, it was mentioned that a candidate namely Mst. Shafqat Nooren was adjusted against the post of appellant. Thereafter, the Honourable High Court also impleaded Mst. Shafqat Nooren as respondent to the writ petition, however, during pendency of writ petition, the respondent No. 4 adjusted



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the appellant against the vacant post of PST in the said school vide office order No. 1141-44 dated 21.09.2016. After that, the appellant once again started her duty and the monthly salary of the appellant was also released. During that period, Mst. Shafqat Nooren was also performing her duty in the same school and also receiving the monthly salary, hence it was clear that the post of PST were available there. But, just after three months, the appellant was stopped from performing her duty in the school and the monthly salary of the appellant was also stopped by the respondents without showing any cause. On 27.10.2021, the writ petition of the appellant was fixed for hearing when Mr. Adnan Ali, Assistant Advocate General produced the copy of impugned office order No. 5583-89 dated 27.04.2017 vide which the service of the appellant was declared null & void from her initial appointment. Previously, the appellant was neither informed nor served the impugned office order dated 27.04.2017 and due to the impugned office order the nature of case of the appellant was totally changed, therefore, the appellant withdrew her writ petition with the permission to approach the proper forum for redressal of her grievances. Therefore, the present appellant filed the Departmental Appeal on 23.11.2021 through registered post to Director Education, KPK, Peshawar but the same was not decided by the authority, hence the appellant filing the instant appeal on the following grounds;

**GROUND:**

1. That the impugned office order dated 27.04.2017 issued by respondent No. 3 is illegal, against the natural justice, ulterior

motives, based on malafide and ineffective upon the rights of the appellant.

2. That the appellant appeared in test & interview and, thereafter, she was appointed on the recommendation of Departmental Selection Committee. Thus, it is very much clear that the appointment of the appellant was not illegal or irregular. But the respondent No. 3 illegally and without any reason issued the impugned office order dated 27.04.2017.
3. That the appellant was eligible candidate for the appointment against the subject post and qualified in the recruitment process, but the respondents clearly ignored the same and declared the appointment order of the appellant as void without giving any show cause notice to appellant.
4. That during pendency of writ petition, the respondent No. 4 adjusted the appellant against the vacant post of PST in the said school vide office order No. 1141-44 dated 21.09.2016. Thereafter, the appellant again started her duty and the monthly salary of the appellant was also released. During that period, Mst. Shafqat Nooren was also performing her duty in the same school and also receiving the monthly salary, hence it was clear that the post of PST were available there. But, the respondent No. 3 while issuing the impugned office order totally ignored this pivotal aspect and erroneously declared the service of the appellant as null & void. Hence, the impugned office order is liable to be set aside.
5. That no proper procedure was adopted by respondent No. 3 while issuing the impugned office order, hence on this score alone the impugned office order is liable to be reversed.
6. That the appellant is the victim of unlawful and illegal act of the respondents and such a malafide act on the part of respondents is against the law and rules, without jurisdiction and lawful authority, against the natural justice, misuse of official powers and is the outcome of victimization known by

(5)

the respondents and it has caused an immense mental torture and agony to the appellant.

7. That the counsel for the appellant may kindly be allowed to raise the additional grounds at the time of arguments.
8. That the departmental appeal of the appellant was well within time after getting the copy of Impugned office order dated 27.04.2017, and the service appeal is being filed within the statutory period prescribed in section 4 of The KPK Service Tribunals Act, 1974, however, if the Honourable Tribunal considered the appeal as time barred then the delay is liable to be condoned.

It is, therefore, prayed that on acceptance of this appeal this court may be pleased to pass orders as prayed for in the heading of this appeal.

Dated: \_\_\_/04/2022

Humble Appellant

*Arshia Latif*  
Arshia Latif

Through Counsel

Muhammad Mohsin Ali  
Advocate High Court,  
District Courts, D.I.Khan.

6

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

Appeal No. \_\_\_\_\_/2022

Mst. Arshai Latif

.....APPELLANT

**VERSUS**

Govt. of KPK and others

.....RESPONDENTS

**AFFIDAVIT**

I, the appellant, do hereby solemnly affirm and declare on oath that all the para-wise contents of the appeal are true and correct to the best of my knowledge and belief; and that nothing has been deliberately concealed or kept secret from this Honourable Court.

*Arshai Latif*  
**Deponent**

***Identified by Counsel***

7

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

Appeal No. \_\_\_\_\_/2022

Mst. Arshia Latiaf

.....APPELLANT

**VERSUS**

Govt. of KPK and others

.....RESPONDENTS

**ADDRESSES OF THE PARTIES**

Mst. Arshia Latif daughter of Abdul Latif resident of Mohallah  
Ustad Qadirdad Wala, Muryali, Tehsil & District Dera Ismail Khan.

.....APPELLANT

1. Government of Khyber Pakhtunkhwa through Secretary Education Govt. of K.P.K, Peshawar.
2. Director Education (Elementary & Secondary), Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female), Dera Ismail Khan.
4. SDEO (Female), Education Department, Dera Ismail Khan.

.....RESPONDENTS

Dated: \_\_/04/2022

Humble Appellant

*Arshia Latif*  
Arshia Latif

Through Counsel

Muhammad Mohsin Ali  
Advocate High Court,  
District Courts, D.I.Khan.

7-A

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

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

Mst. Arshia Latif

.....APPELLANT

**VERSUS**

Govt. of KPK and others

.....RESPONDENTS

**APPLICATION FOR CONDONATION OF DELAY FOR  
FILLING THE ABOVE TITLED APPEAL.**

**RESPECTFULLY SHEWETH:**

1. That the present petitioner is filling the above titled appeal before this Honourable Tribunal.
2. That the impugned order is against the law and facts.
3. That due to unavoidable circumstances the delay has been occurred as the petitioner was seriously ill, therefore, the delay for filling the appeal may kindly be condoned as the petitioner has got a very good prima facie case and it is a very important issue, which requires an authoritative pronouncement.
4. That this Honourable Tribunal has got vast power to entertain the instant petition.

It is therefore, humbly prayed that on the acceptance of instant petition, the delay for filling the Appeal may kindly be condoned.

**Your Humble Petitioner**

*Arshia Latif*

**Through Counsel**

*Muhammad Mohsin Ali*

**Muhammad Mohsin Ali  
Advocate Supreme Court.**

**Dated: \_\_/\_\_/2022**

7-B

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

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

Mst. Arshia Latif

.....APPELLANT

**VERSUS**

Govt. of KPK and others

.....RESPONDENTS

**APPLICATION FOR CONDONATION OF DELAY FOR  
FILLING THE ABOVE TITLED APPEAL.**

**AFFIDAVIT:**

I, Mst. Arshia Latif daughter of Abdul Latif resident of Mohallah Ustad Qadirdad Wala, Muryali, Tehsil & District Dera Ismail Khan, the petitioner, do hereby solemnly affirm and declare on Oath that all the para-wise contents of the petition are true and correct to the best of my knowledge and belief; and that nothing has been deliberately concealed or kept secret from this Honourable court.

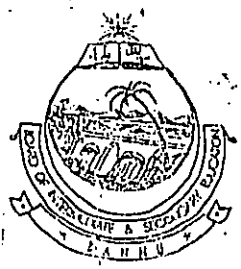
Arshia Latif  
Deponent

No. 5549  
Roll No. 52450

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

(B)  
ANNEX A  
Page # 8

Board of Intermediate and Secondary Education



BANNU (N.W.F.P.), PAKISTAN  
SCHOOL CERTIFICATE EXAMINATION  
SESSION 2005 ANNUAL

This is to Certify that Arshia Latif

Daughter of Abdul-Latif

Student of Govt. Girls High School No. 7, D.I.Khan

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Bannu held in March, 2005 as a Regular candidate.

She obtained 680 marks out of 1050 and has been placed in Grade B

Representing Very Good. The candidate passed in the following subjects:

1. English	2. Urdu	3. Islamiyat	4. Pakistan Studies
5. Mathematics	6. Physics	7. Chemistry	8. Biology

Date of birth according to Registration record: 03 March, Nineteen Eighty-Nine (03-03-1989)

Date of declaration of Result: 20-06-2005

Prepared on: March 5, 2007

Assistant Secretary

SECRETARY

This certificate is issued without alteration or erasure

08/03/07



**RESULT CARD**

Roll No : 52450  
 Group : Science  
 Registration No : 010-B-GD-7-1-03  
 Certificate No : 20552450

Session 2005 (Annual Part-II)

*H*  
*AAH*  
*9*

This is to certify that  
 Son / Daughter of Arshia Latif  
 and a student of Abdul Latif  
Govt. Girls High School No. 7, Dikhan  
 has secured the marks shown against each subject, in the Secondary School Certificate  
 Examination of the Board of Intermediate & Secondary Education, Bannu, held in March, 2005  
 as Regular Candidate

Subject	Marks	MARKS OBTAINED					
		9Th		10Th		Total	In Words
		Theory	Pract	Theory	Pract		
1. English	75	47	-	52	-	99	Ninety-Nine
2. Urdu	75	50	-	59	-	109	One Hundred Nine
3. Islamiyat (Comp)	75	44	-	-	-	44	Forty-Four
4. Pakistan Studies	75	-	-	40	-	40	Forty Only
5. Mathematics	75	58	-	42	-	100	One Hundred Only
6. Physics	75	42	11	45	13	111	One Hundred Eleven
7. Chemistry	75	25	11	40	13	89	Eighty-Nine
8. Biology	75	27	12	35	14	88	Eighty-Eight.

