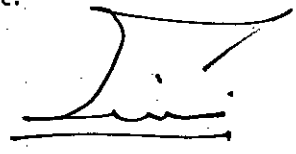


09.09.2022

Learned counsel for the appellant present.
Preliminary arguments heard.

Points raised need consideration, hence the appeal in hand is admitted to regular hearing subject to all legal and valid objections. The appellant is directed to deposit security and process fee within 10 days. Out district respondent be summoned through TCS, the expenses of which be deposited by the appellant within three days. To come up for submission of written reply/comments on 07.11.2022 before the S.B at Camp Court Swat.

Rs 100
Appellant Deposited
Security & Process Fee
1519


(Salah-Ud-Din)
Member (J)
Camp Court Swat

9th June, 2022

None for the appellant present.

Counsel are on strike. To come up for preliminary hearing on 08.07.2022 before the S.B at camp court Swat.





(Kalim Arshad Khan)
Chairman
Camp Court Swat

08.07.2022

Since 8th July 2022 is declared as holiday. Therefore, case is adjourned to 5/8/2022 for the same as before.

5-8-22


Reader
Due to same reason the case is
adjourned to 9-9-22 for the same.



15.11.2021

Learned counsel for the appellant present.

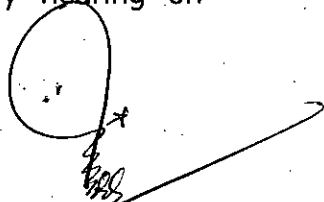
Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for preliminary hearing before the S.B on 25.01.2022.


(MIAN MUHAMMAD)
MEMBER (E)

25.01.2022

Clerk of counsel for the *appellant* present.

Former requests for adjournment due to general strike of the bar. Adjourned. To come up for preliminary hearing on 24.03.2022 before S.B.


(Mian Muhammad)
Member(E)

24.03.2022

Appellant present in person and requested for transfer of appeal to the diary of Camp Court Swat.

Since the matter pertains to territorial limits of Malakand Division, therefore, request is accepted. Case to come up for preliminary hearing on 07.04.2022 before S.B at camp court, Swat.



Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7431 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	20/09/2021	<p>The appeal of Mst. Alahida presented today by Mr. Sabir Shah Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>2-</p> <p>This case is entrusted to S. Bench at Peshawar. Notices be issued to appellant/counsel for preliminary hearing to be put up there on <u>15/11/21</u>.</p> <p>Learned counsel for the appellant present.</p> <p>(Learned counsel for the appellant requested for adjournment on the ground that he has not prepared the brief. Adjourned to come up for preliminary hearing before the S.B on 25.01.2022.)</p> <p style="text-align: right;">(MIAFIRULANMAD) MEMBER (B)</p>

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

CHECK LIST

MST ALHADA

Versus

Court + KPK

..... Appellant

..... Respondents

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

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

Name:- Sabit Shah

Signature:- [Signature]

Dated:- 20-9-021

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 7431 of 2021

Mst. Alahida

... Appellant

VERSUS

Government of KP and others.

... Respondents

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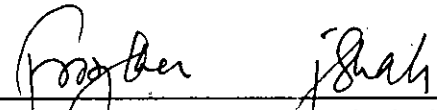
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1.	Memorandum of service appeal	1-13
2.	Certificate, Affidavit & Correct Addresses	14-16
3.	Application for condonation of delay	17
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5.	Photo-snap of the school	B	21
6.	Copy of inquiry report bearing No. 381/F.No.43/SDEO (F) ASDEO/ Estab dated 10.05.2017	C	22-23
7.	Copies of letter bearing No. 165/F.No. 48/SDEO (F) ASDEO /ESTAB and letter bearing No.166/F.No. 48/ SDEO(F) ASDEO /ESTAB of even date 03.04.2018	D	24
8.	Copies of reply dated 03.04.2018 and medical reports	E	25-28
9.	Copies of transfer application of the appellant dated 26.04.2018, transfer order dated 21.05.2018 and charge report dated 22.05.2018	F	29-31
10.	Copy of transfer application dated 25.05.2018	G	32
11.	Copies of show cause notice dated 07.12.2018, reply of the appellant to show cause notice and attendance register of December 2018	H	33-35

12.	Copies of transfer application dated 16.02.2019 and medical documents including the discharge slip	I	36-38
13.	Copies of show cause dated 26.02.2019 and reply 27.02.2019	J	39-42
14.	Copy of removal order dated 29.05.2019	K	43
15.	Copies of departmental appeal dated 24.06.2019 and notification dated 19.07.2019	L	44-48
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17.	Copies of letter No. 4861/F.No.29/F/Appeal Dir Upper dated 02.10.2019, letter No. 7814/F.No.29/F/Appeal Dir Upper dated 14.11.2019 and letter bearing No. 4525/F.No.57/DEO(F)/DIR/U/ dated 10.12.2019	N	53-56
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19.	Copy of appeal dated 01.04.2021	P	62
20.	Copies of letter bearing No. 5122/F.No.49/F/Appeal/Dir-U and letter No. 4375 dated 28.04.2021	Q	63-64
21.	Copy of letter bearing No. 6091/ F.No.49/F/Appeal/ Dir (U) dated 01.07.2021	R	65
22.	Copies of W.P No.703-M of 2021 and order dated 07-09-2021	S	66-70
23.	Power of attorney	71-73
24.	Wakalat Namas	74

**Petitioner
Through Counsels**



Sabir Shah
Advocate Supreme Court of Pakistan
Cell No.03005746744



Falak Naz Khan & Jamal Shah
Advocate High Court
Cell No. 03339491110
Cell No.03429611335

Office: 2nd Floor, Room No.8,9,
Continental Plaza Makanbagh
Mingora Swat

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,

PESHAWAR

Service Appeal No. _____ of 2021

Mst. Alahida W/O Bahadar Munir R/O Qashqaray Payeen, Tehsil & District Dir Upper.

... Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa at Peshawar.
2. Director Elementary & Secondary Education, Government of Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer (Female), District Dir Upper.
4. Sub Divisional Education Officer (Female) Primary, Dir

... Respondents

Service Appeal Under Section 4 of Service Tribunal Act, 1974, against the order dated 25-09-2019 of respondent.3, whereby services of the appellant have been dispensed with and order dated 01-07-2021 of respondent No.2, whereby the appeal of the appellant has been dismissed without assigning any lawful and cogent reason.

Prayer:

On acceptance of this service appeal, the impugned order dated 25-09-2019 of respondent No.3 and order dated 01-07-2021 of respondent No.2, may kindly be set aside and appellant may kindly be re-instated with all back benefits.

Any other relief not specifically prayed but this august court deems proper may also be granted.

Respectfully Sheweth:

1. That, appellant is the bonafide resident of Village Qashqaray Payeen, Tehsil & District Dir Upper and was appointed as PST vide order bearing Endst: No. 336-40/F/AT/Appointment/DEO(F)/SEB dated 05-03-2016. **(Copies of CNIC and order dated 05.03.2016 are annexed as annexure "A")**
2. That, after completion of all codal formalities, the appellant took charge at Government Girls Primary School, Jarjori, Dir Upper and continued her services with zeal and zest and to the satisfaction of her high ups. She performed her duties regularly and punctually despite the remoteness and severe cold weather of the school area, i.e. Government Girls Primary School, Jarjori, Dir Upper, where there is a constant snow and is about 17 Kilometers distance including 3 Kilometers mountain walking trail from the appellant's home. **(Photo-snap of the school is annexed as annexure "B")**
3. That, on the orders of District Education Officer (Female), District Dir Upper/ respondent No.3, the Sub Divisional Education Officer (Female) Primary, Dir/respondent No.4, conducted an inquiry against the teachers of GGPS, Jarjori on 27.04.2017, and pointed out that on the visit day both of the teachers of the school including the appellant were present but the other teacher namely Shariqa Shabeena (PST) was impersonated by her sister namely Sand since one week, as the said teacher namely Shariqa Shabeena has been married now at Chakdara, Dir lower and when she is at her husband's home, so her sister perform her duties in her behalf, consequent upon the pay of the said teacher was stopped for involving in impersonation. The said facts were reported by respondent No.4 in his inquiry report bearing No. 381/F.No.43/SDEO (F) ASDEO/ Estab dated 10.05.2017. **(Copy of inquiry report**

- bearing No. 381/F.No.43/SDEO (F) ASDEO/ Estab dated 10.05.2017 is annexed as annexure "C")
4. That, on another surprise visit of respondent No.4 by the orders of respondent No.3 to GGPS, Jarjori on 19.03.2018, which was reported to respondent No.3 vide letter bearing No. 165/F.No. 48/ SDEO (F) ASDEO /ESTAB dated 03.04.2018 stating therein that the school was found closed and both of teachers including the appellant and the other Shariqa Shabina along with the Chowkidar namely Muhammad Naeem were found absent from 01.03.2018 till the visit date, in action the pay of the whole staff was stopped and an explanation was called from the whole staff of the GGPS, Jarjori vide letter bearing No. 166/F.No. 48/ SDEO (F) ASDEO /ESTAB dated 03.04.2018. **(Copies of letter bearing No. 165/F.No. 48/ SDEO (F) ASDEO /ESTAB and letter bearing No. 166/F.No. 48/ SDEO (F) ASDEO /ESTAB of even date 03.04.2018 are annexed as annexure "D")**
 5. That, the explanation letter bearing No.166/F.No. 48/ SDEO (F) ASDEO /ESTAB dated 03.04.2018 was properly replied by the appellant along with documented proof of her medical reports proving her severe illness on the day of the surprise visit of respondent No.4, i.e. 19.03.2018 as she was in hospital on the same day for her treatment. **(Copies of reply dated 03.04.2018 and medical reports are annexed as annexure "E")**
 6. That, the appellant filed an application before respondent No.3 on 25.4.2018 for her transfer to GGPS, Khan Shaheed or another urban school as the school of her present duty was far flung from her residence as already stated in para No.2 of the facts of the instant service appeal, which was not responded till date, on the other hand the other teacher of the same school namely Shariqa Shabeena (PST) was transferred from GGPS Jarjori, Dir Upper to GGPS, Dolishah, Dir lower vide order bearing Endst; No. 3878-81/F.No 509/(F)G Transfer dated

21.05.2018 given her charge as head teacher to the appellant on 22.05.2018. It is pertinent to mention here that the said transferred teacher namely Shariqa Shabeena was charged of impersonation and also of absentia as stated in para No.3 & 4 of the facts of the instant service appeal in detail, this clearly transpires the malafide of the official respondents, taking strict actions against the appellant and showing leniency to the other teacher. **(Copies of transfer application of the appellant dated 26.04.2018, transfer order dated 21.05.2018 and charge report dated 22.05.2018 are annexed as annexure "F")**

7. That, the appellant filed another application dated 25.05.2018 for her transfer from GGPS, Jarjorai to any other school of the same district as she is performing her duties in the same school from about three years and has completed her tenure, but now being ill, she is facing hardships in reaching the school as there is walking mountainous trail of about 2 or 3 kilometers with a total of 17 kilometers from her residence, but again she was not responded by the official respondents. **(Copy of transfer application dated 25.05.2018 is annexed as annexure "G")**

8. That, the appellant was performing her duties in the same school of her duty, i.e. GGPS, Jarjori, Dir upper, inspite of the hardships she was facing, the appellant received a letter bearing No. 4033-40/F.No.04/DEO(F)/Pry/Dir-U dated 07.12.2018, subject; FINAL SHOW CAUSE NOTICE, stating therein that the appellant is absent from duty since long, and therefore is directed to ensure her presence and show cause of absence within 03 days, which was properly replied by the appellant within due time, that she is regularly and punctually attending the school and some of her leaves/absentia on her part is due to her illness and she being the only one teacher in a two teacher school is facing very hurdles in managing the school, as on one side there is a conflict of the school's

Chowkidar with his son on the school's property and the post of Chowkidar, due to which they keep the school close and on the other side parents of the children do not send them to school, also the appellant is facing problems in reaching the school due to snow fall and severe cold along with the daily transport cost of about Rs.3000. Again the appellant requested respondent No.3 in her reply to transfer her from GGPS, Jarjori to another school. It is also pertinent to mention here that despite the hardships and difficulties the appellant was facing, she tried every possible to attend the school regularly, which is clearly reflected from her school attendance register of the December, 2018. **(Copies of show cause notice dated 07.12.2018, reply of the appellant to show cause notice and attendance register of December 2018 are annexed as annexure "H")**

9. That, the appellant being severe sick was again admitted w.e.f. 15.02.2019 to 17.02.2019 for treatment at hospital, during this period she also undergone a surgery which led to her absence on her duty. In order to save the precious time of children the appellant again filed a transfer application before respondent No.3 on 16.02.2019, i.e. during her stay at hospital, but again it was not responded by the official respondent. **(Copies of transfer application dated 16.02.2019 and medical documents including the discharge slip are annexed as annexure "I")**

10. That, another final show cause notice on 26.02.2019 was issued to appellant through press published in daily Mashriq in name of the appellant for assuring her attendance on duty and to appear before respondent No.3 for explanation regarding her absentia, which were replied by the appellant with plausible and genuine reasons on 27.02.2019. **(Copies of show cause**

dated 26.02.2019 and reply 27.02.2019 are annexed as annexure "J")

11. That, despite the replies to every show cause notice with genuine reasons of her absentia, the appellant was punished and imposed upon with the major penalty of removal from service w.e.f 01.05.2018 vide office order bearing No. 1819-23/F.No.4/DEO(M/F/O/ADO (P) Estab; dated 29.05.2019. It is also pertinent to mention here that despite her severe sickness, the appellant tried her best to attend the school and make sure her presence at the school which was completely overlooked by the official respondents intentionally. **(Copy of removal order dated 29.05.2019 is annexed as annexure "K")**

12. That, the appellant filed a departmental appeal before respondent No.2 on 24.06.2019 requesting therein to redress her grievance by explaining her position that she has been illegally and unlawfully removed of her services just because of personal obstinacy and revenge. The appellant also prayed to struck down her removal order dated 29.05.2019 and the appellant be reinstated on her duty consequent upon an enquiry was initiated to probe into the matter vide notification bearing Endst; No. 4538-34/F.No.49/(F)/Appeal Dir (U)/ dated 19.07.2019 whereby one official Mr. Muhammad Inayat ur Rehman, Vice Principal B-18 GHSS, Havelian, District Abbotabad was appointed as enquiry officer. **(Copies of departmental appeal dated 24.06.2019 and notification dated 19.07.2019 are annexed as annexure "L")**

13. That, the enquiry officer after conducting inquiry submitted his detailed inquiry report along with all supporting documents, and submitted his recommendations on the basis of his facts/findings enquiry, recommending therein to exonerate the appellant of the major penalty of removal and impose the

minor penalty of upholding two increments on the petitioner, the recommendations of the enquiry officer are given below for ready reference.

RECOMMENDATIONS

On the basis of facts/findings concluded during enquiry, following recommendation are suggested if authorities agreed.

