## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 7781/2021

Date of institution

22.11.2021

Mrs. Zarlakhta Farhat, Lecturer in Law (BPS-17), Government Frontier College for Women, Peshawar.

#### **VERSUS**

The Government of Khyber Pakhtunkhwa, through Chief Secretary Government of Khyber Pakhtunkhwa, Civil Secretariat Peshawar and two others.

ORDER 27.04.2022

Mr. Ali Gohar Durrani, Advocate, for the appellant present. Qazi Ayaz, Litigation Officer alongwith Mr. Kabirullah Khattak, Additional Advocate General for official respondents No. 1 & 2 present and produced copy of Notification bearing Endorsement No. SO(C-III)/HE/1-2/Ms. Zarlakhta Farhat dated Peshawar the April 26, 2022, which is placed on file and copy of the same handed over to learned counsel for the appellant.

Learned counsel for the appellant stated at the bar that in light of Notification dated April 26, 2022, the appellant has been retained at Frontier College for Women Peshawar, therefore, he did not want to press the instant service appeal. In this respect, written endorsement of learned counsel for the appellant obtained at margin of order sheet.

In view of the above, the appeal in hand stands disposed of being not pressed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED 27.04.2022

(MIAN MUHAMMAD) MEMBER (EXECUTIVE)

(SALAH-UD-DIN)
MEMBER (JUDICIAL)



### GOVERNMENT OF KHYBER PAKHTUNKHWA HIGHER EDUCATION, ARCHIVES AND LIBRARIES DEPARTMENT

Dated Peshawar the, April 26, 2022.

#### **NOTIFICATION**

## No.SO(C-III)/HE/1-2/Ms. Zarlakhta Farhat

Ms. Zarlakhta Farhat, Lecturer in

Law (BPS-17), under transfer from Govt. Frontier College for Women, Peshawar to Govt. Girls Degree College, Shabqadar, Charsadda is hereby retained at Govt. Frontier College for Women, Peshawar against the vacant post in the best public interest.

2. No T.A/D.A is allowed.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA HIGHER EDUCATION DEPARTMENT

#### Endst; No.& Date as above.

Copy forwarded to the:

- 1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2. Director Higher Education Peshawar, Khyber Pakhtunkhwa, Peshawar.
- 3. Deputy Director (HEMIS CELL), Higher Education Department Rano Garhi Peshawar
- 4. Principals of Colleges concerned.
- 5. District Accounts Officer Charsadda.
- 6. Officer Concerned.
- 7. PS to Secretary Higher Education Department.
- 8. Master File.

(SAMIA JABEEN)

SECTION OFFICER (COLLEGES-III)

Learned counsel for the appellant present. Syed Naseer Ud Din Shah, Asst: AG alongwith Qazi Ayaz, Litigation Officer for respondents present.

Learned Astt: AG sought last opportunity for submission of written reply/comments. Last opportunity is granted to respondents for submission of written reply/comments on or before the next date failing which their right for submission of written reply/comments shall be deemed as stuck off. Adjourned. To come up for written reply/comments as well as arguments before the D.B on 27.04.2022. Operation of the impugned order dated 13.01.2022 shall remain suspended to the extent of appellant, till the date fixed.

(Mian Muhammad)

Member(E)

(Salah Ud Din) Member(J) 01.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 01.04.2022 for the same as before.

Reader.

01.04.2022

M/S Anum Durrani Advocate (junior of learned counsel for the appellant) present. Mr. Asif Masood Ali Shah, learned Deputy District Attorney for the respondents present.

Junior of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is out of station. Adjourned. To come up for arguments on 11.04.2022 before the D.B. Operation of the impugned order dated 13.01.20222 shall remain suspended to the extent of appellant, till next date.

(Rozina Rehman) Member (J)

(Salah-Ud-Din) Member (J) 11.01.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Qazi Ayaz Litigation Officer for official respondents No. 1 & 2 present. None present on behalf of private respondent No. 3, hence proceeded ex-parte.

Reply/comments on behalf of respondent are still awaited. Representative of respondents sought time for submission of reply/comments. Last opportunity is granted to respondent to furnish reply/comments on or before next date, failing which their right to submit reply/comments shall be deemed as struck off by virtue of this order. To come up for arguments before the D.B on 02.02.2022. Operation of the impugned notification dated 13.10.2021 is suspended to the extent of only appellant, till next date.

(Atiq-Ur-Rehman Wazir) Member (E)

31.01.2022

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for respondents present.

Junior to counsel for the appellant requested for adjournment on the ground that learned senior counsel for the appellant is busy before the Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments before the D.B on 01.03.2022. Operation of the impugned notification dated 13.01.2021 is suspended to the extent of only appellant, till next date.

(Atiq-Ur-Rehman Wazir)

Member (E)

Chairman

Appeal No. 7781/2021 Zarlakhta Fashat vs Grovt

17.12.2021

Counsel for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant while arguing the instant appeal stated that the appellant was appointed as Female Lecturer (BS-17) on 25.09.2017 and on completion of her normal tenure of posting she was transferred from GGDC Umerzai (Charsadda) to GGDC, Bacha Khan Peshawar vide notification dated 26.09.2019. She is aggrieved of the transfer order notified on 06.01.2021 when she was transferred from GGDC Bacha Khan Peshawar to GGDC Darra Adam Khel. However, before completion of normal tenure she was again transferred to GFCW Peshawar vide notification dated 20.01.2021 and yet again transferred from GFCW to GGDC, Shabqadar Charsadda vide impugned order dated 13.10.2021. The appellant preferred departmental appeal to the appellate authority on 14.10.2021 which was regretted vide correspondence dated 04.11.2021. Thereafter jurisdiction of the Service Tribunal was invoked under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974. Learned counsel for the appellant further contended that non-observance of the specified tenure is not only violation of Clause-xiv of posting/transfer policy of provincial government but is also violation of PLD 2013 Supreme Court 195. Moreover, the appellant is bachelor and ki ving with her parents at Peshawar and thus her fundamental rights have been violated.

The appeal is admitted for regular hearing subject to all just legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for submission of reply/comments. To come up for reply/comments on 11.01.2022 before S.B.