Total 1050  
 680-B Six Hundred Eighty Only  
 Remarks

Date of Birth according to Registration Record: 03-03-1989 (03 March, Nineteen Eighty-Nine)  
 Date of Declaration of Result: 20-06-2005  
 Prepared by: \_\_\_\_\_  
 Checked by: \_\_\_\_\_  
 Date of Issue: 20-06-2005

*[Signature]*  
 Controller of Examinations  
 Board of Intermediate and  
 Secondary Education, Bannu

(Compiled by IIT Computer Cell, Bannu)

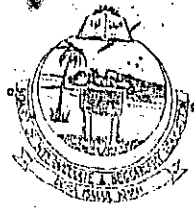
BOARD OF INTERMEDIATE AND SECONDARY EDUCATION  
DERA ISMAIL KHAN W-W.F.P (PAKISTAN)

45

Serial No 25163

Roll No 20163

Group Pre-Medical



Session 2007

Registration No Q7-b-fafad-05

Attempt First

HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION

DECLARATION CERTIFICATE

10

In favour of Mr./Miss. Arshia Latif  
Son / Daughter of Mr. Abdul Latif  
who has qualified for award of Higher Secondary School Certificate at the  
Examination held in the month of May 2007 as a Regular  
candidate of FFF College For Girls Dikhan  
securing 396 marks as per statement given below. He/She  
has been placed in grade B representing Very Good

SUBJECT-WISE STATEMENT OF MARKS

Subject	Total Marks	Part-I		Part-II		Obtained Marks	In Words
		Theory	Practical	Theory	Practical		
English (Comp)	200	58	--	71	--	129	One Hundred and Twenty Nine
Urdu (Comp)	200	69	--	58	--	127	One Hundred and Twenty Seven
Islamic Edu	50	37	--	--	--	37	Thirty Seven
Pakistan Studies	50	--	--	36	--	36	Thirty Six
Physics	200	40	20	32	20	112	One Hundred and Twelve
Chemistry	200	51	19	51	17	138	One Hundred and Thirty Eight
Biology	200	47	20	32	18	117	One Hundred and Seventeen
Grand Total:	1100					696	

(Marks in words) Six Hundred and Ninty Six

Remarks:

Date of declaration of result 10-08-2007

Date of Issue 10-08-2007

Prepared by Muhammad Arshad

Checked by Muhammad Ashfaq

Note:

- This certificate is issued without alteration or erasure.
- Error / omission excepted.

CONTROLLER OF EXAMINATIONS  
B.I.S.E. DERA ISMAIL KHAN

Grading

- 80% and above
- 70% and above but below 80%
- 60% and above but below 70%

- A-1. (Exceptional)
- A. (Excellent)
- B. (Very Good)

- 50% and above but below 60%
- 40% and above but below 50%
- Below 40% to minimum Pass Marks

- C (Good)
- D (Fair)
- E (Satisfactory)

Frontier Education Foundation Degree College For Girls

Serial No



Dera Ismail Khan

Provisional Certificate

This is Certified that Miss Amra Latif D/o Abdul Latif a regular student of " FEF Degree College For Girls DERA ISMAIL KHAN" has appeared in F.A/ F.Sc 200 Annual Examination taken by board of Intermediate & Secondary Education(BISE), D.I.Khan held in May 2007 Under Roll No 3016 Registration No 10000000000000000000

According to the Result Statement, she has passed her Examination in 1st Grade/Division securing 676 out of 770 marks.

Her date of birth according to the College record is 03-03-1981

CHARACTER CERTIFICATE

This is Certified that Miss Amra Latif D/o Abdul Latif was a regular student of this college. Her conduct during her stay in this college was good.

Date: 1 200

[Signature]  
Principal

FEF Degree College For Girls  
Dera Ismail Khan

Note: The Examination was taken as whole/in parts

[Signature]  
Principal

Roll No. 387

GOVT. COLLEGE FOR WOMEN NO. 2 DERA ISMAIL KHAN



PROVISIONAL CERTIFICATE

SESSION 2009.

I certify that Miss Ashia Latif  
Daughter of Mr. A. Baul Latif  
Sister No. 1321-DIK appeared from the College in the B.Sc/B.Z.  
Examination held in June 2009 has according to "Gazette Notification"  
supplied to me by the Registrar, Gomal University, D.I.Khan been declared  
successful in the said Examination.

NOTE: This certificate is given only with the object of enabling to admitted to a College /  
Department and is not be held equivalent to the Certificate to be given by the Registrar,  
Gomal University, Dera Ismail Khan.

Marks Obtained 295 Grade 2nd Div

SUBJECTS 1. Botany 2. Chem 3. 200s  
4. 1st Grad 5. - 6. -

Conduct: GOOD

Prepared by Aslam

Dated D.I.Khan 28/8/09

Arif  
PRINCIPAL

Govt. College for Women No.2  
Dera Ismail Khan

MAQBOOL PRESS DIK 713675

175  
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**DETAILED MARKS CERTIFICATE**  
**B.Sc. EXAMINATION PART II**

Roll No: 387

Held in May-June 2009

Name: Arshia Latif

Session. 2009/Annual

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The Candidate secured the following marks & has been placed in 2nd Division.

SUBJECT	Total No of Marks Allotted	MARKS OBTAINED	
		In Figure	In Words
English	75	-	-
Botany	75	-	-
Physics	75	37	Thirty Seven
Chemistry	75	-	-
Computer Science	75	47	Forty Seven
Zoology	75	-	-
A. Course of Maths	75	35	Thirty Five
B. Course of Maths	75	-	-
Statistics	75	-	-
Geography	75	-	-
Economics	75	-	-
Pak Studies	40	16	Sixteen
Aggregate Part-I	285	160	One Hundred and Sixty
Total Marks	550	295	Two Hundred and Ninty Five

Result Declaration Date 11/09/2009

Additional Controller of Examinations  
 City Campus, Gomal University,  
 Dera Ismail Khan.



# DETAILED MARKS CERTIFICATE

## BACHELOR OF EDUCATION (Private)

Held in April-May 2010

Session 2009/Annual

Roll No: 923Name: ARSHIA LATIFThe Candidate secured the following marks & has been placed in 2nd Division.

## SUBJECT

Total No of  
Marks  
Allotted

## MARKS OBTAINED

In Figure

In Words

SUBJECT	Total No of Marks Allotted	MARKS OBTAINED	
		In Figure	In Words
CE/School Society and Teacher	50	37	Thirty Seven
Perspective of Education	100	47	Forty Seven
School Organization and Classroom Management	100	52	Fifty Two
Human Development Learning	100	45	Forty Five
Education Measurement Evaluation	100	56	Fifty Six
Education Technology	100	62	Sixty Two
Curriculum and Instruction	100	45	Forty Five
English (Comp)	100	38	Thirty Eight
Viva Voce	50	-	-
Teaching of English	100	-	-
Teaching of Urdu	100	-	-
Teaching of Pak Studies	100	-	-
Teaching of Islamiyat	100	-	-
Teaching of Chemistry	100	-	-
Teaching of Physics	100	54	Fifty Four
Teaching of Bio	100	-	-
Teaching of Math	100	64	Sixty Four
Computer/Guid: and Counse/ School Teachers	50	31	Thirty One
Essay	50	-	-
Project and Practical Skill	200	133	One Hundred and Thirty Three
Total Marks	1200	664	Six Hundred and Sixty Four

Result Declaration Date. 30/03/2011

Errors &amp; Omissions Accepted

Additional Controller of Examination  
City Campus, Gomal University,  
Dera Ismail Khan.



# DETAILED MARKS CERTIFICATE

## MASTER OF ARTS URDU FINAL

Held in April-May 2014

Session 2013/Annual

Roll No: 1041

Name: ARSHEE LATHI

The Candidate secured the following marks &amp; has been placed in 2nd. Division.

SUBJECT	Total No of Marks	MARKS OBTAINED	
		In Figure	In Words
Urdu Poetry and Masnavi	100	51	Fifty One
Det: Study of Iqbal	100	46	Forty Six
Hist: of Urdu Language	100	35	Thirty Five
Essay	100	46	Forty Six
Viva Voce	100	40	Forty
Aggregate Previous	300	137	One Hundred and Thirty Seven
Total Marks	800	355+5=360	Three Hundred and Sixty

Result Declaration

Date: 01/12/2014

Errors &amp; Omissions Accepted

*M. J. Khan*  
Controller of Examinations  
Gomal University,  
Dera Ismail Khan.

**ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD**  
**PROVISIONAL RESULT CARD**



Roll No. 202550

Name: **PARSHIA LATIF**  
 Name: **ABDUL LATIF**  
 Address: **ILL AND P.O MARYALI MOH QADIR DAD KHAN**  
 WALA  
 District: **G. I. KHAN**  
 District: **G. I. KHAN**  
 Successfully completed: **PRIMARY TEACHING CERTIFICATE**

Roll No. **AN679441**  
 Registration No. **08NDNO1738**  
 Final Semester **AUT- 2012**

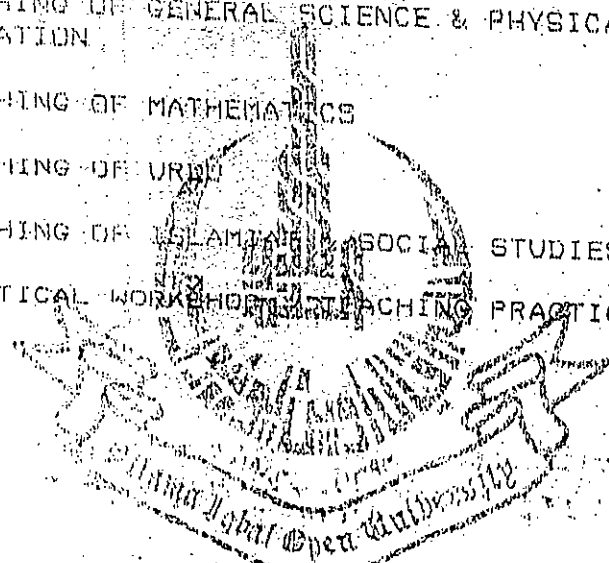
**27**

**AAMIS**

detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
PR-- 12	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	67
SPR-- 12	0614	SCHOOL ORGANIZATION & MANAGEMENT	100	74
SPR-- 12	0614	EDUCATIONAL PSYCHOLOGY	100	70
SPR-- 12	0613	PRINCIPLES OF EDUCATION	100	71
AUT-- 12	0619	TEACHING OF GENERAL SCIENCE & PHYSICAL EDUCATION	100	76
AUT-- 12	0618	TEACHING OF MATHEMATICS	100	71
AUT-- 12	0617	TEACHING OF URDU	100	64
AUT-- 12	0620	TEACHING OF ISLAMIC & SOCIAL STUDIES	100	80
AUT-- 12	0611	PRACTICAL WORKSHOPS/TEACHING PRACTICE	100	90

**16**



CREDITS: 5

Total Marks / Obtained

900 / 663

Result Declared on **JUNE 24, 2013**

Percentage / Grade

74 A

Date of issue **JULY 04, 2013**

*Handwritten Signature*

**Controller of Examinations**

**Disclaimer:**  
 This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.



#2

Annex (E)

ANNEX B  
Page # 17

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

APPOINTMENT ORDER:-

Appointment upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of PRIMARY SCHOOL TEACHER (PST) School Based in BPS-12 (Gs. 2000-500-22000) @ Rs. 7000/- fixed plus usual allowances as admissible under the rules of Adhoc Basis on contract under the existing policy of the Provincial Government w.e. from 28.05.2014 in Teaching Cadre on the terms and condition given below.

S.No	ROLL NO	NAME	FATHER NAME	CNIC	MARKS	PLACE OF POSTING
	1761285	Arshia Latif	Abdul Latif	12101-1822363-8	108.3	GGPS, Muryah Dikhan.

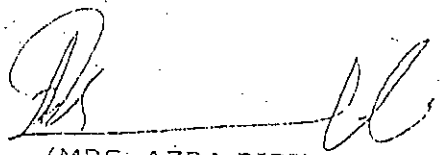
TERMS & CONDITIONS:-

1. No. TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on Adhoc Basis initially for one year from the date of issuance.
4. She should not be handed over charge if she exceeds 35 years or below 18 years. Age relaxation case may be submitted to competent authority (if required).
5. Appointment is subject to the condition that the certificate/ documents must be verified from the concerned authorities by D.E.O. any one found producing bogus certificates will be reported to the law enforcing agencies for further action. Expenditure on verification will be borne by the appointment.
6. Her service are liable to termination on one month's notice from either side. In case of resignation without notice her one pay/ allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate regarding verification of her documents is issued by this office.
8. She should join her post within 15 days of the issuance of this certificate. In case of failure to join the post within stipulated period, her appointment will be deemed to have expired automatically and no subsequent appeal or appeal will be entertained.

17-A

17-A

9. Before handing over charge, she will have to sign an agreement with Department on prescribed form otherwise this order will not be valid.
10. She will be governed by such rules and regulations as may be issued from time to time by Govt.
11. Her services shall be terminated at any time, in case her performance is found unsatisfactory during the period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
12. Her appointment is made on school basis, she will have to serve at the place of posting and her service is not transferable to any other station.
13. Before handing over charge, once again their documents may be checked by DDO concerned, if they have not the required relevant qualifications as per rules on in case of any degree/ certificate issued after January 20, 2014 against which she claimed score for merit they may not be handed over charge of the post.



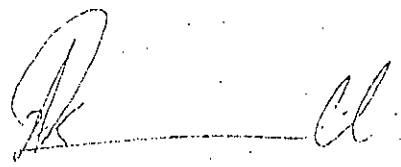
(MRS. AZRA BIBI)  
DISTRICT EDUCATION OFFICER,  
(FEMALE) DERA ISMAIL KHAN

Endst: No 8128-34 /PST/F

Dated DIKhan the 22 / 8 / 2014.

Copy forwarded for information and necessary action to:

1. The Director, E&SE Khyber Pakhtunkhwa, Peshawar.
2. The District Comptroller of Accounts D.I.Khan.
3. The PS to Secretary to Govt: of Khyber Pakhtunkhwa E&SE Department, Peshawar.
4. The Sub Divisional Education Officer, (Female) D.I.Khan.
5. The Head Mistress concerned.
6. The Candidate concerned.
7. Master file.



(MRS. AZRA BIBI)  
DISTRICT EDUCATION OFFICER,  
(FEMALE) DERA ISMAIL KHAN

Suspension

18

سازمان اسناد و کتابخانه ملی جمهوری اسلامی ایران

سازمان اسناد و کتابخانه ملی جمهوری اسلامی ایران

ردیف	عملیات محمد حاتم			عمر تیسیم لطیف			عبدالحمید حسینی			تاریخ		
	روزانه	دو هفته	سه هفته	روزانه	دو هفته	سه هفته	روزانه	دو هفته	سه هفته			
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	1
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	2
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	3
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	4
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	5
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	6
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	7
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	8
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	9
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	10
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	11
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	12
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	13
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	14
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	15
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	16
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	17
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	18
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	19
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	20
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	21
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	22
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	23
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	24
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	25
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	26
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	27
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	28
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	29
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	30
P	12.30	P	7.30	A	12.30	A	7.30	A.T	12.30	A.T	7.30	31

Samira Dabab



گورنمنٹ گریجویٹ ٹیچرز کالج سرگودھا

بابت ماہ نومبر

سلسلہ	تاریخ	مظاہر محمد زوال			عمر نسیم لطیف			عزیز امین			مذمت			
		آد	دستخط	رواگی	آد	دستخط	رواگی	آد	دستخط	رواگی				
8.30	1	P			8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	1
8.30	2	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	2
8.30	3				8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	3
8.30	4				8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	4
8.30	5	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	5
8.30	6	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	6
8.30	7	P	12.25	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	7
8.30	8	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	8
8.30	9	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	9
8.30	10	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	10
8.30	11	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	11
8.30	12	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	12
8.30	13	P	12.25	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	13
8.30	14	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	14
8.30	15	P	12.25	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	15
8.30	16	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	16
8.30	17	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	17
8.30	18	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	18
8.30	19	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	19
8.30	20	P	12.25	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	20
8.30	21	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	21
8.30	22	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	22
8.30	23	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	23
8.30	24	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	24
8.30	25	P	12.25	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	25
8.30	26	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	26
8.30	27	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	27
8.30	28	P	12.25	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	28
8.30	29	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	29
8.30	30	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	30
8.30	31				8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	31

تمہیلات عمر المرام

C/Leave

C-Leave

C/Leave

میزان	باقی	مال	میزان	باقی	مال
5	3	2	4	3	1
میزان	باقی	مال	میزان	باقی	مال

Samina

21

بابت ماہ دسمبر

بابت ماہ دسمبر

2016

روز	دستخط	آء	دستخط	روز	دستخط	آء	دستخط	روز	دستخط	آء	دستخط	روز	دستخط	آء	دستخط
P	1-35	P	8-30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	1	S.P	1-35	
P	1-35	P	8-30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	2	S.P	1-35	
P	1-35	P	8-30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	3	S.P	1-35	
P	1-35	P	8-30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	4	S.P	1-35	
P	1-35	P	8-30	A.L	12.00	A.L	8.30	A.T	19.00	A.T	8.30	5	S.P	1-35	
<del>P</del>	<del>1-35</del>	<del>P</del>	<del>8-30</del>	<del>A.L</del>	<del>1.35</del>	<del>A.L</del>	<del>8.30</del>	<del>A.T</del>	<del>1.35</del>	<del>A.T</del>	<del>8.30</del>	6	S.P	12-00	
<del>P</del>	<del>1-35</del>	<del>P</del>	<del>8-30</del>	<del>A.L</del>	<del>1.35</del>	<del>A.L</del>	<del>8.30</del>	<del>A.T</del>	<del>1.35</del>	<del>A.T</del>	<del>8.30</del>	7	<del>S.P</del>	<del>1-35</del>	
P	1-35	P	8-30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	8	S.P	1-35	
P	1-35	P	8-30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	9	S.P	1-35	
P	1-35	P	8-30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	10	S.P	1-35	
P	1-35	P	8-30	C/leave				A.L	1.35	A.T	8.30	11	S.P	1-35	
P	1-35	P	8-30	A.L	12.00	A.L	8.30	A.T	12.00	A.T	8.30	12	S.P	1-35	
<del>P</del>	<del>1-35</del>	<del>P</del>	<del>8-30</del>	<del>A.L</del>	<del>1.35</del>	<del>A.L</del>	<del>8.30</del>	<del>A.T</del>	<del>1.35</del>	<del>A.T</del>	<del>8.30</del>	13	S.P	12-00	
<del>P</del>	<del>1-35</del>	<del>P</del>	<del>8-30</del>	<del>A.L</del>	<del>1.35</del>	<del>A.L</del>	<del>8.30</del>	<del>A.T</del>	<del>1.35</del>	<del>A.T</del>	<del>8.30</del>	14	<del>S.P</del>	<del>1-35</del>	
P	1-35	P	8-30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	15	S.P	1-35	
P	1-35	P	8-30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	16	S.P	1-35	
												17	S.P	1-35	
												18			
												19			
												20			
												21			
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												28			
												29			
												30			
												31			
سابقہ	حالیہ	میزان	سابقہ	حالیہ	میزان	سابقہ	حالیہ	میزان	سابقہ	حالیہ	میزان	میزان	میزان	میزان	میزان
5	1	4	4	4	4	4	4	4	4	4	4	9	9	9	9

