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

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 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.

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

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 22/29/2021 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

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Due to COVID 19, last 18 adjains no 23-9-2021 for The Same,

Dadre

23.09.2021

11

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 4/4/4 at camp court abbottabad.

Reader

19.4.2

Due to summer vacation case to come up for the same on $2^{O}/\sqrt{3}$ at camp court abbottabad.

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

Pul to Coup-19 case is ad Journey to 16-03-2021 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

the appellant Gul Naseem present. Counsel for 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.

Appellar Deposited Security & Process Fee

(Muhammad Amin Khan Kundi)

Member

Camp Court Abbottabad

Form- A

FORM OF ORDER SHEET

Court of		
Case No	1501 /2018	

d	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	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. REGISTRAR
2-	26-12-18	This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on $18 - 03 - 19$.
-		CHAIRMAN
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The appeal of My 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 singed 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 Smjection Recured on 4/12/18

1 Memorandum of Apprech is duly Signed by Apprechait

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BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

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		

...APPĚLLANT

Through

Dated: 10/1/2018

(HAMAYUN KHAN)

Advocate High Court, Abbottabad

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

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

Khyher Pakhtukhwa 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

Registrative NULL 19

Re-submitted W-day and filed.

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".
- 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: /6/11 /2018

(HAMAYUN KHAN)

Advocate High Court, Abbottabad

VERIFICATION;-

Verified on outh 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 Fehsil Palas Kohistan (EX PTC/ P		
	· · · · · · · · · · · · · · · · · · ·	APPELLANT
•	VERSUS	
		*
Govt. of Khyber Pakhtunkhwa th	rough Secretary Element	ary & Secondary
Education Peshawar & others.		•
	F	RESPONDENTS
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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" C7

WOHISTAN AT DASSU.

APPOINTMENT ORDER

Consequent upon the approval of Departmental Selection Committee, the competent authority has been pleased to appoint the following (Female) Middle Past ed Untrained candidates Fresh of Tehsil Palas (Union Council wise) against the vacant Posts of C in BPS-04 (Rs. 2345-100-15345) Fixed plus Usual Allowances as admislable under the rules on contract basis for a period of Department in the Schools noted against each with intradiat effect in the Schools & Literacy

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53 Begum Hakeem	Abdul Khan	Seo	PTC		Jalkot Village	Agst V.Post
54 Najma Bibi	Ser Baz Khan	Dassu	PTC.			Agst V.Post
55 Nelam Bibi	Shales Khan	Sazio	PTC		Jaio Chortoo	Agst V.Post
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1 Their appointments are purly on temporary basis and liable to termination at any lime / stage with out assigning any reason/notice.

2 Their Certificates if not verified earlier, should be verified by the DDO (M) ie. 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.

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.

They should not be allowed to take over charge if their age is less than 18-years and above 35-

8 They should produce age and health certificate from EDO Health. Kohistan before taking of

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

/ Appt/PTC's (M)U/C Wise Merit /2006 Dated Kohistan the

Copy of the above is forwarded to:-

Director Schools & Literacy NWFP Peshawar...

P/S to Minister of Education NWFP Peshawar

P/S to Secretary Government of NWFP (S & L) Department Peshawar.

District Nazim Kohistan

District Coordination Officer Kohistan with reference your Notification No.10232-36 dated 20/11/2006 & 10407-10 dated 24/11/2006.

District Accounts Officer Kohistan.

District Officer Schools & Literacy Kohistan.

Deputy District Officer (F)S&L Kohistan.

Candidates concerned.

