

15th Nov, 2022

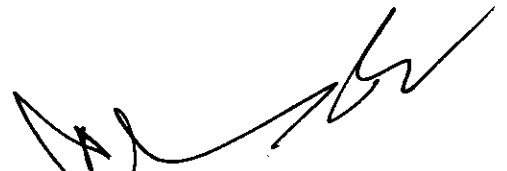
1. None present for the appellant. Mr. Muhammad Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

2. Called several times till last hours of the court but nobody turned up on behalf of the appellant. In view of the above, the instant appeal is dismissed in default. Consign.

3. *Pronounced in open court in Abbottabad and given under our hands and seal of the Tribunal on this 15th day of November, 2022.*



(Salah Ud Din)
Memebr(J)

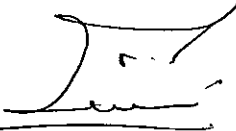



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

19th July 2022

None for the appellant present. Mr. Noor Zaman Khattak, District Attorney for respondents present.

Fresh notices be issued to the appellant and her counsel through registered post. To come up for arguments on 20.09.2022 before D.B at camp court Abbottabad.


(Salah Ud Din)
Member (Judicial)



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

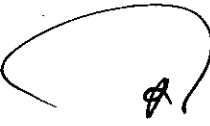
20.09.2022

Junior to counsel for appellant present.

Muhammad Jan, learned District Attorney for respondents present.

Former requested for adjournment as senior counsel for appellant is busy before the Hon'ble Peshawar High Court, Abbottabad Bench. Adjourned. To come up for arguments on 15.11.2022 before D.B at Camp Court, Abbottabad.


(Fareeha Paul)
Member (E)
Camp Court, A/Abad


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

1501/2018

18.11.2021

Junior to counsel for the appellant and Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG for the respondents present.

Former seeks adjournment due to engagement of learned senior counsel for the appellant in Peshawar High Court, Abbottabad Bench today in various cases. Request is accorded. To come up for arguments before the D.B on 16.03.2022 at camp court, Abbottabad.



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



Chairman
Camp Court, A/Abad

16.03.2022

Due to retirement of the Hon'ble Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same on 16.05.2022.



Reader

16.05.2022

Counsel for the appellant present. Mr. Muhammad Riaz Khan, Assistant Advocate General for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief. Adjourned. To come up for arguments before D.B on 19.07.2022 at camp court Abbottabad.



(Fareeha Paul)
Member(E)



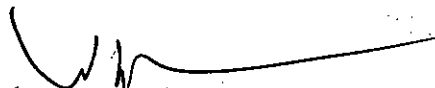
(Kaleem Arshad Khan)
Chairman
Camp Court Abbottabad


16.03.2021

Appellant present through counsel.

Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Former made a request for adjournment; adjourned. To come up for arguments on 22/04/2021 before D.B at Camp Court Abbottabad.


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad


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

22-4-21

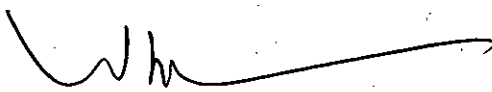
Due to COVID 19, case is adjourned to 23-9-2021 for the same.




23.09.2021


Nemo for the appellant. Mr. Asar Jan, ADO (Litigation) alongwith Mr. Usman Ghani, District Attorney 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 his counsel and to come up for arguments before the D.B on 18.11.2021 at Camp Court Abbottabad.


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


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

Due to covid ,19 case to come up for the same on 14/4/20
at camp court abbottabad.


Reader

14.4.20

20/

Due to summer vacation case to come up for the same on 20/10
at camp court abbottabad.

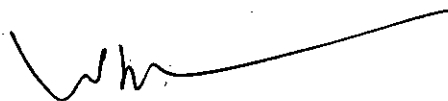

Reader

20.10.2020

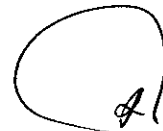
Representative of appellant on behalf of appellant
present.

Usman Ghani learned District Attorney for respondents
present.

Lawyers are on general strike. Therefore, case is
adjourned to 15.12.2020 for arguments, before D.B at Camp
Court, Abbottabad.

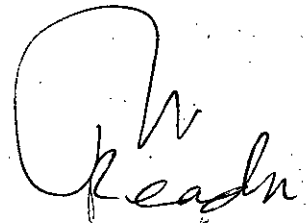


(Atiq ur Rehman Wazir)
Member (E)
Camp Court, A/Abad



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


Due to COVID-19 case is
adjourned to 16-03-2021


Reader

18.11.2019

Counsel for the appellant present. Mr. Usman Ghani, District Attorney for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 17.12.2019 before D.B at Camp Court, Abbottabad.



Member


Member
Camp Court Abbottabad

17.12.2019

None present on behalf of the appellant. Mr. Ziaullah, Deputy District Attorney for the respondents present. Notice be issued to appellant for attendance and arguments for 23.01.2020 before D.B at Camp Court Abbottabad.



(Hussain Shah)
Member
Camp Court Abbottabad


(M. Amin Khan Kundi)
Member
Camp Court Abbottabad

23.01.2020

None for the appellant present. Mr. Muhammad Jan, DDA for the respondents present. Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for further proceedings on 17.02.2020 before D.B at camp court Abbottabad. Appellant be put on notice for the date fixed.


Member


Member
Camp Court A/Abad

22.05.2019

Counsel for the appellant and Mr. Muhammad Saddique, ADEO (Litigation) alongwith Mr. Muhammad Bilal, Deputy District Attorney for the respondents present. Written reply on behalf of respondents not submitted. Representative of the department requested for adjournment. Adjourned to 09.07.2019 for written reply/comments before S.B at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

09.07.2019

Counsel for the appellant and Mr. Muhammad Saddique, ADO (Litigation) alongwith Mr. Muhammad Bilal Khan, Deputy District Attorney for the respondents present. Written reply on behalf of respondents not submitted. Representative of the department requested for further adjournment. Adjourned to 16.09.2019 for written reply/comments before S.B at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

17.09.2019

Counsel for the petitioner and Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith Mr. Saddique, ADO (Litigation) for the respondents present. Representative of the department submitted joint para-wise comments on behalf of respondents No. 1 to 3 which is placed on record. Case to come for rejoinder and arguments on 18.11.2019 before D.B at Camp Court Abbottabad.




(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

18.03.2019

Counsel for the appellant Gul Naseem present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Education Department as Primary School Teacher. She was removed from service vide order dated 23.12.2017 on the allegation of her absence from duty. The appellant filed departmental appeal on 20.07.2018 which was not responded hence, the present service appeal on 14.11.2018. Learned counsel for the appellant further contended that the appellant performing her duty regularly but the respondent-department has wrongly shown her absent from duty. It was further contended that neither absence notice was issued to the appellant nor regular inquiry was conducted. It was further contended that there is some delay in filing of departmental appeal but the appellant has also filed an application for condonation of delay. It was further contended that since the impugned order has been passed without conducting regular inquiry therefore, the impugned order is illegal and liable to be set-aside.

The contention raised by learned counsel for the appellant needs consideration. The appeal is admitted for regular subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days thereafter, notice be issued to the respondents for written reply/comments for 22.05.2019 before S.B at Camp Court Abbottabad.

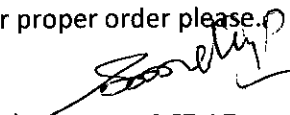


Appellant Deposited
Security & Process Fee


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1501/2018

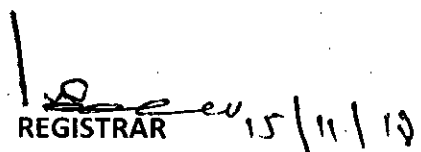
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/12/2018	<p style="text-align: center;">The appeal of Mst. Gul Naseem received today by post through Mr. Hamayun Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: center;"> REGISTRAR</p>
2-	26-12-18	<p style="text-align: center;">This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>18-03-19.</u></p> <p style="text-align: center;"> CHAIRMAN</p>

The appeal of ~~Mr.~~ Gul Naseem D/o Haji Amir Zada resident of Kaley Medan Ex-PTC Kohistan received today i.e. on 14.11.2018 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Copies of appointment order and Writ Petition mentioned in the memo of appeal in respect of appellant are not attached with the appeal which may be placed on it.

No. 2293/S.T.

Dt. 15/11/2018.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.


Mr. Hamayun Khan Adv.
High Court A.Abad.

Reply of objection Received on 4/12/18

1- Memorandum of Appeal is duly signed by appellant

2- writ Petition mentioned in Appeal filed by P.S.T Teacher of Distt Kohistan and all P.S.T Teacher of Distt Kohistan interest directly and indirectly involved in the said writ Petition. Teacher filed writ Petition being Representative capacity name of Appellant is clearly mentioned at serial No-16
Page 7- ^{Amore "A"} please kindly, date for hearing be fixed.

8/12/18

Hamayun Khan
Advocate
A. A. Abad.