روز	دستخط	آء	دستخط	روز	دستخط	آء	دستخط
26	P	1-35	P	8-30	A.L	1.35	A.L
27	P	1-35	P	8-30	A.L	1.35	A.L
28	P	1-35	P	8-30	A.L	1.35	A.L
29	P	12-00	S.P	8-30	A.L	1.35	A.L
30	P	1-35	S-P.S	8-30	A.L	1.35	A.L
31	P	1-35	S-P.S	8-30	A.L	1.35	A.L

Samina

Samina

(Handwritten signature)

نمبر	عصا محمد خان			محمد نعیم لطیف			عصا محمد خان			نمبر			
	روز	وقت	نوع	روز	وقت	نوع	روز	وقت	نوع				
1										1			
2										2			
3										3			
4										4			
5										5			
6										6			
7										7			
8										8			
9										9			
10										10			
11										11			
12	P	1.30	P	8.30	A.L	1.35	A.L	8.30	C/Leave	8.30	12		
13	P	1.30	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	13
14	P	1.30	P	8.30	C/Leave				A.T	1.35	A.T	8.30	14
15	P	1.30	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	15
16	P	1.30	P	8.30	A.L	12.00	A.L	8.30	A.T	12.00	A.T	8.30	16
17	P	1.30	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	17
18													18
19	P	1.30	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	19
20													20
21	P	1.35	P	8.30	C/Leave				A.T	1.35	A.T	8.30	21
22	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	22
23	P	1.35	P	8.30	A.L	12.00	A.L	8.30	A.T	12.00	A.T	8.30	23
24	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	24
25													25
26	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	26
27	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	27
28	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	28
29	P	1.35	P	8.30	A.L	1.35	A.L	8.30	C/Leave				29
30	P	1.35	P	8.30	A.L	12.00	A.L	8.30	A.T	12.00	A.T	8.30	30
31	P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	31
موجودگی	میران		میران		میران		میران		میران		میران		میران
نفاذ	-		-		-		-		-		-		-
استحقاق													
بازی													
میران													

نقصات موسم  
سرما دوری  
بیماری

Saminia Gaba

استور رفته (روزگار امیری) کنترل سرپایی

23



28

بابت ماه فروری

عمر شیب		عمر شیب		عمر شیب		عمر شیب		عمر شیب		عمر شیب		عمر شیب	
PST		PST		PST		PST		PST		PST		PST	
روزگار	دستخط	آد	دستخط	روزگار	دستخط	آد	دستخط	روزگار	دستخط	آد	دستخط	روزگار	دستخط
/	/	/	/	/	/	/	/	/	/	/	/	/	/
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	1	/
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	2	S.P 1-35
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	3	S.P 1-35
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	4	S.P 1-35
/	/	/	/	/	/	/	/	/	/	/	/	5	/
P	1.35	P	8.30	A.L	12.00	A.L	8.30	A.T	12.00	A.T	8.30	6	S.P 12-
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	7	S.P 1-35
/	/	/	/	/	/	/	/	/	/	/	/	8	/
P	1.35	P	8.30	C/Leave				A.T	1.35	A.T	8.30	9	S.P 1-35
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	10	S.P 1-35
P	1.35	P	8.30	A.L	1.35	A.L	8.30	C/Leave				11	S.P 1-35
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	12	S.P 1-35
P	1.35	P	8.30	A.L	12.00	A.L	8.30	A.T	12.00	A.T	8.30	13	S.P 12-
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	14	S.P 1-35
/	/	/	/	/	/	/	/	/	/	/	/	15	/
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	16	S.P 1-35
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	17	S.P 1-35
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	18	C/Le
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	19	S.P 1-35
P	1.35	P	8.30	A.L	12-	A.L	8.30	A.T	12.00	A.T	8.30	20	S.P 12-
P	1.35	P	8.30	C/Leave				A.T	1.35	A.T	8.30	21	C/Le
/	/	/	/	/	/	/	/	/	/	/	/	22	/
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	23	S.P 1-35
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	24	S.P 1-35
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	25	S.P 1-35
P	1.35	P	8.30	A.L	1.35	A.L	8.30	A.T	1.35	A.T	8.30	26	S.P 1-35
P	1.35	P	8.30	A.L	12.00	A.L	8.30	A.T	12-	A.T	8.30	27	S.P 12-
P	1.35	P	8.30	A.L	1.35	A.L	8.30	C/Leave				28	S.P 1-35
												29	
												30	
												31	
بیزان	سابقہ	مال	بیزان	سابقہ	مال	بیزان	سابقہ	مال	بیزان	سابقہ	مال	بیزان	سابقہ
-	-	-	4	2	2	4	2	2	4	2	2	4	2

Samina Iqbal

Samina



بابت ماہ مارچ

نمبر	گورنمنٹ گریجویٹ کالج سرگودھا				گورنمنٹ کالج سرگودھا				گورنمنٹ کالج سرگودھا			
	دستخط	رواگی	دستخط	AT	دستخط	رواگی	دستخط	AT	دستخط	رواگی	دستخط	AT
1	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>
2	P	1:35	P	8:30	A.L	1:35	A.L	8:30	A.T	1:35	A.T	8:30
3	P	1:35	P	8:30	A.L	1:35	A.L	8:30	A.T	1:35	A.T	8:30
4	P	1:35	P	8:30	A.L	1:35	A.L	8:30	A.T	1:35	A.T	8:30
5	P	1:35	P	8:30	A.L	1:35	A.L	8:30	A.T	1:35	A.T	8:30
6	P	1:35	P	8:30	A.L	12:00	A.L	8:30	A.T	12:00	A.T	8:30
7	P	1:35	P	8:30	A.L	1:35	A.L	8:30	A.T	1:35	A.T	8:30
8	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>
9	P	1:35	P	8:30	C/Leave				A.T	1:35	A.T	8:30
10	P	1:35	P	8:30	A.L	1:35	A.L	8:30	A.T	1:35	A.T	8:30
11	P	1:35	P	8:30	A.L	1:35	A.L	8:30	A.T	1:35	A.T	8:30
12	P	1:35	P	8:30	A.L	1:35	A.L	8:30	A.T	1:35	A.T	8:30
13	P	1:35	P	8:30	A.L	12:00	A.L	8:30	A.T	12:00	A.T	8:30
14	P	1:35	P	8:30	A.L	1:35	A.L	8:30	A.T	1:35	A.T	8:30
15	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>
16	P	1:35	P	8:30	A.L	1:35	A.L	8:30	C/Leave			
17	P	1:00	P	8:00	A.L	1:00	A.L	8:00	A.T	1:00	A.T	8:00
18	P	1:00	P	8:00	A.L	1:00	A.L	8:00	A.T	1:00	A.T	8:00
19	P	1:00	P	8:00	A.L	1:00	A.L	8:00	A.T	1:00	A.T	8:00
20	P	1:00	P	8:00	A.L	11:30	A.L	8:00	A.T	11:30	A.T	8:00
21	P	1:00	P	8:00	A.L	1:00	A.L	8:00	A.T	1:00	A.T	8:00
22	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>
23	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>
24	P	1:00	P	8:00	C/Leave				A.T	1:00	A.T	8:00
25	P	1:00	P	8:00	A.L	1:00	A.L	8:00	A.T	1:00	A.T	8:00
26	P	1:00	P	8:00	A.L	1:00	A.L	8:00	A.T	1:00	A.T	8:00
27	P	1:00	P	8:00	A.L	11:30	A.L	8:00	A.T	11:30	A.T	8:00
28	P	1:00	P	8:00	A.L	1:00	A.L	8:00	A.T	1:00	A.T	8:00
29	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>	<del>.....</del>
30	P	1:00	P	8:00	A.L	1:00	A.L	8:00	A.T	1:00	A.T	8:00
31	P	1:00	P	8:00	A.L	1:00	A.L	8:00	A.T	1:00	A.T	8:00
مجموعہ	میزان	میزان	مال	مال	میزان	میزان	مال	مال	میزان	میزان	مال	مال
انتظامیہ					6	4	2	5	4	1		
انتظامیہ												
میزان												