Executive District Officer chools & Literacy Kohistan

Consequent upon the approval of Departmental Selection Committee The competent authority has been pleased to appoint the following (Female) Middle Passed Untrained candidates Freshiof Tensil Partan | Union Council Mise | against the vacant Posts of PTC in BPS-04 (Rs. 2345-100-5345) Fixed plus Usual Allowances as admislable 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 Schools noted against each with immediat effect in the interest of public service

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. -	10 Noorena	Abdul Hanan	Bankad	PTC	GGPS Dheri Charoon	
:	11 Fatima Mosa	M.Musa	Bankad.	PTC	GGPS I i Charou	Agst V.Post
· -	12 Nadia Kefayat	Kifayat-Ullah	Chawa	PIC	GGPS Dhub Shmal	Agst V.Post
" . -	13 Falza Bibl:	AKUUF WILLIAM		PTO	GGPS Qamar Bandi	Agst V.Post
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- Their appointments are purly on temporary basis and liable to termination at any time / stage with
- Their Certificates if not verified earner, should be verified by the DDO (M) is Mr.Abdur Rehman II Dy:50 (F) S&L Kohistan before handing over their charge.
- tharge reports should be submitted to all concerned.
- प्रस्क बन्द regulations enforced and as prescribed by the A NO TAIDA is allowed to any one. Government from time is one far the category of the Government Servants to which they 5 They will be governed by sup-
- 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-
- 8. They should produce age and health certificate from EDO Health. Kohistan before taking of
- 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

AppuPTC's (M)U/C Wise Merit /2006. Dated Kohistan the Copy of the above is forwarded to:-

- Director Schools & Literacy NWFP Peshawar.
- PIS to Minister of Education NWFP Peshawar.
- 3 PS to Secretary Government of NWFP (S & L) Department Peshawar.

- District Coordination Officer Kohistan with reference your Notification No.10232-36 District Nazim Kohistan dated 20/11/2006 & 10407-10 dated 24/11/2006.
- 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

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Annexure "C"

IN THE PESHAWAR HIGH COURT ABBOTTABAD BENCH, <u>ABBOTTABAD</u>

Writ Petition No. 978 -A/2017

- 1. Bass Pari Bibi wife of Basheer R/o Kolai Meedan P/o Jabjaal, Tehsil Palas, District Kohistan.
- 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 Ḥajira 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.
- Hassan Pari daughter of Malik Haider, wife of Munshi, resident of Palas, District Kohistan.

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

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

RESPONDENTS

OF A

CONSTITUTION OF ISLAMIC REPUBLIC PAKISTAN, 1973. **FOR ISSUANCE** DECLARATION TO THE EFFECT THAT STOPPAGE OF SALARY OF THE PETITIONERS IN THE WAKE OF LETTER NO 1973/F NO 04/F/INQUIRY DATED

WRIT PETITION UNDER ARTICLE 199 OF THE

PESHAWAR 14/12/2016, INSTEAD OF UPGRADING

HER FROM BPS-04 TO BPS-12 AS PER THIER

ENHANCE QUALIFICATION ACCORDING TO

Alleslee

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 ENHANCED EDUCATIONAL OF 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:-

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

Allested 14 Sy 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.
- 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.

- 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 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.

...PETITIONERS

Dated: 10/10 /2017

Through

(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

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

<u>AFFIDAVIT</u>

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.

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Identified by

Receipt No: 23

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

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2	4.10.20	W.P.No.97 Present:-	8-A/2017. Sardar Nasir petitioners.	Aslam	Khan,	Advocate	for
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			The learned c	ounsel fo	r petitio	ners 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 preadmission 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.

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge(s).
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14.11.2017	C.M No.895-A/2017 in W.P. No.978-A/2017
	Present: Sardar Nasir Aslam Khan, Advocate, for the petitioner.
	Mr. Yasir Zahoor Abbasi, AAG, for respondents.

	SYED MUHAMMAD ATTIQUE SHAH, J. Through
	instant CM, the petitioner seeks impleadment of applicant
	as petitioners being similarly placed alongwith th
	petitioner in the present writ petition. Allowed. Office
	directed to make necessary entry in the heading of the wr
	petition.
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PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

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	Present:- Clerk of counsel for petitioners.
	Raja Muhammad Zubair, AAG for respondents.

	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.
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PESHAWAR HIGH COURT, ABBOTTABAD BENCH

ORDER SHEET

Date of Order of Proceedings Order or other Proceedings with Signature of Judge(s).