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

Appeal No. 1501 /2018

Mst. Gul Naseem D/o Haji Amir Zada, resident of Kaley Medan P.O Jelal Tehsil Palas Kohistan (EX PTC/ PST Teacher Govt. Khizarabad Kohistan).

...APPELLANT

VERSUS

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

...RESPONDENTS

SERVICE APPEAL

INDEX

S.#	Des~cription	Page No.	Annexure
1.	Memo of Appeal	1 to 6	
2.	Copy of appointment order	7-9	"A"
3.	Copy of attendance register	10-19	"B"
4.	Copy of writ petition	20-32	"C"
5.	Copy of impugned order	33	"D"
6.	Copy of departmental appeal	34-35	"E"
7.	Wakalatnama		

...APPELLANT

Through

Dated: 10/11 /2018


(HAMAYUN KHAN)

Advocate High Court, Abbottabad

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

Appeal No. 1501 /2018

Mst. Gul Naseem D/o Haji Amir Zada, resident of Kaley Medan P.O Jelal Tehsil Palas Kohistan (EX PTC/ PST Teacher Govt. Khizarabad Kohistan).

...APPELLANT

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1633

Dated 14-11-2018

VERSUS

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

...RESPONDENT

Filed to-day

Registrar

14/11/18

Re-submitted to-day
and filed.

Registrar

SERVICE APPEAL UNDER SECTION 4 KPK
SERVICE TRIBUNAL ACT 1974 AGAINST THE
IMPUGNED ORDER NO. 4328-34/DEO(F) KH,
DATED 23/12/2017 PASSED BY RESPONDENT NO.
3 WHEREBY RESPONDENT NO. 3 IMPOSED
MAJOR PENALTY REMOVED FROM SERVICE
WITH EFFECT FROM 25/05/2016 WHICH IS

ILLEGAL UNLAWFUL WITH OUT JURISDICTION
AGAINST THE PRINCIPAL OF NATURAL JUSTICE
AND LIABLE TO BE SET-ASIDE.

PRAYER:- ON ACCEPTANCE OF THIS SERVICE
APPEAL IMPUGNED ORDER DATED 23/12/2017
MAY KINDLY BE DECLARED NULL AND VOID
AND APPELLANT BE RE-INSTATED IN SERVICE
ALONGWITH ALL BACK BENEFITS, ANY OTHER
RELIEF WHICH THIS HONOURABLE TRIBUNAL
DEEMED FIT PROPER IN THE INTEREST OF
JUSTICE.

Respectfully Sheweth;-

May it please your lordship appellant bet to solicit on the
following factual and legal grounds;-

1. That the appellant belong from the most backward
and hilly district Kohistan.

2. That appellant initially was appointed as PTC/ PST teacher in year 2005 in BPS-4. Copy of appointment order is annexed as Annexure "A".
3. That consequent upon the appointment order appellant submitted her arrival report at GGPS Mahreen and joint duty.
4. That thereafter appellant transferred from one to another on the direction of respondent No. 3.
5. That during this period appellant performed her duty to the satisfaction of officers with full devotion and liability and there had no complaint was against the appellant in respect of her responsibility as well as duty. Copy of attendance register is annexed as Annexure "B".
6. That respondent No. 3 stopped monthly salary of appellant due to some technicalities that the time of appointment low qualification, in this connection some of the teachers has been filled constitutional petitioner before Peshawar High Court, Abbottabad Bench. Copy of writ petition is annexed as Annexure "C".

7. That appellant approached to respondent No. 3 for release her salary whereby respondent No. 3 assured that he will resolve her grievances very soon alongwith all others 30 teachers pending before respondent No. 1 of final order in respect of proper pay scale up-gradation and allowances.
8. That appellant again visited to the offices of respondent No. 3, 12 July, 2018 for information and whereby appellant received impugned order and respondent No. 3 stated you are removed from the service on 23/12/2017 and since last 7 months you are not employee of the department. Copy of impugned order is annexed as Annexure "D".
9. That on 20/07/2018 appellant filed departmental appeal before the respondent No. 2 but till that respondent No. 3 not passed any order on the said appeal and similarly not given any response to the appellant. Copy of departmental appeal is annexed as Annexure "E". Hence his service appeal on the following grounds;-

GROUNDS:-

- a. That impugned order dated 22/12/2017 against the law and fact hence liable to be a set-aside.
- b. That all allegations mentioned in the impugned order is self and so-called.
- c. That all proceeding conducted in absence of appellant.
- d. That respondent at the time of passing impugned order ignored all basic principal of E & D Rules and principal of natural justice.
- e. That order of respondent No. 3 dated 23/12/2017 against the constitutional granted rights of appellant.
- f. That respondent No. 3 issued impugned order without show cause notice, inquiry in absence of appellant.

It is, therefore, humbly prayed that, on acceptance of this service appeal impugned order dated 23/12/2017 may kindly be declared null and void and appellant be reinstated in service alongwith all back benefits, any other relief which this Honourable Tribunal deemed fit proper in the interest of justice.


...APPELLANT

Through

Dated: 10/11 /2018


(HAMAYUN KHAN)
Advocate High Court, Abbottabad

VERIFICATION:-

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


...APPELLANT

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. _____/2018

Mst. Gul Naseem D/o Haji Amir Zada, resident of Kaley Medan P.O Jelal
Tehsil Palas Kohistan (EX PTC/ PST Teacher Govt. Khizarabad Kohistan).

...APPELLANT

VERSUS

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

...RESPONDENTS

**APPLICATION FOR CONDONATION OF DELAY IF
ANY.**

Respectfully Sheweth;-

1. That the above titled appeal is being filed before this Honourable Tribunal and contents of the same may kindly be treated as integral part of this application.
2. That the appellant has brought a good prima facie case and balance of convenience also lies in favour of the appellant.

3. That valuable rights of reinstatement in service of the appellant as PST teacher are involved.
4. That the impugned order received on 12 July, 2018 from the office of respondent No.3 and respondent No.3 could not delivered the same within time.
5. That delay in filing of service appeal is not willful.

It is therefore, humbly requested that the delay if any may kindly be condone in the interest of justice.


...APPELLANT

Through

Dated: 10/11 /2018


(HAMAYUN KHAN)
Advocate High Court, Abbottabad

VERIFICATION:-

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


...APPELLANT

ANNEXURE 'A' 7

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 Pa ed Untrained candidates Fresh of Tehsil Palas (Union Council wise) against the vacant Posts of TC 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.N	Name of candidate	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	Sadlam Khan	Bataira	PTC	GGPS Darra M.Khel	Agst V.Post
3	Yasmin Bibi	Sher Zada	Bataira	PTC	GGPS Mahreen	Agst V.Post
4	Gul Samina	Sher Zada	Bataira	PTC	GGPS Mahreen	Agst V.Post
5	Bibi Khobana	Hazrat wali	Botalial	PTC	GGPS Safia Darra	Agst V.Post
6	Taj-un-Nissa	Haroot	Haran	PTC	GGPS Dusham Abad	Agst V.Post
7	Ruqia Bibi	Chaloo	Gulbagh	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 Hairterabad	Agst V.Post
10	Hasleem Bibi	Chaloo	Haran	PTC	GGPS Bahadarabad	Agst V.Post
11	Zanab 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	Basmeeen Bibi	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	Kolai	PTC	GGPS Mahreen	Agst V.Post
17	Robina	Amir Zada	Koli	PTC	GGPS Mahreen	Agst V.Post
18	Gul Zaron	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
24	Safina Bibi	Abdur Rahman	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 Qayyum	Kuz Paro	PTC	GGPS Saobar 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 Qureshi	Abdul Hanan	Peech Bela	PTC	GGPS Khizarabad	Agst V.Post
30	Bibi Rehana	Shamal	Hukum Abadi	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 Hijjarabad	Agst V.Post
33	Rashida Jabeen	Khanizaman	Kuz Shrial	PTC	GGPS Shilkanabad	Agst V.Post
34	Hussan Pari	Malik Haidar	Kuz Shrial	PTC	GGPS Shilkanabad	Agst V.Post
35	Nusrat Begum	Pir Dad	Shalkanabad	PTC	CMS Shilkanabad	Agst V.Post
36	Begum Bibi	Daldel	Shalkanabad	PTC	GGPS Shilkanabad	Agst V.Post
37	Bibi Hajira	Habat Khan	Shalkanabad	PTC	GGPS Shilkanabad	Agst V.Post
38	Bibi Halima	M.Gulfray	Shalkanabad	PTC	GGPS Shilkanabad	Agst V.Post
39	Bushra Hayat	Hayat Mohammad	Shalkanabad	PTC	GGPS Shilkanabad	Agst V.Post
40	Aisha Bibi	Gul Fraz	Shalkanabad	PTC	GGPS Shilkanabad	Agst V.Post
41	Tasleem bibi	Qaland	Shalkanabad	PTC	GGPS Shilkanabad	Agst V.Post
42	Kiran Mustafa	M.Mustafa	Bar Sheyal	PTC	GGPS Datt	Agst V.Post
43	Misal Jan	Rokha	Bar Sheyal	PTC	GGPS Shilkanabad	Agst V.Post
44	Sadaf Bibi	M.Musafa	Bar Sheyal	PTC	GGPS Sabirabad	Agst V.Post
45	Saima Hanif	Mohd Hanif	Bar Sheyal	PTC	GGPS Sabirabad	Agst V.Post
					GGPS Sharakot	Agst V.Post