Alongwith memorandum of service appeal, request for interim relief for suspension of the impugned order dated 13.10.2021, has also been made. Operation of the impugned notification dated 13.10.2021 is suspended to the extent of only appellant, till next date

(Mian Muhammad) Member (E)

#### Form- A

## FORM OF ORDER SHEET

Court o	f	
Case No	<u> </u>	7781/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	22/11/2021	The appeal of Mrs. Zarlakhta Farhat presented today b Mr. Ali Gohar Durrani Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
2-		REGISTRAR  This case is entrusted to S. Bench at Peshawar for preliminar
<u>-</u>	·	hearing to be put there on $17(2)$ .
		CHARMAN
	,	
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	;	
•		

## KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Zarlakila Fathal Versus

......Respondents

NO		
1. This petition has been presented by: Advocate Court 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?	YES	NO
<ol> <li>Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?</li> <li>Whether appeal is within time?</li> <li>Whether the enactment under which the appeal is filed mentioned?</li> <li>Whether the enactment under which the appeal is filed is correct?</li> <li>Whether affidavit is appended?</li> <li>Whether affidavit is duly attested by competent Oath Commissioner?</li> <li>Whether appeal/annexures are properly paged?</li> <li>Whether certificate regarding filing any earlier appeal on the subject, furnished?</li> </ol>	,	<u> </u>
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<ul> <li>Whether the enactment under which the appeal is filed mentioned?</li> <li>Whether the enactment under which the appeal is filed is correct?</li> <li>Whether affidavit is appended?</li> <li>Whether affidavit is duly attested by competent Oath Commissioner?</li> <li>Whether appeal/annexures are properly paged?</li> <li>Whether certificate regarding filing any earlier appeal on the subject, furnished?</li> </ul>	<b>√</b>	<u> </u>
<ul> <li>Whether the enactment under which the appeal is filed is correct?</li> <li>Whether affidavit is appended?</li> <li>Whether affidavit is duly attested by competent Oath Commissioner?</li> <li>Whether appeal/annexures are properly paged?</li> <li>Whether certificate regarding filing any earlier appeal on the subject, furnished?</li> </ul>	<b>V</b>	<u> </u>
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?	<b>V</b>	<u> </u>
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?	√	<u> </u>
<ul><li>8. Whether appeal/annexures are properly paged?</li><li>9. Whether certificate regarding filing any earlier appeal on the subject, furnished?</li></ul>	$\sqrt{}$	
9. Whether certificate regarding filing any earlier appeal on the subject, furnished?	1	
10. Whether annexures are legible?	√.	
	1	<u> </u>
11. Whether annexures are attested?		
12. Whether copies of annexures are readable/clear?	√	
13. Whether copy of appeal is delivered to AG/DAG?	V	
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?	×	
17. Whether list of books has been provided at the end of the appeal?		
18. Whether case relate to this court?	. 1	
19. Whether requisite number of spare copies attached?		T.
20. Whether complete spare copy is filed in separate file cover?	<b>V</b>	
21. Whether addresses of parties given are complete?	V	
22. Whether index filed?	1	
23. Whether index is correct?	V	
24. Whether Security and Process Fee deposited? On		1
25. Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along	<b>√</b>	
with copy of appeal and annexures has been sent to respondents? On		
26. Whether copies of comments/reply/rejoinder submitted? On		T
27. Whether copies of comments/reply/rejoinder provided to opposite party? On	,	1
		-

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

Name:- Ali Gohat Gurrano

Signature:- X My 16 So Dated:-

### BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

Appeal No. 778/ /2021

#### Zarlakhta Farhat

### Versus

## Government of Khyber Pakhtunkhwa through Chief Secretary and others

## **INDEX**

S.No	Description of documents	Annex	Pages
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**APPELLANT** 

**Through** 

ALI GOHAR

DURRANI Court(s)

Advocate High 0332-9297427

khaneliegohar@yahoo.com

SHAH | DURRANI | KHATTAK (A REGISTERED LAW FIRM) HOUSE NO. 231-A, STREET NO.13, NEW SHAMI ROAD, PESHAWAR.

## BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Khyber Pakhtukhwi Service Tribunal

Diary No. 7923

Dated 22/11/202

APPEAL No. 7781/2021

Mrs. Zarlakhta Farhat,

Lecturer in Law (Bps-17), Government Frontier College for women, Peshawar.

...... Appellant

#### Versus

- 1. The Government of Khyber Pakhtunkhwa,
  Through Chief Secretary Government of Khyber Pakhtunkhwa,
  Civil Secretariat Peshawar.
- 2. The Higher education Education,
  Through Secretary, Government of Khyber Pakhtunkhwa,
  Civil Secretariat, Peshawar.
- 3. Ms. Shehla Ashraf
  Lecturer in Law (BPS-17)
  Govt. Girls Degree College Shabqadar, Charsadda.

.....Respondents

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE TRANSFER ORDERS DATED 13-10-2021 AND THE REGRET OF APPEAL VIDE 04-11-2021 OF THE APPELLANT WHEREBY SHE HAS BEEN TRANSFERRED/POSTED PREMATURELY. ILLEGALLY AND WITHOUT LAWFUL AUTHORITY AND IN CONTRAVENTION OF THE FEMALE UNMARRIED OFFICERS POLICY, E-TRANSFER POLICY, BAN PERIOD AND ALSO AGAINST THE TENURE POLICY.

## RESPECTFULLY SUBMITTED:

The appellant most humbly beg to submit as under:

Registrar 2071

1. **That** the Appellant is a law-abiding citizen of Pakistan and also hails from a respectable family. **She** is a civil servant who was appointed as a Lecturer in Law vide Notification dated 25-09-2017. She was posted as Lecturer at the Government Girls Degree College Umerzai, Charsadda as her first posting.

#### Copy of the notification is Annex-A.

2. **That** the applicant remained posted at the GGDC Umerzai Charsadda for two years whereafter she was Government Girls Degree College Bacha Khan Peshawar vide Notification dated 26-09-2019.

### Copy of the transfer notification is Annex-B.

3. That the applicant was posted and transferred merely after an year from Government Girls Degree College Bacha Khan Peshawar to Government Girls Degree College Dara Adam Khel vide notification dated 06-01-2021.

## Copy of the transfer notification is Annex-C.

4. That again the appellant was transferred vide notification dated 20-01-2021. This time she while being under transfer from GGDC Bacha Khan Peshawar to GGDC Dara Adam Khel, Kohat was transferred against vacant post in the Government Frontier College for Women Peshawar.

## Copy of the transfer notification is Annex-D.

5. That the agony of the appellant however wasn't to end as she has again been transferred from the Government Frontier College for Women Peshawar to Government Girls Degree College Shabqadar, Charsadda. And the respondent No. 3 has been transferred against the position as Lecturer at Government Frontier College for Women, Peshawar vide notification dated 13-10-2021.

# Copy of the transfer notification is Annex-E.

6. **That** against the afore-mentioned transfer dated 13-10-2021, the appellant moved a representation albeit appeal, which was diarized vide diary no. 14288 dated 15-10-2021.

### Copy of the representation is Annex-

7. That the said representation was ironically regretted with reasons which bewilders any prudent mind vide letter dated 04-11-2021. The said letter clearly states that there is one sanctioned position of law at the Government Frontier College for Women, Peshawar and against

3

this one post there are three teachers working. And that the tenure of the appellant isn't completed and immature. Yet no decision in respect of the acceptance of the appeal is being made.