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22.05.2018

W.P No.978-A/2017

Present:

Sardar Nasir Aslam Khan, Advocate, for the petitioner.

Mr. Yasir Zahoor Abbasi, Assistant AG alongwith Raj Muhammad Khan, DEO(F) Kohistan, respondent No.3, Famil Rahim. 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

PESHAWAR HIGH COURT, ABBOTTABAD BENCH

FORM 'A' FORM OF ORDER SHEET

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	Present:- Sardar Nasir Aslam Advocate for petitioner.	r į	
	Mr. Yasir Zahoor Abbasi, Assistan along with Fazal Rahim ADEO Kohistan.	i <i>A</i>	

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	comments filed by the respondents. May do so within a fortni	~1.	
	Adjourned to a date in office.	gn	
	CM NO. 4-A/2018		
	SYED ARSHAD ALI J Learned counsel for the petitioner sta	ite	
	that he would not press instant petition, provided he may	L.	
:	permitted to file separate writ petitions on behalf of the applicar	Ma	
	petitioners. In this view of the matter, instant CM stands dismiss.	·	
	However, the applicants would be at liberty to file separate w	rit	
	petitions, if need arise.		
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PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

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OFFICE OF THE DISTRICT EDUCATION OFFICER, (F)KO)

Ph: 8: Fax No.0998407225

Notification:

WHERE AS 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.

	o: each	and recovery of pay for the absence period may be made	
;	S.No .	Name of teachers with School	t .
	1	Bibi Amina PST GGPS Kuz Saprona	Terminated w.e.
:	2	Memona PST GGPS Bankad Villag	23-4-2016
	3 V	Shaheen PST GGPS Dhook BZ	18-3-201 6
٠ [†]	4	Ruby Bibi PST GGPS Dhook BZ	21-5-2016
	5	Nazmeen PST GGPS Dhoop Gal lijal	21-5-2016
	6	Rahmat bibi PST GEPs Kuz Saprona	, 23-4-2016
•	7 ~	Mehmaz Begum PST GGPS Syltan Abad	23-4-2015
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i	G .	Lubna Janan PST GGPS Sultan Abad	18-5-2016
ŗ	10	Gul badan Shah PST GCPS Dannat	21-5-2016
1	11	Kansir Bibi PST GGPS Shamat Viujawar Abad	25-5-2016
į	12	Gul Naseem PST GGPS Khizar Abad	25-5-2016
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No 4328-34

J DEO(F)KH' Dated

23-15

/2017

Figures Education Officer (Female) Kontistan.

Copy of the above is forwarded to:

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

2. The Deputy Commission of Marketing Commission of the 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 Kohiston 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.

Privilet Education Officer

M (Female) Kohjelau

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12/1 Los)

فنمت مناب والمركز اليونوى است سيسلدرى اليحاسن المركب عرباء الالم الا

ويوال:

محكماله ابرل

امل لرك بى السروس وا دامرگى سالق متحوش المرك بى المرك المرك بى المرك الم -: كاه 13 تا صنيعلم 15 مام

ا بالاجان

1- ليرم سأملم الي بورس عودت دات سے - اور صولدت دليتواه ك میمانده و دود افتاد فنله کوسیّال ی ریالتی یه -

2- ايرم سأملى لتيناك فيت PTc/PST يشيرسال 2005 سين بوك - 2 فیمات سوانی مینی دینی ہے۔ اور جوانی 18 مو کا میں موالی ج

المركة معال 15 مهين اي - أو صاحب في معالم في منطي أو سندارول -وم سائله ای دی او صاصب کے دفتر سے بابت سے ستی ای دورویات قالال ما اور آن لولوں عالی معلولہ لیس الم ہونے کی و الرسط منظال ما اور آن لولوں کے باسس معلولہ لیس الم ہونے کی و الرسط