- ❖ *Under the Khyber Pakhtunkhwa civil servant rules (Efficiency and Disciplinary) sub rules (4) (a) (ii) the minor penalty of upholding two increments may be served imposed on the accused and may be exonerate from the major penalty of removal from service imposed by DEO (F) Dir Upper vide her office order Endstt No. 1819-23/F.No.04/DEO (F) (M/F) ADO (P)/ Esttb dated 29.05.2019.*
- ❖ *An affidavit may be obtained from the accused for performing her duties regularly to the extend.*
- ❖ *Further she was found irregular or commit any offence, strict disciplinary action may be taken against her as per rules.*
- ❖ *The absence period may please be converted to Medical leave or leave without pay under the leaves rules 1981.*

(Copy of enquiry report is annexed as annexure "M")

14. That, respondent No.3 was been asked to submit detail report in the light of enquiry recommendation and to proceed further into the matter by respondent No.2, vide letter No. 4861/F.No.29/F/Appeal Dir Upper dated 02.10.2019 and another reminder, letter No. 7814/F.No.29/F/Appeal Dir Upper dated 14.11.2019 which was finally responded by respondent No.3 vide letter bearing No. 4525/F.No.57/DEO(F)/DIR/U/ dated 10.12.2019, alleging therein that the enquiry report of Mr. Inayat Ur Rehman, (the enquiry officer appointed to look into the matter) is one sided and biased as he belongs to the same locality and that the enquiry officer has ignored the facts and therefore the matter in hand may be re-inquired through third party/ impartial person. **(Copies of letter No. 4861/F.No.29/F/Appeal Dir Upper dated 02.10.2019, letter No. 7814/F.No.29/F/Appeal Dir Upper dated 14.11.2019 and letter bearing No. 4525/F.No.57/DEO(F)/DIR/U/ dated 10.12.2019 are annexed as annexure "N")**

15. That, the appellant time and again inquired about her reinstatement, as she has been left in a hanging position by the official respondents, but was not responded by the official respondents. In this context the appellant also filed applications dated 11.03.2020 and 20.10.2020 before the worthy respondent No.2 praying therein, to struck down her removal order dated 29.05.2019 and reinstate her as per the recommendations of the enquiry officer, but the said applications remained un-responded. It is also pertinent to mention here that during this period, fresh three teachers were appointed by respondent No.3, for the GGPS, Jarjori, Dir upper, vide order bearing Endst No.35-90/PST/Appointment/Adhoc/NTS 2018/2019 dated 14.05.2020. **(Copies of applications dated 11.03.2020 and 20.10.2020 and appointment order dated 14.05.2020 are annexed as annexure "O")**

16. That, the appellant was waiting for the reply of her applications from the official respondents, but got no response from anywhere and as stated in the preceding para, that the appellant was left in a hanging position by the official respondents despite of the recommendations of the inquiry officer, which clearly recommended the removal of the major penalty from the appellant, but neither the recommendations were followed nor another inquiry was initiated as requested by respondent No.3, therefore the appellant filed another appeal dated 01.04.2021 before respondent No.2 to redress her grievances and also inform her of her fate as the appellant is still kept un-informed of her service status. **(Copy of appeal dated 01.04.2021 is annexed as annexure "P")**

17. That, the appeal dated 01.04.2021 of the appellant was put forwarded by office of the worthy respondent No.2 vide letter bearing No. 5122/F.No.49/F/Appeal/Dir-U, whereby the

respondent No.3 was directed to submit detailed report/ comments/ views to the Directorate and to proceed further into the matter which was responded by respondent No.3 vide letter No. 4375 dated 28.04.2021. **(Copies of letter bearing No. 5122/F.No.49/F/Appeal/Dir-U and letter No. 4375 dated 28.04.2021 are annexed as annexure "Q")**

18. That, the aforementioned letter No. 4375 dated 28.04.2021 of respondent No.3 was responded by the office of worthy respondent No.2 vide letter/order bearing No. 6091/ F.No.49/F/Appeal/ Dir (U) dated 01.07.2021, stating therein that the appeal of the appellant has been seen & file/regretted by the Competent Authority, in this way the appellant was deprived of her services in a very illegal and unlawful way. **(Copy of letter bearing No. 6091/ F.No.49/F/Appeal/ Dir (U) dated 01.07.2021 is annexed as annexure "R")**

19. That feeling aggrieved of the orders impugned herein, the appellant challenged the same in W.P No.703-M of 2021 on 06-07-2021, which was withdrawn with the permission to approach the proper forum vide order dated 07-09-2021, hence, the instant service appeal. **(Copies of W.P No.703-M of 2021 and order dated 07-09-2021 are annexed as annexure "S")**

20. That, both the impugned orders dated 29-05-2021 and 01-07-2021 of respondents No.3 & 2 respectively are illegal, ultra vires, ultra shariah and against the established norms of administration, are liable to be struck inter alia on the following grounds:

Grounds:

- i. That, the impugned orders dated 29-05-2021 and 01-07-2021 of respondents No.3 & 2 are illegal, ultra vires, ultra

shariah and against the established norms of administration, therefore, are not tenable in the eyes of law.

- ii. That, appellant has not been dealt with in accordance with law, which is the worst example of discrimination, therefore, is against the fundamental rights of the appellant, as enshrined in Articles 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan, 1973.
- iii. That no opportunity of personal hearing has been provided to the appellant.
- iv. That, the worthy respondent No.2 was supposed to approve the recommendations of enquiry committee, or to order the denovo enquiry, but strange enough, he dis-approved the recommendations of the enquiry committee and maintained the order of removal passed by respondent No.3 without further proceedings.
- v. That, the impugned order dated 29.05.2019 has been issued by respondent No.3 despite the factual and reasoned replications of the appellant to each and every show-cause notice consequently deviating from law on the subject.
- vi. That, appellant has not been dealt with in accordance with law, as the frequent transfers applications of the appellant were not even respondent despite of her genuine reason of severe illness while on the other hand the other teacher of the same school namely Shariqa Shabeena (PST) was transferred from GGPS Jarjori, Dir Upper to GGPS, Dolishah, Dir lower despites that she was

been charged of impersonation and also of absentia as stated in para No.3 & 4 of the facts of the instant service appeal in detail, which is the worst example of discrimination, therefore, is against the fundamental rights of the appellant, as enshrined in Articles 4, 25 & 27 of the Constitution of Islamic Republic of Pakistan, 1973.

- vii. That, appellant has been deprived of her legal right of service, safeguarded by constitution of Islamic republic of Pakistan, 1973, as her tenure in the subject school was complete and still her transfer applications were not even responded but was given the charge of head teacher to the appellant on 22.05.2018 after the illegal and discriminatory transfer of another teacher namely Shariqa Shabeena of the same school, this clearly transpires the malafidy of the official respondents, taking strict actions against the appellant and showing leniency to the other teacher one or the other way.
- viii. That, the impugned order dated 19-05-2019 issued by respondent No.3 is in violation of established norms of administration and is alien to laws on the subject, as well as not appealable to prudent mind because on one hand respondent No.3 has initiated an enquiry herself against the appellant and on the other hand respondent No.3 herself has denied the recommendations of the inquiry and called upon respondent No.2 for another enquiry if any, this fact not only transpires personal obstinacy on the part of official respondents in general and respondent No.3 in particular but also and vindictiveness and rancorous attitude towards the appellant.

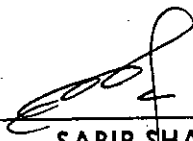
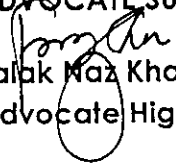
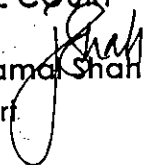
- ix. That, despite of the enquiry report of the enquiry officer namely Mr. Muhammad Inayat ur Rehman coupled with all supporting documents, it seems to be very strange and unjust to invalidate his/her own initiated enquiry and its recommendation alleged as biased and one sided by respondent No.3, this clearly transpires the malafide of the official respondents against the appellant by issuing the impugned order dated 29.05.2019 with malafide intention not only to victimize and discriminate the petitioner, but to disturb her peace of mind and that of the entire family.
- x. That the impugned order dated 29.05.2019 of imposing a major penalty of removal of the appellant is based on worst political motivation, discrimination, retaliation, maladministration and there is no justification whatsoever, for its retention under the law.
- xi. That, the appellant was been in severe illness as official per medical record, thus making hardships and insurmountable hurdles, for the appellant, to move to a station far away about 17 Kilometers including about 3 Kilometers mountainous train on walk has caused mental distress to the appellant with the consequences, which are not only injurious to the appellant but her family.
- xii. That delay so caused in filling of appeal before this honorable tribunal is bonafide, therefore may kindly be treated as well with in time.
- xiii. Any other ground not specifically raised will be argued with the prior permission of this August Court.

In view of the above, it is therefore very humbly prayed that, on acceptance of this service appeal, the impugned order dated 25-09-2019 of respondent No.3 and order dated 01-07-2021 of respondent No.2, may kindly be set aside and appellant may kindly be reinstated with all back benefits.

Any other relief not specifically prayed but this august court deems proper may also be granted.

APPELLANT THROUGH

Counsels


SABIR SHAH
ADVOCATE SUPREME COURT

Falak Naz Khan & Jamal Shah
Advocate High Court 

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____ of 2021

Mst. Alahida

... Appellant

VERSUS

Government of KP and others.

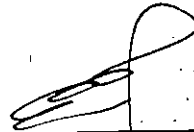
... Respondents

Certificate

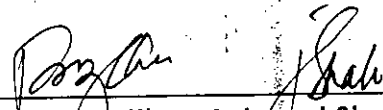
As per instructions received from my client, it is certified that no such like service appeal against the impugned orders, has been earlier filed before this Hon'ble Court.

APPELLANT THROUGH

Counsels



SABIR SHAH
ADVOCATE SUPREME COURT



Falak Naz Khan & Jamal Shah
Advocate High Court

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____ of 2021

Mst. Alahida

... Appellant

VERSUS

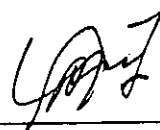
Government of KP and others.

... Respondents

Affidavit

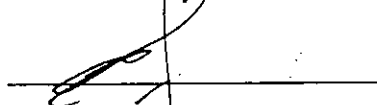
I Bahadur Munir S/O Jan Ali R/O Qashqaray Payeen, Tehsil & District Di Upper (Husband and Attorney of the Appellant), do hereby solemnly affirm and declares on oath that, all the contents of the accompanying service appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed or withheld from this Hon'ble court.

Deponent



Bahadur Munir
(Attorney of the Appellant)
CNIC: 15701-6977942-1

Identified By:



SABIR SHAH
ADVOCATE SUPREME COURT

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____ of 2021

Mst. Alahida

... Appellant

VERSUS

Government of KP and others.

... Respondents

Address of Appellant:

Mst. Alahida W/O Bahadar Munir R/O Qashqaray Payeen, Tehsil & District Dir
Upper

CNIC No. 15701-6977942-1

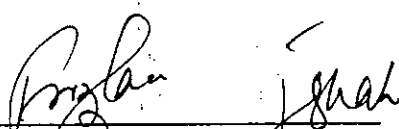
Cell No.0345-8880057

Addresses of Respondents:

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa at Peshawar.
2. Director Elementary & Secondary Education, Government of Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer (Female), District Dir Upper.
4. Sub Divisional Education Officer (Female) Primary, Dir

APPELLANT THROUGH
Counsels


SABIR SHAH
ADVOCATE SUPREME COURT


Falak Naz Khan & Jamal Shah
Advocate High Court

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. _____ of 2021

Mst. Alahida Appellant

VERSUS

Government of KP and others. Respondents

APPLICATION FOR CONDONATION OF DELAY U/S 5 OF
THE LIMITATION ACT 1908

Respectfully sheweth:

The appellant/applicant submits as under:

- 1) That the accompanying service case was submitted before this Honorable Peshawar High Court, but the appellant was allowed to withdraw his case with the permission to approach the proper forum.
- 2) That the above delay so occurred is not intentionally and willfully even bonafide and valuable rights of the appellant are involved therein, as the appellant has been removed from service illegally.

It is therefore very humbly prayed that on acceptance of the instant application for condonation of delay, delay occurred if any, may kindly be condoned and the accompany service appeal may kindly be considered with in time.

Appellant/applicant

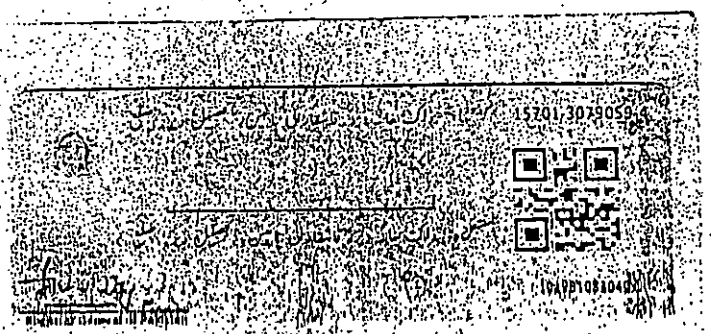
Through Counsel


SABIR SHAH
Advocate Supreme Court

Dated: 20-09-2021

Annexure - A (18)

Annexure - A



کشدہ کارڈ کے برائے برائے برائے برائے برائے برائے

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT DIR UPPER.

OFFICE ORDER.

Am B

8
19

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of Primary schools teacher (PST) Schools/Union Council based/under NTS policy in BPS-12 (Rs. 9055-650-28555) @ Rs. 9055- fixed plus usual allowances as admissible under the rules on adhoc basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below with effect from the date of their taking over charge:-

S. #	Name	Father's Name	Merit	Union Council	Place of Posting	Remarks
1	Nazifa Bibi	Akhtur Gul	80.09	Thali	GGPS Lamoti	A.V.P.
2	Farhat Naz Tariq	Fazal Salam	76.79	Shahikot	GGPS Dogal	A.V.P.
3	Gul Baddan	Hazrat Gul	75.33	Shahikot	GGPS Kharawa	A.V.P.
4	Zeenat Yasmin	Matiullah	81.61	Qalandi	GGPS Miana Khwar	A.V.P.
5	Shariqa Shabeena	Jamil Ahmad	71.79	Qalandi	GGPS Jarjori	A.V.P.
6	Alaheeda	Habibullah Khan	80.77	Qalandi	GGPS Jarjori	A.V.P.

TERMS & CONDITIONS:

- No TADA etc is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- Appointment is purely on temporary basis initially for one year.
- They should not be recruited over charge if they exceed 35 years or below 20 years of age.
- Appointment is subject to the condition that their certificates/degrees must be verified from the concerned authorities if any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
- Her services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
- Pay will not be made until and unless a certificate from the concerned authority is issued her certificates are verified.
- They should join their post within 15 days of the issuance of this notification. In case of failure to join their post within 15 days of the issuance of this notification, her appointment will expire automatically and no subsequent appeal shall be entertained.
- Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
- She will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services shall be terminated at any time, in case of her performance is found unsatisfactory during her contract period. In case of misconduct, they will be proceeded under the rules framed from time to time.
- Her appointment is on School based, He/she will have to serve at the place of posting, and His/her service is not transferable to any other station.
- Before handing over charge once again their document may be checked if they have no required qualifications they will not be handed over charge.
- No payment will be made then before making verification from concerned institutions.

(MQINUD DIN)
District Education Officer,
(Female) District Dir Upper.

Endst: No. 336 / File No. - / AT/ Appt/ DEO(F)/SEB Dated Dir (U) the 5/3/2016.

Copy forwarded for information and necessary action to the:-

- Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
- District Accounts Officer Dir Upper
- Sub divisional Education Officer (Female) Dir.
- A.P. EMIS Local Office.
- All others concerned.

District Education Officer,
Female Dir Upper.

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT DIR UPPER.OFFICE ORDER.

Consequent upon recommendation of the departmental selection committee, appointment of the following candidates are hereby ordered against the post of primary schools teachers (PST) schools/Union Council based/under nts policy in BPS-12 (Rs. 9055-650-28555) @ Rs. 9055-fixed plus usual allowances as admissible under the rules on adhoc under the existing policy of the provincial government, in teaching cadre on the terms and conditions given below with effect from the date of their taking over charge:-

S.#	Name	Father's Name	Merit	Union Council	Place of Posting	Remarks
1.	Nazifa Bibi	Akhtar Gul	50.09	Thall	GGPS Lamoti	A.V.P
2.	Farhat Naz tariq	Fazal Salam	76.70	Shahikot	GGPS Dogai	A.V.P
3.	Gul Baddan	Hazrat Gul	75.33	Shahikot	GGPS Kharawa	A.V.P
4.	Zeenat Yasmin	Matiullah	81.61	Qulandi	GGPS Mian Khwar	A.V.P
5.	Shariqa Shabeena	Jamil Ahmad		Qulandi	GGPS Jarjori	A.V.P
6.	Alaheeda	Habibullah Khan	80.77	Qulandi	GGPS Jarjori	A.V.P

TERMS AND CONDITIONS.

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary basis initially for one year.
4. They should not be handed over charge if they exceed 35 years or below 20 years of age.
5. Appointment is subject to the condition that their certificates/degrees must be verified from the concerned authority if any one producing bogus certificate will be reported to the law enforcing agencies for further effect.
6. Her services are liable to be termination on one month notice from either side. In case of resignation without notice his one month pay/allowances shall be forfeited to the government.
7. Pay will not be until and unless a certificate from the concerned authority is issued her certificate verified.
8. They should join the post within 15 days of the issuance of this notification. In case of failure to join their post within 15 days of the issuance of this notification, her appointment will expire automatically and no subsequent appeal shall be entertained.
9. Health and age certificate should be produced from the medical superintendent concerned before taking over charge.
10. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. Their services shall be terminated any time in case of her performance is found unsatisfactory during contract period. In case of misconduct she will be proceeded under the rules framed from time to time.
12. Her appointment will be on school based, he/she will have to serve at the place of posting and his/her service is not transferrable to any other station.
13. Before handing over charge one again their document may be checked if they have no required qualification they must be handed over charge.
14. No payment will be made so then making verification from concerned institution.

(MOINUD DIN)
District Education officer,
(Female) District Dir Upper.

Endst No. 336-40/File No. -/NT/Appl:/DEO(F)/SEB Dated Dir (U) the 5/3/2016.
Copy forwarded for information and necessary action to be.

1. Director of Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Education officer Dir Upper.
3. Sub Divisional Education Officer (Female) Dir.
4. A.P EMIS Local office.
5. Concerned.

District Education officer,
(Female) District Dir Upper.

B



OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER FEMALE PRIMARY DIR

NO 381 / F.NO 43 / SDEO (F)ASDEO/ ESTAB/ DATED DIR THE 10/5/2017

To: The District Education Officer (Female) Dir Upper.

Subject: Inquiry report of GGPS Jarjori.

Memo: Reference your orders for an inquiry against the teachers of GGPS Jarjori vide No 1161-62/file no 57 dated 26.04.2017.

The undersigned visited the school on 27.04.2017 accompanied with Mr. Alam Zeb Supdt; and pointed out that:-

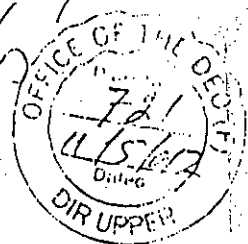
1. During my visit day, both the teachers were found present and busy in their teaching however Miss Shariqa Shabina PST was impersonated by her sister Sana performing duty since one week.
2. Mrs; Shariqa Shabeena PST has been married now at chakdara when she goes to home at chakdara her sister performs duty on her behalf.
3. Written statement of the available inhabitants is obtained and attached herewith.
4. Chowkidar of he school was present .
5. Enrolment of the school is only 33.
6. Gate/ Boundary Wall is direly needed.
7. The school is un safe.
8. Amount of Rs=200000/- (two lac) for Group Latrine has been given in the G/Grant 2016-17.