Contd:P.02

8

(177)

Page No-02							
48	Gul for	M.Faqeer	Harban	PTC	GGPS	Gakuz	Agst V.Post
49	Bibi Miryam	M.Ibrahim	kuz Jaikot	PTC	GGPS	Shakari	Agst V.Post
50	Lazaba Bibi	Shams ur Rahman	Dilbar Dadir	PTC	GGPS	Jalo Chortoo	Agst V.Post
51	Kulsoom bibi	Barkat Khan	kuz Jaikot	PTC	GGPS	Jalkot Village	Agst V.Post
52	Gul Shad	Sher Mohammad	kuz Jaikot	PTC	GGPS	Jalkot Village	Agst V.Post
53	Begum Hakeem	Abdul Khan	Seo	PTC	GGPS	Seo Village	Agst V.Post
54	Najma Bibi	Ser Baz Khan	Dassu	PTC	GGPS	Jalo Chortoo	Agst V.Post
55	Nolam Bibi	Shales Khan	Sazin	PTC	GGPS	Sultanabad	Agst V.Post
56	Sobia Akram	Mohammad Akram	Sazeen	PTC	GGPS	Sultanabad	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 earlier, 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.
- 5 They will be governed by such rules and regulations enforced and as prescribed by the Government from time to time for 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 with in 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. 10232-36 / App/PTC's (M)U/C Wise Merit /2006 Dated Kohistan the 27/12/2006.

- 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 & 10407-10 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

Attended
H. J.

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 Tensil Pattan 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.N	Name of Candidate	Father's Name	Residence/ UIC	Apptt as	School where posted	Remarks
1	Bibi Rizwana	Gul Fraz	Jijal	PTC	GGPS Dhup Gil	Agst V. Post
2	Bibi Rehmat	Abdul Mateen	Keyal	PTC	GGPS Domiser	Agst V. Post
3	Maer Bibi	Maqsad	Keyal	PTC	GGPS Harigah	Agst V. Post
4	Tahira Bibi	Sher Mehmood	Keyal	PTC	GGPS Maidan Kayal	Agst V. Post
5	Sonia Bibi	Sher Mehmood	Keyal	PTC	GGPS Harigah	Agst V. Post
6	Sadia Bibi	Sher Mehmood	Keyal	PTC	GGPS Kayal Village	Agst V. Post
7	Ghungroo	Said Amin	Keyal	PTC	GGPS Pattan Village	Agst V. Post
8	Robina	Said M. Khan	Pattan	PTC	GGPS Alidad Khel	Agst V. Post
9	Zenab	Shah jahan	Ranolia	PTC	GGPS K.K Ranolia	Agst V. Post
10	Noorena	Abdul Hanan	Ranolia	PTC	GGPS Dheri Charoona	Agst V. Post
11	Fatma Mosa	M. Musa	Bankad	PTC	GGPS Dheri Charoona	Agst V. Post
12	Nadia Kefayat	Kifayat-Ullah	Bankad	PTC	GGPS Dhub Shmal	Agst V. Post
13	Faiza Bibi	Akbar Khan	Chawa	PTC	GGPS Qamar Bandi	Agst V. Post
14	Bibi Razena	Sultan M. Ayub	Segayun	PTC	GGPS Dhub Shmal	Agst V. Post
15	Rabia Bibi	Abdul Haq	Chawa	PTC	GGPS Dheri Charoona	Agst V. Post
16	Hijrat	M. Noon	Bankad	PTC	GGPS Dheri Charoona	Agst V. Post

CONDITIONS:-

1. Their appointments are purely on temporary basis and liable to termination at any time / stage with or without assigning any responsibilities.
2. Their Certificates if not verified earlier, should be verified by the DDO (M) i.e. Mr. Abdur Rehman I/C DDO (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.
5. They will be governed by rules and regulations enforced and as prescribed 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

Encls: No. 8649-57 / App/PTC's (M) UIC Wise Merit /2006. Dated Kohistan the 11/12/2006.

- 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 & 10407-10 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

ANNE XUR B رجسٹر حاضری مدرسین

10

2016ء جولائی

بابت ماہ

نام	بیس پری	گل نسیم	نام	بیس پری	گل نسیم
1	P		1	P	
2	PP		2	PP	
3	PP		3	PP	الوار
4	PP		4	PP	
5	PP		5	PP	
6	PP		6	PP	
7	PP		7	PP	
8	PP	12:35	8	PP	8:00
9	PP	1:35	9	PP	8:00
10	PP		10	PP	الوار
11	PP	1:35	11	PP	8:00
12	PP	1:35	12	PP	8:00
13	PP	1:35	13	PP	8:00
14	PP	1:35	14	PP	8:00
15	PP	12:35	15	PP	8:00
16	PP	1:35	16	PP	8:00
17	PP		17	PP	الوار
18	PP	1:35	18	PP	8:00
19	PP	1:35	19	PP	8:00
20	PP	1:35	20	PP	8:00
21	PP		21	PP	8:00
22	PP	12:35	22	PP	8:00
23	PP	1:35	23	PP	8:00
24	PP		24	PP	الوار
25	PP	1:35	25	PP	8:00
26	PP	1:35	26	PP	8:00
27	PP	1:35	27	PP	8:00
28	PP	1:35	28	PP	Absent
29	PP	1:35	29	PP	8:00
30	PP	12:35	30	PP	8:00
31	PP		31	PP	

بیس پری
 گل نسیم
 الوار
 22-5-16
 ASDP-0
 تعلیمات

موسم بیماری

Absent

Master

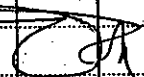
میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

رجسٹر حاضری مدرسین

بابت ماہ

۲۰۱۶ء فروری

نام عہدہ	کلاس پری	کل لیسیم	نام عہدہ	کلاس پری	کل لیسیم
تاریخ	آمد	دستخط	رواگی	آمد	دستخط
1	8:00	BasPas	1:35	کل لیسیم	1:35
2	8:00	BasPas	1:35	کل لیسیم	1:35
3	8:00	BasPas	1:35	کل لیسیم	1:35
4	8:00	BasPas	1:35	کل لیسیم	1:35
5	8:00	BasPas	12:35	کل لیسیم	12:35
6	8:00	BasPas	1:35	کل لیسیم	1:35
7	الوار				
8	8:00	BasPas	1:35	کل لیسیم	1:35
9	8:00	BasPas	1:35	کل لیسیم	1:35
10	8:00	BasPas	1:35	کل لیسیم	1:35
11	8:00	BasPas	1:35	کل لیسیم	1:35
12	8:00	BasPas	2:35	کل لیسیم	2:35
13	8:00	BasPas	1:35	کل لیسیم	1:35
14	الوار				
15	8:00	BasPas	1:35	کل لیسیم	1:35
16	8:00	BasPas	1:35	کل لیسیم	1:35
17	8:00	BasPas	1:35	کل لیسیم	1:35
18	8:00	BasPas	1:35	کل لیسیم	1:35
19	8:00	BasPas	2:35	کل لیسیم	2:35
20	8:00	BasPas	1:35	کل لیسیم	1:35
21	الوار				
22	8:00	BasPas	1:35	کل لیسیم	1:35
23	8:00	BasPas	1:35	کل لیسیم	1:35
24	8:00	BasPas	1:35	کل لیسیم	1:35
25	8:00	BasPas	1:35	کل لیسیم	1:35
26	8:00	BasPas	2:35	کل لیسیم	2:35
27	8:00	BasPas	1:35	کل لیسیم	1:35
28	الوار				
29					
30					
31					

Attested


قسم رخصت	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
انفاقہ									
استحقاق									
بیماری									
میزان									

رجسٹر حاضری مدرسین

13

جنوری 2016ء

بابت ماہ

ہذا الحق		گل نسیم		بس پری		بابت ماہ		جنوری 2016ء		
روز	تاریخ	آمد	روائی	آمد	روائی	آمد	روائی	آمد	روائی	
PP		12:35	گل نسیم	8:50	BasPas	10:35	BasPas	8:00	1	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	2	PP
PP									3	PP
PP		1:35	گل نسیم	8:50					4	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	5	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	6	PP
PP									7	PP
PP		12:35	گل نسیم	8:50	BasPas	12:35	BasPas	8:00	8	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	9	PP
PP									10	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	11	PP
PP		1:35	گل نسیم	8:50					12	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	13	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	14	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	15	PP
PP		12:35	گل نسیم	8:50	BasPas	12:35	BasPas	8:00	16	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	17	PP
PP									18	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	19	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	20	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	21	PP
PP		12:35	گل نسیم	8:50	BasPas	12:35	BasPas	8:00	22	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	23	PP
PP									24	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	25	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	26	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	27	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	28	PP
PP									29	PP
PP		1:35	گل نسیم	8:50	BasPas	1:35	BasPas	8:00	30	PP
PP									31	PP