ح- يدم اي - دى - أ هن أسال أن الحولان كالسين والرملير وسيدلمرى سَوْلِهِ لَ لَهُ سِلُهُ لِلْ اللَّهِ اللَّهُ اللَّاللَّا اللَّهُ الللَّهُ اللّ عيس العج دي - اور جنتي صيابيس آنا أسي دهن على سرَّا لوُّلُول كُو سَنَّوْسَ مِنْ مِنْ مِلْ مَا مِنْ مِلْ مَالْمُ اللَّهِ مِنْ مِلْ مَا اللَّهِ مِلْ مُلْكُول مد ليركم مذكوره بالاسسلم عادى رياكم هاجولاني عراه كي لوي سائل مير الله د مند اي دي أو صاص في قد النهادال نه سّال كم المرد مور فر71-13-28 كو كو لو كرى سى ليطرف كردي لي سي ا

P-T-0

آ- لربی عذکورہ حکی میں سائلہ سنجلاف ڈیوٹی سے ویروافر دسنے کے الزامات لگائے گئے سین ۔

4- لیربس نم از سال کوه کے سے تاحال لبھی میسرحافد از رہی ہے۔ اور الحقالی قاندن ایمان احتیاب کری گئی ۔ آو (O-D) اور ت کے مطابق امنی ساللہ جنہاں کر حکی ہے۔ حسکا باقامرہ اوازت فیتلف ادتقات میں تھنیل نے دی گھیں ۔

كم سائلم كو كؤلرى ليز كالكرف اورسالف لقاع ستوليب دادا كرف كا علم صادر فرمايا هائه -

عرقوح 18-70-02

صعاة على منه مند ماى المرداده سالنه لولى مرال بالس كوسيال (سالقد شير گور الفت الدر الخرى سكل حفرا و كوسيال) من المرابع من المرداد الفتران من المرابع من المرابع المرا كورث فيس

وكالبث نامير

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Appeal : is in its	
باعث تحریر آنکہ اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آل مقام	
Hamenfun Khen 3 Sumera Nauco Dee Lot of the Control of the Sun of Sun o	
ر ساحب موصوف کوکرنے راضی نامہ وتقر رثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈ گری میں	100
کرانے اجراء وصولی چیک رو پیہ وعرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت مراہ اپنی ضرورت مقدمہ مذکور کی کل پاکسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی	
عبائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا معرف منظور وقبول ہوگا۔ دوران مقدمہ جوخرچہ وہر جاندالتوائے مقدمہ کے سبب ہوگا اس کے ساختہ پر داختہ مجھ کومنظور وقبول ہوگا۔ دوران مقدمہ جوخرچہ وہر جاندالتوائے مقدمہ کے سبب ہوگا اس کے	[
مستحق وکیل صاحب ہوں گے۔ نیز بقایار قم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہویا علیہ استحق حدیے باہر ہوتو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کر دہ میں	300
🥻 کوئی جز و بقایا ہوتو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے ۔ نیز درخواست بمراد	
استجارت نالش بصیغهٔ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کواختیار ہوگا۔ لہذاو کالت نامہ تحریر کر دیا تا کہ سندر ہے۔	J. C.
15/11/18 1/18	(a)
وقاص فو نوسنیت پیجری (ایب آباد)	

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

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2	Appointment order	Α	5
3	Absent Report	В	6
4	Show Cause Notice	C	. 7
5	News Paper cutting	· D	8
6	Termination Order	Е	9

WY A

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 Sheweath,

S.

Preliminary Objections.

- 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 Unitduring 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 tonon- 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.

GROUNDS.