Action Taken:- pay of Mst Shariqa PST is hereby stopped as she is involved in impersonation. Report is hereby sent for further necessary action along with statement of villagers.

Sub Divisional Education Officer (Female) Primary Dir 10/5/17

TO EBC(F) For n/a of [Signature]

DA Call explanation from HT for not observing school timings and issue show cause to Shariqa Shabeena for impersonation. @MUS 15/5/17



23

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER FEMALE PRIMARY DIR

NO 165 /F.NO 48/SDEO(F)ASDEO/ ESTAB/ DATED DIR THE 03 / 01 / 2018

The District Education Officer Female
Dii Upper

Subject: Visit Report Against GGPS Jarjori

Memo: It is submitted for your kind information that the undersigned visited GGPS Jarjori 19.03.2018 along with ASDEO Shagufta Bibi School was found completely closed. According attendance register.

1. Shariqa Shabina PST was found absent w.e.f 01.03.2018 to 11.03.2018 and 16.03.2018 till visit date.
 2. Alahida PST was found absent w.e.f 01.03.2018 till visit date.
 3. Muhammad Naeem chowkidar was found absent w.e.f 01.03.2018 to 11.03.2018 to 13.03.2018 till visit date. Report is submitted for disciplinary action please.
- Pays of the whole staff has been stopped.

Sub Divisional Education Officer
(Female) Primary Dir

5/4/18
DA 1/5/18

Issue 5
notice
absent
GGPS Ja
with direct
SDEO to
pay of ab
staff.

~~Forwarded~~

~~To Account Bracket (F)
for n/a please.~~

~~To EB Primary (F)
for n/a please.~~

4/11/18

File No: 103
File Date: 4/4

24

Annexure - D

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER FEMALE PRIMARY DIR

NO 166 / F.NO 48/SDEO(F)/ASDEO/ ESTAB/ DATED DIR THE 03 / 04 / 2018

To

The whole staff of GGPS Jarjori

Subject Explanation

Memo:

The undersigned paid a surprise visit on 19.03.2018. your school was found completely closed. According to Attendance register all of you were thoroughly absent after winter vacations closure of school is illegal.

It seems that you are not serious / interested in your duties. This lead to mis-conduct negligence and inefficiency.

You are hereby directed to explain your position within three (03) days for such an authorized absentee and wasting precious time of little kids.

Sub Divisional Education Officer
(Female) Primary Dir

3/4/18

جناب ASD EO صاحب زمانہ دہلی بالا

درخواست برائے شوقاز نوٹس (Explanation)

جناب عالیہ :- شوقاز نے اپنے شوقاز نوٹس نمبر 166 مورخہ 19-3-2018 تفیلی گزارش یا بت بندش سٹول میں خدمت ہے۔

جناب عالیہ ایم بیٹر کو دفتر سے اخراج ملی تھا کہ آپ اپنے سٹول کے اوپر اور اول اعلیٰ کے امتحان کے شروع کرنے سے پہلے امتحان لینا شروع کیے تھے۔ یہ سٹول سٹول کے پھیرنے کے بعد سٹول سٹول سے تھے۔ اس وجہ سے تو میں کیا کر سکتی۔ گزارش ہے کہ اس دن مجھے بندہ بھٹا رہا تھا۔

تو اسے وجہ سے میں سٹول میں ہی اور پتال گئی۔ اگر کسی چیز سے ریلوٹی میں interest میں تھے تو یہ سٹول دو سال تک اس دوران رائے یہ جاتے تھے ایم بیٹر نے کسی بھی چیز کی پروا نہیں کی اور ٹائپو ڈیوٹی سہرا کی آدین۔ اور سٹول کے جو ریکارڈ تھے تقاضوں والوں نے گھنٹوں میں اس کو ہار اٹھا ایم نے دوبارہ دوسری رجسٹر خریدی اور اسے گھنٹہ کرادی۔ اس دن اس کے رزلٹ بنا کر جاری تھی اور وہ صبح سے ہیں تھی۔

Head Teacher
G.G.P.S Jarjuray
Distt: Dir Upper

الاحیدرہ

پسٹر جوڑنے G.G.P.S PST

3.4.2018

26

TIMERGARA CLINICAL LAB

Zhar Medical Center Opp
D.H.Q Hospital Timergara



تیمرگروہ کلینکل لیبارٹری

اطہر میڈیکل سنٹر بالمقابل ڈی ایچ ایچ ہسپتال تیمرگروہ

Reg.No: HRA/500/F/DRL/X-RAY/I

0345-9520663
0340-9000200

PATIENT NAME: W/O MUNAIR
DR NAME: MARIAM MAQSOOD SB GYNAECOLOGIST
S NO: 63. 19-3-018

TEST	RESULT	UNIT	N. VALUE
Hb% (Haemoglobin)	10.0	mg/dl	M13 - 18 F11.5 - 16.5
SHARIF FOR MP	NEGATIVE		
ERYTHROCYTE	NON REACTIVE		
ERYTHROCYTE	NON REACTIVE		

TEST	URINE EXAMINATION PHYSICAL EXAMINATION RESULT	N. VALUE
Colour	PALE YELLOW	PALE YELLOW
Quantity	10 ML	10 ML

TEST	CHEMICAL EXAMINATION	N. VALUE
PH	5.0	5.0
Albumin	NIL	NIL
Sugar	NIL	NIL

TEST	MICROSCOPIC EXAMINATION	N. VALUE
Red Cells	NIL	NIL /HPF
Pus Cells	6-8	2-3 /HPF
Ca.Oxilate	NIL	NIL /HPF
Casts	NIL	NIL /HPF

[Signature]
I/C Sign

24 Hours Service

Fayaz Ahmad
D.M.L Technology
JIMS (Peshawar)
Cell: 0346-9840629
Email: tmglab_Yahoo.com

Rahman Ullah (Nawab)
DML Technology (PIMS)
Cell: 0345-9531321

M. Ishaq
D.M.L Technology
AIMS (Timergara)
Cell: 0345-9520663

27

Mariam Maqsood



لیڈی ڈاکٹر مریم مقصود

ایم بی بی ایس، ایف سی پی ایس

ماہر امراض نسوان

ڈسٹرکٹ ہیڈ کوارٹر ہسپتال تیمرگرہ

BS, FCPS

Obstetrician & Gynaecologist

D.H.Q. Hospital Timergara

Name: Muhammad Yousaf Age: _____ Sex: _____ Date: 19-3-2018

20 sudday ofayun - P
 w - ab kamy - 1mg 7 3if
 Bo - diphen - 1000 / 1000
 RE - Tab. Nubenzol 1000 / 1000
 - Tab. Moxigel - 400mg / 1000
 - Tab. Clomid 50mg / 1000
 - Tab. Premarin 0.625 / 1000
 Cap. Sulfoxon 100 / 1000
 Cap. Rofen Rimo 100 / 1000
 Tab. Maxifal 1000 & 500 / 1000

Mob: 0300-3162974

ڈسٹرکٹ ہیڈ کوارٹر ہسپتال تیمرگرہ
29-3-18

(28)

Dr. Mariam Maqsood

MBBS, FCPS
Obstetrician & Gynaecologist
D.H.Q. Hospital Timergara



لیڈی ڈاکٹر مریم مقصود

ایم بی بی آئی، ایف سی پی آئی
ماہر امراض نسوان
ڈسٹرکٹ ہیڈ کوارٹر ہسپتال تیمرگرہ

Name Liqo Muneer Age _____ Sex _____ Date 19/3/18

ULTRASOUND PELVIC

Dr.

- ❖ Scan of the pelvis shows ~~Anteverted~~ Anteflexed Uterus.
- ❖ Normal endometrial cavity seen.
- ❖ No uterine or adnexal mass seen.
- ❖ Right ovary is normal.
- ❖ Left ovary is normal.
- ❖ No fluid seen in cul de sac.

IMPRESSION

Normal Scan of Pelvis

Muneer

گھنڈی: EDO قومی سروس ڈسٹرکٹ ڈپٹی کمشنر

Annexure-F

دفتر سے مرد ارنسٹرز کے ساتھ PST
از دس گھنٹے چورس گھنٹے دس گھنٹے

فہرست کے ساتھ اس طرف سے (a)

1۔ یہ سائڈ ٹیکہ اچھوتی نڈا سے کسی PST کے ساتھ
دس گھنٹے چورس گھنٹے ڈاک ٹوٹیہ دھان سال انجام دیتی

2۔ یہ سائڈ ٹیکہ سکور روڈ سائڈ کے ٹوٹیہ 3 گھنٹے پیدل سہولت
دراو سے جگہ جگہ کو بھور دینٹ پورہ ٹوٹیہ 1500 آنے سے
صرف چورس گھنٹے

3۔ یہ سائڈ ٹیکہ سکور سے مرد ڈاک ٹوٹیہ انجام دینے سے انٹال
سہولت دنت کا سائڈ ٹیکہ سے

4۔ ارنسٹرز کے ساتھ قانون دیکھو جو چورس گھنٹے کو
دیکھو سے دس گھنٹے چورس گھنٹے ارنسٹرز
کے ساتھ ساتھ

میں سے ارنسٹرز کے ساتھ ساتھ
میں سے ارنسٹرز کے ساتھ ساتھ

26 $\frac{4}{18}$

(30)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR

OFFICE ORDER

Mst. Shariqa Shabeera PST GGPS, Jurjuray, Dir Upper, is hereby transferred/ adjusted against the vacant post of PST at GGPS, Dolishah, Dir Lower, on her own pay & BPS in the interest of public service with immediate effect.

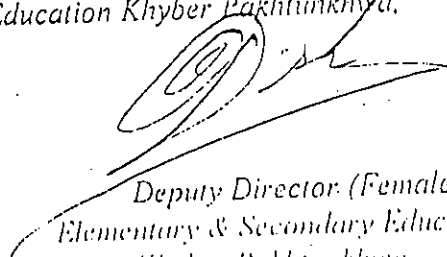
- Note:-
- 1 Charge report should be submitted to all concerned.
 - 2 No TA/DA etc are allowed
 - 3 The DEOs (F) concerned are directed to check /verify her original service documents before making payment of her salary.
 - 4 Her seniority will be determined at the bottom of the seniority list of PST (B-12) as per rules.

Director
Elementary & Secondary
Education Khyber Pakhtunkhwa

Endst: No. 3878-81 /F.No.509/(F)G. Transfer Dated Peshawar the 21/5/18 /2018

Copy for information to the:-

1. District Education Officers (Female) Dir Upper & Dir Lower
2. District Account Officer Dir Upper & Dir Lower
3. Headmistress concerned.
4. Teacher concerned.
5. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa.
6. M/File.


Deputy Director (Female)
Elementary & Secondary Education
Khyber Pakhtunkhwa.

MLZahid

18/5/18

املاً عملاً رپورٹ

میں مسماة شتارہ شینہ ہی ایس ٹی نے آج حضور

کے لئے از دہلیہ حوالہ کیا۔ چارج نائٹ مدرسہ الاعدادہ
22/5/2018 اپنی عہدے کا مکمل چارج نائٹ مدرسہ الاعدادہ

کے لئے از دہلیہ حوالہ کیا۔ چارج نائٹ مدرسہ الاعدادہ

مطابق آرڈر 3878-81 تاریخ 22/5/2018

از دفتر ڈائریکٹ صاحبہ از انجکشن پشاور

حوالہ کیٹیج اور رپورٹ دفتر عالیہ کو رائے

مزید کاروائی سے بیج رہے ہیں

الحامدین

آج کا تابع فرمان شتارہ شینہ

ہی ایس ٹی حوٹ ہوئے

22/5/2018

Azhar
Head Teacher
G.G.P.S Jarjuray
Distt: Dir Upper

کتابت صحت و سلامت با کمال احتیاط و رعایت اصول بهداشتی
در تمام مراحل انجام پذیرد

Annexure-G

درخواست براد بنادله استانی مآه علیه PST از طرفت با
گیزه برای ای سول و با جوزه تا اربان دبه سول

ص 34
ص 4

در تمام مراحل

1- کتبه سول و کتبه سول 3 سول 3 GPS کتبه جوزه سول

2- کتبه سول و کتبه سول 3 سول 3 GPS کتبه جوزه سول

3- کتبه سول و کتبه سول 3 سول 3 GPS کتبه جوزه سول

4- کتبه سول و کتبه سول 3 سول 3 GPS کتبه جوزه سول

کتابت صحت و سلامت با کمال احتیاط و رعایت اصول بهداشتی

کتابت صحت و سلامت با کمال احتیاط و رعایت اصول بهداشتی

کتابت صحت و سلامت با کمال احتیاط و رعایت اصول بهداشتی

Head Teacher
G.P.S Jorina
Dist: Dir. U.P.

Head Teacher
G.P.S Jorina
Dist: Dir. U.P.

کتابت صحت و سلامت با کمال احتیاط و رعایت اصول بهداشتی

کتابت صحت و سلامت با کمال احتیاط و رعایت اصول بهداشتی

Annexure - H

33

FINAL SHOW CAUSE NOTICE.

OFFICE OF THE
DISTRICT EDUCATION OFFICER,
FEMALE, DIR UPPER.
No. 4033-40 F.No.04/DEO(F)/Pry/DirU/
Dated Dir Upper the, 07/12/2018.

To

Mst: Alahida, PST,
GGPS Jarjuray.

C/O

SDEO(Female) Dir.

Subject:-

FINAL SHOW CAUSE NOTICE.

Memo:-

As reported by the SDEO (F) Dir vide her letter No.662 dated, 23/11/1018 that you are absent from your duty since, long and your where about is not known

Your this paractice is against the service discipline and amounts to misconduct.

Therefore, you are finally directed to ensure your presence in the school & show cause of your absence within 03 days otherwise, strict disciplinary action will be taken against you under E&D ruels, 2011, *culminating your dismissal from service.*

DISTRICT EDUCATION OFFICER,
FEMALE, DIR UPPER.

Endst; No. _____

Copy to:-

- 1- District Monitoring Officer (IMU) Dir Upper.
- 2- SDEO(Female) Dir w/r to her letter No. & date, mentioned above.

DISTRICT EDUCATION OFFICER,
FEMALE, DIR UPPER.

*Support
Send through
registered cover also
make her copy by for immediately
8/12/18*

DFC F

4038-F-40F

23-11-2018

الحمد لله

موضوع: درجہ اولیٰ کے طالب علموں کی کھلی میٹنگ کے متعلق
میں نے کھلی میٹنگ کے دوران طلبہ کو درجہ اولیٰ کے طالب علموں کے بارے میں
تعمیراتی امور کے بارے میں آگاہ کیا ہے۔ ان میں سے بعض طلبہ نے کہا کہ
میں نے کھلی میٹنگ کے دوران اس بارے میں آگاہ کیا ہے۔ ان میں سے
بعض طلبہ نے کہا کہ میں نے کھلی میٹنگ کے دوران اس بارے میں
آگاہ کیا ہے۔ ان میں سے بعض طلبہ نے کہا کہ میں نے کھلی میٹنگ
کے دوران اس بارے میں آگاہ کیا ہے۔ ان میں سے بعض طلبہ نے
کہا کہ میں نے کھلی میٹنگ کے دوران اس بارے میں آگاہ کیا ہے۔
ان میں سے بعض طلبہ نے کہا کہ میں نے کھلی میٹنگ کے دوران
اس بارے میں آگاہ کیا ہے۔ ان میں سے بعض طلبہ نے کہا کہ
میں نے کھلی میٹنگ کے دوران اس بارے میں آگاہ کیا ہے۔ ان میں
سے بعض طلبہ نے کہا کہ میں نے کھلی میٹنگ کے دوران اس بارے میں
آگاہ کیا ہے۔ ان میں سے بعض طلبہ نے کہا کہ میں نے کھلی
میٹنگ کے دوران اس بارے میں آگاہ کیا ہے۔ ان میں سے بعض طلبہ
نے کہا کہ میں نے کھلی میٹنگ کے دوران اس بارے میں آگاہ کیا ہے۔

الحمد لله

Head Teacher
G.G.P.S. Jarjouray
Distt: Dir Upper

چشمه حاضری مدرسه ... بابت ماه ... و ...