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

رجسٹر حاضری مدرسین

بابت ماہ

2015ء

دسمبر
ہذا مہینے
کو تہیہ

نمبر	پس پیری	کل نسیم	نمبر	پس پیری	کل نسیم
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تاریخ	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی	آمد	دستخط	روانگی
1	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
2	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
3	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
4	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
5	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
6	الوار														
7	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
8	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
9	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
10	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
11	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
12	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
13	الوار														
14	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
15	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
16	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
17	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
18	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
19	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
20	الوار														
21	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
22	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
23	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
24	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
25	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
26	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
27	الوار														
28	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
29	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
30	8:00	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35	BasPa	1:35
31	الوار														

Attested
[Signature]

نمبر رخصت	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
اتفاقية									
استحقاقی									
بیماری									
میزان									

16
رجسٹر حاضری مدرسین

بابت ماہ اکتوبر 2015ء

بابت ماہ

نمبر	نمبر	بیس پری	کل ٹیم	بیس پری	کل ٹیم	تاریخ
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نمبر	نمبر	بیس پری	کل ٹیم	بیس پری	کل ٹیم	تاریخ
1	1	PP	1:35	1:35	8:00	1
2	2	PP	12:35	12:35	8:00	2
3	3	PP	1:35	1:35	8:00	3
4	4	PP				الوار
5	5	PP				
6	6	PP				
7	7	PP				
8	8	PP				
9	9	PP				
10	10	PP				
11	11	PP				الوار
12	12	PP	1:35	1:35	8:00	12
13	13	PP	1:35	1:35	8:00	13
14	14	PP	1:35	1:35	8:00	14
15	15	PP	1:35	1:35	8:00	15
16	16	PP	12:35	12:35	8:00	16
17	17	PP	1:35	1:35	8:00	17
18	18	PP				الوار
19	19	PP	1:35	1:35	8:00	19
20	20	PP	1:35	1:35	8:00	20
21	21	PP	1:35	1:35	8:00	21
22	22	PP	1:35	1:35	8:00	22
23	23	PP	12:35	12:35	8:00	23
24	24	PP	1:35	1:35	8:00	24
25	25	PP				الوار
26	26	PP				
27	27	PP	1:35	1:35	8:00	27
28	28	PP	1:35	1:35	8:00	28
29	29	PP	1:35	1:35	8:00	29
30	30	PP	12:35	12:35	8:00	30
31	31	PP				

مہرم کی پھینک

نمبر رجسٹر	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
اتفاقیت												
استحقاق												
بیماری												
میزان												

All the best
H

رجسٹر حاضری مدرسین

۷۹

۲۰۱۷ء جولائی

بابت ماہ

صیالقی	مگل نسیم	کیس پیری	نام	ہون
چوکیدار			نمبرہ	مبار

روز	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روز	روائی
1	PP															1	PP
2	PP															2	PP
3	PP															3	PP
4	PP															4	PP
5	PP															5	PP
6	PP															6	PP
7	PP															7	PP
8	PP															8	PP
9	PP															9	PP
10	PP															10	PP
11	PP															11	PP
12	PP															12	PP
13	PP															13	PP
14	PP															14	PP
15	PP															15	PP
16	PP															16	PP
17	PP															17	PP
18	PP															18	PP
19	PP															19	PP
20	PP															20	PP
21	PP															21	PP
22	PP															22	PP
23	PP															23	PP
24	PP															24	PP
25	PP															25	PP
26	PP															26	PP
27	PP															27	PP
28	PP															28	PP
29	PP															29	PP
30	PP															30	PP
31	PP															31	PP

SUMMER VACATION

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

شیخ شیشری سٹوڈنٹس اردو بازار، لاہور۔ فون: 042-37226599

دستخط ہیڈ ماسٹر

Annexure 'C'

IN THE PESHAWAR HIGH COURT ABBOTTABAD BENCH,
ABBOTTABADWrit Petition No. 978 -A/2017

1. Bass Pari Bibi wife of Basheer R/o Kolai Meedan P/o Jabjaal, Tehsil Palas, District Kohistan.
2. Robina Bibi D/o Haji Ameer Zada R/o Kolai Meedan P/o Jabjaal, Tehsil Palas, District Kohistan.
3. Mehnas Begum Daughter of Rush R/o Kolai Meedan P/o Jabjaal, Tehsil Palas, District Kohistan.
4. Tahira Bibi D/o Sher Muhammad R/o Tehsil Palas, District Kohistan.
5. Sadia Bibi D/o Sher Muhammad R/o Tehsil Palas, District Kohistan.
6. Sonia Bibi D/o Sher Muhammad R/o Tehsil Palas, District Kohistan.
7. Kalsoom Bibi D/o Sikandar Khan R/o Jamira Jalkot, District Kohistan.
8. Sargina Bibi D/o Abdul Hanan R/o Kameela Tehsil Dasoo, District Kohistan.
9. Salma Bibi D/o Qalandar Khan R/o Jalkot Kameela Tehsil Dasoo, District Kohistan.
10. Gul Napoor w/o Badar R/o Kameela Tehsil Dasoo, District Kohistan.
11. Farzana D/o Rush Khan w/o Abdul Ghafaar R/o Jalkot Tehsil Dasoo, District Kohistan.
12. Sakeena Bibi D/o Muhammad Nazir Shah R/o Tehsil Palas District Kohistan.
13. Gul Zaroon Bibi w/o Wazeen Khan D/o Ameer Zada R/o Kolai P/o Ranooliyan Tehsil Palas, District Kohistan.
14. Parveen Bibi D/o Muhammad Sirtaj R/o Kolai P/o Ranooliyan Tehsil Palas, District Kohistan.
15. Bibi Hajira D/o Haibat Khan w/o Muhammad Nisar R/o Shah Makhanabad Tehsil Palas, District Kohistan.
16. Bibi Hajira D/o Mehraaj R/o Kolai, Tehsil Palas, District Kohistan.
17. Peegaloo W/o Abdul Rasheed R/o Pattan District Kohistan.
18. Zainab D/o Muhammad Shareen R/o Palas, District Kohistan.
19. Hassan Pari daughter of Malik Haider, wife of Munshi, resident of Palas, District Kohistan.

Abdullah
H. J.

21

20. Gul Sanam son of Ameer Zad, resident of Palas, District Kohistan.
21. Shaheen Bibi daughter of Ilyas Khan, resident of Dassu, District Kohistan.
22. Najma Bibi daughter of Sarbaz Khan, resident of Dassu, District Kohistan.

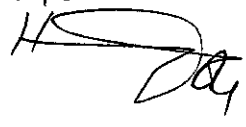
.... PETITIONERS

VERSUS

1. Secretary to the Government of Khyber Pakhtunkhwa, in the Department of Elementary & Secondary Education Department, Peshawar.
2. Deputy Director, Establishment (F), Elementary & Secondary Education Department, Peshawar.
3. District Education Officer (F), Dassu, Kohistan.
4. Secretary to the Government of Khyber Pakhtunkhwa, in the Department of Finance, Peshawar.
5. Sub Divisional Education Officer Dassu, District Kohistan.
6. Sub Divisional Education Officer Pattan, District Kohistan.
7. Sub Divisional Education Officer Palas, District Kohistan.

.... RESPONDENTS

WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN, 1973, FOR ISSUANCE OF A
DECLARATION TO THE EFFECT THAT STOPPAGE
OF SALARY OF THE PETITIONERS IN THE WAKE
OF LETTER NO 1973/F NO 04/F/INQUIRY DATED
PESHAWAR 14/12/2016, INSTEAD OF UPGRADING
HER FROM BPS-04 TO BPS-12 AS PER THIER
ENHANCE QUALIFICATION ACCORDING TO THE

Attested


3 22

REQUIREMENT FOR THE PST AND STILL NOT
UPGRADED, IS MALAFIDE AGAINST THE OWN
POLICY OF THE RESPONDENTS, IS UNLAWFUL
AND WITHOUT LAWFUL AUTHORITY

PRAYER: ON ACCEPTANCE OF THE INSTANT
WRIT PETITION, IT BE DIRECTED THAT SALARY
OF THE PETITIONERS WITHHELD FROM MAY
2016 TO DATE AND ALSO TO DIRECT THE
RESPONDENTS TO UPGRADE THE PETITIONERS
FORM BPS-04 TO BPS-12, THE GRADE
PERMISSIBLE FOR A PTC TEACHER, IN THE
WAKE OF ENHANCED EDUCATIONAL
QUALIFICATION OF THE PETITIONERS. ANY
OTHER RELIEF AS MAY BE DEEMED FIT FOR
THE PETITIONERS MAY ALSO BE GIVEN TO
THEM.