محمد حسین صاحبزادہ

Inchaq  
D. Khan

کونسل کے لیے درخواستیں سول ریالی

حاضر کی تاریخ

بابت ماہ اپریل

25



2015

عطا محمد خان چونڈار		عشر شہ رطیف PST						PST			عہدہ	رواگی	دستخط	
رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	تاریخ			
											1			
											2			
											3			
											4			
											5			
											6			
											7			
P	12.30	P	7.30	A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	8	S.P	12-3
P	12.30	P	7.30	A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	9	S.P	12-3
P	12.30	P	7.30	A.L	11.00	A.L	7.30	A.T	11.00	A.T	7.30	10	S.P	11-0
P	12.30	P	7.30	A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	11	S.P	12-3
/	/	/	/	/	/	/	/	/	/	/	12	/	/	/
P	12.30	P	7.30	A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	13	S.P	12-3
P	12.30	P	7.30	A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	14	S.P	12-3
P	12.30	P	7.30	A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	15	S.P	12-3
P	12.30	P	7.30	C/leave			A.T	12.30	A.T	7.30	16	S.P	12-3	
P	11.30	P	7.30	A.L	11.30	A.L	7.30	A.T	11.30	A.T	7.30	17	S.P	11-3
P	12.30	P	7.30	A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	18	S.P	12-3
/	/	/	/	/	/	/	/	/	/	/	19	/	/	/
P	12.30	P	7.30	C/leave			A.T	12.30	A.T	7.30	20	C/		
P	12.30	P	7.30	A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	21	S.P	12-3
P	12.30	P	7.30	A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	22	S.P	12-
P	12.30	P	7.30	A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	23	S.P	12-
P	11-	P	7.30	A.L	11-	A.L	7.30	A.T	11-	A.T	7.30	24	S.P	11-2
P	12.30	P	7.30	A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	25	S.P	12-
/	/	/	/	/	/	/	/	/	/	/	26	/	/	/
				A.L	12.30	A.L	7.30	C/leave			27	S.P	12-	
				A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	28	S.P	12-
				A.L	12.30	A.L	7.30	A.T	12.30	A.T	7.30	29	S.P	12-
				A.L	12.30	A.L	7.30	C/leave			30	S.P	12-	
											31			
میزان	مبالغہ	مال	میزان	مبالغہ	مال	میزان	مبالغہ	مال	میزان	مبالغہ	مال	میزان	مبالغہ	مال
			8	6	2			7	5	2				

Samira Jafar

Samira

بابت ماہ \_\_\_\_\_

روز	عشرینہ شریف			حفیظہ حسین			تاریخ
	آمد	دستخط	رہائی	آمد	دستخط	رہائی	
1	12.35	A.I	7.30	A.T	12.35	A.T	7.30
2	12.35	A.I	7.30	A.T	12.35	A.T	7.30
3	12.35	A.I	7.30	A.T	12.35	A.T	7.30
4	12.35	A.I	7.30	A.T	12.35	A.T	7.30
5	12.35	A.I	7.30	A.T	12.35	A.T	7.30
6	12.35	A.I	7.30	C/Leave			
7	12.35	A.I	7.30	A.T	12.35	A.T	7.30
8	12.35	A.I	7.30	A.T	12.35	A.T	7.30
9	12.35	A.I	7.30	A.T	12.35	A.T	7.30
10	12.35	A.I	7.30	A.T	12.35	A.T	7.30
11	12.35	A.I	7.30	A.T	12.35	A.T	7.30
12	12.35	A.I	7.30	A.T	12.35	A.T	7.30
13	12.35	A.I	7.30	A.T	12.35	A.T	7.30
14	12.35	A.I	7.30	A.T	12.35	A.T	7.30
15	12.35	A.I	7.30	A.T	12.35	A.T	7.30
16	12.35	A.I	7.30	C/Leave			
17	12.35	A.I	7.30	A.T	12.35	A.T	7.30
18	12.35	A.I	7.30	A.T	12.35	A.T	7.30
19	12.35	A.I	7.30	A.T	12.35	A.T	7.30
20	12.35	A.I	7.30	C/Leave			
21	12.35	A.I	7.30	A.T	12.35	A.T	7.30
22	12.35	A.I	7.30	A.T	12.35	A.T	7.30
23	12.35	A.I	7.30	A.T	12.35	A.T	7.30
24	12.35	A.I	7.30	A.T	12.35	A.T	7.30
25	12.35	A.I	7.30	C/Leave			
26	12.35	A.I	7.30	A.T	12.35	A.T	7.30
27	12.35	A.I	7.30	C/Leave			
28	12.35	A.I	7.30	C/Leave			
29							
30							
31							

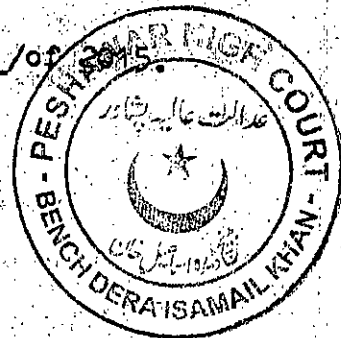
شماره دست	مال	سابقہ	بھران	مال	سابقہ
آفتاب	2	7	9	4	8
آفتاب					
بھاری					
بھران					

Signature

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

Writ Petition No. 609-D of 2015

ANNEX: C  
Page # 27



Arshia Batool daughter of Abdul Latif  
Resident of Mohallah Ustad Qadir Dad Wala,  
Muryali Tehsil and District D.I. Khan,  
PST Education Department, D.I. Khan.  
....Petitioner.

Filed today 2769

Add: Registrar.

15/9/2015

Versus

1. Government of Khyber Pakhtunkhwa  
through Secretary to Government of K.P.K  
Education Department, Peshawar.

2. Secretary to Government of K.P.K.  
Education Department, Peshawar.

3. Director Elementary & Secondary Education,  
K.P.K. Peshawar.

4. District Education Officer, (Female)  
D.I. Khan.

5. S.D.E.O. (Female) D.I. Khan.

6. Comptroller of Accounts DIKhan.

7. *Met. Shafiqat Nawaz u/o Abdul Ghafoor No. 10  
Qureshiya Wala, Tehsil and Dist. D.I. Khan.* Respondents

Writ Petition under Article 199 of the  
Constitution of Islamic Republic of Pakistan, 1973.

Respectfully Sheweth:-

1. That the addresses of the parties as given above are correct and sufficient for the purposes of service.
2. That the Petitioner is permanent resident of Mohallah Ustad Qadir Dad Wala, Muryali Tehsil and District D.I. Khan and hails from a respectable Baloch family. The copies of the NIC & domicile certificate are enclosed as Annexures-A&B.

Annexure-A&B

(Grounds) of WP No 609-D of 2015, title Arshia Batool Vs Govt of kpk

ATTESTED

EXAMINOR  
Peshawar High Court Bench,  
Dera Ismail Khan

28/10/2015

*vide order dated 11-10-15  
of the Honourable Court 2015  
OB.*

28

3. That the Petitioner was appointed as Primary School Teacher (PST) in BPS-12 in the GGPS Muryali Tehsil and District D.I.Khan on the recommendation of the Departmental Selection Committee, vide District Education Officer(Female) D.I.Khan order No.8128-34/PST/F dated 22/8/2014 on adhoc basis on contract under the existing policy of the Provincial Government on certain terms and conditions. The copy of the appointment order is enclosed as Annexure-C.

Annexure-C.

4. That it was invariably mentioned in the aforesaid appointment order that the service of the Petitioner will be liable to termination on one month's notice from either side and in case of resignation without notice her one pay/allowances shall be forfeited to the Government and that she will be governed by such rules and regulations as may be issued from time to time by the Govt.

5. That the Petitioner passed her Secondary School Certificate Examination from the Board of Intermediate & Secondary Education, Bannu in March, 2005 and passed her Higher Secondary School Certificate Examination during the session 2007 from the Board of Intermediate & Secondary Education D.I.Khan. She passed her B.Sc. Examination from the Gomal University, D.I.Khan during the session 2009 and also passed her M.A.Urdu Examination from the said University in the session 2013/Annual. Besides this the Petitioner is a trained PST and had passed her PST Examination from the Allama Iqbal Open University, Islamabad in the year, 2012. The copies of her testimonials are enclosed herewith as Annexure-D.

Annexure-D.

Filed to: 20769  
 Addl Registrar.  
 15/9/2015

SL

(Grounds) of WP No 609-D of 2015 title Arshia Batool Vs Govt of kpk

ATTESTED  
 EXAMINOR  
 Benawal High Court Bench,  
 D.I.Khan

26/10/22

Annexure-E.

5. That the Petitioner was marked always present at the place of her posting and was not found absent at any occasion. Copy of service book is Annexure-E.

6. That the Petitioner is performing her duties to the entire satisfaction of her superiors and there was no complaint whatsoever against her from any independent quarter, during her long tenure of one year service.

7. That the Petitioner was receiving her monthly pay regularly but the SDEO (Female) DIKhan and District Education Officer (Female) D.I.Khan and the District Comptroller of Accounts, DIKhan stopped payment of her monthly pay to the Petitioner from the last two months without any rhyme and reasons.

8. That the Petitioner has requested the concerned authorities to release her monthly pay to the Petitioner and also to extend the period of her service for further period and to regularize her services but no reply has been given to the Petitioner.

9. That the Petitioner is left with no other adequate remedy but to invoke the extraordinary constitutional jurisdiction of this Honourable Court by way of present writ petition to direct the Respondents No. 4 to 6 viz. (Female) the District Education Officer, DIKhan, SDEO (female) D.I.Khan and the Comptroller of Accounts D.I.Khan to release her monthly pay to the Petitioner with retrosepective effect and also to regularize her services as PST Teacher, on inter-alia, the following grounds:-

GROUNDS.