Copy of the regret letter dated 04-11-2021 is Annex-

**8.** That aggrieved of the said transfer dated 13-10-2021 and the letter dated 04-11-2021, the appellant has no alternate remedy but to approach this honorable tribunal amongst others on the following grounds:

#### **Grounds:**

- a. **Because** the transfer/posting order is based in malafide and is inherently illegal, unlawful and without jurisdiction on the score of the ill-will involved in the order of transfer/posting and is thus liable to be set-aside.
- b. **Because** The Rules designate certain posts as 'tenure posts' (rule 22 read with Schedule IV of the Rules) and prescribe a period of three years for an incumbent to serve on such posts. Such prescribed tenure may therefore be categorized as the ideal duration for which a civil servant should serve at a particular post. The post of the appellant is a tenure post, yet she has been transferred from her posting before the tenure was complete. Thus, the appellant having not been allowed to complete her normal tenure and thus the order impugned is violation of transfer posting policy of the Government and the judgment of the apex court reported in PLD 1995 SC Page No 530 and PLD 2013 Supreme Court Page No 195.
- c. **Because** the recently the august Supreme Court of Pakistan has in its Judgment reported in 2013 PLD SC 195, decided a point of law and while committing upon the transfer and posting and other related matters of service held as under:-
  - (i) Appointments, Removals and Promotions:- Appointments, removals and promotions must be made in accordance with the law and the rules made there under; where no such law or rule exists and the matter has been left to discretion, such discretion must be exercised in a structured, transparent and reasonable manner and in the public interest.
  - (ii) <u>Tenure. posting and transfer:</u> When the ordinary tenure for a posting has been specified in the law or rules made there under; such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable.
  - (iii) <u>Illegal Orders:</u> Civil servants owe their first and foremost allegiance to the law and the Constitution. They are not bound to obey orders from superiors which are illegal or are not in accordance with accepted practices and rule, based norms; instead, in such situations, they must record their opinion and; if necessary, dissent.

(iv) O.S.D Officers should not be posted as OSD except for compelling reasons, which must be recorded in writing and are judicially reviewable. If at all an Officer is to be posted as OSD, such posting should be for the minimum period possible and if there is a disciplinary inquiry going on against him, such inquiry must be completed as the earliest.

Relying upon the Judgment of the Supreme Court of Pakistan the Respondents are duty bound to have follow the law, judgment of the superior courts, and posting and transfer should not have been influenced in any manner whatsoever.

d. **Because** the Supreme Court of Pakistan in CP No. 2812/2017 clearly directed in the following terms:

".......The issues raised in this petition are substantial questions of law of public importance in terms of Article 212(3) of the Constitution, which we have dilated upon and which were left unattended by the learned chairman and members of the Tribunal. The Tribunal also did not take into account the referred to judgments of this Court. The Tribunal referred to a judgment of this Court, Zaka Ullah Bajwa v Chief Secretary, Government of the Punjab (2005 SCMR 13), which held that a civil servant, "is required to serve anywhere against the post to which he is transferred", however, that does not mean a civil servant can be made to serve under his subordinate or for a very brief period of time or that the minister can undermine the authority of the secretary of the department".

It was further observed in the said judgment that:

"The Chief Secretary and the secretaries of the departments of the Government are directed not to act pursuant to any notification, order and/or instruction whereby a minister orders the posting/transfer of a civil servant."

e. **Because** Section 10 of the Khyber Pakhtunkhwa Civil Servants Act states as follows:

"Every civil servant shall be liable to serve anywhere within or outside the province in any post under the Federal Government, or any Provincial Government or local authority, or a corporation or body set up or established by any such Government:

Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region:

Provided further that where a civil servant is required to serve in a post outside his service or cadre, his terms and conditions of service as to his pay shall not be less favorable than those to which he would have been entitled if he had been so required to serve."

The aforesaid section does not empower the Government to cut short the normal tenure of a posted/transferred civil servant, and particularly without assigning any reason. In the case of Mahmood Akhtar Naqvi (Anita Turab case) (above) this Court held: "16. In the Hajj Corruption Case, the court reiterated its earlier ruling in Zahid Akhtar v. Government of Punjab (PLD 1995 SC 530), where it had been held that

"The normal period of posting of a Government servant at a station, according to Rule 21 of the Rules of Business is three years, which has to be followed in the ordinary circumstances, unless for reasons or exigencies of service a transfer before expiry of the said period



becomes necessary in the opinion of the competent authority." Furthermore, with regard to transfers of civil servants, this Court has stated that transfers by political figures which are not legally sustainable. Farrukh gulzar v. Secretary Local Government and Rural Development Department, Lahore and 2 others (1998 SCMR 2222). These are principles of law enunciated by this court and are to be followed in terms of Article 189 of the Constitution. We, however, repeatedly come across violations of such principles. This unnecessarily leads to litigation which, in turn, clogs Courts and Service Tribunals."

- f. **Because** in-fact there exist no exigencies of service nor can the order of transfer be termed as in the public interest rather the same has been issued in violation of the transfer and posting policy and in ban period.
- g. **Because** the Appellant has been treated illegally, unlawfully and against the spirit of the law.
- h. **Because** the unmarried female policy and protection and safeguarding thereof of the same has been disregarded in its totality vide the transfer orders.
- i. Because the mechanism provided under Article 212 is attracted for the reason of the order being corum non judice and illegal for the entrenched malice on part of the Respondents in the case.
- j. **Because** the Appellant has been seriously discriminated in line with the spirit of Article 25 of the Constitution of Islamic Republic of Pakistan, as there is a blanket ban imposed on transfers of teaching faculty within the province, yet in order to settle score with the Appellant, there has been a dispensation sought and granted without even a remote reference as to how or why such dispensation was sought and granted by the competent authority. There has been no reason given. The record is clear that there is no reason other than the clear political pressure being exerted on the appellant.
- k. **Because t**he actions on part of the respondents seriously are in the negation of the Constitution of the Islamic Republic of Pakistan, 1973 and the Civil Servants Act.
- Because before taking the impugned action, no due process of law has been adopted by the Respondents.
- m. **Because** the Fundamental Rights of the Appellant have been violated in relation to Article 4, 8, 9, 18 & 25 of the Constitution of the Islamic Republic of Pakistan, 1973. The said rights flow out of the Constitution the terms and conditions of service of the Appellant and this Honorable Court being the custodian of the Fundamental Rights of citizens of Pakistan, as well as the protection afforded by the Constitution of Islamic Republic of Pakistan 1973, is why the Appellant seeks the redress of their grievances and to end the ordeal the Appellant is going through due to the illegal, unlawful and unjust acts and inaction of the Respondents.
- n. **Because** the actions and inactions of the Respondents proclaim their own mala fide.
- o. **Because** the Appellant has got the fundamental right of being treated in accordance with law but the treatment meted out to the Appellant is on consideration other than legal and he has been deprived of his rights duly guaranteed to him by the constitution of Pakistan.