Respectfully Sheweth:

Brief facts giving rise to the instant writ petition are arrayed
as under:-

FACTS:-

1. That, the petitioners were appointed as PTC Teacher in
BPS-04 upon educational qualification as Middle
standard. (Copies of appointment orders are attached

Attested
H. S. [Signature]

as Annexure "A", while school leaving certificate as a Middle qualified student are attached as Annexure "B").

2. That, the petitioners improved/enhanced their qualification and qualified Matriculation exam from BISE Abbottabad. (Copies of DMC's SSC are attached as Annexure "C").

3. That, in due course it was decided that the PTC teachers who have not qualified metric, the basic requirements for appointment as a PTC Teacher, his or her services shall be dispensed with, and likewise the ones who have enhance their qualification upto the requisite requirement that is Metric shall be upgraded.

4. That, it was in the above background that a direction was passed vide impugned letter to act upon the above formula. (Copy of the impugned letter No letter no 1973/F No 04/F/Inquiry dated Peshawar 14/12/2016 is attached as Annexure "D").

Attested
[Signature]

5. That, though, the service of the petitioners were not terminated, however, respondent no 2 ordered stoppage of salary without any lawful reason w.e.f 01/05/2016 to date. No order in writing has also been passed in this regard.

- c. That, in due course of time and inquiry was ordered to sought out the case is of PTC teachers who still were holding qualification of middle class and those who held enhanced their qualification, to bring it at par with the requisite qualification for appointment of a PTC Teacher in BPS-12. It was further directed that those who had enhanced their qualifications should be upgraded forthwith. This was not done in the petitioners' case and their salary stop with any lawful reason.

- d. Those, after enhancement of qualification, the petitioners are entitled for up gradation in grade 12, instead of stoppage of their salary due to non of their fault.

- e. That, the petitioners belong to an extreme backward and hardship area and hail from a very poor background, having a large family to support, therefore stoppage of their salary and not granting them the due grade is a straight blow on the backbone. An exercise not permissible under the law or the principle are equity, justice and fair play.

- f. That, there is no other remedy available to the petitioners except the instant writ petition, therefore no latches can be laid at their doors.

Attest
H
[Signature]

A 25

- g. That, addresses of parties are given correctly at the head note of the petition.
- h. That Court fee stamp paper worth Rs.500/- is attached herewith.

It is therefore humbly prayed that on acceptance of the instant writ petition, it be directed that salary of the petitioners withheld from May 2016 to date and also to direct the respondents to upgrade the petitioners from BPS-04 to BPS-12, the grade permissible for a PTC Teacher, in the wake of enhanced educational qualification of the petitioners. Any other relief as may be deemed fit for the petitioners may also be given to them.

Dated: 10/10 /2017

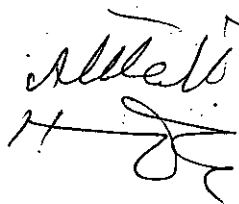
Through

...PETITIONERS

(SARDAR NASIR ASLAM KHAN)
Advocate High Court Abbottabad

VERIFICATION

Verified on oath that the contents of writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.



...PETITIONERS

26

8

IN THE PESHAWAR HIGH COURT ABBOTTABAD
BENCH, ABBOTTABAD

Writ Petition No 978

Bass Pari Bibi wife of Basheer R/o Kolai Meedan P/o
Jabjaal, Tehsil Palas, District Kohistan & others
.... Petitioners

VERSUS

Secretary to the Government of Khyber
Pakhtunkhwa, in the Department of Elementary &
Secondary Education Department, Peshawar &
others

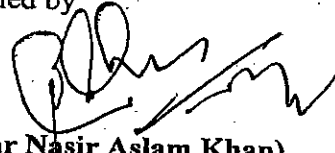
.... Respondents

WRIT PETITION

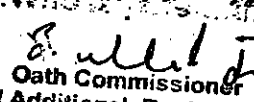
AFFIDAVIT

I, Bass Pari Bibi wife of Basheer R/o Kolai Meedan P/o
Jabjaal, Tehsil Palas, District Kohistan, do hereby declare on
oath that the contents of writ petition are true and correct to the
best of my knowledge and belief & nothing has been concealed
and suppressed from this Honourable Court.

Bass Pari
DEPONENT 13803-9421323-0

Identified by

(Sardar Nasir Aslam Khan)
Advocate High Court Abbottabad



AFFIDAVIT
66781/133
Receipt No: 133
I, Bass Pari Bibi wife of Basheer R/o Kolai Meedan P/o Jabjaal, Tehsil Palas, District Kohistan, do hereby declare on oath that the contents of writ petition are true and correct to the best of my knowledge and belief & nothing has been concealed and suppressed from this Honourable Court.
I,  Oath Commissioner
(Additional Registrar)
Peshawar High Court (Circuit Bench)
3/10/17



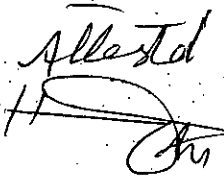
27

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

Court of.....


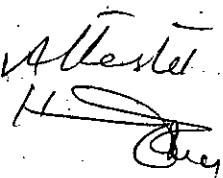

Case No.....of.....

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
24.10.2017	<p><u>W.P.No.978-A/2017.</u></p> <p>Present:- Sardar Nasir Aslam Khan, Advocate for petitioners.</p> <p style="text-align: center;">***</p> <p>The learned counsel for petitioners stated at the bar that the petitioners are neither being paid salary according to their original appointments nor salary for up-graded posts in accordance with their memo dated 14.12.2016; therefore, a pre-admission notice be issued to respondent No.3 for a short date in office. The office is directed to club this petition with writ petition No.527-A/2017 and fix both the same on one and the same date.</p> <div style="text-align: right; margin-top: 20px;">  JUDGE </div> <div style="text-align: right; margin-top: 10px;">  JUDGE </div> <div style="text-align: center; margin-top: 40px;"> <p><i>Attested</i></p>  </div>

28

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge(s).
1	2
14.11.2017	<p><u>C.M No.895-A/2017 in W.P. No.978-A/2017</u></p> <p>Present: Sardar Nasir Aslam Khan, Advocate, for the petitioner.</p> <p>Mr. Yasir Zahoor Abbasi, AAG, for respondents.</p> <p>***</p> <p><u>SYED MUHAMMAD ATTIOUE SHAH, J:</u> Through instant CM, the petitioner seeks impleadment of applicants as petitioners being similarly placed alongwith the petitioner in the present writ petition. Allowed. Office is directed to make necessary entry in the heading of the writ petition.</p> <p style="text-align: right;"> JUDGE</p> <p style="text-align: center;"><i>Attested</i> </p> <p style="text-align: right;"> JUDGE</p>



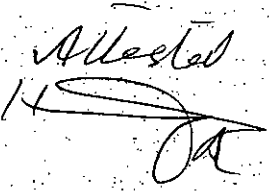
29

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

Court of.....

Case No.....of.....



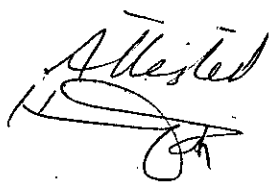
Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
23.01.2018	<p><u>W.P.No.978-A/2017.</u></p> <p>Present:- Clerk of counsel for petitioners.</p> <p>Raja Muhammad Zubair, AAG for respondents.</p> <p>***</p> <p>As the legal fraternity is observing strike on the call of Khyber Pakhtunkhwa Bar Council, therefore, the case is adjourned to a date fixed by the office.</p> <p style="text-align: right;"> JUDGE</p> <p style="text-align: right;"> JUDGE</p> <p style="text-align: center;">Attested </p>

30

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

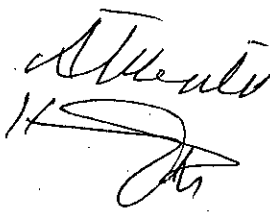

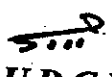
ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge(s).
22.05.2018	<u>W.P No.978-A/2017</u>
	Present: Sardar Nasir Aslam Khan, Advocate, for the petitioner.
	Mr. Yasir Zahoor Abbasi, Assistant AG alongwith Raj Muhammad Khan, DEO(F) Kohistan, respondent No.2; Farid Rabine ADEO (F) Kohistan.