(Grounds) of WP No 609-D of 2015 title Arshad Bibi Vs Govt of Punjab admitted fact that

ATTESTED

EXAMINOR

Peshawar High Court Bench,  
Dera Ismail Khan

26/4/022

Filed today 769  
Addl. Registrar.  
15/9/2015

Sf

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her to continue her services further and to regularize her services on permanent basis to meet the ends of justice.

Your humble Petitioner

(Arshia Batool)  
Petitioner

Through Counsel.

SFL

D/-8.9.2015. (Saif-ur-Rahman Khan)  
Advocate, High Court, D.I. Khan.

Certificate

Certified that no other writ petition on the subject has earlier been filed by the Petitioner in this Hon'ble Court.

Advocate  
Counsel

D/-8.9.2015. Petitioner.

BOOKS

1. Constitution of Islamic Republic of Pakistan, 1973.
2. K.P.K. Govt. Servants (Efficiency & Discipline) Rules, 2011.

Filed today - 2769  
Addl: Registrar.  
15/9/2015

Name Saif-ur-Rahman Khan  
S/O Advocate

R/O D.I. Khan

On the identification of \_\_\_\_\_

On this 15/9 day of Sept 2015  
Verified the contents of the above

affirmation before me on oath

No 2648 Dated 15/9/2015

[Signature]  
Additional Registrar

Oath Commissioner

Deputy High Court

D.I. Khan Bench.

AFFIDAVIT

I, Saif-ur-Rahman Khan, Advocate High Court, D.I. Khan Counsel for the Petitioner do hereby solemnly affirm and declare that the contents of the instant writ as per information furnished to me by my client are true and correct to the best of my knowledge and belief and that nothing has been concealed from this August Court.

D/-8.9.2015.

SFL

Deponent.

ATTESTED

EXAMINOR

Deputy High Court Bench,

(Grounds) of WP No 609-D of 2015 title Arshia Batool Vs Govt of KPK

28/9/2015

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**BEFORE PESHAWAR HIGH COURT BENCH**  
**DERA ISMAIL KHAN.**

Writ Petition #. 609-D/2015

Mst; Arshia-Batool  
**VERSUS**  
Govt; of K.P.K etc



Memo:

**WRIT PETITION U/A 199 OF CONSTITUTION OF**  
**ISLAMIC REPUBLIC OF PAKISTAN, 1973.**

**COMMENTS ON BEHALF OF RESPONDENT NO. 4**

Filed today 3614

Add: Registrar.

01/12/15

Respectfully Sheweth:-

The para wise reply on the Writ Petition from the respondent No. 4 is as under:-

**PRELIMINARY OBJECTIONS.**

1. That the petitioner having low merit that's why her contract was not extended.
2. That on the acceptance of appeal of Mst; Shafqat Noureen (merit position 114.06) adjusted on the said post GGPS, Muryali, Dera Ismail Khan. Copies of affidavit & appointment order are attached.
3. That the present Writ Petition is not maintainable in its present form.
4. That the Writ Petition is based on malafide.
5. That the petitioner is not entitled for any relief.
6. That the petitioner has not approached this Honourable Court with clean hands.
7. That the DSC/DRC recommended not to extend the service of the present petitioner for any further period. Copy attached.

*Received  
Ans  
11/12/15*

ATTESTED

EXAMINOR

Peshawar High Court Bench,  
Dera Ismail Khan

(Comments) of WP No 609-D of 2015 title Arshia Batool Vs Govt of kpk

*26/12/15*



REPLY ON FACTS:-

1. That Para No. 1 is correct.
2. That Para No. 2 is correct.
3. That Para No. 3 is correct, to the extent of the petitioner having low merit & Shafqat Noureen whose merit was High then the petitioner. After recommendation of DSC/DRC the petitioner does not entitle for any further relief.
4. That Para No. 4 is incorrect.
5. That Para No. 5 need proof.
6. That Para No. 6 need proof.
7. That Para No. 7 is incorrect.
8. That Para No. 8 is correct.
9. That Para No. 9 is legal.

GROUND:-

1. That Para No. 1 is correct
2. That Para No. 2 is correct.
3. That Para No. 3 is correct, to the extent of appointment order based on the terms and conditions mentioned in the ad-hoc appointment orders. It is pertinent to mention here that all the appointments were for one year period, subject to scrutiny of the record, as clearly mentioned in the appointment order. That the under signee in those days were tasked to recruit more than 600 candidates on ad-hoc basis. The under signee even issued letter No. 8279-83 dated 23/08/2014 to all the concerned, to not to handover charge to the appointees prior full satisfaction / consultation and verification of their orders. Copy is annexed. As the under-signee was planned to perform Hajj and after return back from Hajj the under signee services were suspended (the inquiry later on finalized in exoneration of the petitioner which is annexed for the kind perusal of this Honourable Court) the appointment in question was done in good faith without any stigma of malafide.
4. That Para No. 4 need proof.
5. That Para No. 5 is incorrect. Petitioner having low merit due to which her services may not be extended further.

Filed today 3614  
 dt: Registrar  
 11/12/2015

(Comments) of WP No 639-D of 2015 title Arshia Batool Vs Govt of kpk

ATTESTED

EXAMINOR  
Peshawar High Court Bench,  
Khan

28.11.2015

6. That Para No. 6 is incorrect.

It is, therefore, humbly prayed that Writ Petition against respondent No. 4 may kindly be dismissed according to law.

Humble Respondent No. 4

Dated: /11/2015

*[Signature]*

DISTRICT EDUCATION OFFICER  
(FEMALE)  
Dera Ismail Khan.

Filed today 3614

Addl Registrar.

01/12/2015

**AFFIDAVIT**

I, Abdul Salam, on behalf of respondent No. 4 is hereby authorized to pursue the instant case and do hereby solemnly affirm and declare on oath that all contents of para wise comments/are true and correct, to the best of my knowledge and belief. Nothing has been concealed from this Honourable Court.

*[Signature]*  
12/01-1597502-5

*[Signature]*  
DEPONENT

Identified by

*[Signature]*

Additional Advocate-General  
High Court Khyber Pakhtunkhwa,  
D.I.Khan

Name Abdul Salam Digh  
S/O Educator official  
R/O D.I. Khan  
On the Identification of DDG.

On this 01st day of Dec 2015  
Verified the contents of the above  
affirmation before me on oath  
No 3361 Dated 01/12/2015

*[Signature]*  
Additional Registrar  
Oath Commissioner  
Peshawar High Court  
D.I.Khan Bench.

ATTESTED

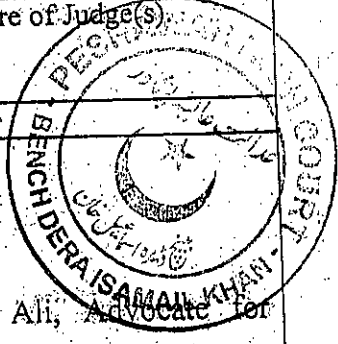
EXAMINOR  
Peshawar High Court Bench,  
Dera Ismail Khan

26/12/2015

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**PESHAWAR HIGH COURT, D.I.KHAN BENCH**

**FORM OF ORDER SHEET**

Date of Order or proceedings (1)	Order or other proceedings with signature of Judge(s) (2)
27.10:2021	<div data-bbox="1109 356 1444 700" style="text-align: right;">  </div> <p><u>W.P.No.609-D/2015 with C.M.No.642-D/2015.</u></p> <p><u>Present:</u> Muhammad Mohsin Ali, Advocate for petitioner.</p> <p>Mr. Adnan Ali, Asstt: A.G. for respondents No.1 to 6.</p> <p>Nemo for respondent No.7.</p> <p style="text-align: center;">***</p> <p><b>ABDUL SHAKOOR, J.:-</b> Through the instant petition filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, the petitioner is seeking the following relief:-</p> <p style="margin-left: 40px;">“In wake of the above submissions, it is respectfully prayed that on acceptance of this writ petition, the respondents No.4 to 6 viz DEO (F), D.I.Khan, SDEO (F), D.I.Khan and Comptroller of Accounts, D.I.Khan may very kindly be directed to make payment of the monthly salary of the petitioner for the last two months and onward and to allow her to continue her services further and to regularize her services on permanent basis to meet the ends of justice.”</p> <p>2. At the very outset, learned Asstt: A.G. representing respondents No.1 to 6 produced order bearing Endst: No.5583-89 dated 27.4.2017 issued by respondent No.4, whereby the services of the petitioner</p>

AD

ATTESTED

EXAMINOR  
Peshawar High Court Bench,  
Dera Ismail Khan

26/10/2021

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were declared as null and void from the date of her taking over charge. Learned counsel appearing on behalf of the petitioner stated that the petitioner is not in knowledge of the said letter and he himself came to know about it today. He stated that this letter has completely changed complexion of the case, therefore, petitioner wants to withdraw the instant petition in order to call in question the aforesaid termination order of her service which, as hinted hereinabove, came in her knowledge today.

3. In view of above, this writ petition is dismissed as withdrawn. However, the petitioner is at liberty to approach the competent authority/forum for the redressal of her grievance arising as consequence of aforesaid termination order of her service and otherwise.

Announced  
Dt: 27.10.2021.