- p. Because the Respondents cannot be allowed under the law to pass any illegal order.
- q. **Because** the appellant has not been treated in accordance with law, hence his rights secured and guaranteed under the Law are badly violated.
- r. **Because** the Appellant crave for leave to add further grounds at the time of his oral arguments before this Hon'ble Tribunal highlighting further contraventions of the provisions of the Constitution & Laws which adversely affected the Appellant.

#### PRAYER:

In view of the above, it is humbly prayed that this honorable Tribunal may graciously be pleased to declare that the transfer order dated 13-10-2021 by virtue of which the appellant has been transferred be declared to be illegal, unlawful, against the norms of justice and corum non judice and to Direct the respondents to forthwith withdraw the impugned transfer/posting orders of the Appellant. Any other relief deemed appropriate in the circumstance of the case may also be granted.

#### Interim Relief:

May it please this Honorable Tribunal to suspend the posting/transfer of the Appellant till the final disposal of the appeal, and that no adverse action be taken against her.

Through

ALI GOHAR DURRANI Advocate High Court(s) 0332-9297427

khaneliegohar@yahoo.com
SHAH | DURRANI | KHATTAK
(A REGISTERED LAW FIRM)
HOUSE NO. 231-A, STREET
NO.13, NEW SHAMI ROAD,
PESHAWAR.



### BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No.\_\_\_\_

Mrs. Zarlakhta Farhat Versus Government of KP and others

### **AFFIDAVIT**

I, Mrs. Zarlakhta Farhat D/O Mr. Farhat Ullah Khan R/O House No. 1-A, Street No. 1, Sector H-4, Phase II, Hayatabad, Peshawar do hereby solemnly affirm and declare on oath that the contents of accompanied writ petition are true and correct to the best of my knowledge and belief and nothing has been intentionally concealed from this

Honorable Court.

**Deponent** CNIC No.

Advocate High Court(s)



## BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

APPEAL No. \_\_\_\_\_/2021

Addresses of Parties

#### Mrs. Zarlakhta Farhat,

Lecturer in Law (Bps-17), Government Frontier College for women, Peshawar.

..... Appellant

#### Versus

- 1. The Government of Khyber Pakhtunkhwa,
  Through Chief Secretary Government of Khyber Pakhtunkhwa,
  Civil Secretariat Peshawar.
- 2. The Higher education Education,
  Through Secretary, Government of Khyber Pakhtunkhwa,
  Civil Secretariat, Peshawar.
- 3. Ms. Shehla Ashraf
  Lecturer in Law (BPS-17)
  Govt. Girls Degree College Shabqadar, Charsadda.

......Respondents

Appellant

Through

ALI GOHAR DURRANI Advocate High Court(s) 0332-9297427

khaneliegohar@yahoo.com

SHAH | DURRANI | KHATTAK (A REGISTERED LAW FIRM) HOUSE NO. 231-A, STREET NO.13, NEW SHAMI ROAD, PESHAWAR.



## LIBRARIES DEPARTOR

Dated Peshawai the 25 September, 7 17

5. SOE MIMED 17 Restrictions of Female Legisland. Confequent upon the recommendation of Khyber Pakhyankhwa, Public Service 5 of Khyber Pakhrankhwa, Public Service Cor mission, the Competent Authority Education against a following recommendees. Department with a medicine effect with to-Department with a mediane effect with terms and conditions and to post them in the Colleges noted systems each

	Name Father's Name Address	-	l'ested at	Remarks
	Thing Facility 5 (Ame Address	Subject		Against Post
. ?	Zarlakhta Farhat D O Farhat Ullah Khan Postal Address: House & A Street E Section Hed. Phase I Havatabad Peahawar	Law	GUEC, L merzai Charmilda	Vacatives
:	Umna Eman D'O Ejaz Ahmad Postal Address, Machine Chowk, Village 4rd P.O. Chamkan Tehsil and District Peshawar	i. Law	GGDC Mandum Abbutabad	Vacant Fr
<b>:</b> 1	Zainab Hussain D O Muhammad Hussain Postal Address: IB Traders Kashmir Rood, Manschra	Physic:	GGDC Parhina Manschrii	Against Vacant Post
4	Nadia Sultan D-O Stuhammad Ration Postni Address: House 167-J, Sector D-3, Street + 1, Phase # II, KDA Kobat	Physics	TGGDC, Lachi Kohal	Against Vacani P
•	Hafia Ikhtiar Khan D.O Ikhtiar Khan Pental Address: C.O Professor Ikhtiar Khan, be mute of Chemical Sciences University of Pestawar	Physics	Gove Home Economics Callege, Nowhern	Against Vacant Post
5	Bushru Jahren D.O. Wafa Mohammad Postal Address: C.O. Adii Tyre Corporation Airport Road Mohallah Ghani Abad, Nawakalay, Mingora Swat	Physics	GGPGC, Saidu Sharif Swat	Against Vacant Post
Ψ.	Munazza Gul D/O Pio Dar Khan Postal Address: C O Pio Dar Khan, Village To # Bala, Kohat	Physics	GGDC, Sabirabad Karak	Against Vacant Pos
ŧ	Lubna Shamshad D'O Shamshad Ali Postal Address: Moballah Akhoon Khel, Victoge and P.O. Prang District and Tehsil Charsadda	Physics	GGDC, Par Hoti Mardan	Against Vacant Pos
i	Amber Saced D/O Saced Ahmad Khan Postal Address: 42-A Mukhmar Gul Road Kohat Cantt	Textile & Clothing	Govt. Home Economics College, Abbottabed	Against Vacant Po-

#### **TERMS AND CONDITIONS:**

- They will have all rights privileges command in Khyber Pakhtunkhwa Civil Servants Act, 1973 with all amendments made therein including Khyber Pakhtunkhwa Civil Servanis (Amendment) Act. 2013 and Rules made there under.
- In case of resignation, the officer will have to give one month prior notice. In absence of ....th natice their one month's pay allowances shall be forfeited to Government.
- The appointers should join their pasts within 30-page of the issue of this Notification failing which it shall be presumed that they are not interested to join the same. Charge report should be submitted to all concerned. The Director, Higher Education, Khybe Pakhunkhwa, Peshawar sheald furnish a certificate to the effect that the appointees have joined their posts or otherwise, after one month of the issue of this Notification.