روزانه				روزانه				روزانه				تاریخ
آد	دستخط	رواگی	دستخط	آد	دستخط	رواگی	دستخط	آد	دستخط	رواگی	دستخط	تاریخ
				P	11:30	P	8:30	P	11:30	P	8:30	1
				Sincerely								2
				P	11:30	P	8:30	P	11:30	P	8:30	3
				P	11:30	P	8:30	P	11:30	P	8:30	4
				P	11:30	P	8:30	P	11:30	P	8:30	5
				P	11:30	P	8:30	P	11:30	P	8:30	6
				P	11:30	P	8:30	C / leave				7
				P	11:30	P	8:30	P	11:30	P	8:30	8
				Sincerely								9
				P	11:30	P	8:30	P	11:30	P	8:30	10
				P	11:30	P	8:30	P	11:30	P	8:30	11
				P	11:30	P	8:30	P	11:30	P	8:30	12
				P	11:30	P	8:30	P	11:30	P	8:30	13
				P	11:30	P	8:30	P	11:30	P	8:30	14
				P	11:30	P	8:30	P	11:30	P	8:30	15
				Sincerely								16
				P	11:30	P	8:30	P	11:30	P	8:30	17
				P	11:30	P	8:30	P	11:30	P	8:30	18
				P	11:30	P	8:30	P	11:30	P	8:30	19
				P	11:30	P	8:30	P	11:30	P	8:30	20
				P	11:30	P	8:30	P	11:30	P	8:30	21
				P	11:30	P	8:30	P	11:30	P	8:30	22
				Sincerely								23
												24
												25
												26
												27
												28
												29
												30
												31

تعمیرات ...

استاذ رئیس مدرسه

...

کشمور صاحب ۵۶۵ صاحب فی میل دیر اپیر

دفعہ دست برائے شرف النسخہ زجی جی کی ایسی ضرورت ہے

جی جی کی ایسی خانہ شیر دیر اپیر (Annexure-1)

حباب عالیہ گزارش حسب ذیل ہے۔

۱۱۔ یہ کہ سائیکل جی جی کی الی ضرورت ہے میں مگر صدق نہیں سال

سے اپنی فراغت منجلی جیت PST ۱۹۵۳

آئندہ مالی انتظام داری سے سرانجام دی رہی ہے

۱۲۔ یہ کہ سائیکل در ٹاؤن کی سڑک تیار ہے۔ اور
در سے ضرورت ہے میں ڈروٹی سرانجام دینے میں
سخت مشقت کا سامنا کرنا پڑتی ہے۔

۱۳۔ یہ کہ سائیکل نے گاڑنا اپنی ضرورت منجلی ہے

آئندہ جی جی کی منجلی ضرورت ہے

آز جی جی کی الی ضرورت ہے تاکہ جی جی

طمان زبیر شرف النسخہ کے کچھ اصناف

صادر کرنا یا جایک کو ارس ہوئی

الگار (۱۹-۲-۱۵)

37

(PVT) HOSPITAL YINENGARA

PH: 0945-894434



60

Discharge Slip

Name: Mpd Bladun Murnani Ad. No: 60.
 Age: 31yr Sex: ♀ Room No:
 Address: Dkr Bada Kras.
 Date of Adm: 15.02.19 Date of Dis: 17.02.19
 Date of Adm: 15.02.19 Date of Dis: 17.02.19
 Diagnosis: Q.P. PTP. PRESHEAL I GYDENG
 Operation: PM. RA I MEMBATAS
 Operation: EMGULSES
 Consultant: DR. MAMBAH HIRAJODD

over

Home Treatment

- cap. Carabuf 100mg 2x10
- Tas. Flagyl 1000mg 1x1
- Tas. Paracetamol 1000mg 1x1
- Tas. Paracetamol 1000mg 1x1
- Tas. Paracetamol 1000mg 1x1
- Tas. Sofras 1000mg 1x1
- Tas. Kal V 1000mg 1x1
- Sp. Suban 2x2x2

25.02.19

File

TREATMENT AT HOSPITAL

6/16/54

W/om 7/27

Catheter 24hr

w/ opoid 1 gm to 1000

w/ piazyl 100cc to 200

w/ Rye 100cc TMS

w/ Venous TMS

w/ Transal 805

w/ max 8/10

w/ Zandac 800

w/ Ruspam 1000 8/10

INVESTIGATION

Hb % age 11.6 g/dl Blood Group B

HES -ve HCV -ve

OPERATION NOTES

1st admission 2/14

Benby, Acute

Capable

As 8/10 10/10

Tanacet

muscles especially jaw

39

Annexure - J

26-2-2019
وزارت صحت

آخری نوٹس اظہار وجوہ / شیر حاضری

آپ الاحیہ بی۔ ایس۔ بی۔ اے کی ایس۔ جی۔ جی۔ سے تعلق رکھنے والے اپنے بھائی کی حاضری سے حتمی اطلاع یا حکام کی اہانت کے ذریعے مسلسل غیر حاضری ہیں۔ آپ سے درج ذیل شوکارڈوں کے ذریعے جواب دہی کی تمہاری حاضری آپ سے ملنے والی حاضری میں ملتی ہے۔

نمبر	نام کوہمہ	سکول، دفتر	تاریخ غیر حاضری	جاری شدہ شوکارڈوں کی نمبر متاریخ
1	لاحیہ بی۔ ایس۔ بی۔ اے	بی۔ ایس۔ جی۔ جی۔ سے تعلق رکھنے والے	از 01/03/2018	پہلا شوکارڈ نمبر 1018-20 تاریخ: 11/04/2018 دوسرا شوکارڈ نمبر 4038-40 تاریخ: 07/12/2018

لہذا آپ کو آخری بار بذریعہ اخباری اشتہار مطلع کیا جاتا ہے کہ آپ اخباری اشتہار کی اشاعت کے بعد دونوں کے بعد کوئی بھی حاضری نہیں ملے گی اور جو بھی حاضری ملے وہ غیر حاضری کی صورت میں مقرر کر کے دیکر آپ کے خلاف سزایں عطا کی جائیں گی۔ انہیں روز 2011 کے تحت پکڑنے کا ردوائی عمل میں لائی جائے گی۔ جس میں آپ کی ملازمت سے برطرف بھی شامل ہے جس کے متعلق کوئی اطلاع نہیں ملے گی۔

ڈسٹرکٹ ایجوکیشن آفیسر زنانہ ویربالا

INF(P)803

محکمہ صحت، ڈی او جناب DEO آفیسر صاحبہ ویریا

جواب نوٹس واشتہار مجریہ 23/02/2019، 26/02/2019

جناب عالی!

گزارش حسب ذیل ہے۔

- 1- یہ کہ آپ صاحبہ کے دفتر سے اخباری اشتہار مجریہ 23/02/2019 و 26/02/2019 جاری ہو چکے ہیں جس میں آپ صاحبان نے من سائیکل سے نسبت ڈیوٹی پر حاضری و زبردستی کے روبرو پیش ہونے کا احکامات جاری کر رکھے ہیں۔
- 2- یہ کہ ماسائیکل جب سے GGPS جڑ جوڑے کو ٹرانسفر ہو چکی ہے کو باقاعدہ حاضر ہوتی رہی ہوں اور تا حال اپنے ڈیوٹی بہ احسن طریقے سے انجام دیتی رہی ہوں۔
- 3- یہ کہ انجناب نے اشتہار مجریہ شدہ میں شوکا ز نوٹس کا ذکر کیا ہے جس بابت انجناب کو بروقت ہر نوٹس کے جواب دے چکی ہوں (نقولات لف ہے)۔
- 4- یہ کہ ماسائیکل باوجود مختلف مشکلات جس میں پیدل راستہ جو کہ تقریباً 2,3 کلومیٹر ہے زانہ ذات ہونے کی بناء مختلف بیماریوں کے باوجود راستے کو طے کر کے حالانکہ سکول متذکرہ میں تقریباً 3,4 طالبات پڑھتے ہیں بروقت سکول میں حاضری دی ہے۔
- 5- یہ کہ سکول میں سکول کے چوکیدار نوکری پر جو کہ آپس میں باپ اور بیٹی ہیں نے کئی لڑائیاں کر کے سکول کو بند کر کے باوجود اس کے سکول کے باہر طلبات کو پڑھائی لکھائی کی ہے۔
- 6- یہ کہ ہر دو افراد کے ذاتی عناد کی لڑائی کے وجہ سے سکول سے تمام طلبہ کو والدین نے منع کر رکھی ہے اور ساتھ ہی سکول کے بات رومز وغیرہ کو

پھاڑ کر ختم کی ہے جس سے طلبات کے علاوہ مااستانی کو بھی مختلف مشکلات کا سامنا ہے۔

7- یہ کہ گریڈ سکول ہونے کی بناء چار دیواری نہ ہونے کی وجہ سے پردہ نشینی کو ناقابل نقصان پہنچنے کا قوی اندیشہ ہے قبل ازیں سکول ہذا کیلئے فنڈ مقرر ہوا تھا جس کو انجناب نے سیاسی اثر و سونخ و دیگر عناد کی وجہ سے سکول ہذا سے ٹرانسفر کر کے کہی اور خرچ کر رکھی ہے۔

8- یہ کہ انجناب نے اشتہار مجریہ میں مااستانی کو مورخہ 01/03/2018 سے غیر حاضر شائع کر رکھی ہے حالانکہ ماسائیلہ کے ساتھ دوسری استانی سمسٹی شبینہ جس کو آپ نے غیر قانونی طور پر ٹرانسفر کر کے مجھ کو متذکرہ نے چارج بمورخہ 22/05/2018 حوالہ کی ہے جس کا نقل لفب جواب نوٹس ہذا ہے۔

9- یہ کہ اگر ماسائیلہ 01/03/2018 سے غیر حاضری رہی تو کس طرح وہ مجھ کو 22/05/2018 چارج حوالہ کرتی۔

10- یہ کہ ماسائیلہ زنانہ ذات و پردہ نشین خاتون و مختلف بیماریوں کی وجوہات کی بناء اور مطلوبہ طلبات کی تعداد نہ ہونے کی بناء انجناب کو بغرض ٹرانسفر کرنے مختلف درخواست ہائے وقتاً فوقتاً بالترتیب بمورخہ 26/04/2018، 25/05/2018، 16/02/2019 دے رکھی ہے لیکن آپ انجناب مجھ سے ذاتی عناد رکھتے ہونے کے بناء ٹرانسفر بھی نہیں کرتے۔

11- یہ کہ موضع جبر جوڑے پہاڑی علاقہ ہے جس میں موسم سرما میں ہر وقت برف پڑتی رہتی ہے باوجود سخت مشکلات و اذیت من سائیلہ حاضری دیتی رہی ہوں۔

12- یہ کہ ماسائیلہ سکول متذکرہ میں واحد استانی ہوں دوسری استانی کیلئے ماسائیلہ نے بمورخہ 08/06/2018، اور اس سے قبل بھی انجناب کو

بغرض تعیناتی و تقرری دوسرانی میل ٹیچر کی درخواست دے رکھی ہے لیکن انجناب نے درخواست ہائے کو محض گندگی کی ٹوکری میں ڈال کر کوئی عمل درآمد تا حال نہیں کی ہے۔

13۔ یہ کہ انجناب ایک اعلیٰ آفیسر ہونے کی بناء ماسا سائلہ کیساتھ ذاتی عناد جس کا مجھے علم نہ ہے شروع کر رکھی ہے اور بار بار مانوٹس گرہندہ کے خلاف اشتہارات اخبار میں چھپواتے ہیں جس سے ماسا سائلہ کے عزت و ساکھ کو ناقابل تلافی نقصان پہنچنے کے علاوہ ذہنی کوفت میں مبتلا کر رکھی ہے جس کی ازالہ آپ کو قانوناً و شرعاً کرنا پڑے گا۔

14۔ یہ کہ ماسا سائلہ تا حال اپنی ڈیوٹی بخوبی سرانجام دے رہی ہوں اور کبھی بھی غیر حاضری نہیں کی ہے اور ماہ ستمبر تک انجناب نے مجھے ماہوار تنخواہ دے رکھی ہے اور اب انجناب نے موسم سرما کے چھٹیاں ہونے کی باوجود ماسا سائلہ کا ماہوار تنخواہ بند کر رکھی ہے جس کی ادائیگی کا بذریعہ جواب نوٹس ہذا استدعاء کرتی ہوں۔

15۔ یہ کہ انجناب من نوٹس گرہندہ کو اگر آپ بلاوجہ سیاسی اثر و سونخ و دیگر وجوہات کے بناء بلا جواز و بلا قانون تنگ کرتی رہی ہو تو من سائلہ مجاز فورم برخلاف انجناب رجوع کرونگی جسکی جملہ ازالہ بذمہ آپ ہوگی۔

مورخہ: 27/02/2019

عریفے *Adele*

علیحدہ بی بی PST

جی جی پی ایس جرجوڑے

(43)

OFFICE OF THE DISTRICT EDUCATION OFFICER, FEMALE DIR UPPER.
PH No. 0944-881900-Fax-880411E-mail demisdirupper@gmail.com

Annexure-K

OFFICE ORDER.

Whereas, I **Habiba Bibi**, District Education Officer Female Dir Upper, as competent authority, am of the opinion that **Mst: Alahida, PST GGPS Jarjuray** has rendered her self liable to be proceeded against as she committed the following acts / omissions with the meaning of rule 3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) Rules, 2011.

Statement of allegations.

That she remained absent since, 01/03/2018 without prior sanction of leave as reported by the Sub-Divisional Education Officer Female Dir. This act is against the office discipline and amounts to miss-conduct under rule 3 (b) & (d) of the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) Rules, 2011.

Whereas, 1st show Cause notice was issued to the accused vide this Office Endst: **No.1018-20 dated 11/04/2018**, but she has not resumed duties within stipulated period.

Whereas, 2nd show Cause notice was issued to the accused vide this office Endst: **No.4038-40 dated 07/12/2018**, but she has not resumed her duty within stipulated period.

Whereas, the last show cause notice was issued to her through **press** which has been published in **daily Mashriq dated 26-02-2019**, but she has not resumed her duties within stipulated period.

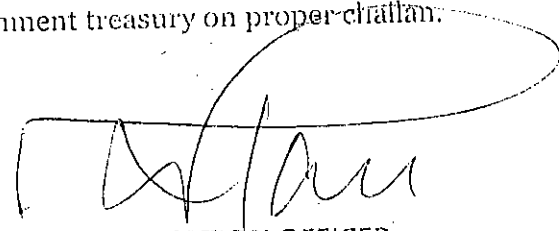
Now therefore, I **Habiba Bibi**, DEO Female Dir Upper in the capacity of competent authority am satisfied that the charges against the accused has been proved beyond no doubt. I, as a competent authority under the power conferred upon me under Rule 3 of the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 is hereby impose **Major penalties of Removal from service** upon **Mst:Alahida, PST GGPS Jarjuray** Sub-Division Dir w.e.f **01-05-2018**.

(HABIBA BIBI)
DISTRICT EDUCATION OFFICER
FEMALE DIR UPPER.

No. 1819-23 /F.No.04 /DEO(M/F)/ADO(P)Estab: Dated Dir(U) the 29 / 05 /19.

Copy forwarded for information & necessary action to:-

- 1- The District Accounts Officer Dir Upper.
- 2- The D.M.O (IMU), Dir Upper.
- 3- The Sub-Divisional Education Officer, Female Dir with the directions to carry out necessary entry to this effect in the service book of the teacher and ensure this office that pay of absent period if paid, may be recovered and deposit in Government treasury on proper challan.
- 4- A.P EMIS Local Office.
- 5- Official Concerned.


DISTRICT EDUCATION OFFICER
FEMALE DIR UPPER.

Annexure - L

بجسور جناب ڈائریکٹر ایجوکیشن بمقام پشاور KPK

مسماة علیحدہ بی بی ٹیچر PST، جی پی ایس جرجوڑے تحصیل دیر ضلع دیر بالا

بنام

مسماة حبیبہ بی بی ڈسٹرکٹ ایجوکیشن آفیسر فی میل دیر اپر۔

ڈیپارٹمنٹل اپیل:

جناب عالی!