  
JUDGE

  
JUDGE

*Office  
28/x*

ATTEST

EXAMINOR  
Peshawar High Court Bench  
Dera Ismael Khan

26/10/22


Inran/\*

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

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

ORDER

1. WHEREAS, Mst; Arshia Latif PST appointed vide order No; 8051-56 dated; 19-08-2014.
2. AND WHEREAS in light of recommendation of inquiry committee conducted by DEO vide order No; 24497 dated; 12.08.2015 and the committee made the recommendation that Mst, Arshia Latif PST appointed below merit hence her services was not extended
3. AND WHEREAS, after passage of 2 years order was issued by non-competent authority vide Endst No; 1003 dated; 05.10.2015 but competent authority DEO (F) had not gave approval.
4. AND WHEREAS she was adjusted by non-competent authority against vacant post without completion of codal formalities of appointment.
5. AND WHEREAS in this regard DEO (F) sought explanation of EX DDO Mst, Rizwana Jabeen in written reply she refused from her signature of this order and stated that she is not competent authority.
6. AND WHEREAS competent authority DEO (F) has not issued her appointment /order.
7. AND WHEREAS I Parveen khatak being competent authority and satisfied that you have committed the acts/omissions and proved yourself as Guilty of corruption and fraudulent.
8. Hence Services of Mst; Arshia Latif PST is hereby null and void from the date of taking over charge.

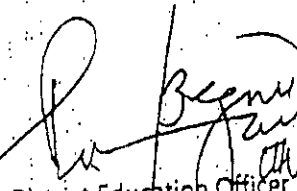
  
(PARVEEN KHATTAK)  
District Education Officer  
(Female) Dera Ismail Khan

Endst; No. 5583-89

Dated DI Khan the 22/4 /2017

Copy of the above is forwarded for information to the:-

- 1 Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. District Accounts officer DI Khan.
3. Deputy Commissioner DI Khan.
4. SDEO(F) pry DI Khan.
5. Accountant SDEO(F) DI Khan with the direction to calculate the salaries w.e.f the date of appointment up to date and submit report to this office immediately to recover the said amount from the beneficiary and also justify your position why the illegal drawl of salaries was made being responsible hand and why not reported to DDO.
6. Assistant Director Anti-Corruption DI Khan.
7. Official Concerned.

  
District Education Officer  
(Female) Dera Ismail Khan



OFFICE OF THE SUB DIVISIONAL EDUCATION  
OFFICER (FEMALE) DERA ISMAIL KHAN

Page # 3

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OFFICE ORDER:-

As per Affidavit submitted by the PST Teachers to the undersigned, the following Teachers are hereby Adjusted against Vacant Posts, the School noted against their names till the final conclusion of departmental proceedings/ Court decisions.

S.No	Name & Designation	Adjusted at
1	Amna Baiool PST.	GGPS Noor Salam Koroono
2	Rabia Noreen PST	GGPS Faizullah Koroono
3 ✓	Arshia Latif PST	GGPS Muryali
4	Rehana Parveen PST	GGPS Singhar Sharif
5	Aisha Inam PST	GGPS Chah Syed Munawar

The monthly salaries of the above teachers are hereby released with immediate effect subject to performance of their duties in the best interest of public service.

Sd/-  
Sub-Divisional Education  
Officer (Female) D.I. Khan.

Endst. No. 1141-44 / Dated DI Khan the 21/09/2016

Copy For Information:

1. DEO (Female) D.I. Khan with the request for approval please.
2. District Account Officer DI Khan.
3. ASDO Concerned.
4. Official Concerned.

Sub-Divisional Education Officer

(38)

چارج رپورٹ

(4)

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میں مسماہ عمر شہبہ لطیف بہن کو 5000 روپے کی رقم کے ساتھ ایجوکیشن کے مقاصد کے لیے

سکول میں آڈر نمبر 1141-46 کے تحت مورخہ 2016-19-09 کے تحت

مورخہ 2016-19-09 کے تحت مورخہ 2016-19-09 کے تحت

مورخہ 2016-19-09 کے تحت مورخہ 2016-19-09 کے تحت

Kheddad  
G.P.S. Murli  
Head Mistress  
D. I. Khan  
Date 23/9/2016

چارج دھندہ

چارج گرنیڈ  
Arshiahtif

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

No. \_\_\_\_\_  
Dated \_\_\_\_\_/01/2017.

The Hon. Dist. Education Officer,  
Dera Ismail Khan.

Subject: REGULARIZATION OF FIVE POSTS/STOPPAGE OF PAY.

Reference your letter No. 1455/01/22.12.2016, & Ex-000  
No. 01, dt: 03.01.2017, on the subject cited above.

It is stated for your information that the pay of the following PST teachers is hereby stopped with their  
performance.

S	Name of Teacher	Name of School
1	Umera Batool	GGPS, Manz Sahib Korani Dikhan.
2	Saba Maureen	GGPS, Fatmullah Korani Dikhan.
3	Farah Latif	GGPS, Muryali Dikhan.
4	Behana Parveen	GGPS, Singhar Sharif Dikhan.
5	Aishah Inam	GGPS, Chah Saib Munawar Dikhan.

*Sd/-*  
DISTRICT EDUCATION OFFICER  
(FEMALE) DIKHAN.

Distt No. 195 Dated Dikhan the 16 /01/2017.

Copy to:-

01. PA in Director ES & Education Dikhan for information please.

*A.S) DEU (act) of  
PI 2 rule and  
manual - Com P. Khan  
11-1-2017*

*Per Begum*  
DISTRICT EDUCATION OFFICER  
(FEMALE) DIKHAN

*Noted  
11/01/17*

*Received LHM  
12-01-17  
at 4 P.M*



## ڈائریکٹر ایلیمنٹری اینڈ سیکنڈری ایجوکیشن، خیبر پختونخواہ، پشاور

ANNEX: E

Page # (40)

حکمانہ اپیل برخلاف نوٹیفکیشن نمبر 89-5583 مورخہ: 27/04/2017 جاری کردہ ازالہ پروین خٹک ڈسٹرکٹ ایجوکیشن آفیسر (فی میل) ڈیرہ اسماعیل خان جس کی رو سے ڈسٹرکٹ ایجوکیشن آفیسر (فیمیل) ڈیرہ اسماعیل خان نے من ساٹھ کی ملازمت بطور PST کو از ابتداء سے null & void قرار دیا۔

جناب عالی: من ساٹھ ایپلانٹ حسب ذیل عرض رساں ہے۔

۱۔ یہ کہ من ساٹھ مستقل رہائشی و سکونتی محلہ استاد قادر دادوالا، مریالی تحصیل و ضلع ڈیرہ اسماعیل خان ہے۔ اور من ساٹھ نے ایم اے اردو کی ڈگری پاس کی ہے اور اسی طرح ساٹھ PST trained ہے جو کہ من ساٹھ نے اس نسبت امتحان علامہ اقبال یونیورسٹی اسلام آباد سے پاس کیا۔ نقول شناختی کارڈ، ڈومیسائل و تعلیمی اسناد ہمراہ لف ہیں۔

۲۔ یہ کہ محکمہ تعلیم ڈیرہ اسماعیل خان نے اساتذہ کی مختلف کٹگریز کی آسامیوں کی بھرتی کے لیے اشتہار جاری کیا جو کہ من ساٹھ نے PST (BPS-12) کی پوسٹ کے لیے اپلائی کیا اور باقاعدہ ٹیسٹ و انٹرویو میں پیش ہوئی اور ڈیپارٹمنٹل سلیکشن کمیٹی کی recommendation پر بحوالہ آفس آرڈر نمبر PST/F/34-8128 مورخہ 22/08/2014: گورنمنٹ گزٹ پر انٹری سکول مریالی ڈیرہ اسماعیل خان میں بطور PST تعینات ہوئی جو کہ ساٹھ کی یہ باتیں بمطابق پالیسی adhoc basis پر تھی۔ نقل حکم تعیناتی لف ہے۔

۳۔ یہ کہ من ساٹھ نے اپنے فرائض سرانجام دینے شروع کیے اور انتہائی ایمانداری اور محنت کے ساتھ اپنے فرائض سرانجام دیے جو کہ من ساٹھ کو باقاعدہ طور پر ماہوار تنخواہ بھی جاری ہوئی اور پھر ماہ جولائی 2015 میں من ساٹھ کی تنخواہ بند کر دی گئی اور کوئی وجہ بھی نہیں بتائی گئی اور اسی طرح من ساٹھ کی سروس کو مزید extend بھی نہیں کیا گیا جب کہ من ساٹھ کے ساتھ تعینات دیگر employees کی سروس کو extend کیا گیا تھا جس کے بعد من ساٹھ نے عدالت عالیہ پشاور ہائی کورٹ ڈیرہ اسماعیل خان بیچ میں رٹ پٹیشن نمبر 609-D/2015 بعنوان عرشہ جہول بنام گورنمنٹ آف خیبر پختونخواہ وغیرہ دائر کی اور دوران کارروائی رٹ پٹیشن ڈسٹرکٹ ایجوکیشن آفیسر (فی میل) کے کنٹیکٹ میں یہ بات سامنے آئی کہ مذکورہ پوسٹ پر ایک دیگر امیدوار مسماہ شفقت نورین کو adjust کیا گیا ہے جس کے بعد عدالت عالیہ نے مذکورہ رٹ پٹیشن میں مسماہ شفقت نورین کو فریق بنایا تاہم دوران کارروائی رٹ پٹیشن SDEO فی میل ڈیرہ اسماعیل خان نے بروئے آفس آرڈر نمبر 44-1141 مورخہ: 21/09/2016 من ساٹھ کو دیگران کو adjust کرنے کا آرڈر جاری کیا جس میں من ساٹھ کو GGPS مریالی میں adjust کیا گیا اور پھر من ساٹھ نے اپنی چارج