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Annex



## GOVERNMENT OF KILVBER PAKHTUNKHWA HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT



Dated Peshawar 26th September, 2019

## **NOTIFICATION**

No. SO(C-1H)/HE/1-2/2019 / The competent authority is pleased to order the following transfer/posting in relaxation of ban in the best public interest:-

S.	NAME &	PRESENT	POSTED AT	REMARK
#	T	STATION	POSTEDAT	S
1.	Ms. Shah Rukh Fazal	GGDC Shabqadar	GGDC Pirpai	AVI
<del></del>	Lecturer in Botany	(Charsadda)	(Nowshera)	
2.	Ms. Tahira Naz Lecturer	GGDC No.2	GGPGC Mardan	AVP
	in Botany	Hayatabad		İ
		(Peshawar)		
3.	Ms. Shagufta Afridi	GGDC Sadda	GGDC Jalozni	AVP
-	Lecturer in Botany	(Kurram)	(Nowshera)	
4.	Ms. Hajra Bibi Lecturer	GGDC WANA	GGDC Sheikh	AVP
	in Botany	(South Waziristan)	Maltoon Mardan	
5.	Ms. Samrina Anjum	GGDC Takht-e-	GGDC Paharpur	AVP
	Lecturer in Computer	Nosrati (Karak)	D.I.Khan	
	Science			
6,	Ms. Resham Lecturer in	GGDC No.2	GGDC Dara Adam	Vice S.No.7
	Computer Science	Parachinar	Khel	
7.	Ms. Zubaida Begum	GGDC Dara Adam	GGPGC Bannu	AVP
	Lecturer in Computer	Khel		
	Science			
8.	Ms. Asma Ahmad	GGDC Zaida	GGDC Yar Hussain	AVP
	Lecturer in Chemistry	(Swahi)	(swabi)	i '
		<u> </u>		
9.	Ms, Ruqia Bibi Lecturer	GGDC Sarai	GGDC Lakki Marwat	AVP
	in Chemistry	Naurang (Lakki		
		Marwat)		
10.	Ms. Wareeda Nawab	GGDC Jandool Dir	GGDC Dargai	AVP
	Lecturer in Chemistry	(Lawer)	(Malakand)	
11.		GGDC Dir Upper	GGDC Nowshera	AVP
	in Chemistry			
12.	Ms. Riffat Un Nisa	GGDC Sadda	GGDC, Mankarai	AVP
	Lecturer in Chemistry	(Kurram)	Haripur	1
13.	Ms. Saira Bano Lecturer	GGDC Lund Khwar	GGDC Takht Bhai	Against
	in Chemistry	(Mardan )	(Mardan)	S.No.14
14.	Ms. Abida Sardar	GGDC Takht Bhai	GGDC Lund Khwar	Against
`''	Lecturer in Chemistry	(Mardan)	(Mardun )	S.No.13
15	Ms. Maryum Lecturer in	GGDC Kemal Sher	GCGC Gulbahar	AVP
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16.	Ms. Amina Rizwan	GGDC Mathra	GGDC Zaryab	AVP
	Lecturer in English	Peshawar	Peshawar	AVP
17	Ms. Madecha Andaleeb	GGPGC Kohat	GGDC Mathra	A
` ' '	Lecturer in English	COLOC MAINT	Peshawar	Against
18.	Ms. Samana Khatoon	GGDC Havelian	GGPGC Haripur	S.No.16
٠٥.	Lecturer in English	Abbottabad	Co. OC Hanhur	AVP
10	Ms. Kiran Asad Lecturer	GGDC Karak	CCDC Zorrat	
1 Y.	*	GODE KEREK	GGDC Zaryab	AVP
<u>,</u>	in Economics	CODON	Colony Peshawar	
	Ms Huma Afsar Lecturer	GGDC No.1	GGDC Pabbi	AVP
	in Geography	Abbottabad	(Nowshera)	AT