گزارش حسب ذیل ہے۔

- 1- یہ کہ آپ ریسپانڈنٹ کے دفتر سے اخباری اشتہار بحریہ 23/02/2019 و 26/02/2019 جاری ہو چکا تھا جس میں ریسپانڈنٹ نے من سائیلہ سے نسبت ڈیوٹی پر حاضری و زبردستی کے رو برو پیش ہونے کا احکامات جاری کر رکھے تھے۔
- 2- یہ کہ ماسائیلہ جب سے GGPS جرجوڑے کو ٹرانسفر ہو چکی ہو تو باقاعدہ حاضر ہوتی رہی ہوں اور تاحال اپنے ڈیوٹی بہ احسن طریقے سے انجام دیتی رہی ہوں۔
- 3- یہ کہ ریسپانڈنٹ نے اشتہار بحریہ شدہ میں شوکا ز نوٹس کا ذکر کی ہے جس بابت انجناب کو بروقت ہر نوٹس کے جواب دے چکی ہوں (نقولات لف ہے)۔
- 4- یہ کہ ماسائیلہ باوجود مختلف مشکلات جس میں پیدل راستہ جو کہ تقریباً 2,3 کلومیٹر ہے زنا نہ ذات ہونے کی بناء مختلف بیماریوں کے باوجود راستے کو طے کر کے حالانکہ سکول متذکرہ میں تقریباً 3,4 طالبات پڑھتے ہیں بروقت سکول میں حاضری دی ہے۔
- 5- یہ کہ سکول میں سکول کے چوکیدار نوکری پر جو کہ آپس میں باپ اور بیٹے ہیں نے کئی لڑائیاں کر کے سکول کو بند کر کے باوجود اس کے سکول کے

باہر طلبات کو پڑھائی لکھائی کی ہے۔

6- یہ کہ ہر دو افراد کے ذاتی عناد کی لڑائی کے وجہ سے سکول سے تمام طلبہ کو والدین نے منع کر رکھی ہے اور ساتھ ہی سکول کے بات رومز وغیرہ کو پھاڑ کر ختم کی ہے جس سے طلبات کے علاوہ مااستانی کو بھی مختلف مشکلات کا سامنا ہے۔

7- یہ کہ گریڈ سکول ہونے کی بناء چار دیواری نہ ہونے کی وجہ سے پردہ نشینی کو ناقابل نقصان پہنچنے کا قوی اندیشہ ہے قبل ازیں سکول ہذا کیلئے فنڈ مقرر ہوا تھا جس کو ریسیانڈنٹ نے سیاسی اثر و سونخ و دیگر عناد کی وجہ سے سکول ہذا سے ٹرانسفر کر کے کبھی اور خرچ کر رکھی ہے۔ (نقل چیکس لف ہے)۔

8- یہ کہ ریسیانڈنٹ نے اشتہار بھر یہ میں مااستانی کو مورخہ 01/03/2018 سے غیر حاضر شائع کر رکھی ہے حالانکہ ماسائیکلہ کے ساتھ دوسری استانی مسکی شبینہ جس کو ریسیانڈنٹ نے غیر قانونی طور پر ٹرانسفر کر کے مجھ کو متذکرہ استانی نے چارج بمورخہ 22/05/2018 حوالہ کی ہے جس کا نقل لف ہذا ہے۔

9- یہ کہ اگر ماسائیکلہ 01/03/2018 سے غیر حاضری رہی تو کس طرح وہ مجھ کو 22/05/2018 چارج حوالہ کرتی۔

10- یہ کہ ماسائیکلہ زنانہ ذات و پردہ نشین خاتون و مختلف بیماریوں کی وجوہات کی بناء اور مطلوبہ طلبات کی تعداد نہ ہونے کی بناء ریسیانڈنٹ کو بغرض ٹرانسفر کرنے مختلف درخواست ہائے وقتاً فوقتاً بالترتیب بمورخہ 26/04/2018، 25/05/2018، 16/02/2019 دے رکھی ہے لیکن آپ ریسیانڈنٹ مجھ سے ذاتی عناد رکھتے ہونے کے بناء ٹرانسفر بھی نہیں کرتے۔

11- یہ کہ موضع جرجوڑے پہاڑی علاقہ ہے جس میں موسم سرما میں ہر وقت برف پڑی رہتی ہے باوجود سخت مشکلات و اذیت من سائیکلہ حاضری

دیتی رہی ہوں۔

12- یہ کہ ماسا سائلہ سکول متذکرہ میں واحد استانی ہوں دوسری استانی کیلئے ماسا سائلہ نے بمورخہ 08/06/2018، اور اس سے قبل بھی ریسا انڈنٹ کو بغرض تعیناتی و تقرری دوسرانی میل ٹیچر کی درخواست دے رکھی ہے لیکن ریسا انڈنٹ نے درخواست ہائے کو محض گندگی کی ٹوکری میں ڈال کر کوئی عمل درآمد تاحال نہیں کی ہے۔

13- یہ کہ ریسا انڈنٹ ایک اعلیٰ آفیسر ہونے کی بناء ماسا سائلہ کیساتھ ذاتی عناد جس کا مجھے علم نہ ہے شروع کر رکھی ہے اور بار بار مانوٹس گرہندہ کے خلاف اشتہارات اخبار میں چھپواتے رہے اور آخر کار بمورخہ 29/05/2019 کو ماسا سائلہ اپنی ڈیوٹی سے برخاست کر کے سسپنڈ کیا۔ جس سے ماسا سائلہ کے عزت و ساکھ کو ناقابل تلافی نقصان پہنچنے کے علاوہ ذہنی کوفت میں مبتلا کر رکھی ہے جس کی ازالہ ریسا انڈنٹ کو قانوناً و شرعاً ادا کرنا پڑے گا۔

14- یہ کہ ماسا سائلہ تاحال اپنی ڈیوٹی بخوبی سرانجام دے رہی تھی اور کبھی بھی غیر حاضری نہیں کی ہے اور نہ محکمانہ حکم کی خلاف ورزی کی ہے، اور ماہ ستمبر تک انجناب نے مجھے ماہوار تنخواہ دے رکھی ہے اور اب انجناب نے موسم سرما کے چھٹیاں ہونے کی باوجود ماسا سائلہ کا ماہوار تنخواہ بند کیا ہے جس کی ادائیگی کا بذریعہ اپیل ہذا استدعاء کرتی ہوں۔

15- یہ کہ ریسا انڈنٹ من اپیلانٹ کو اگر آپ بلاوجہ سیاسی اثر و سوخ و دیگر وجوہات کے بناء بلا جواز و بلا قانون تنگ کرتی رہی اور بلا آخر مورخہ 29/05/2019 ڈسٹرکٹ ایجوکیشن آفیسر فی میل مسماۃ حبیبہ بی بی نے ما اپیلانٹ کو غیر قانونی، خلاف ضابطہ، خلاف مسلمہ فطری اصول انصاف، اپنے ڈیوٹی سے Suspend کر کے Removal کے احکامات جاری کر رکھی ہے جو کہ خلاف قانون، خلاف ضابطہ، خلاف حقائق، یعنی بربدیتی، ایزاء رسانی ہے۔ (نقل حکم لف ہے)۔

16 - یہ کہ آپ صاحبان مہربانی کر کے حکم ریساٹنٹ محررہ 29/05/2019 کو منسوخ کر کے ماسائیلہ کو اپنے ڈیوٹی پر بحالی کے احکامات صادر فرمایا جائے اور متعلقہ سکول سے کسی دوسرے سکول کو ٹرانسفر کر کے تاکہ میں اپنا ڈیوٹی بخوبی سرانجام دوں۔

بحالات بالا استر تاء ہے کہ حسب دستور چیدہ دستور عید عنوان اپیل ہذا منظور فرمایا جا کر حکم ریساٹنٹ کے منسوخ اور ماسائیلہ کے اپنی ڈیوٹی پر بحالی کے احکامات صادر فرمایا جائے۔

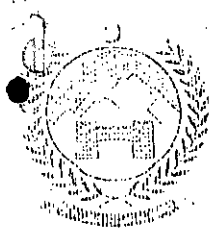
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DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

NOTIFICATION:

Muhammad Inayat-ur-Rehman, Vice Principal B-18 GHSS, Havelian, District Abbottabad is hereby appointed as enquiry officer to probe into the matter as per attached application in respect of Mst. Alahida PST GGPS, Jarjuray, District Dir Upper.

The inquiry officer should submit detail inquiry report alongwith clear findings recommendations within 15 days positively to this Directorate for further necessary action please.

Director
Elementary & Secondary Education Khyber
Pakhtunkhwa, Peshawar

Endst:No. 4538-39 /F.No.49/(F)/Appeal Dir (Upper) Dated Pesh: the 19/7 /2019.

Copy forwarded to the:-

1. Muhammad Inayat-Ur-Rehman Vice Principal B-18 GHSS, Havelian, District Abbottabad.
2. District Education Officer (F) Dir Upper with the remarks to assist and provide the relevant record to the Inquiry Officer concerned.
3. PA to Director E&SE Peshawar.

Hand
Deputy Director (Female)
(E&SE) Khyber Pakhtunkhwa,

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19/7/19

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7/11
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Annexure - M

To

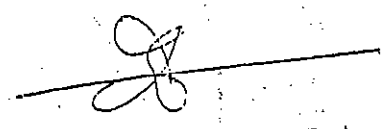
Director Elementary & Secondary Education
Khyber Pakhtunkhwa
Peshawar.

Subject:-

SUBMISSION OF ENQUIRY REPORT IN R/O MST. ALAHIDA EX-PST
GGPS JARJURY DISTRICT DIR UPER

Memo:-

With reference your office Notification No. 4538-39/F-49/appeal/Dir
upper dated 19.07.2019. on the subject cited above, complete enquiry report along
with all supporting documents in IN. R/O MST. Alahida EX-PST GGPS JARJURY District Dir
Upper is hereby submitted for further proceeding & necessary action.



Dr. Muhammad Inayat Ur Rehman
(Enquiry Officer)
V/P GHS No. 1 Havelian Abbottabad

However the chowkldar has not recorded his signatures in the attendance register,
while attendance for his father (Muhammad Naem) was obtained and also tempering was
found in register.

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ENQUIRY AGAINST MST. ALAHIDA EX-PST GGPS JARJURY DISTRICT

DIR UPER
INDEX

S #	Nature of paper/documents.	Page No	Annexure
01.	Enquiry report.	1-2	
02.	Removal from service order of Mst: Alahada Ex-PST.	3	A
03.	Appeal of Mst: Alahida Ex-PST to DEO (F) & Director E&SE KPK.	4-10	B
04.	Notification of Enquiry Officer .	11	C
05.	Appointment Order of Mst Alahida EX PST .	12	D
06.	Applications for transfer of Alahida PST.	13-17	E
07.	Reply of DEO(F) and SDEO(F) Dir Upper.	18-28	F
08.	Replies of Mst Alahida to explanations	29	G
09	Photocopy of Attendance.	30-32	H
10	Complaint Of Accused teacher	33-39	I
11	Information letters to concernd	40-42	J
12	Statement of Mst Alahida EX PST and ChowKidar GGPS Jarjury District Dir Upper	46-48	K
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14	Medical prescriptions of doctor in respect of Mst Alahida EX-PST GGPS Jarjury Dir Upper	51-59	M
15	Pay/ Salery slips of Mst Alahida	60-61	N
14	Miscellaneous documents		O

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Page 1

TT

ENQUIRY AGAINST MST. ALAHIDA EX-PST GGPS JARJURY DISTRICT

DIR UPER

ENQUIRY CONSTITUTED BY	Enquiry constituted by Director Elementary and Secondary Education Khyber-pakhtunkhawa Peshawar..Vide Endstt: No. 4538-39/F-49/appeal/Dir upper dated 19.07.2019.
Enquiry committee	Dr. Muhammad Inayat.Ur Rehman (B-18) V/P GHS No. 1 Havelian Abbottabad
Enquiry against	MST Alahida Ex- PST, GGPS Jarjuray District Dir Upper.

NATURE OF ENQUIRY

One MST Alahida Ex-PST, was removed from service by DEO (Female) Dir Upper vide order Endstt No 1819-23/F, No 04/DEO (M/F) ADO (P) Estb dated 29.05.2019 (Annexure-A).

The accused official filed an appeal in Directorate Elementary & Secondary Education Khyber Pakhtunkhawa Peshawar on dated Nil vide dairy No. 115 dated 28.06.2019 against the removal order of her service (Annexure-B)

Director Elementary & Secondary Education KPK constituted an enquiry and the undersigned was appointed as Enquiry officer to conduct a fact finding enquiry and suggest recommendations in this connection (Annexure-C).

BACKGROUND/HISTORY OF ENQUIRY

One MST Alahida was appointed as PST teacher through NTS in year 2016 at GGPS Jarjury Dir.Upper at S.No 7 vide DEO (F) Dir Upper Endst: No. 336-40/F /PST/ Apptt/DEO(F)/SEB dated 05.03.2016 (Annexure-D).

She claimed that she was performed her duties regularly and Punctuality. However due to hard and far flung area she submitted applications for transfer time and again to DEO (F), but no action was initiated and consequently the approached teacher was transferred and she was ignored (Annexure-E)

DEO (F) & SDEO (F) Dir called explanation from the official concerned due to her absence from duties (Annexure-F). DEO (F) & SDEO (F) Dir replied for the questionnaire and provided the relevant document/record as per their statements/response to questionnaire that she had never replied for explanations nor resumed her duties, due to which school was badly suffered (Annexure-G), while the accused claimed that she always replied for explanations as well as performed her duties (Annexure-H).

She provide photocopy of attendance register as a proof/evidence for her presence and performing duties (Annexure-I).

The accused also make complaint for the shifting/shuffling Conditional grant of Rs; 1400000/- (fourteen lac from GGPS Jarjury to other school (Annexure-J)

PROCEDURE OF ENQUIRY

In pursuance of Notification of Director E&SE KPK Peshawar, the under signed visited to DEO (F) Dir Upper office and informed the concerned to provide the relevant record/documents and respond to questionnaire and record their statements (Annexure-K).

The undersigned also visited GGPS Jarjury, and collect the record as well as statements of Alahida Ex-PST and Mr. Sartajudin Chowkidar, which are self-explanatory the accused claimed for performing her duties up to February 2019. The chowkidar also supported her statement and for performing verified her duties (Annexure-L).

However the chowkidar has not recorded his signatures in the attendance register, while attendance for his father (Muhammad Naeem) was obtained and also tempering was found in register.

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Page 2

FINDINGS

From the perusal of record and cheking other documents, following facts/findings were concluded.

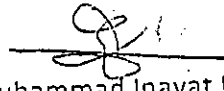
- On the checking Attendance Register, Mst: Alahida Ex-PST was present upto 23th December 2019 while January and February were winter vacations.
- Mst Shariqa Shabin PST, on her transfer handover charge to Mst: Alahida Ex-PST on 22.05.2018 (Annexure-M).
- Mst: Alahida claimed and provide Medical Certificate due to her treatment by doctor, Prescriptions (photo copies are attached) (Annexure-N).
- DEO (F) recorded/declared her absence from her duties w.e.f 01.03.2018, but she was paid salary/pay up to September 2018 and further period of absence has not been mentioned in the order removal from service (Annexure-O).
- Due to hard and far flung area the school is badly suffering and presently as per statement of chowkidar that school is closed and Non-functioning. Therefore DEO (F) may be directed to initiate efforts and take action for functioning school at earliest that, the precious time of kids may not be wasted more, and escape their further in the best interest of public/action

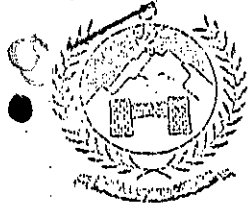
RECOMMENDATIONS

On the basis of Facts/Findings concluded during enquiry, following recommendation are suggested if authorities agreed.

- ❖ Under the Khyber Pakhtunkhawa civil servant rules (Efficiency and Disciplinary) sub.rules (4) (a) (i) the minor penalty of upholding two increments may be served imposed on the accused and may be exonerate from the major penalty of removal from service imposed by DEO(F) Dir Upper vide her office Order Endstt No: 1819-23/F.No 04/DEO(F) (M/F) ADO (P) Esttb Dated 29.05.2019.
- ❖ An Affidavit may be obtained from the accused for performing her duties regularly to the extend.
- ❖ Further she was found irregular or commit any offence, strick disciplinary action may be taken against her as per rules.
- ❖ The absence period may please be converted to Medical leave or leave without pay under the leaves rules 1981

The Enquiry was conducted in the best interest of public


Dr. Muhammad Inayat Ur Rehman
(Enquiry Officer)
V/P GHS No 1 Havelian ATD



(53) *Handwritten initials*

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.

No. 4961 /F.No.49/F/Appeal Dir Upper
Dated Peshawar the 2/10 /2019

Annexure-N

To

The District Education Officer,
(Female) Dir Upper

Subject:- ENQUIRY REPORT

I am directed to refer to the subject cited above and to enclose herewith a copy of enquiry report carried out by Muhammad Inayat-ur-Rehman Vice Principal GHS NO.1 Havelian Abbottabad Mst. Alahida Ex-PST GGPS Jarjury District Dir Upper and to ask you to submit detail report in the light of enquiry recommendation to proceed further into the matter.

Endst: No. _____
Copy forwarded your information to the:-

1. PA to Director (E&SE) Khyber Pakhtunkhwa local Directorate.

Handwritten signature
Deputy Director Female
(E&SE) Khyber Pakhtunkhwa; *11/10/19*

Handwritten signature
Deputy Director Female
(E&SE) Khyber Pakhtunkhwa; *11/10/19*

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**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

Reminder-I

No. 7314 /FNo.49/E/Appeal Dir Upper

Dated Peshawar the 10-11 /2019

To

The District Education Officer,
(Female) Dir Upper

Subject:-

ENQUIRY REPORT

I am directed to refer to the subject cited above and to enclose herewith a copy of enquiry report carried out by Muhammad Inayat-ur-Rehman Vice Principal GHS NO.1 Havelian Abbottabad Mst. Alahida Ex-PST GGPS Jarjury District Dir Upper and to state that progress of the case is still awaited at your end and to ask you once again to submit detail report in the light of enquiry recommendation to proceed further into the matter.

[Signature]
Deputy Director Female
(E&SE) Khyber Pakhtunkhwa

[Signature]
14/11/2019

Endst: No. _____

Copy forwarded your information to the:-

1. PA to Director (E&SE) Khyber Pakhtunkhwa local Directorate.

Deputy Director Female
(E&SE) Khyber Pakhtunkhwa

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OFFICE OF THE
DISTRICT EDUCATION OFFICER,
FEMALE DIR UPPER.

No. 4525 /F.No.57 DEO(F)/Dir/U/
Dated 16/11/2019

To.

The Director,
Elementary & Secondary Education,
Khyber Pukhtun Khwa Peshawar.

Subject:
Memo:

Enquiry Report.