رپورٹ جمع کی اور اپنے فرائض سرانجام دینے لگی تاہم تین ماہ بعد من ساٹھ کو دوبارہ کام سے روک دیا گیا اور تنخواہ بھی بند کر دی گئی جو کہ اس دوران جب من ساٹھ GGPS مریالی میں بطور پی ایس ٹی فرائض سرانجام دے رہی تھی اور تنخواہ وصول کر رہی تھی تو اسی دوران مسماہ شفقت نورین بھی اپنے فرائض بطور پی ایس ٹی سرانجام دے رہی تھی اور تنخواہ بھی وصول کر رہی تھی جس سے واضح ہے کہ مذکورہ سکول میں پی ایس ٹی کی پوسٹ موجود ہے اور مسماہ شفقت نورین اور من ساٹھ علیحدہ علیحدہ پوسٹ پر فرائض سرانجام دے رہے تھے اور پھر مورخہ: 27/10/2021 کو مذکورہ رٹ پٹیشن کی سماعت عدالت عالیہ پشاور ہائی کورٹ ڈیرہ اسماعیل خان بیچ میں مقرر تھی جو کہ دوران سماعت محترم جناب عدنان علی اسٹنٹ ایڈوکیٹ جنرل صاحب نے آفس آرڈر نمبر 89-5583 مورخہ: 27/04/2017 پیش کیا جس کے مطابق من ساٹھ کی سروس کو اب از ابتداء سے null & void قرار دیا گیا جو کہ آفس آرڈر مورخہ: 27/04/2017 کا علم ساٹھ کو قبل ازیں نہ تھا اور نہ ہی کوئی کاپی موصول ہوئی تھی اور پہلی مرتبہ مورخہ: 27/10/2021 کو دوران سماعت رٹ پٹیشن آفس آرڈر مورخہ: 27/04/2017 کا علم ہوا جس کی وجہ سے من ساٹھ کی رٹ پٹیشن اکیس میں یکسر تبدیلی آگئی اور من ساٹھ نے رٹ پٹیشن withdraw کی تاکہ مذکورہ آفس آرڈر مورخہ: 27/04/2017 کی نسبت competent authority کے سامنے ساٹھ اپنی grievance رکھ سکے جو کہ بعد از علم بابت آفس آرڈر مورخہ: 27/04/2017 اپیل ہذا اندر میعاد ہے۔ اور درج ذیل وجوہات کی بناء پر من ساٹھ کی اپیل قابل منظور ہے۔

الف۔ یہ کہ آفس آرڈر مورخہ: 27/04/2017 سراسر غلط، خلاف قانون اور خلاف واقعات ہے۔ اس لیے قابل منسوخی ہے۔

ب۔ یہ کہ آفس آرڈر مورخہ: 27/04/2017 جاری کرنے سے قبل من ساٹھ کو شہوانی کا کوئی موقع نہیں دیا گیا اور اسی طرح کوئی انکوائری بھی برخلاف من ساٹھ نہیں کی گئی جو کہ جملہ کاروائی من ساٹھ کی غیر موجودگی میں کی گئی۔

ج۔ یہ کہ ڈسٹرکٹ ایجوکیشن آفیسر فی میل کو اس نسبت کوئی اختیار حاصل نہ تھا کہ وہ من ساٹھ کی سروس کو از ابتداء سے null & void قرار دیتی کیونکہ من ساٹھ کا ابتدائی appointment آرڈر باقاعدہ طور پر ڈیپارٹمنٹل سلیکشن کمیٹی کی recommendation پر competent authority نے جاری کیا تھا کیونکہ من ساٹھ اہل امیدوار تھی جس کے بعد من ساٹھ نے چارج رپورٹ دے کر باقاعدہ طور پر اپنے فرائض سرانجام دیے اور پھر مسماہ شفقت نورین کی جانب سے ایک time barred اپیل کو entertain کر کے من ساٹھ کی سروس کو extend نہیں کیا گیا جو کہ مسماہ شفقت نورین کی اپیل بھی time barred تھی اور من ساٹھ کی تعیناتی بھی بمطابق قانون درست طور پر ہوئی تھی اور بعد ازاں بھی جب مسماہ شفقت نورین GGPS مریالی میں تعینات ہوئی تو اس کے بعد بھی من ساٹھ کو GGPS مریالی میں adjust کیا گیا اور وہ adjustment آرڈر متعلقہ آفیسر نے جاری کیا تھا مگر

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علم مورخہ: 27/04/2017 میں غلط طور پر تحریر کیا گیا کہ adjustment آرڈر جس نے جاری کیا اس نے اپنے دستخط سے انکار کیا جو کہ آفس آرڈر مورخہ: 27/04/2017 خلاف قانون جاری شدہ ہے جس میں غلط طور پر من ساکنہ پرکیشن اور فراڈ کا الزام لگایا گیا ہے کیونکہ من ساکنہ نے کسی قسم کی کوئی کرپشن یا فراڈ نہیں کیا بلکہ بمطابق قانون اپنے فرائض جاری رکھے اور جب ایک مرتبہ من ساکنہ کی تعیناتی بمطابق قانون ہوئی تھی تو ایسی صورت میں من ساکنہ کی سروس کو null & void قرار نہیں دیا جاسکتا خصوصاً ایسے حالات میں جب ساکنہ کو کوئی شتوانی کا موقع بھی نہیں دیا گیا۔  
نقول رٹ و شیش و حکم عدالت عالیہ و آفس آرڈر مورخہ: 27/04/2017 مراہ دیکر نقول لف ہیں۔

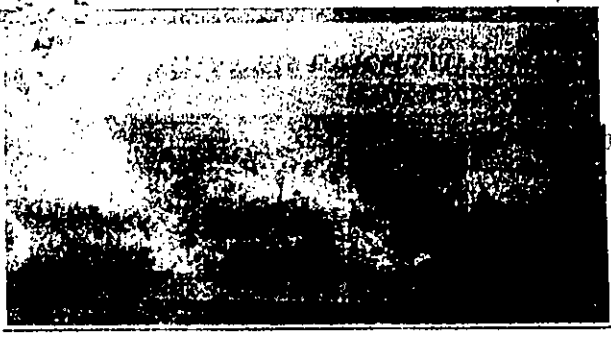
لہذا استدعا ہے کہ اجیل

ہذا منظور فرمائی جاوے۔

مورخہ: 23/11/2021

عرشہ لطیف دختر عبدالطیف سکنہ محلہ استاد قادر دادوالا امریالی تحصیل و ضلع ڈیرہ اسماعیل خان

*A. S. Khan*



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VAKALATNAMA

BEFORE THE HONOURABLE PESHAWAR HIGH COURT,  
BENCH DERA ISMAIL KHAN.

Mst. Arshia Latif Appellant /Petitioner/Complainant/ Accused

Suite of PK & A-111 Vs Respondent / Complainant / Accused

to whom the present shall come that I/We Appellant  
do hereby appoint **Muhammad Mohsin Ali Advocate High Court** (herein after called the advocate/s) to be my/our Advocate in the above noted case authorise him:-

1. To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each Court by me/us.
2. To sign, file, verify and present pleadings, appeals, cross-objections or petitions for executions review revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages and to pay the payment of fees for each stage.
3. To take back documents, to admit and/or deny the documents of opposite party.
4. To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.
5. To take execution proceedings.
6. To deposit, draw and receive monthly cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.
7. To appoint and instruct any other Legal Practitioner authorising him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on our behalf.
8. And I/We the undersigned do hereby agree to rectify and confirm all acts done by the Advocate or his substitute in the matter as my/our own acts, as if done by me/us to all intents and purposes.
9. We undertake that I/We or my/our duly authorised agent would appear in Court on all hearings and will inform the Advocate for appearance when the case is called.
10. And I/We the undersigned do hereby agree not to hold the advocate or his substitute responsible for the result of the said case.
11. The adjournment costs whenever ordered by the Court shall be of the Advocate which he shall receive and retain for himself.
12. And I/We the undersigned do hereby agree that in the event of the whole or part of the fee payable by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. The fee settled is only for the High Court and the Appellate Court. I/we hereby agree that once fee is paid, I/We will not be entitled to the refund of the same in any case whatsoever and if the case prolongs for more than 30 days the original fee shall be paid again by me/us.

IN WITNESS WHEREOF I/We do hereunto set my/our hand to these presents the contents of which have been understood by me/us on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_

Accepted  
Muhammad Mohsin Ali  
Advocate High Court  
Bench Dera Ismail Khan.

Arshia Latif

"A"

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

*Resd*  
No.

*TR DIK*

APPEAL No. *872* of 20*22*

*Mst Arshia Latif*

Appellant/Petitioner

Versus

*Secy. Edu. Resh*

RESPONDENT(S)

Notice to Counsel Petitioner *Mohammad Mohsin Ali*  
*A. Ali*

*DISTT COURT DIKW*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *28/6/22* 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 DIKW*

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

"A"

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No. *Razq*

*TB DIK*

APPEAL No. *872* of 20 *22*

*Mst Arshia Latif*

Appellant/Petitioner

Versus

*Sey: Edm: Peshawar*

RESPONDENT(S)

Notice to Appellant/Petitioner *Mst Arshia Latif D/O*  
*Abdul Latif R/O Moh: Ustad Qaderdad*  
*Wala Muzgali teh 8 Distt Dikhan*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *28/6/22* 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.

*Ataul Goust*

*D/Kw*

Registrar,

Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.