	The latter seeks time to file parawise comments on behalf of respondents No.1 to 3. Adjourned. May do within three days. Notice be also issued to respondent No.4 to file parawise comments before the next date of hearing. Adjourned to 07.06.2018.
	 JUDGE
	 JUDGE
	 Attested

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

FORM 'A'
FORM OF ORDER SHEET

Date of Order or Proceedings	ORDER OR PROCEEDINGS WITH SIGNATURE OF JUDGE/JUDGES
1	2
07.06.2018	<p><u>W.P. No. 978-A/2017</u></p> <p>Present:-</p> <p>Sardar Nasir Aslam Advocate for the petitioner.</p> <p>Mr. Yasir Zahoor Abbasi, Assistant AG along with Fazal Rahim ADEO (F) Kohistan.</p> <p>***</p> <p>Former wants to submit rejoinder to para-wise comments filed by the respondents. May do so within a fortnight.</p> <p>Adjourned to a date in office.</p> <p><u>CM NO. 4-A/2018</u></p> <p><u>SYED ARSHAD ALI J.-</u> Learned counsel for the petitioner states that he would not press instant petition, provided he may be permitted to file separate writ petitions on behalf of the applicants/petitioners. In this view of the matter, instant CM stands dismissed. However, the applicants would be at liberty to file separate writ petitions, if need arise.</p> <p><u>Announced.</u> 07.06.2018</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  </div> <div style="text-align: center;">  JUDGE </div> </div> <div style="display: flex; justify-content: space-around; align-items: center; margin-top: 20px;"> <div style="text-align: center;">  JUDGE </div> </div>



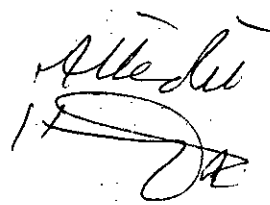
32

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

Court of.....

Case No.....of.....

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
19.09.2018	<p><u>W.P.No.978-A/2017.</u></p> <p>Present:- Sardar Nasir Aslam Khan, Advocate for petitioners.</p> <p>Mr. Yasir Zahoor Abbasi, Asstt. A.G for respondents alongwith Fazal Rahim, ADEO (F) Kohistan.</p> <p>***</p> <p>The latter seeks time to file better comments on behalf of respondent No.3. May do so within a fortnight.</p> <p>Adjourned to a date in office.</p> <p style="text-align: right;">JUDGE  JUDGE </p> <p style="text-align: center;"></p>

ANNEXUR 'D'

33

OFFICE OF THE DISTRICT EDUCATION OFFICER, (F) KOHISTAN.

Ph: & Fax No. 0998407225

Notification:

WHEREAS reported absent by ASDEO/SDEO /IMU. Where as show cause notices were served on Home addresses available in this office through registered post and where as neither joined duties nor submitted convincing replies.

WHEREAS final show cause notice was served in the DAILY NEWS PAPER Shamal Abbottabad on 17/9/2016 in which directed to submit replies for long will full absence from duty but neither attended the schools nor submitted convincing replies to the under signed.

Hence, being the Competent Authority imposed the major penalty of removal from service under E & D Rules 2011 section (2) with effect from date mentioned against the name of each and recovery of pay for the absence period may be made.

S.No	Name of teachers with School	Terminated w.e.f.
1	Bibi Amina PST GGPS Kuz Saprona	23-4-2016
2	Memona PST GGPS Bankad Villag	18-3-2016
3	✓ Shaheen PST GGPS Dhook EZ	21-5-2016
4	Ruby Bibi PST GGPS Dhook EZ	21-5-2016
5	Nazmeen PST GGPS Dhook Gal Jijai	23-4-2016
6	Rahmat bibi PST GGPS Kuz Saprona	23-4-2016
7	✓ Mehnaz Begum PST GGPS Sultan Abad	10-3-2016
8	Lubna Jehan PST GGPS Sultan Abad	18-5-2016
9	Gul badan Shah PST GGPS Dannat	21-5-2016
10	Kansir Bibi PST GGPS Shamal Mujawar Abad	25-5-2016
11	Gul Naseem PST GGPS Khizar Abad	25-5-2016
12	✓ Bas Pari PST GGPS Khizar Abad	25-5-2016

No 4328-34 / DEO(F)KH Dated 23-12

District Education Officer (Female) Kohistan. /2017

Copy of the above is forwarded to:

1. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa
2. The Deputy Commissioner Kohistan upper, Lower and Kolai Pallas.
3. The District Monitoring Officer (IMU) District Kohistan.
4. The District Accounts Officer, Kohistan.
5. The Sub Divisional Education Officer (F) Dassu, Pattan and Pallas Kohistan with the direction to ensure th recover of absent period pay from the Teacher concerned if already paid.
6. The ASDEOs Circle.
7. Teachers concerned.

Handwritten signature and initials at the bottom left.

Handwritten signature and date 23/12/17 with stamp of District Education Officer (Female) Kohistan.

19/1/2018

خدمت جناب ڈائریکٹر ایگزیکیوٹو ایسٹ سٹیشنری ایجوکیشن
۱۲.۲.۱۲ء کے لئے لکھا اور

عنوان :-

مکالمہ اپریل

اپریل لبرٹے کیالی سروسز و ادارتی سائلز شیڈولز جنوری
۲۰۱۵ تا صیفہ :-

جناب عالی!

- 1- لیڈم سائلز ایگزیکیوٹو سروسز ذات ہے۔ اور اصولہ فیڈ بک جنوری
سہ ماہیہ و دودا اقلہ ضلع کو پتال کی ریالٹی ہے۔
- 2- لیڈم سائلز کی تعمیراتی قیمت PTC/PST پتھر سال 2005 میں ہوئی۔
- 3- لیڈم لبرٹے تعمیراتی سائلز ضلع کو پتال کے مختلف سکولوں میں اپنی
خدمات سدا انجام دیتی رہی ہے۔ اور جولائی 2018 تک سدا انجام
دی۔
- 4- لیڈم سال 2015 میں ای۔ ڈی۔ او صاحب نے سائلز کی تنخواہ کو بند کر دیا۔
جب سائلز نے ای ڈی او صاحب کے دفتر سے بابت بند تنخواہ کی وجوہات
مانگی تو برائی ہوئے کہ آپ لوگوں کی تعمیراتی سال 2005 میں جو مطالبی
قالقون ہے اور آپ لوگوں کے پاس مطلوبہ تسلیم نہ ہونے کی وجہ سے
تنخواہوں کو بند کیا ہے۔
- 5- لیڈم ای۔ ڈی۔ او نے لیڈم آپ لوگوں کا ایس ڈائریکٹر و سیکریٹری
پاس بھیج دیا ہے۔ اور جنک ضلع نہیں آتا اس وقت تک
آپ لوگوں کو تنخواہیں نہیں مل سکتیں۔
- 6- لیڈم مذکورہ بالا سائلز جاری رہا کہ 2 جولائی 2018 کو جب سائلز
دوبارہ دفتر ای ڈی او صاحب کی تو ایڈارل نے بتایا کہ آپ کو
مور 17-19-23 کو نوٹری سے لبر طرف کر دیا گیا ہے۔

کورٹ فیس

وکالت نامہ

Before The K.P.I.C Service Tribunal

بعدالت

West Civil Museum

نام Court K.P.I.C

عنوان:

Appellant

مخانب:

Appeal

نوعیت مقدمہ:

ATD

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام

Hameem Khan vs Sumera Nadeem

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال 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

جگہ تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پر داختمہ 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 جز و بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست برآمد

استجارت ناش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

بمقام:

المقوم:

15/11/18
Accepted by

BEFORE THE KYBER PAKHTUNKHWA SERVICE
TRIBUNAL, KPK PESHAWAR.

Service Appeal No. 1501/2018

Gul Naseem

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	Appointment order	A	5
3	Absent Report	B	6
4	Show Cause Notice	C	7
5	News Paper cutting	D	8
6	Termination Order	E	9

list to
12/18

BEFORE THE HONOURABLE SERVICE TRIBUNAL, KPK
PESHAWAR.

Service Appeal#1501/2018

GUL NASEEM.....APPELLANT

VERSUS

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

RESPONDENTS

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

Respectfully Sheweach,

Preliminary Objections.

1. That he Appellant has neither got a cause of action nor locus standi to file the instant Appeal
2. That the Tribunal has no jurisdiction to adjudicate the matter.
3. That the Appellant has concealed the material facts from this Honorable Tribunal.
4. That the appellant has been stopped by her own conduct to file the appeal.
5. That the appellant has been come to the tribunal with unclean hands.

ON FACTS.

1. No comments.
2. Para No.2 is correct to the extent that petitioner was appointed as untrained middle passed teacher in BPS-04 purely on contract basis for the period of three years as stopgap arrangement, but neither her service was extended nor regularized through a proper procedure.

(Copy of the appointment order is annexed as Annexure "A")

3. Reply of Para 3 is that, As per Appointment order she was appointed at GGPS SadarkotKolai, not in GGPS Mahreen.

(Copy of the appointment order is annexed as Annexure "A")

4. Para No. 4 is incorrect, furtherstated thatall the appointments that subject to proof.

5. Para No.5 is Incorrect, as per-report of ASDEO/SDEO/ IMU she was found absent from her school duty. The GGPS Khizar Abad was reported closed by Independent Monitoring Unit during its visit on 10/08/2015 & 9/9/2015. The copy of the attached attendance register with the service appeal is fake, bogus.