- 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.
- 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 andrelevant Policy.
- f) Incorrect and denied, the respondent acted as per law and rules

In view of the above made submissions, this Hon'ableTribunal 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)

Direct

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

DISTRICT OFFICER KOHISTAN AT DASSU OFFICE OF THE EXECT Malle Consequent upon the approval of Departmental Selection Committee the competent authority has been pleased to appoint the following (Female) Middle Passed Untrained candidates APPOINTMENT ORDER. Fresh of Tehsil Palas (Union Council wise) against the vacant Posts of PTC in BPS-04 (Rs. 2345-100). 535) Fixed plus: Usual Allowances as admisiable 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. Remarks GGPS Gulababad No.14 Agst V.Post Father's Name DICE Name of GGPS Darra M.Khel PTC Agst V.Post candidate Bataira PTC Abdul Shakoor Agst V.Post GGPS Mahreen Bataira 1|Shakira Sadam Khan PTC Agst V.Post GGPS Mahreen 2Rakhshanda 3Yasmin Bibi Bataira GGPS! Safia Darra Agst V.Postli PTC Sher Zada Bataira GGPS Dusham Abad A PTC Agst V.Post Sher Zada Botial Gul Samina GGR Nawazabad PTC Hazrat wali Agst V.Post Haran Bibi Khobana GGRST Uhoom Gali PTC Agst V.Post Haroot Gulbagh GGRS2 Haiderabad PTC 5Taj-un-Nissa Agst V.Post Chaloo GGPSX Bahadarabad Qadam Khan Haran Rugia Bibi PTC Agst V.Post Haran ! Masra Bibl Agst V.Post Chaloo GGPS Datt Haran: Tasleem bib PTC GGPS Gulibagh Agst V.Post Chaloo Sherin Haran Hasleem Bibi GGPS Gulibagh Agst V.Post PTC Mohammad Gaddar GGPS Kgaro Gaddar N Zanab Bibi PTC Agst V.Post Nazcer Gaddar Mohammad Sirtal (GGPS) Safia Darra /12 Noshaba PTC Agst V.Post V13 Parveen Bibi Khotakot Agst V.Post Safoor Mahreen GGPS Kareen 14 Basmeen Bibi Abdul Qadir GGPS Mahreen Agst V.Post Kolai 15 Bushra Bibi Agst V.Post Amir Zada PTC Mahreen GGPS Koli नि Gul Nasim Nawazabad PTC Amir Zada Agst V.Post GGPS Koli V17 Robina PTC Agst V.Post Amir Zacia Kuz Paro GGPS Unna 118 Gul Zaroon Banaras khan Mohd Nazeer Shah Kuz Paro PTC Agst V.Post GGPS5 Unna -19 Shabana Khan Shuman Kot Kuz Paro Aast V.Post GGPS /201Sekina Bibi GGRS% Shuman Kot PTC Agst V. Post Qulab Din Kuz Paro 72 Khalida 422 Gul Shah Naz PTC Mohd Nazeer Shah Kuz Paro Zarafkot Agst V.Post GGPS SGPS Sadbar Kot PTC Agst V(Post Kuz Paro 23 Samina Bibi Abdur Rahman GGPS Sadbar Kot PTC Mohd Nazeer Shah Kuz Paro Agst V. Post 74 Salina Bibi 25 Hussan Bibi PTC Agst V.Post SGRS Kolai Kuz Paro Abdul Qayoum PTC GGPS Kolai Agst V.Post Bar Paroo 元Saira Bibi Khizarabad Khizarabad PTC Gul Zareen Hukamabad Agst V.Post (IGGPS Mohammad Nazir 27)Salia Bibi PTC Agst V.Post Peech Bela Hukum Abad PTC 8 Shumaila GGPS: KK Jahmra Abdul Hanan Agst V.Post SGPS Hujarabad Nabiia Qureshi Agst V.Post Shamal Kuz Shrial (70 Bibi Rehana GGPS. Shilkanabad Mohd Mustafa Agstiv Posts Kuz Shrial . S RZainab Mustafa PTC Shilkanabad V Mustala Kuz Shrial Agst V.Post GGPS Shilkanabad Shalkan abad PTC Khanizaman 32Nacia Agst V.Post 83 Rashida Jabeen GGRS% Shilkanabad Shalkan abad PTC Malik Haidar Agst V.Post Shalkan abad PTC GCPS Shilkanabad 34)Hussan Pari Pir Dad Agst V.Post Nusrat Begum Shalkan abad PTC GGPS Shirkanabad Agst V.Post Daleel Shalkan abad PTC GGPS Shilkanabad Begum Bibi Habat Khan Agst V.Post Shalkan abad PTC GGPS Shilkanabad Bibi Hajira Agst V: Post M.Gulfraz Hayat Mohammad Shalkan abad PTC Bibi Halima Agst V.Post GGPS Datt Bushra Hayat GGPS: Shilkanabad Gul Fraz Bar Sheyal Agst V.Post 0)Aisha Bibi GGPS# Sabirabad PTC Agst V.Post Qalandar Bar Sheyal Tasleem bibi PTC Sabirabad M. Mustafa Bar Sheyal GGPS Kiran Mustala PTC Sharakot Bar Sheyal Rokhan Misal Jan GGPS N1.Mustafa Bar Sheryal 24)Sadal Bibi Contd:P-02 Mohd Hanif 5 Saima.Hanil