- Reference your Office letter issued vide Deputy Directress Female bearing NO.4861/F.NO.49/F/Appeal Dir Upper, dated 02.10.2019. The detail report is as under.
1. Mst. Alahida PST was appointed through NTS in 2016 in GGPS, Jarjuray Upper Dir. vide DEO (F) Endst: NO.336-40/F/PST/Appointment/DEO (F) dated 05.03.2016. The School was reported closed by IMU staff with pictorial proofs to Deputy Commissioner vide monitoring Office letter No.461/2017 dated 19.4.2017 (Photocopy of the letter is attached as A).
 2. The School was reported closed by IMU Staff vide his Office letter NO.545/2017 dated 27.09.2017 (Photocopy is attached as B).
 3. Show cause notices were issued to the absent teacher vide DEO Office NO.5152-54 dated 29.09.2017 (Photocopy of final show cause notice is attached as C) but she submitted an affidavit that she will perform duty regularly, so her pay was released and further disciplinary proceeding was stopped.
 4. She was once again found absent from her duty and the School was found closed. Ist. Show Cause was issued vide DEO Office Endst: NO.1018-21 dated 11.04.2018 enclosed as (D) but no reply was received.
 5. Whereas final show cause notice was issued vide DEO (F) Office NO.4038-40 dated 7.12.2018 (attached as (E)) The absent teacher submitted reply that it is difficult for her to perform duty in GGPS Jarjuray as she is single teacher in that School and there are only three or four students and they remain mostly absent and She may be transferred from that School. (Photo copy of application is attached as (F)).
 6. Final Show cause through press was issued to her which was published in two daily newspapers the daily "Aaj" on 23-02-2019 and in daily "Mashriq" on 26.2.2019 (Annexed as (G)).

(Continued P-2)

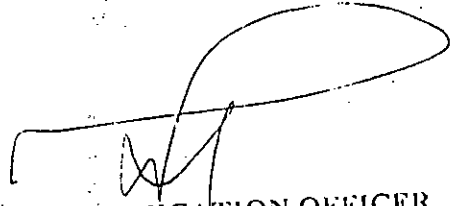
- 7. Whereas Mst: Alahida PST did not bother to appear before the competent authority and explain her position. She submitted reply through her husband that She performs her duty regularly. (Photocopy of her reply is annexed as (H)).
- 8. The SDEO Dir was asked to confirm whether She performs her duty or otherwise.
- 9. The SDEO concerned submitted her report vide her Office NO.1092 dated 24.05.2019. (Copy of report is attached as (I) that the teacher is thoroughly absent w.e.f. 01.03.2018 So,Mst:Alahida PST was removed from Service vide DEO (F) Office Endst:NO.1819-23 dated 29.05.2019 (Photo copy is attached as (J)).

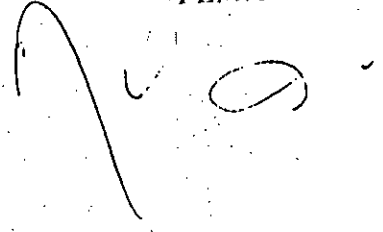
So for the inquiry report of Mr.Inayat-ur-Rahman principal is concerned. it is one sided and biased as he belongs to the same locality. As he has ignored the facts, the teacher had prepared a bogus attendance register at home which is not official attendance register and has not signed by any officer during their visits to the school. The inquiry officer has himself admitted that the chowkidar has not signed in the attendance register, it shows that the register was at the home of the said teacher so was not signed by the chowkidar.

The inquiry officer has recommended for withholding two increments and converting her absence period into leave without pay or medical leave, it means that the offence has been done.

So, in the light of the above facts and figures the inquiry may be filed or may be re-inquired through third party/impartial person.

The report is submitted accordingly.


 DISTRICT EDUCATION OFFICER,
 FEMALE DIR UPPER



(57)

بکھنور جناب ڈائریکٹر ایجوکیشن بمقام پشاور KPK

Annexure - 0

جناب عالی!

میں مسماة علیحدہ بی بی سابقہ PST ٹیچر جی جی پی ایس جرجوڑے ضلع دیرا پرنے آپ صاحبان کو ڈیپارٹمنٹ اپیل کی تھی۔ اور آپ صاحبان نے اس میں انکوائری کے لیے ڈاکٹر عنایت الرحمن صاحب انکوائری کے لیے مقرر کیا۔ اس نے انکوائری کر کے میرے حق میں انکوائری کر کے میری بحالی کا فیصلہ کر دیا۔ آپ صاحبان دوبارہ DEO(F) کو انکوائری فیصلہ ارسال کیا۔ اس نے دوبارہ میرے انکوائری فیصلے کے باوجود بھی اس نے میرے خلاف پھر انکوائری کرنے کا حکم دیا۔

لہذا آپ صاحبان مہربانی کر کے میری بحالی کا نوٹیفیکیشن جاری کر کے عنایت مشکور فرمائیں۔

عین نوازش ہوگی

العارضہ

مورخہ: 11/2/2020

عادل نواز

آپ کا تابع فرماں سائلہ

مسماة علیحدہ بی بی ٹیچر PST، جی پی ایس جرجوڑے تحصیل دیر ضلع دیر بالا

جناب عالی۔

ذیل عرض ہے۔

- 1- میں مسماة علیحدہ بی بی سابقہ PST ٹیچر جی جی پی ایس جرجوڑے ضلع دیربالا نے اپ صاحبان کو ڈیپارٹمنٹ اپیل کی تھی اپ صاحبان نے اس میں انکوآری کی تھی۔ ڈاکٹر عنایت الرحمان انکوآری کیلئے مقرر کیا اس نے انکوآری کر کے میرے بحالی کا فیصلہ کر دیا تھا۔ اور تنخواہ ریلیز کر کے دوسرے سکول میں ٹرانسفر کرانے کی منتی اسفارش کی گئی تھی اپ صاحبان نے دوبارہ DEO(F) دیرا پر کو انکوآری ارسال کیا لیکن اس نے انکوآری کا کوئی جواب نہیں دیا جس کے بعد سائلہ نے بمورخہ 11/03/2020 درخواست کی تھی۔ لیکن اس کا بھی سائلہ کو کوئی اطلاع نہیں دی گئی۔
- 2- یہ من سائلہ نے اپ کو درخواست کی تھی کہ DEO(F) نے سائلہ کے ساتھ ذاتی معاملات کے بناء پر انکوآری دوبارہ اپ کے پاس بھیج دیا ہے جو کہ بزنی بر بدینتی ہے۔ اور سائلہ کے خلاف کسی قسم غیر قانونی ثبوت یا لا تعلق گواہ موجود نہ ہے جس سے سائلہ کے خلاف انکوآری کا جواز بن سکے۔
- یہ کہ سائلہ نے بمورخہ 11/03/2020 کو برائے بحالی درخواست کی تھی کہ اپ صاحبان من سائلہ کے بحالی کا نوٹیفیکیشن جاری کرے۔ لیکن تا حال اس پر کسی قسم کا روائی نہیں ہو پائی ہے۔ سائلہ کو بحال کرنا قرین انصاف اور قانونی امر ہے۔ جس میں کوئی امر مانع نہ ہے۔
- یہ کہ آج پھر اپ صاحبان کو اپیل کرتی ہوں کہ سائلہ نے تا حال اپنی ڈیوٹی بخوبی انجام دی ہے۔ اور کسی قسم کو تا ہی نہیں کی ہے۔ لہذا سائلہ کو بحال فرمایا جائے۔

استدعا ہے کہ درخواست حسب مندرجہ و مستدعیہ منظور

فرمائی جانے کے احکام صادر فرمایا جائے۔

المرقوم۔ 20/10/2020

A. Ahmed

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**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)**
Dir Upper (Phone # 0944-881900) E-mail: deo@dirupper@gmail.com

OFFICE ORDER:

Consequent upon the recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered purely on merit against the vacant posts of PST on Adhoc School basis policy in BPS-12 (Rs.13320-960-42120/-) Fixed plus usual allowances as admissible to them under the Rules and existing policy of the Provincial Government on the terms & conditions given below with effect from the date of their taking over charge in the interest of public service.

Slr	Roll No	Name	Father Name	DOB	MC	School	UC	Score	Remarks
PK-10									
1	231600448	NINA JAN	FATEH BANO JAM	03-10-1999	15761-3981802-0	GGPS BUDHAI	SAWHI	112.25	A.V.P
2	231600774	UZMA	BANAWAR KHAN	25-11-1993	15701-4709567-4	GGPS DOBBA	SAWHI	86.26	A.V.P
3	231600159	ASMA NISAR	NISAR UL HAQ	20-09-1991	15701-7435505-2	GGPS SHARADA	SAWHI	85.14	A.V.P
4	232800450	SAADIA	TAJIZ TAHER ULM	01-01-1999	15701-4151-0	GGPS SHARADA	SAWHI	91.76	A.V.P
5	231600352	KHURSHID CHAGHA	FAZAL MALIK	03-07-1993	15701-2210037-0	GGPS SAWHI PAYEEN	SAWHI	91.32	A.V.P
6	232600664	SIDRA HIGAN	HIGAN ULLAH	01-01-1992	15701-4195256-0	GGPS SAWHI BALA	SAWHI	91.3	A.V.P
7	231600607	NAFSA BIBI	JAN MURHAMAD	29-02-1994	15701-6626377-8	GGPS JATKOOL	SAWHI	90.71	A.V.P
8	231600728	SALZHEER	VAZIR AHMAD	15-05-1990	15701-2122452-3	GGPS JATKOOL	SAWHI	90.31	A.V.P
9	232600157	RIHADA	FAZAL PARHA	05-12-1994	15701-2036405-2	GGPS BUDHAI	SAWHI	89.26	A.V.P
10	231600275	DR. NAZ	HAFIZ KHAN	01-01-1990	15701-5042981-2	GGPS SAWHI PAYEEN	SAWHI	88.67	A.V.P
11	231600430	RUQAYYAH	JAN MURHAMAD	01-03-1996	15701-2161726-6	GGPS JATKOOL	SAWHI	88.09	A.V.P
12	231600101	SERVA	MUZAFFAR SAID	10-10-1999	15701-2267923-4	GGPS BUDHAI	SAWHI	87.26	A.V.P
13	231600236	TEHJAN BEGUM	HIRAN ULLAH	29-05-1999	15701-3082344-3	GGPS BUDHAI	SAWHI	82.39	A.V.P
14	231600764	SHAYESTA BEGUM	ISMAIL ULLAH KHAN	01-04-1996	15701-695659-4	GGPS BUDHAI	SAWHI	80.05	A.V.P
15	232900744	IRINA HASAN	SERJAN ALAM	03-03-1995	15703-15703-2976023-4	GGPS HAZROOH	GAWALDAI	116.42	A.V.P
16	231600743	LUBNA SADA	MUSTAFAZ TAJKOH	15-02-1996	15701-3237787-0	GGPS SHARADA	GAWALDAI	102.4	A.V.P
17	232900495	FARVA BEGUM	MUHAMMAD ISLAM	11-12-1999	15701-8358423-2	GGPS HAZROOH	GAWALDAI	94.57	A.V.P
18	192000319	ROHINA	RAHAM DALI	04-13-1995	15701-3599570-4	GGPS THALI	THALI	82.42	A.V.P
19	232901911	NAJIA BIBI	ABDUR RAHMAN	03-05-1993	15701-2201205-2	GGPS KHOT	DOAG DARA	83.17	A.V.P
20	232600767	SAMINA ALAM	MUHAMMAD ALAM	10-02-1994	15701-6624277-1	GGPS KHOTKASH	DOAG DARA	81.32	A.V.P
21	232900448	ROHIA	FAZAL SHAFIQ	04-10-1993	15701-1154350-0	GGPS KATAH	DOAG DARA	80.26	A.V.P
22	231600594	SARVA BEGUM	MUHAMMAD NAHIDUL	02-02-1992	15701-2107912-6	GGPS GIPA	DOAG DARA	80.18	A.V.P
23	231600377	AMRANHA	MUHAMMAD ALAM	12-10-1993	15701-6582361-2	GGPS KALOOK KHWAL	DOAG DARA	85.51	A.V.P
24	231600184	NAZIA BIBI	ABDUL SAMAD	01-01-1995	15701-9548616-2	GGPS KATAH	DOAG DARA	85.35	A.V.P
25	232900396	SANJEEN BIBI	RISAT KHAN	26-03-1995	15701-6342890-2	GGPS KHOT	DOAG DARA	81.52	A.V.P
26	232800426	NAJIA BIBI	ABDUL MALIK	15-03-1990	15701-4695241-2	GGPS KATAH BALA	JABBAR	108.55	A.V.P
27	232900616	ZARFA	TAL MUHAMMAD KHAN	20-01-1996	15701-9519479-2	GGPS SHARADA KARE	KALROY	87.14	A.V.P
28	232900157	SHARHEEN	ARIFULLAH	03-04-1995	15701-4329712-2	GGPS KALROY	KALROY	86.77	A.V.P
29	231600260	NADIA BIBI	SAMMAT CHAI	07-12-1994	15701-4192523-6	GGPS SHARADA FARID KHAN	KALROY	81.9	A.V.P
30	232900319	NAJIA BIBI	FAZAL MUHAMMAD	15-02-1995	15701-4290893-6	GGPS ALMAS	TANPATAR	104.29	A.V.P
31	232900512	ROZANNA	MUHAMMAD ALMAS	04-04-1992	15701-9272897-4	GGPS ALMAS	TANPATAR	104.49	A.V.P
32	231600342	SIDRA BIBI	ALI RAHMAN	03-03-1996	15302-15302-3583024-0	GGPS HAZROOH ALMAS	TANPATAR	104.1	A.V.P
33	231600349	HABIBULA BIBI	ROOZ MUHAMMAD KHAN	25-12-1992	15701-3320166-2	GGPS ALBASAR	TANPATAR	101.85	A.V.P