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·	Lecturer in History	GGDC Nowshera to GF	C i Vowsperm		drawn	
	(BPS-17)	(W ) Peshawar	m Adjusted at GFC	un TVice	- S.No 26	
725	Ms. Roshan Ara	Under transfer fro	m Adjusted at GPC	יייי ונה,		
	Lecturer in Zoology	GGDC Dabgas	ri, Peshawar	1		
ť	(BPS-17)	Peshawar to GGD	ю'	- 1		
i	(2.0)	Pabbi, Nowshera	<u> </u>		- 35	4
1-76	Ms. Basecrat		GGDC P	abbi   Vic	e S.No. 25	
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'	Lecturer in Zoology	1	i	,		_
	(BPS-17)		on Retained at GG	PGC Vi	ce. S. No. 28	7
27.	Ms. Saines Zafar	CECCI W				1
	Assistant Professor	GGPGC Kebat to GGI	OC Kohat	1		
	of Maths (BPS-18)	Alizai (Kurrem)			· · · · · · · · · · · · · · · · · · ·	
28.	7 . D.J.:	Under transfer in		GDC   V	ice. S. No. 27.	
1 20.	Lames in Maths	GGDC Alizai (Kum	m) <sub> </sub> Alizai (Kuram)	1		•
	Lectures as iviates	to GGPGC Kohut		•		
	(BPS-17)	Under Transfer fr	nen GCGC Peshawa		lice. S.No. 30	ì
29.	Ms. Farah Nadir,		ec	•		1
5	LASSISTANT Professor	GFCW, to GH	ا الله	}		
ŧ	of Home Economics	Nowshera	1	1		1
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<b></b>	BS-18	GCGC, Peshawar	GHEC, Nowshe	n T	Vice. S. No. 29	1
<b>ે 30.</b>	Ms Shabana	1	1	1		:
1	Nazmeen, Assistant	ļ	!	1		ŧ
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32.	Ms. Shagufta Sattar	GFC (W) restawar	ינאטוי אחמה	P-1 -4	1	
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33.	Ms. Samina Sameen	Under uansier	HAMI WINDOWN OF		1	
	Lecturer in Law	GGDC Zaryab Co	olony   Bacha Khan I	CZDZWEL	1	
		(Peshawar) to G	GDC		ļ	
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34	Ms. Zarlakhta Farhat	GGDC Bacha	Khan GGDC Dar	a Adam	1 AICE 22/0731	
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	(BS-17)	<sup>y</sup> ]	Spen	
	41 Ms. Fatiena Uibi	- <del> </del> -       -  - - -	 	
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1.4	Assistant Professor	Under transfer from Khan Kohi Nowsbern to GGDC		Vace S.No. 11
11/	of Law (BPS-18)	Dahwari Pestuwar	Chengharmatti,	ì
~	als Bibi Lana	Carlos Carlos	Personar	_ '
·	Assistant Profession	GUDC Chacharmans,	GUDU No i	AVP
k (	Political Science		Parachinar	1
_	(BS-18)			1
	Ms Maryam.	Under transfer from		<u> </u>
	Lecturer in Urdu	The same of the sa	Retained at GGDC to	Vice S no 41
<b>-</b>	BS-17	Charcadda to GGDC	Tzjo Bibi Charradda	1
		Khan Kohi Newsberg		1
4	5 Ms. Najma Gul		Parimal a comp	1
	Lecturer in Urdu	GGDC Khan Kohai to	Retained at GGDC	Vice S.no. 44
,	ľ	GGDC Tajo Bibi	when your yourpleis	1
,		Charsadda		1
-16	Ms. Munara	under transfer from		
	Intikhab Assistant	GGDC Dabgari Peshawar	adjusted at GFC (W)	Vice, S. No.47
1	Professor of	to GGDC Shabqadar	Peshawar	1
	Chemistry (Bs-18)	Charsadda Stateganar		1
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***	Ms. Samina Akhtar,	GFC (W) Peshawar	GGDC Shabqadar	Vice, S. No. 46
	Assistant Professor	1	Charsadda	
þ	of English (Bs-18)		1	
-48.	Ms. Rozma Rauf,	Under transfer from	Retained at GGDC	Her transfer order
ļ	Assistant Professor	GGDC Dargai Charsadda	Dargai Charsadda	
	of House Economics	to GGDC no.2 Playatabad		is hereby
į	(85 18)			withdrawn
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47	Ms.Shafaq Zahid	Under transfer from	adjusted at GGDC	Vice S.No.50
1	Locturer in	GGDC Tarkha Nowsbera	Nowshera	
	Economics (BS-17)	to GGDC Dam Adam	1	1
	<u> </u>	Khel Kohat	!	
50.	Ms. Naila Gul	GGDC Nowsbera	GGDC Dara Adam	Nine 521- 45
) 		COLO NUMBER		Vice S.No.49
į .	Lecturer in		Khel Kohat	1
<del>ن</del> سبب	Economics (BS-17)		<u> </u>	1 1
51	Ms. Shahnum Aman	Under transfer from	GGDC Khan Kohi	AVP
	Lecturer in Urda	GGDC Dabgari Peshawar	1	****
			Nowshera	. !
<del>}</del>	BS-17	to GGDC Thall Hangu	<u> </u>	
52.	Ms. Shandana Ihsan	Under transfer from	Retained at GFC (W	) Vice \$ No.53
	Lecturer in Islamiyat	GPC(W) Peshawar to		The
	00.17	MANA MANAGEMENT		/. <del></del> .
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11	15. Ms.Raila Artistics	in from	djusted at GODA Dargai Chursaddu	٠
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, ,	7 Ms Saima Rehman.	- Mardara	·	
•		GGDC Kustani. Sumbi	Retained at GGDC	Vice 5.00 59
	(BS-17)	to GGDC Panjpir, Swabi	Detained at GGDC	Aire
_		t to the second	Retained in Umerzai, Charsadda	
ةً ،	8. Ms. Nighat Lecturer in Physics	GGDC CCDC	· · · · · · · · · · · · · · · · · · ·	
	(BS-17)	Charsadda to GGL	GGDC Kotha Swabi	Vice S. No. 5%
1	1	Kotha Swabi CCDC Umerzai	GGDC Kours Street	
51		Constitution		Vice S.no.6
·	Assistant Professor of Physics BS-18		adjusted at GGDC,	Aice 2 Horas
. 6		Under transfer from GGPGC Kohat to GGDC	Timergara, Dir Lower	<b>:</b>
	Assistant Professor	GGPGC Kohat to CGDC	, <del></del>	,
•	in Political Science	Jandol Dir Lower	Die	Vice S.no.6"
\ L	(BPS-18) I. Ms.Saima Sattur.	GGDC Timergura,	GGDC Janes: -	1
61	Lecturer Political	0020 1	Lower	
<b>-</b>	Science (BPS-17)		Retained at GGDC,	Vice 5.no.63
62		Under transfer from	Nahaqi, Peshawar	\
•	Assistant Professor	GODC, Name	, · · · · · · · · · · · · · · · · · · ·	
	in Mathematics BS-18	GODC, Zame, Sines		Vice S.no.62
63		GGDC Nahaqi, Peshawar	GGDC Zaida Swabi	A 106 2 100 102
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	BS-17	<del></del>	1	+
6-1.	Lecturer in Urdu	GGDC No.3, DJ Khan to	No.1 D.1 Khan	1
1	(BPS-17)	GGDC, Wanz (South		1
ı.	(Dr3-17)	Waziristan)	· •	
65.	Ms. Momi Gul	Under transfer from		C Vice Snu.66
	Lecturer in Islamiyat		r   Adenzai Dir Lower	
	BS-17	Lower to GGDC Khwazz	<b>L</b>	Î.
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66.	Ms. Noreen Kiran		r ' GGDC Khwaza Khe   Swat	ta Vice Snu.65
, 1	Lecturer in Islamiyat	Lower	3487	į
1	BS-17	GGDC Sarai Nourans	GCDC Ph	NI AVD
67.	Ms. Farham Habib,	OUL SHE NUMBER	Khan	TVA LC
j	Assistant Professor	FERNI MITTING	i Primit	1
	of Computer	1	ļ	1
	Science BS-18	Under transfer from	n adjusted at GG	DC Vice S.no.69
68	Ms. Humaira Ali	1	in Kenaal Sher Khan i	
·	Lecturer in Political	Swabi to GGDC Mane		. ,
1 1	Science (BPS-17)	Swabi	as Sweet	
15	Ms. Aziz-Un-Nissa.	GGDC Kernal Sher Kh	m CCDC M C-	rabi Vice S.no.68
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7 5	Lecturer in Political	Kili Swabi		
	Science (BPS-17)	CCDC B	CCDC N- 1	Vice S.co.71
	Ms. Khush Bakht	GGDC, Pasipir, Swabi	GGDC No.1	ARC 2 Ed. 11
_	Assistant Professor	<del> </del>	Charsaida	· ·
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	Ms. Uzer : Gral,	GGDC No.1 Charsadda	GGDC, Panjpir, S	wabi   Vice S.r.J."6
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3.43	] '' ]	Ms Rukhsana Bibi	SOM Sharif	GGGS States	
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	76.	Ms BPS-17		GGDC No.3	
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	77.	n Islamiyat BPS-17	1	Hayatahad, Peshawa:	Vice S. No. 77
4	**-   X	15. Fartust Rauf.			
	1	Annual CRUIT	GGDC No.2, Hayatabad,		
dife	1	ecturer in Islamiyat	Peshawar	GCGC Gulbalan	
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		iahawar Assistant	Under Transfer from	Retained at GGDC	I Her Transfer contact
		ofessor of Botany	GGDC Hangu to GGDC	Hangu	is hereby
	BS	S-18			withdrawn
1 ! -	<u> </u>		Umerzai Charsadda	1	1
		. Ulfai Jehan,	Under transfer from	Retained at GGD	C 12- 2
		cturer in	GGDC Kohat to Banda	Kohat	
1	Ecc	onomics BS-17			withdrawn
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	3. Ms	. Shumaila Saced	111-4	-	_11
l'	1		Under transfer from	1	AVP of BPS-19 in
	,	istant Professor	GGDC No.1 DJ Khan to	NO.1 D.1 Khan	OPS
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84	. Ms.	Nadia	Under transfer from		DC Vice Sau 85
	Khu	ushood Assistant	GGDC Mathra Peshawa	- 1 -	
he had	Prof	essor of Maths	to GGDC Manki Swabi	Gulshan Rehn	nun i
	BS-			Colony Peshawar	<b>\</b>
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77	of Policy in the second of the	8 Rana Zahoer	Under transfer fro GGDC Umera	zai Umervai, Charsa	is hereby
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	of Policy I BS-1 Ms. Lectu	Rnna Zaheer mer in Political see BS-17	Under transfer fre GGDC Umera Charsadda to GGI	zai Umervai, Charsa	is hereby
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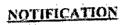
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### GOVERNMENT OF KHYBER PAKHTUNKHWA HIGHER EDUCATION, ARCHIVES & LIBRARIES DEPARTMENT