(Copy of the absent report is annexed as Annexure "B")

6. Para No.6 is incorrect, that the pay of the appellant has been stopped on her willful absence from her school duty and also due to non-availability of position code for the post of BPS-04 in the PST cadre accordingly her pay was automatically stopped. In this regard Writ Petition No.978-A/2017 is already been pending before the Honorable Peshawar High Court Abbottabad, Bench.
7. Para No.7 is incorrect, Respondent No.3 treated the appellant as per rule and law.
8. Para No.8 is incorrect; she was terminated due to her willful long absence after observing all the codal formalities. Show cause notice was issued on home address of the appellant but she neither replied to the show cause notice nor appear before the competent authority for personal hearing and to rebut the allegation of absence, but the appellant neither replied to the newspaper nor appeared before the competent authority for personal hearing, therefore she was removed from service. The appellant was fully aware of her service terms and condition.

(Copy of the show cause, final show cause published in daily Newspaper & termination order is annexed as Annexure "C", "D" & "E")

9. Para No. 9 is incorrect, no appeal was filed by the appellant. She failed to file appeal as per rule and law.

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

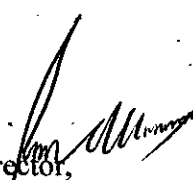
GROUND.

- a) Incorrect and denied, she was terminated due to her willful long absence after observing all the codal formalities, her absentee reported by ASDEO Circle, SDEO and Independent Monitoring Unit. The respondent acted as per law and rules and Policy.
- b) Incorrect and denied, she was reported absent by ASDEO Circle, SDEO and Independent Monitoring Unit.
- c) Incorrect and denied, all the codal formalities observed before her termination.
- d) Incorrect and denied, as per ground para No.c
- e) Incorrect and denied, the respondent acted as per law, rules and relevant Policy.
- f) Incorrect and denied, the respondent acted as per law and rules

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.

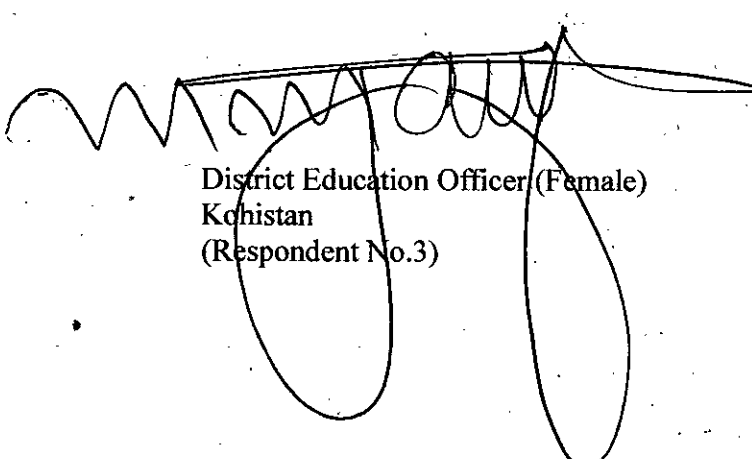


Secretary,
Government of Khyber Pakhtunkhwa,
Elementary & Secondary Education Deptt:
Peshawar.
(Respondent No.1)



Director,
Elementary & Secondary Education
Peshawar.

(Respondent No.2)



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

BEFORE THE KYBER PAKHTUNKHWA SERVICE
TRIBUNAL, KPK PESHAWAR.

Service Appeal No. 1501/2018

Gul Nseem

Appellant.

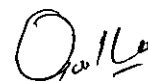
Versus.

Govt: of KPK etc:

Respondent

AFFIDAVIT

I, Mr. Muhammad Siddique, ADEO (litigation) 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

BPS: 4

27 21

TEHSIL PALAS

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS AND LITERACY
KOHISTAN AT DASSU.

Annexure A

Middle

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 Inf: BPS: 04 (Rs. 2345-100; 5345) Fixed plus Usual Allowances as admissiable 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 immediat effect in the interest of public service.

S.N	Name of candidate	Father's Name	Residence/ UIC	Appl't 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 Mahreen	Agst V. Post
4	Gul Samina	Sher Zada	Bataira	PTC	GGPS Mahreen	Agst V. Post
5	Bibi Khobana	Hazrat wali	Bolial	PTC	GGPS Safia Darra	Agst V. Post
6	Taj-un-Nissa	Haroot	Haran	PTC	GGPS Dusham Abad	Agst V. Post
7	Ruqia Bibi	Chaloo	Gulbagh	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	Zanab 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 Kgaro Gaddar	Agst V. Post
14	Basmeen Bibi	Safoor	Khotakot	PTC	GGPS Safia Darra	Agst V. Post
15	Bushra Bibi	Abdul Qadir	Kareen	PTC	GGPS Mahreen	Agst V. Post
16	Gul Nasim	Amir Zada	Kolai	PTC	GGPS Mahreen	Agst V. Post
17	Robina	Amir Zada	Koli	PTC	GGPS Mahreen	Agst V. Post
18	Gul Zaroon	Amir Zada	Koli	PTC	GGPS Nawazabad	Agst V. Post
19	Shabana Khan	Banaras khan	Kuz Paro	PTC	GGPS Unna	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 Shuman Kot	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 Zarakot	Agst V. Post
24	Safina Bibi	Abdur Rahman	Kuz Paro	PTC	GGPS Sadbar Kot	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 Kolai	Agst V. Post
27	Safia Bibi	Gul Zareen	Bar Paroo	PTC	GGPS Kolai	Agst V. Post
28	Shumaila	Mohammad Nazir	Hukamabad	PTC	GGPS Khizarabad	Agst V. Post
29	Nabila Qureshi	Abdul Hanan	Peech Bela	PTC	GGPS Khizarabad	Agst V. Post
30	Bibi Rehana	Shamal	Hukum Abad	PTC	GGPS K.K Jahmra	Agst V. Post
31	Zainab Mustafa	Mohd Mustafa	Kuz Shrial	PTC	GGPS Hujarabad	Agst V. Post
32	Nadia	Mustafa	Kuz Shrial	PTC	GGPS Shilkanabad	Agst V. Post
33	Rashida Jabeen	Khanizaman	Shalkan abad	PTC	CMS Shilkanabad	Agst V. Post
34	Hussan Pari	Malik Haidar	Shalkan abad	PTC	GGPS Shilkanabad	Agst V. Post
35	Nusrat Begum	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	Habat Khan	Shalkan abad	PTC	GGPS Shilkanabad	Agst V. Post
38	Bibi Halima	M. Gulfraz	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 Datt	Agst V. Post
41	Tasleem bibi	Qalandar	Bar Shoyal	PTC	GGPS Shilkanabad	Agst V. Post
42	Kiran Mustafa	M. Mustafa	Bar Shoyal	PTC	GGPS Sabirabad	Agst V. Post
43	Misal Jan	Rokhan	Bar Shoyal	PTC	GGPS Sabirabad	Agst V. Post
44	Sadaf Bibi	M. Mustafa	Bar Shoyal	PTC	GGPS Sharakot	Agst V. Post
45	Saima Hanif	Mohd Hanif	Bar Shoyal	PTC	GGPS Sharakot	Agst V. Post

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Contd: P-02

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Handwritten signature or initials at the bottom right.

OFFICE OF THE ASSISTANT DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION (FICHER) ... KURRI

Inspection Report:

Annexure B

Time of Visit with Date	Name of School	UIC	Name of the Teachers + Position + Status	Enrollment Class Wise								H / P	Status of the school	PTC Fund Position	Short comings/Suggestion /Recommendations /Action Taken/Remarks	
				K a	P a	1 st	2 nd	3 rd	4 th	5 th	Total					
08/06/2014	G.G.P.S. Hujw Abad	35		K a	P a	1 st	2 nd	3 rd	4 th	5 th	Total	H			All these schools were found closed. Teachers are not performing their duties so strict disciplinary action should be taken against their absentee.	
				6 th	7 th	8 th	9 th	10 th	Total							
				Present												
08/09/2014	G.G.P.S. Khizar Abad	35		K a	P a	1 st	2 nd	3 rd	4 th	5 th	Total				Schools were found closed.	
				Present												
				Present												
08/09/2014	G.G.P.S. Mujan Abad	35		K a	P a	1 st	2 nd	3 rd	4 th	5 th	Total				Schools were found closed.	
				Present												
				Present												
				K a	P a	1 st	2 nd	3 rd	4 th	5 th	Total					

[Signature]

Assistant Superintendent
Education
Circle Pafai Kohistan

15/9/2014

SHOW CAUSE NOTICE

I, Khan Muhammad District Education Officer Female Kohistan, as competent authority under the Khyber Pakhtunkhwa Govt; Servants (Efficiency & Discipline) Rules 2011, do hereby serve you Mrs Amal Naseem PST GAPS Khuzar as follows.