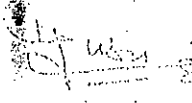
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34	231000004	HALIMA BINTI KHAN AMIR	SARIED BAWAZ KHAN AMIR	20-02-1955	15701-1951197-5	GGPS GOROKHA	PALAM	87.51	AMP
35	231000005	SARAFATUN	MUHAMMAD ALI KHAN	10-02-1954	42401-2361280-5	GGPS GOROKHA	PALAM	84.82	AMP
36	190000026	SHEKHA AQA	MUHAMMAD ALI KHAN	25-05-1992	15703-9045455-9	GGPS PINGAS	PATRAK	89.7	AMP
37	231000003	SARAFATUN BINTI	ROZI KHAN	16-08-1994	15701-518392-9	GGPS PINGAS	PATRAK	77.88	AMP
38	231000008	SHEFA	SHOUKAT ISLAM	03-04-1998	15705-3789957-2	GGPS GURYAL	SHEKINGAL	89.85	AMP
39	151000000	SHEHA BANG	SULTAN JANI	05-05-1993	15703-3633635-2	GGPS GOMADAI	SHEKINGAL	87.25	AMP
40	231000010	SUMMAL	SURUJI MURSHID	03-03-1994	10201-6575217-6	GGPS GARAWONT	SHAIKOT	89.48	AMP
41	231000016	HANISAS BECUM	ABDEL HAZAD	05-02-1988	15701-2542320-1	GGPS DUGAL	SHAIKOT	85.95	AMP
42	231000054	SHAFIQUNA	TANOURAH	01-02-1997	15701-4914325-6	GGPS HASLAT	SHAIKOT	87.5	AMP
43	231000073	SYEDA AISHA BINTI	SYED SAMBULLAH	16-08-1994	15701-7124230-4	GGPS KHARAYD	SHEKOT	71.87	AMP
44	231000082	SHALIDA BINTI	JANI MURSHID	01-04-1995	15701-3598320-6	GGPS SHAIKOT	SHAIKOT	86.85	AMP
45	231000083	NAZANIN	ALI HANISAH	20-03-1992	15701-18309	GGPS SHAIKOT	SHEKINGAL	100.63	AMP
46	190000005	HEDA SADI	IMZAH KHAN	09-08-1956	15701-4267023-2	GGPS HANISAR	SHEKINGAL	105.95	AMP
47	231000013	ROUZEEDA BECUM	KADHAN KHAN	12-03-1995	15701-6142715-5	GGPS SHEKOT	SHEKINGAL	75.27	AMP
48	231000030	SAJID GUL	ABDEL HAKIM	07-10-1997	15701-9510999-2	GGPS SHAFI	SHEKINGAL	94.17	AMP
49	231000032	LEILA Y/BASSIRA	HAYAT KHAN	11-09-1991	15701-18701915	GGPS SHAIKOT	SHEKINGAL	84.67	AMP
50	231000039	ROOYA	HANISAH SHAD	15-01-1991	15701-7293282-2	GGPS SHAFI	SHEKINGAL	82.45	AMP
51	231000041	MURSHIDAT KHAN	MURSHIDAT KHAN	05-04-1994	15701-42401	GGPS	SHAIKOT		
52	231000051	HUSNA BINTI	HANISAH KHAN	24-04-1992	15701-2205629-8	GGPS KHANSA	SHAIKOT	107.27	AMP
53	231000057	SHAFIQUNA	MURSHIDAT KHAN	01-01-1994	15701-2246875-4	GGPS KHANSA	SHAIKOT	112.92	AMP
54	231000058	SHAFIQUNA	HANISAH KHAN	15-03-1993	15701-4027167-6	GGPS KHANSA	SHAIKOT	89.83	AMP
55	231000067	HANISAH KHAN	GHURBA KHAN	02-07-1995	15701-2733292-2	GGPS KHANSA	SHAIKOT	93.74	AMP
56	231000074	SARAFATUN	MURSHIDAT KHAN	29-05-1990	15701-2205629-8	GGPS KHANSA	SHAIKOT	86.5	AMP
57	231000075	SARAFATUN	MURSHIDAT KHAN	05-02-1994	15701-42401	GGPS	SHAIKOT	87.87	AMP
58	231000088	SARAFATUN	MURSHIDAT KHAN	20-03-1995	15701-3888492	GGPS KHANSA	SHAIKOT	84.67	AMP
59	231000091	BINTI SHAFIQUNA	MURSHIDAT KHAN	29-05-1990	15701-8771833-0	GGPS KHANSA	SHAIKOT	77.18	AMP
60	231000096	SARAFATUN	MURSHIDAT KHAN	14-01-1995	15701-3405322-2	GGPS KHANSA	SHAIKOT	111.15	AMP
61	231000098	TANSHIRAZA	ABDEL HAKIM	03-12-1995	15701-2961199-4	GGPS KHANSA	SHAIKOT	107.18	AMP
62	231000099	ANNA	FAYD KHAN	02-02-1990	15701-7386530-6	GGPS KHANSA	SHAIKOT	105.20	AMP
63	231000100	SARAFATUN	ABDEL HAKIM	02-04-1995	15701-2321234-4	GGPS KHANSA	SHAIKOT	95.21	AMP
64	231000104	SHAFIQUNA	MURSHIDAT KHAN	03-10-1990	15701-8213204	GGPS KHANSA	SHAIKOT	88.19	AMP
65	231000202	SARAFATUN	MURSHIDAT KHAN	31-01-1995	15701-8897702	GGPS KHANSA	SHAIKOT	115.17	AMP
66	231000208	SARAFATUN	MURSHIDAT KHAN	20-10-1995	15701-4225811-2	GGPS KHANSA	SHAIKOT	105.17	AMP
67	231000257	SARAFATUN	MURSHIDAT KHAN	07-03-1995	15701-8842371-6	GGPS KHANSA	SHAIKOT	102.55	AMP
68	231000277	SARAFATUN	MURSHIDAT KHAN	29-06-1995	15701-4302216-6	GGPS KHANSA	SHAIKOT	100.3	AMP
69	231000288	ROOYA	MURSHIDAT KHAN	01-01-1992	15701-6575131-3	GGPS KHANSA	SHAIKOT	105.55	AMP
70	231000303	SARAFATUN	MURSHIDAT KHAN	02-03-1992	15701-2205629-8	GGPS KHANSA	SHAIKOT	86.21	AMP
71	231000305	SARAFATUN	MURSHIDAT KHAN	27-12-1991	15701-4881574	GGPS KHANSA	SHAIKOT	109.85	AMP
72	231000305	SARAFATUN	MURSHIDAT KHAN	02-02-1995	15701-166701	GGPS KHANSA	SHAIKOT	96.4	AMP
73	231000370	SARAFATUN	MURSHIDAT KHAN	03-05-1992	15701-16101	GGPS KHANSA	SHAIKOT	97.21	AMP
74	231000374	SARAFATUN	MURSHIDAT KHAN	27-02-1997	15701-16101	GGPS KHANSA	SHAIKOT	91.4	AMP
75	231000384	SARAFATUN	MURSHIDAT KHAN	07-06-1991	15701-7386530-6	GGPS KHANSA	SHAIKOT	100.02	AMP
76	231000385	SARAFATUN	MURSHIDAT KHAN	01-02-1992	15701-812218-2	GGPS KHANSA	SHAIKOT	100.02	AMP

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TERMS & CONDITIONS:

1. Appointment is purely on temporary & adhoc basis for a period of one year.
2. They should join their posts within 15 days after re opening of schools, closed due to COVID-19 Pandemic/ summer vacations. In case of failure to join the post within 15 days of the issuance of this Notification, their appointment shall stand expired automatically and no subsequent appeal etc. shall be entertained.
3. No TA/DA is allowed.
4. Charge reports should be submitted to all concerned.
5. They should not be handed over charge if their age exceeds 35+3 (3 Years age relaxation for hard area) or below 18 years of age.
6. Appointment is subject to the condition that their certificates/documents must be verified from the concerned authorities, and anyone found producing bogus certificate/s or degree/s their appointment shall be cancelled and they will be reported to the law enforcing agencies for further legal action.
7. Their services are liable to termination on one month's prior notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government treasury.
8. Pay shall not be drawn until and unless a certificate is issued by the SDEO office (concerned) to the effect that their documents have been verified.
9. Health & Age Certificate should be produced from the Medical Superintendent before taking over charge.
10. They will be governed by such Rules and Regulations as may be issued from time to time by the Government.
11. Their services shall be terminated at any time in case of their performance is found unsatisfactory during their service period. In case of misconduct, they shall be proceeded against under the relevant rules & regulations announced from time to time.
12. Their appointment is Ad hoc and school based. They shall have to serve at their place of posting and their services are not transferable to any other station.
13. Before handing over charge to them, their documents may be checked and if found bogus or fake they may be reported to this office for necessary action.
14. Posting within the selected five school is the wholly solely authority of the appointing authority and no one has the right to claim for a specific school.
15. All the SDEOs are required to collect an affidavit from each candidate that she will follow all the terms and conditions listed above and will keep it on record.
16. The appointees will get compulsory training (induction) to be conducted by PTE / RITE
17. Errors and omissions will be acceptable within the specified period.

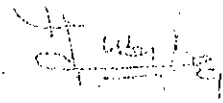

HUSSAN ARA
DISTRICT EDUCATION OFFICER
Female DIR UPPER

Encl No. 35-90 /DST/Appointment/Adhoc/MTS 2018/2019

Dated: 11/05 /2020

Copy forwarded for information & necessary action to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Account Officer Dir Upper.
3. Principal(s)/Headmistress/incharge concerned.
4. Accountant Local Office.
5. Teachers Concerned.


DISTRICT EDUCATION OFFICER
Female DIR UPPER

14/11/2019

ممبران کے ناموں کی فہرست
 29/07/2019
 14/11/2019

1۔ بین سماج، علیحدہ بی بی سائٹ، P.S.A. مرکزی بن بنی اس پر پورے ضلعی ڈیپارٹمنٹ نے اپنا بیان کر دیا۔ پتہ کارڈسٹ اور پل کی بھی اپ صاحبان نے اس میں انکوائری کیلئے ڈاکٹر سہایت الزمان انکوائری کیلئے اپنا بیان دیا۔
 29/07/2019 مقرر کیا اس نے انکوائری مکمل کرنے کے بعد بحالی کا فیصلہ کر دیا تھا۔ اور درخواستیہ لیکر کر کے دوسرے سکول میں فرانسفر کرنے کی ہتھی اسطرح کی گئی تھی اپ صاحبان نے بدورنہ 01/10/2019 کو برائے کمیشن DEOF کو نوٹوا دیا لیکن اس نے کسی قسم کا جواب نہیں دیا۔ اس کے بعد بدورنہ 14/11/2019 پر اپ نے دوبارہ DEOF کو دوبارہ نوٹوا کر دیا لیکن اس پر بھی کسی قسم کا جواب نہیں دیا۔
 یہ سن سائلڈ نے اپ کو درخواست کی تھی کہ DEOF نے سائلڈ کے ساتھ ذاتی معاملات کے بناء پر انکوائری دوبارہ اپ کے پاس بھیج دیا ہے جو کہ بیٹھی پر بیٹھی ہے۔ اور سائلڈ کے خلاف کسی غیر قانونی شدت یا لاطن کو او نہ ہونے سے جس سے سائلڈ کے خلاف انکوائری کو ہوا نہ ہو سکے۔

3۔ یہ کہ سائلڈ نے بدورنہ 11/03/2020 کو برائے بحالی درخواست کی تھی کہ اپ صاحبان میں سائلڈ کے بحالی کا نوٹیفیکیشن جاری کرے لیکن تا حال اس پر کسی قسم کا ردائی نہیں ہو پائی ہے۔
 یہ کہ سائلڈ نے دوبارہ بدورنہ 20/10/2020 درخواست لکھ کر دی تھی۔ اور اپ صاحبان نے چوتھی بار DEOF سے اس نسبت کمیشن مانگ لئے لیکن سائلڈ کو تا حال کسی قسم اطلاع وغیرہ نہ دی گئی۔ اور نہ باخبر رکھا گیا۔
 یہ کہ اپ صاحبان سے اپیل کرتی ہوں کہ سائلڈ کے مستقبل کے بارے میں سائلڈ کو آگاہ کریں تو یقیناً حل ہوگی۔

استدعا ہے کہ درخواست حسب مندرجہ و مستدعیہ منظور فرمائی جانے کے لئے کام صادر فرمایا جائے۔ تو سائلڈ دعا گو رہے گی

امروز - 01/04/2021

A. Ahmad



Annexure - Q

(63)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

No. 5122 /F.No.49/F/Appeal/Dir U

Dated Peshawar the 19-4- /2021

To

The District Education Officer,
(Female) Dir Upper

Subject: APPEAL

I am directed to refer to the subject cited above and to enclose herewith a copy of appeal in respect of Mst. Alaida Bibi Ex-PST, GGPS Jar Jor District Dir Upper, and to ask you to submit detail report comments/views to this Directorate to proceed further into the matter.

Endst No. _____

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

[Signature]
Assistant Director (Female)
E&SE, Khyber Pakhtunkhwa,
19/4/2021

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa,

64

Dir Upper (Phone # 0944-881900) E-mail: deofdirupper@gmail.com
NO. 6225 /Dated 28/10/2021 /2021.

To:

The Director
Elementary & Secondary Education
Khyber pakhtunkhwa Peshawar.

Subject:

inquiry report

Memo:

Reference your office memo: No 5122/F.No 49 /F/ Appeal/ Dir upper dated Peshawar
the 19-4-2021.

Enclosed please find herewith the photo copy of inquiry report and termination order
of Alahida Ex PST which was already submitted vide this Office memo:NO.1666 dated
22.10.2021.

DISTRICT EDUCATION OFFICER
(FEMALE)E&SE UPPER DIR.

Annexure - R

65



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

No. 6691 /FNo.49/F/Appeal/Dir (U)

Dated Peshawar the 1-7- /2021

To

The District Education Officer,
(Female) Dir Lower

Subject:- **APPEAL**

Memo:

I am directed to refer to your letter No. 4375 dated 28.4.2021 on the subject cited above and to state that the appeal of Mst. Alahida Ex-PST, GGPS Jarjuray Dir Upper has been seen & file/regretted by the Competent Authority.

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa,

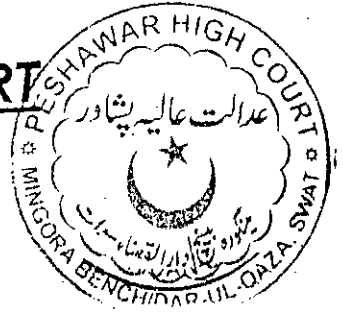
Endst No. _____ /

Copy of the above is forwarded to the:

1. PA to Director E&SE KPK Peshawar.

Deputy Director (Female)
E&SE Khyber Pakhtunkhwa,

BEFORE THE PESHAWAR HIGH COURT
MINGORA BENCH SWAT



W.P No. 703-m / 2021

Mst. Alahida W/O Bahadar Munir R/o Qashqaray Payeen,
 Tehsil & District Dir Upper.

...Petitioner

--VERSUS--

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education at Peshawar.
2. Director of Elementary and Secondary Education at Peshawar.
3. District Education Officer (F) District Dir Upper

...Responders

TESTED
 Examiner
 Peshawar High Court Bench
 Dar-ul-Qaza, Swat.

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

Respectfully Sheweth:

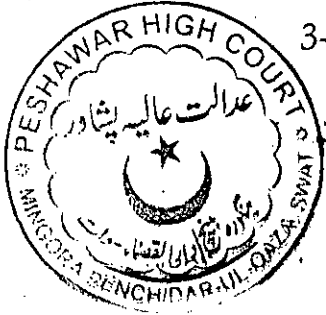
- 1- That, the petitioner is bonafide resident of Qashqaray Payeen, Tehsil & District Dir Upper. (Copy of CNIC attached as annexure "A").

FILED TODAY

06 JUL 2021

Additional Registrar

2- That, after recommendation of the departmental selection committee (DSC), the petitioner was appointed as PST in GGPS Jarjurai, vide appointment order dated 05-03-2016. (Copy of Appointment order dated 05-03-2016 is attached as annexure "B").



3- That, petitioner attended her school and continued his services till 22-12-2018, but to the very surprise of the petitioner, she got the impugned order dated 29-05-2019 allegedly on the appeal filed by the petitioner to respondent No.2, conducted inquiry regarding the matter, whereby her service was unlawfully terminated. (Copies of Impugned order dated 29-05-2019, appeal and register of letter dispatched are attached as annexure "C & D").

4- That the inquiry report was in favour of the petitioner (copy of inquiry report dated 19-07-2019 is annexed as annexure "E")

ATTESTED

Examiner
Peshawar High Court Bench
Mingora Dar-ul-Qaza, Swat.

1. That the impugned order of respondent No. 3 is illegal, unlawful and against the established norms of administration. The petitioner having no other adequate and efficacious remedy, approaches this august court inter alia on the following grounds.

GROUNDS:

FILED TODAY

06 JUL 2021

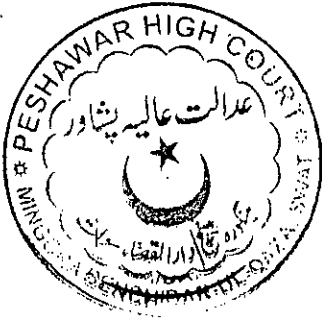
Additional Registrar

i. That the impugned order dated 29-05-2019 of respondent No. 3 is illegal, unlawful and against the established norms of administration.

ii. That petitioner has been validly appointed after all codal formalities and her termination of the

service herein is clearly in violation of the fundamental rights of the petitioner.

- iii. That the petitioner has been deprived of her legal rights and service, in a manner in which no one can be terminated even his personal servant.
- iv. That, the action and inaction of the respondent No. 2 are clearly in disregard of the fundamental rights of the petitioner.
- v. Any other ground not specifically raised will be argued with the prior permission of this August Court.



It is therefore very humbly prayed that, by the acceptance of this writ petition, the impugned order dated 29-05-2019 of respondent No. 3 may kindly be declared null and void upon the fundamental rights of the petitioner, be set aside and petitioner may kindly be allowed to continue his services with all back benefits.

Any other relief not specifically prayed but this august court deems proper may also be granted

ATTESTED

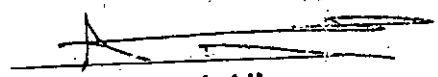
Examiner
Peshawar High Court Bench
Mingora Dar-ul-Qaza, Swat.

FILED TODAY

06 JUL 2021

Additional Registrar

Petitioner
Through Counsel

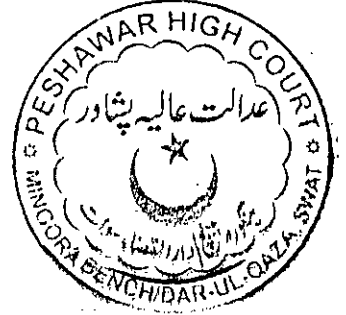

Liaqat Ali
Advocate High Court

Interim Relief:

By way of interim relief,

The impugned order dated 29-05-2019 may kindly be suspended till disposal of the instant writ petition.

Petitioner
Through Counsel



Liaqat Ali
Advocate High Court

Certificate

As per instruction received from my client/petitioner, it is certified that no such like other writ petition has been earlier filed before this august Court.

Petitioner
Through Counsel

Liaqat Ali
Advocate High Court

List of Books:

- Constitution of Islamic Republic of Pakistan 1973.
- Service Laws.
- Civil Servant Act, 1973.
- APT Rules 1989.
- Case law according to need.

ATTESTED

Examiner
Peshawar High Court Bench
Mingora Dar-ul-Qaza, Swat.