Dated Peshawar the: 20th January, 2021

AMMER



No.SO/C-HDHF/1-2/2021/Posting/Transfer/ The Competent Authority is pleased to order posting/transfer of the following Female Assistant Professors/Lecturers at colleges mentioned against each with immediate effect in the best public interest:

S. #	Name & Designation	Present Station	Posted Station	Remarks
1,	(BPS-17)	GGDC No.2 Haripur to GGDC Tool Swabi	GGDC No.2 Haripur	Her Trainfer order is hereby cancelled
2.	Ma. Sadia Sadaf Assistant Professor of English (BPS-18)	Under transfer from GGDC Jalezai Nowshera to GGDC Dargai Charsadda		
3.	Ms. Salma Rafique Lecturer in English (BPS:17)	GGDC Dabgari	Nowshera	
	Ms. Urooj Khizran Lecturer in Home Economics (BPS-17)	Under transfer from GHEC Nowshera to GDGC Garhi Kapora (Mardan)	GHEC Newshern	Her Transfer order is hereby cancelled.
	Ms. Seema Lectures in Jalamiyat (BPS-17)	Under transfer from GGDC Lund Khwar (Mardan) to GGDC Garhi Kapiera Mardari	GDGC Lund	Vice S.No. 06
6.	Assistant Professor of		GGDC Garbi Kapata Mardan	
7.	Unda (BPS-17)	GGDC Tarkha Nowsbera	Adjusted at GGDC No.1 Hayatabad	
8.	Ms: Shazia Mehmood Lecturer in Urdu (BPS- -17)	-	Tarkha (Nowshiera)	
9.	Ms Fouzia Rani, Assistant Professor of Maths (HPS-18)		(Pesliawar)	
ŢŌ.	Ms. Bushin Gul Lecturer in Maths (BPS-17)	GGDC Dabgari (Peshawar)	GGDC Jalozai Nowshera	Vice S.No. 09
11.	Ms. Zakia Minhas Assistant Professor of Pak Study (BPS-18)	GGDC Chagharmetti Peshawar to GGPGC Mardan		
12.	Assistant Professor of Pak Study (BPS-18)	Nowshera	2	and the second s
13.	Ms. Salma Asalstant Professor of Pak Study (BPS-18)		GGDC Khwazz Khela (Swai)	
I4.	Ms, Sadia Shaheen AP of Maths (BPS-18)	Under transfer from GGPGC Haripur to GGDC Zubaida Amer Ghazi Haripur	GOPOC Haripur	
15.	Ms. Necium Naz, AP of Maths Bs-18	GGPGC Hariper	GGDC Zubiad Annan Ghau Haripur	

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_		or collination I	Present Station	Cate a grant and a	Remprits
	, e			GGDC Nohaqi	Vice SNo.17
1	6.		GGINC Dabgari	Peshawar	
			(Peshawat) to GGDC		
Ì	į	17)	Marghuz (Swabi)		
_		37 37 31 31	GGDC Nahaqi Peshawar	GGDC Marghuz	Vice SNo. 16
1	7.		OGDC stated commen	(Swahi)	
ļ		Lecturer In Law (BPS-	į	(0)	
L		17)	Under Transfer from	Retained GGPGC	Her transfer order is
ı	18.	Ms. Sidra Irshad,	GCEC Harilan to	Haripur'	hereby withdraw
١			GGDC, Zubaida Aman,	1271.164.	Vice S.No 19
l		English	Ghazi Raripur	ŀ	
ŀ	10		GGPGC Haripur	GGDC, Zubaida	Vice SNo.18
ļ.	19.	Ms. Annia Bibl. Assistant Professor of	GOP GC Haripur	Aman, Ghazi	
١		English		Haripur	
ŀ	30		Under transfer From	Retained at	Her transfer order is
١	ZO.		GGDC Matta Swat to	GGDC Matte	hereby cancelled
1		(Bs-17)	GGDC Barikot Swal	Swal	
H	21.	Ms. Humairo Khalil			Her transfer order is
İ	<u> -1.</u>	Lecturer in English BS-	(W) Peshawar to GGDC	(W) Peshawar	hereby withdrawn
ļ		17	Pabbi Novstiem	A : 18 : 18 : 18 : 18 : 18 : 18 : 18 : 1	
Ì	22.	Ms. Noshab Lecturer in		GGDC Mandan	Vice 5No.23
1	÷#.	Political Science	GGDC Kakki Bannu to	Bannu	-
ļ		. *************************************	GGDC Kulachi DiKitan		
Ì	23.	Ms. Sidra Wazir	GGDC Mandan Bannu	GGDC Kulachi	Vice SNo.22
1		Lecturer in Political		D.I.Khun	1
- [		Selence			
١	.24.	Ms. Shabana Nazneen	Under transfer from	GGDC Dabgari	Vice SNo.25
		Assistant Professor of	GCGC Peshawar to	Peshawar	
1		Home Economies (DPS-	GHEC Nowshera	, , , , , , , , , , , , , , , , , , ,	ļ
	<u></u>	18)	, ,		
	25.	Ms. Jehan Ara Assistant	GGDC Dabgari Peshawar	OHEC Nowshern	Vice SNo.24
١		Professor of Home	, , , , ,		
y		Economics (BPS-18)			
Ī	26.	Ma. Salma Taj Leciuter	Under transfer from		AVP
•	l	in Psychology (BPS-17)	GODC Bacha Khan		
	ļ		Perhawar to GODC Sabirahad Karak	Peshawar	
	<del></del> -	. O. Alleria Balance		Retained of	Against already
	27.	Ma, Rukhtaj Rehman Lecturer in History			
		(BPS-17)	GGDC Balakot Mansehra	Harinur	occopioc posi
	28.	Ms. Khadin Assistant			Against already
	-0.	Professor of Urdu (BPS-			
	1	18)	OODC Mana Swat	Swat	'
	29			GGDC Khankehi	AVP
	1	Janjua Lecturer in Matha		Novehera	1
	30.		Under jinnsfer from	GFC (W)	Vice SNo.31
		Lecturer in Botany	GGDC Hayaunhad	Feshawar	
		(BPS-17)	Peshawar to GGDC	4	!
	<u></u>		Jalozni Nowshera	<u> </u>	
	31.	Ms. Sayeda Sarah		GGDC Inform	Vice SNo.30
	•	Mubarak Lecturer in		Nowellett	
		Boteny (BPS-17)		LOGDO WEE	3
	32.				1 0
	1	Assistant Professor of	Ounti (Linithm)	(Haripur)	OPS)
	77	Botsny (BPS-18)	Under Transfer from	Dalalund	Anding die
	33.	Ms. Shabeena Begum Assistant Professor of			
	[	Urdu (BS-18)	GGDC Jandool Die		occupied Post
		Aire (82.19)	(Lower)	']	1
	34.	. Ms. Zninab Bibi,		Adjusted at	AMD to the to
	17	Lecutere in Maihs (Us-			AVP in BS-18 in OPS
	1	17)	Manshers to GGDC		Ura
	1	1'''	Zubiada Aman Ghaz		İ
		_1.	Haripur	1	1
	35	. Ms. Shehla Ashraf	Under Transfer from	1 60 <b>0</b> C	AVP of BS-18_10
	1	Lectiner in Law (Bs-17)	GGDC No.2 Haylabad		DISCITED
	1	<u>'</u>	Peshawar to GODO		