- i. That on eve of IMU visit to your school, you remain absent from duty on 25-5-2016 without any information your School was found closed.
- ii. I am satisfied that you are guilty of misconduct and in efficiency as specified in rule 3 of the said rules. Thus you have rendered yourself liable to be proceeded against under the said rules.

In exercise of the powers conferred by the Khyber Pakhtunkhwa Govt. servants (Efficiency & Discipline) Rules 2011, the competent authority is hereby pleased to dispense with the conduct of a formal enquiry and serve you with the instant show cause notice with the direction to submit your defence in written within 07 (seven) days of the receipt of this notice as to why one of the major or minor penalty under rule-4 of the said rules should not be imposed upon you. You are further directed, whether you desired to be heard in person or not.

In case you failed to submit your reply within the stipulated period and not presented yourself for personal hearing it will be presumed that you have no defence to offer and an ex-parte decision will be taken against you.

To,

Mrs. Amal Naseem PST GAPS Khuzar Abad

[Signature]
District Education Officer
(female) Kohistan.

E/No, IMU/Estt., 3285-91/DEO (F) KH: Dated the 6/6/2016,

Copy of the above is forwarded to:

1. The Deputy Commissioner Kohistan.
2. The PA to the Director, Elementary & Secondary Education, Khyber Pakhtunkhwa.
3. The District Accounts Officer, Kohistan.
4. The DMO (IMU) District Kohistan.
5. The Deputy District Education Officer (F) Kohistan.
6. Official Concerned.
7. Office record.

[Signature]
District Education Officer
(female) Kohistan.

یہیں ہوئے ہیں کی بی یو این کونسل کے عوام اپنے نمائندوں سے مطمئن نظر نہیں آ رہے ہیں۔ ان نمائندوں نے جو وعدے کیے تھے ان کی کوئی وجہ اظہار ہوتا ہوا نظر نہیں آ رہا اور ساتھ خود کی جاننے ہیں کہ وہ عوام کے سامنے نہیں آ رہے ہیں۔

انصاف کی حکومت عمران خان کی نمائندگی کا کام نہیں کر سکتی ہے۔ ان نمائندوں نے جو وعدے کیے تھے ان کی کوئی وجہ اظہار ہوتا ہوا نظر نہیں آ رہا اور ساتھ خود کی جاننے ہیں کہ وہ عوام کے سامنے نہیں آ رہے ہیں۔

کوشش غیر حاضری

آپ ضرور ذیل معلومات MU/S/DEO/AS/DEO کی طرف سے معلقہ ایجنسیوں کے ملازمین کو مطلع کرنے کے لیے دی گئی ہیں۔ اس کے علاوہ ان کے دفتر سے مقررہ وقت میں حاضری نہ لگنے کی اطلاع دی گئی ہے۔

نمبر	نام	مقام	تاریخ	حالت
1	✓	دست لابی	23-4-2016	R
2	✓	دست لابی	23-4-2016	R
3	✓	دست لابی	10-03-2016	R
4	✓	دست لابی	10-03-2016	R
5	✓	دست لابی	30-03-2016	X
6	✓	دست لابی	27-03-2016	X
7	✓	دست لابی	29-03-2016	AR
8	✓	دست لابی	29-03-2016	X
9	✓	دست لابی	29-03-2016	X
10	✓	دست لابی	29-03-2016	X
11	✓	دست لابی	22-03-2016	N
12	✓	دست لابی	30-03-2016	X
13	✓	دست لابی	30-03-2016	N
14	✓	دست لابی	18-05-2016	X
15	✓	دست لابی	21-05-2016	R
16	✓	دست لابی	21-05-2016	R
17	✓	دست لابی	21-05-2016	R
18	✓	دست لابی	21-05-2016	X
19	✓	دست لابی	25-05-2016	X
20	✓	دست لابی	25-05-2016	R
21	✓	دست لابی	25-05-2016	R
22	✓	دست لابی	30-05-2016	X
23	✓	دست لابی	23-05-2016	R
24	✓	دست لابی	18-05-2016	X
25	✓	دست لابی	26-05-2016	X
26	✓	دست لابی	26-05-2016	X
27	✓	دست لابی	18-05-2016	X
28	✓	دست لابی	30-05-2016	X
29	✓	دست لابی	30-05-2016	X
30	✓	دست لابی	30-05-2016	X
31	✓	دست لابی	14-05-2016	X
32	✓	دست لابی	10-03-2016	X
33	✓	دست لابی	12-03-2016	X
34	✓	دست لابی	29-08-2016	X
35	✓	دست لابی	29-08-2016	X
36	✓	دست لابی	28-08-2016	X
37	✓	دست لابی	28-08-2016	X
38	✓	دست لابی	28-08-2016	X
39	✓	دست لابی	28-08-2016	X
40	✓	دست لابی	28-08-2016	X
41	✓	دست لابی	28-08-2016	X
42	✓	دست لابی	28-08-2016	X
43	✓	دست لابی	27-08-2016	X
44	✓	دست لابی	27-08-2016	X

پہلے سے کہ وہ بلدیاتی نمائندوں کے ذریعے ترقیاتی کام کروا کر نہ صرف عوام میں اپنے جائیداد کی کوئی کمی ہوگی بلکہ بلدیاتی نمائندوں کو بھی عوام کی عدالت میں سرخرو کر دیں تاکہ بلدیاتی نمائندوں سے این بی اوز سے خیرات مانگ کر دل کو تسکین دینے کے بجائے صحیح سمتوں میں عوام کی خدمت کریں۔

اطلاع عام

ہر خاص و عام کو مطلع کیا جاتا ہے کہ سہ ماہی جانوری ڈویژن کے دفتر میں خیراتوں کی درخواستیں قبول کی جائیں گی۔

اطلاع عام

میرا دل محمد احمد صاحب کی طرف سے ہے۔ ان کے خیراتوں کو قبول کیا جائے۔

اطلاع عام

میں نے محمد احمد صاحب کی طرف سے خیراتوں کی درخواستیں قبول کی ہیں۔

میں نے محمد احمد صاحب کی طرف سے خیراتوں کی درخواستیں قبول کی ہیں۔

میں نے محمد احمد صاحب کی طرف سے خیراتوں کی درخواستیں قبول کی ہیں۔

میں نے محمد احمد صاحب کی طرف سے خیراتوں کی درخواستیں قبول کی ہیں۔

میں نے محمد احمد صاحب کی طرف سے خیراتوں کی درخواستیں قبول کی ہیں۔

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17 ستمبر 2016 ATD

7-9-2016

Annexure "E"

OFFICE OF THE DISTRICT EDUCATION OFFICER, (F) KOHISTAN.

Ph: & Fax No.0998407225

Notification:

WHEREAS reported absent by ASDEO/SDEO /IMU. Where as show cause notices were served on Home addresses available in this office through registered post and where as neither joined duties nor submitted convincing replies.

WHEREAS final show cause notice was served in the DAILY NEWS PAPER Shamal Abbottabad on 17/9/2016 in which directed to submit replies for long will full absence from duty but neither attended the schools nor submitted convincing replies to the under signed.

Hence, being the Competent Authority imposed the major penalty of removal from service under E & D Rules 2011 section (4) with effect from date mentioned against the name of each and recovery of pay for the absence period may be made.

S.No	Name of teachers with School	Terminated w.e.f.
1	Bibi Amina PST GGPS Kuz Saprana	23-4-2016
2	Memona PST GGPS Bankad Villag	20-3-2016
3	Shaheen PST GGPS Dhook BZ	21-5-2016
4	Ruby Bibi PST GGPS Dhook BZ	21-5-2016
5	Nazmeen PST GGPS Dhoop Gal Jijal	23-4-2016
6	Rahmat bibi PST GGPs Kuz Saprana	23-4-2016
7	Mehnaz Begum PST GGPS Sultan Abad	10-3-2016
8	Lubna janan PST GGPS Sultan Abad	18-5-2016
9	Gul badan Shah PST GGPS Dannat	21-5-2016
10 ✓	Kansir Bibi PST GGPS Shamal Mujawar Abad	25-5-2016
11	Gul Naseem PST GGPS Khizar Abad	25-5-2016
12	Bas Pari PST GGPS Khizar Abad	25-5-2016

No 432834 / DEO(F)KH' Dated 23-12- /2017

District Education Officer
(Female) Kohistan.

Copy of the above is forwarded to:

1. The Director, Elementary & Secondary Education, Khyber Pakhtunkhwa.
2. The Deputy Commissioner Kohistan upper, Lower and Kolai Pallas.
3. The District Monitoring Officer (IMU) District Kohistan.
4. The District Accounts Officer, Kohistan.
5. The Sub Divisional Education Officer (F) Dassu, Pattan and Pallas Kohistan with the direction to ensure th recover of absent period pay from the Teacher concerned if already paid.
6. The ASDEOs Circle.
7. Teachers concerned.

District Education Officer
(Female) Kohistan.