FILED TODAY

06 JUL 2021

Additional Registrar

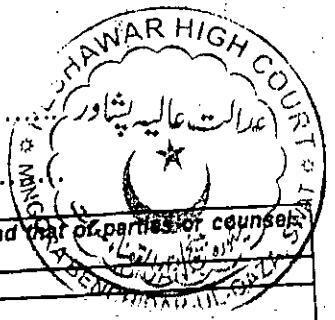
Petitioner
Through Counsel

Petitioner

Liaqat Ali
Advocate High Court

PESHAWAR HIGH COURT, MINGORA BENCH (DAR-UL-QAZA), SWAT

FORM OF ORDER SHEET




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

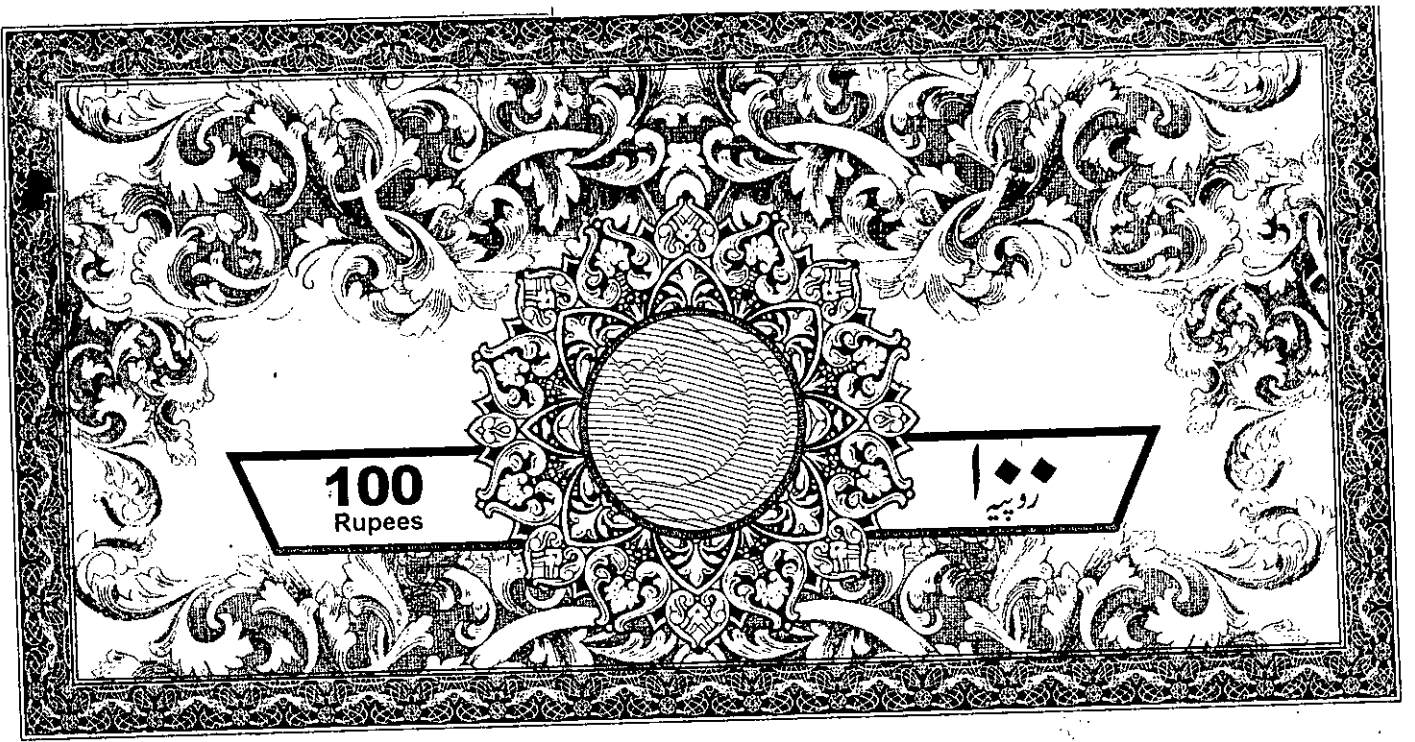
Date of Order or Proceedings Order or other Proceedings with Signature of Judge and that of parties or counsel where necessary. 3

1	2	3
	07-09-2021	<p><u>W.P No. 703-M/2021 with Interim Relief</u></p> <p>Present: Mr. Liaqat Ali, Advocate for the petitioner.</p> <p>*****</p> <p><u>ISHTIAQ IBRAHIM, J.-</u> Learned counsel for petitioner requested for withdrawal of the instant writ petition, in order to approach the appropriate forum. Same is therefore dismissed as withdrawn. Petitioner would be at liberty to approach the proper forum, if so advised.</p> <p><u>Announced</u> <u>Di: 07.09.2021</u></p> <p style="text-align: right;">JUDGE</p> <p style="text-align: right;">JUDGE</p>

S.No. 11
 Name of Applicant: Abbas Ali Shari
 Date of Presentation of Applicant: 7/9/2021
 Date of Completion of Copies: 7/9/2021
 No of Copies: 5
 Urgent Fee: ---
 Fee Charged: 207
 Date of Delivery of Copies: 9/9/2021

Certified to be true copy


 EXAMINER
 Peshawar High Court, Mingora/Dar-ul-Qaza, Swat
 Authorized Under Article 87 of Quanoon-e-Shahadat Order 1944



بعدالت خیبر پختونخواہ سروسز ٹریبیونل بمقام پشاور

علیحدہ بنام حکومت KPK بذریعہ سیکرٹری تعلیم وغیرہ

سروس اپیل مختار نامہ خاص منجانب

منکہ مسماة علیحدہ زوجہ بہادر منیر سکنتہ قشقرے دیر ضلع دیر بالا مقدمہ عنوان بالا کی پیروی کرنے سے بہ وجہ ذاتی مصروفیات و زمانہ ذات بذات خود قاصر ہوں۔ بدین وجہ اپنے طرف سے مسکئی بہادر منیر ولد جان علی سکنتہ قشقرے تحصیل دیر ضلع دیر بالا کو مختار خاص مقرر کر کے اختیار دیتا ہوں، تاکہ وہ میرے جانب سے بعدالت حضور پیش ہو کر وکیل مقرر کرے دعویٰ، رٹ پیشین دائر کریں، پیروی مقدمہ کریں۔ جواب دعویٰ، درخواست، جواب درخواست، دائر کریں۔ بیان حلفیاں دیں۔ شہادت پیش کریں، رقم جمع کریں۔ یا واپس لیں۔ ضمانت پیش کریں۔ کوئی صلح راضی نامہ پیش کریں۔ نقولات حاصل کریں اپیل انگریزی حکم فیصلہ و پرچہ ڈگری اور حکم درمیانہ کے خلاف تا بعدالت عالیہ و عظمیٰ اپیل، انگریزی، رٹ پیشین، اجراء، دیوانی پیشین وغیرہ دائر کریں نظر ثانی دائر کریں۔ الغرض اندرین بارہ جو اختیارات من مقرر کو حاصل ہے مختیار موصوف کو حاصل ہونگے۔ نیز اگر مقدمہ ریمانڈ ہو تو مختار موصوف متذکرہ اختیارات استعمال کر سکتا ہے، وہ سب مختار موصوف کو تفویض کرتے ہیں۔

مورخہ: 09/09/2021

مختار نامہ خاص مجھے قبول و منظور ہے۔

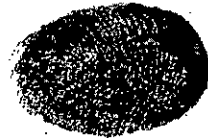
العبد

بہادر منیر

گواہ

کامران الدین ولد حبیب اللہ خان سکنتہ بانڈے خور دیر

15701-7160041-1



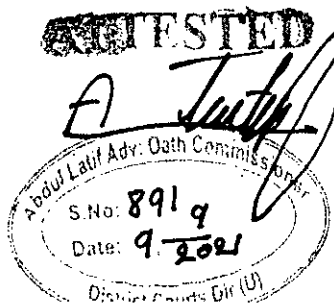
العبد

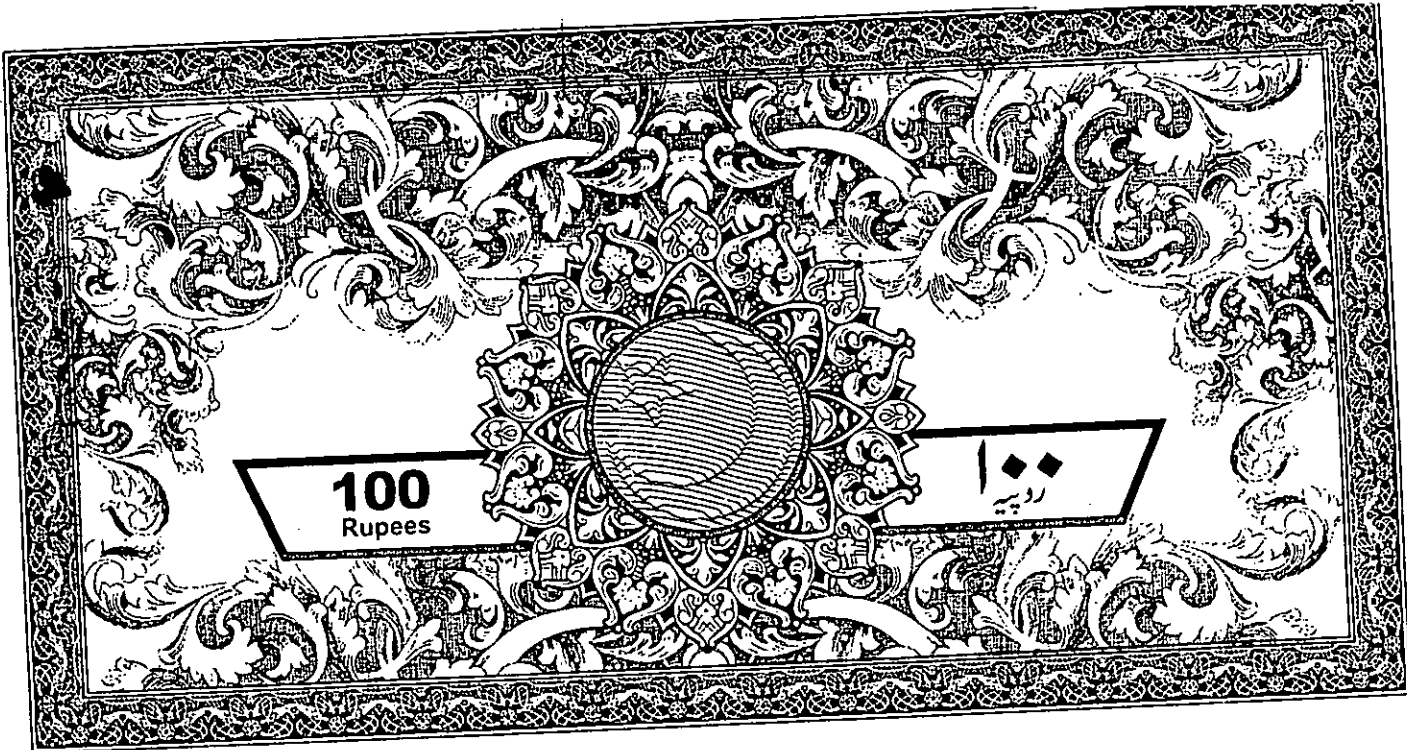
علیحدہ

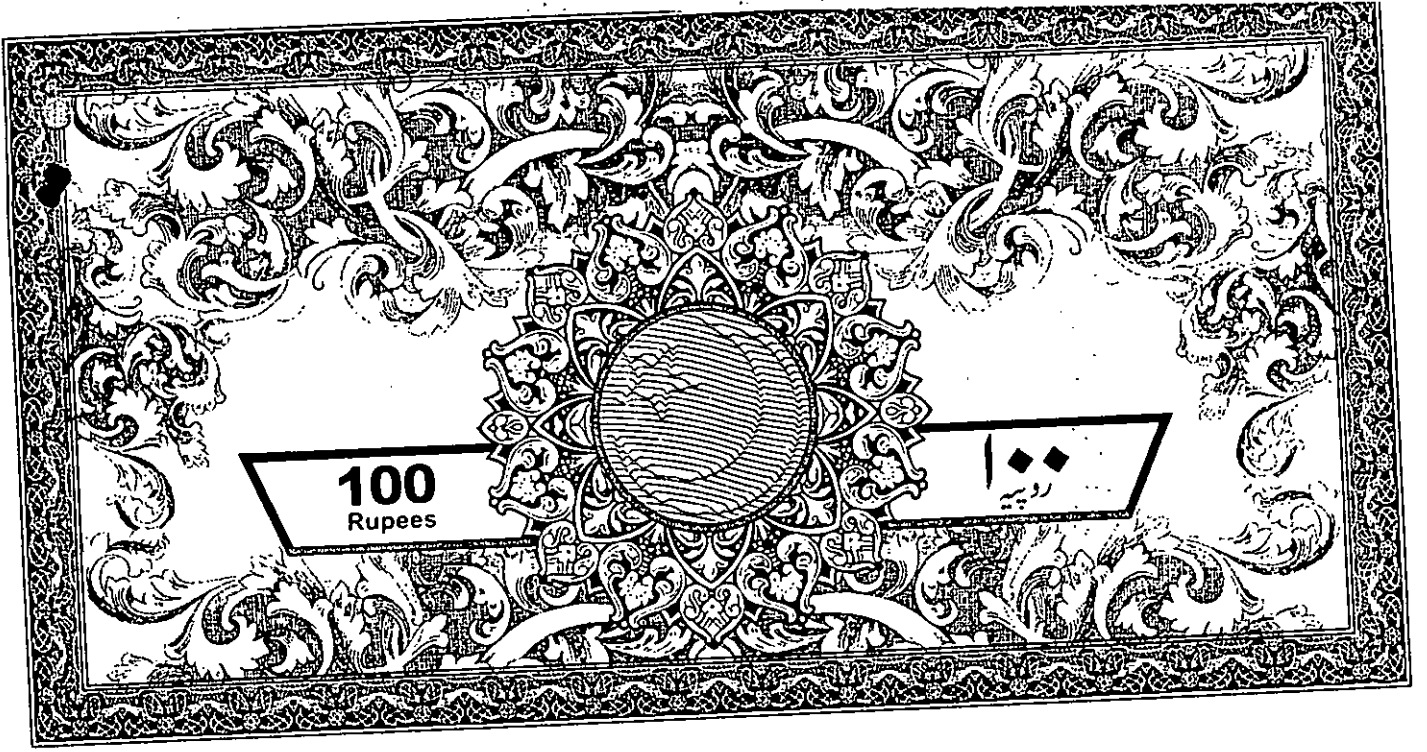
گواہ

مراد خان ولد محمد یار خان سکنتہ گلشو سیرنی دیر

15701-5530879-3







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Rupees



**BEFORE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
AT PESHAWAR**

WAKALAT NAMA

Service Appeal No. _____ of 2021

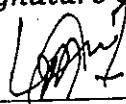
Title Mst: Alahida VERSUS Government of KP and others.

I Bahadur Munir S/O Jan Ali R/O Qashqaray Payeen, Tehsil & District Di Upper
(Husband and Attorney of the Appellant), do hereby appoint Sabir Shah (ASC),
Falaknaz Khan & Jamal Shah Advocates High Court in the above
mentioned case, to do all or any of the following acts, deeds and things:-

- 1) To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard, and any other proceedings arising out of or connected therewith.
- 2) To sign and verify and file, petitions, appeals, affidavits and applications as may be deemed necessary or advisable by them for the conduct, prosecution or defense of the said case at all its stages.
- 3) To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of the proceedings.
- 4) To do any act necessary or ancillary to the above acts, deed and things.
- 5) To appoint any other counsel to do any/all of the acts, deeds and things.
- 6) I/we, shall appear in the court/tribunal on every date of hearing for assistance and if due to my/our non-appearance, any adverse judgment/order/decree is passed, they will not be held responsible.

IN WITNESS whereof I/we have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this 20/09/2021.

Signature of Executants:



Bahadur Munir
15701-6977942-1

ACCEPTED BY:



SABIR SHAH
Advocate, Supreme Court



FALAKNAZ KHAN
Advocate High Court



JAMAL SHAH
Advocate High Court

"A"

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

No. Rozd

TB Swat

APPEAL No. 7431 of 20 24

Mst Alawida

Appellant/Petitioner

Versus

Imraugh Sayy (EGSE)

RESPONDENT(S)

Notice to Appellant/Petitioner Resp No 3

District Education
Officer (Female)
District Upper

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 7-11-22 at 9:00 AM

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp Court
Swat



Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

TB Swat

No.

7431

APPEAL No..... of 20

21

Mst Alahida

Appellant/Petitioner

Versus

Through Secy. (ESSE) Pesh

RESPONDENT(S)

RESP No 2

Notice to Appellant/Petitioner

Director (ESSE)
Peshawar

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 7-11-22 at 1.00 PM

[Handwritten Signature]

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

WT CAMP COURT
Swat

[Handwritten Signature]

[Handwritten Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

S.B

No.

Recd

APPEAL No..... 7431 of 20 21.

Mst. Alahida

Appellant/Petitioner

Versus

Through Secy T&SE Pesh.

RESPONDENT(S)

(counsel)
Notice to Appellant/Petitioner Falak Naz Khan & Jamal Shah
Advocate High court office 2nd Floor, Room No. 8,9
Continental Plaza Makaanbagh Mingora Swat
03339491110

Take notice that your appeal has been fixed for Preliminary hearing,
replication, affidavit/counter affidavit/record/arguments/order before this Tribunal
on 15/11/2021 at 9:00 AM at Peshawar.

You may, therefore, appear before the Tribunal on the said date and at the said
place either personally or through an advocate for presentation of your case, failing
which your appeal shall be liable to be dismissed in default.

M. P. J. S.
Registrar,

Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

"A"

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

N. Raza

TR Swat

APPEAL No. *7631* of 20 *21*

Mst Atalida

Appellant/Petitioner

Versus

Through Secy: (ESSE)

RESPONDENT(S)

Notice to Appellant/Petitioner *Post No 9* Sub Divisional
Education officer (Female)
Primary Dir N.P.P.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on *7-11-22* at *9:05 AM*

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

at camp court
Swat

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