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Annexure C

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 but Nascom PST lass Khizer as fallows.

- That on eve of IMU visit to your school, you remain absent from duty on <u>25-5-361/h</u> without any information your School was found closed.
- 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, Line Naseem PST Liggs Pluzer Plan District Education Officer (female) Kohistan.

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

District Education Officer (female) Konistan.

Annexure B

لعمات فالمومت عمران مان فی مانیم مولئے میں کی جی بوشن اوس معوام فریری جاکر نواز شریف نے بی دانی منی خلاقات کیلے آئے والے مخلف وقود سے الماف كالكر كالمتراض كرا كل من الله المستعدد سيد الماكندون من المراس ال امام اس کے باوجود مران مان کرائدی مفتلو کے دوران کیا۔

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دین خلک وزیراعلی کے لی کے عده ایناء مرتا مواظر میں آر بااور تراکنده خود می ر دور سه دریوس ب ب ب گون لینا چاہیے تا موممران خان مبائنے میں کدد دواع کے مائے میں ہیں دو ہے مرکز کر ایس کا مرحمران خان مبائنے میں کہ دو دواع کے مائے میں میں دو ہے۔ الکی توجہ ندوی البغا ہم مطالبہ کرتے ۔ جارے بھی کس ہے بھی کس سے تجرات ما تک كر وام كوخوش كروب بيل جس طرح عيدالفي بدى كساته كل تعليم على المادت كي مون ير منتف تعلمون في كوث ليكر وام می تقیم کرے ابن کاد کردگ اورائی سیاست کو زعده كرف كى اكام كوشش كى كى حكومت كر میاے کہ وہ بلدیاتی نمائندوں کے زریعے ترقیاتی کام کردا کرند مرف اوام می اید جانعال مایوی کوشتم کریں بلکہ بلدیاتی نمائندوں کو میمی عوام کی عدالت میں سرخرو کریں تا کھ بلدیانی فائندے این کی ادوز سے خرات مانگ کردل کوتل دیے کے عبائے مجم سولوں

المتحيراعلى فيبريخو تخواه لوري لوكس ان کو بحال کروا کرستاهل کریں۔ مظفرا باديس بوكا ن عن بكرام، المسمود، برى بور عن ددكاكل ين جكدايب آباد ،طورفر، اش كم مبلوكمب كالنعاد كرديا جائكا ب می ارینگ کے قرائض بزارہ ك استند كون تمريز خان انجام شراعوام کی خدمت کرسیس_ ، الا تمريز حال نے ميڈيا ہے كفتكو (Legis) وسفيكها كمه باسكت بال كى طرح ار المي براره وويزن كالمتبول رين كعيل

مرفاس وعام ومطلع كماجاتا بكرماة مه باكتال فيك بال فيدريش خصومي راره دونیزن میں چک بال تعیل پر توجہ نا ہے تمریز خان سے کہا کہ بہت جلد چک بال تملیعی شپ کا انعقاد کیا جائیگا ل ف كا مراده ي غورى على روزاندى ول كوير ييش دى جاني بيادراس دند ث می می میک بال دکی گئے جس میل کوئر پورٹی ملکی _ ے دجوما کرے

> شش کررہاہوں،ارشداقبا<u>ل</u> きなどのよりというしかし اور الم الموق من كدونر آن وال بر اور يسادافعى كاجائزكام ميلكرون ماسه كراكم مير عماقد حمق كاكول مائزكام بوبلاجيك ممريد ماته رايله الثاء الله اسكامو بائز كام فرزاحل الكافي كالمتول في تحصيلة وارشدا قبال ص عاديس ديوني كرائض مرانجام

> > کی کمبر مرعام دریای کرار باہے جس

كيماته باقاعدة ترييك معابده يدس

رجينك كالإبندب يحريهال نظام الزاجا

ولنادىباؤى بعادي مقدارين باستثله

بافرون كوبحى ختة بريثاني كامامنا

عائشه بي بيازوجه تحرر ين وخر مير حسن وت مو پکل ہے جس کے شری ور نام شن محرر فین (خاوعه) تميراني بي وختر مير حسن ولد نورحسن (دالد) مرور جان (والده) بین ان کے علاده کوئی شرکی دارث ندے کمی کو عذر امرّاض مولو ملقه پرواری ماسمره ش نبر 1

إحارةعام ميرا والدمتسود الرحمن دلدم والجباد لوستديوجكا

ب جن کے شری وردا و من مساة تاج المری يره و محمد الفنل و محمد سباول، محمد خياز و محمد ارمثد يران و تقيم اخر مشارم تورين في في وخران مسود الرحن إلى ان علاه وكوفي وارين بين ب أكر كى كواحمر اض دواقو حاقد پاؤارى ب مآست دن کے اعروالیا کرسکن ہے

انب يندسجان ولدمتعود الزمن ياؤن

يثمام كالمحيص ولدفحرابيب شيث لانك المثورلس ليبدآ بادكا لمازم تماش فيعود تل فانحده كام كم تنا حرمددد ماه سے من نے کام چیور دیا ہے اپی والمكا مود دى ب فقيادى كاكون بى عراياليى الدائد الله الميسى في كرية والت فود ليبث أباد لدون آس سے رجون کرے اگر کی میں بالسی والدوف وكارى امنيث لاتف آفس عي باليي فى دامد دى سيادرندى بلزغيرا يريانيو كريكي

مَنْكُورِ فِي الْمَرِدِ شَاخَنَ كُارِدُ نِيرِ 13503-0523468-1 موبال فبر 0301-5185511

في كروا كي توجي اس كا ذر دارجين بون ي كي مح إلىى مولاد كوكونى شك شيرموز المدين والطوكرما ہے بمراحکیامی سے محی مجل غیر وار یا غیرسے ليسئ جوانزدسنت داجا وكرس

وللوقماليسهاكن كمزحابالافتكياري

معمشابل PST GGPS کمت کلیا 12-03-2016 35 PST/Ziv GGPS بری کریال 29-08-2016 76 ويمازPST GGPS يركارال 29-08-2016 37 PST GGPS کرم آبار 26-08-2016 PST-/ Sec GGPS 26-08-2016 انلبارpst Sec GGPS 26-08-2016 40 : مرست کل P\$T GGPSوحكيلدواذكه 26-08-2016 ggps رسو مامرمین PST 28-08-2016 PSTJUST GGPS 26-08-2016 43 اشدمادید.PST و GGPS-البائزل 27-08-2016 44) لاجشرPST GGPSمال باثرل 27-08-2016

Anneroure E



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

Ph: & Fax No.0998407225

Notification:

WHERE AS 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 Saprona	23-4-2016
2	Memona PST GGPS Bankad Villag	26-3 -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 Saprona	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 4328-34

/ DEO(F)KH' Dated

27-12-

/2017

Strict 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 Offic

(Female Kohisian.,