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#### PAGE-03

		PAGE-03		
8.0	Name & Designation	Present Station	O-test Caration	Remarks
36.	Ms. Rukherra Ribi	Under Transfer from	Proted Station	AVP of BS-18 in
I	Lecturer in Chemistry		Retained at GGDC Madyan	OPS
ĺ	(DPS-17)	GGDC Madyan Swat to	Shat	
		GGDC Salda Sharif Swar	suri	•
37.	Mr Jalwa Kreem	GGDC Jubgram Dir	5000 T	AVP of BS-18 in
<u></u>	Lecturer in Maths BS-17	(Lower)	GGDC Thana	OPS
38.	Ms. Rabia Beggin	GGDC Januari Dirt	Malakand	AVP
<u></u>	Lecturer in Matha	Lower	GGDC Umerzai Chanadda	Ayr .
39.		Under transfer from	Retained 21	Againti the already
1	in Betany	GGDC Shiekh Maltonia	GGDC Sheikh	Occupied Past.
		Mardan to GGDC Kerral	Malton Mordan	
-		Sher Khan Swabi		
40.	Ms. Noor Un Nisa,			AVP
1	Assistant Professor in Urdo BPS-18		GGDC	
1	Guen 112-19	to GGDC Kaiski Bazzru	Shabqadar	
41.	Ms. Alina Youngs		Charadda	
17"	Ms. Alina Youngs Assistant Professor			AVP of BS-19 in OPS
	Computer Science (BPS-	tum tange		Urs
1	18)		Nowsberz.	į
42	<del></del>	Under Transfer from	Adjusted at	AVP
	Assissant Professor of	GGDC No.1 Charsadda	GGDC	of BS-19 in OPS
ļ	Pashto (BS-18)	to GGDC Painipir Swabi	Shabqadar	
.			Charastida	۵۹۰
43				Her transfer order is
	Professor of Political			hereby withdrawn
\	Science (BS-18)		Haripur	
144				AVP
V	Professor of Economics (BS-18)		GHEC: Abbottabad	ļ .
A 45		to GGDC Batagram GGDC Tool South	GGDC Garhi	AVP
<u>[]</u> . 43	Professor of Botany		Kapoora Mardan	77.1
7	(BS-18)		1	
46		Under Transfer from	GCDC Tangi	AVP
	Assistant Professor of	GGDC Umerzai		
1	Physics (BS-18)	Charradda to GGDC		
<u></u>		Kotha Swahi		
47	. Ma, Urooj Zunish.	Under Transfer from		Aice 200'48
-		GGDC NO3 DI Khan to	Khan	1
48	Science (BS-17)		GGDC Tank	Vice S.mo.47
140	Assistant Professor of		Outs. Tells	7 100 35100.71
ļ	computer Science (BS-		!	1
1	(16)	1		.1
49	Ms. Mehnaz Kamar	Under transfer, from		
	Lecturer in Economics	GCGC Pethawar to	GGDC Khan	1
	(BS-17)	GGDC No.2 Parachinar	Kohi Nowshern	
50				
	Law (BS-17)	GGDC Zaryah Colony to		
		GGDC. Timergam Dir	Charsadda .	
	I Take State	Lower transfer from	Retained - M	Mai Zorant
5	. Ms. Zainab Faiz Lecturer in Psychology			Her transfer order is
	(BS-17)	Abbottabed to GGDC		hereby withdrawn
1	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	Dalvisi	· · · · · · · · · · · · · · · · · · ·	1
52	Ms. Humaira Yasmeen		GGDC Chitral	Vice.S.no.\$3
"	Lecturer în filamiyat		1	. 1,17 = 7, = 114W (14   15
	(BS-17)		1	
53		GGDC Chitral	GGDC Boon	Vice S.no. 52
1	Lecturer in Islamiyat		Chitral	,
	(BS-17)	<u> </u>	<u></u> .	
5:	. Ms. Bushra Bibi	Under transfer from		Her transfer order is
1	Lecturer in Physics (BS-		GGDC No.3	hereby withdrawn
	17)	GGDC Balasat	Haripur	
55				AVP of BS-18 in
	Zeology (BS-17)	GGDC Dara Adam Khe		OPS
		to GGDC Jandool Dis	Timergara	
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56.	Ms. Faira Rehman	Under transfer from	Posted Station	Remarks
ĺ	Lecturer in Home	1 5 1 5 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		AVP
	Economics (BS-17)	Ages had her with	GHEC Nowshera	
		Nowshern Khan Kohi		
57.	Ms Shaheen Begum			
1 ** * *	Ms Shaheen Begum	GGDC Khar Bajaur	Adjusted at	i a i res
	Lecturer in Economics			AVP
	(85-17)			
58.	Ms. Shabana [haan]	Under transfer from	Charsadda	
1	Lecturer in Islamiyat	Cresses in t	Adjusted at	AVP of BS-19 in
	BS-17)	1 2	F 200 200 200 200 1 1 1 1 1 1 1 1 1 1 1 1	OP5
İ	23.11	GGDC Khan Koh	Nowshera	, ,
		Nowshera		
59.	Ma Neelum Zaman	Under transfer from	Adjusted at	AVP of BS-19 in
1	Assistant Professor of	GODC Bacha Khun		
1 .	Islamiyat (BS-18)	Peshawar to GGDC		Ors
1 .		Panipir Swebi	CAO ASSISTED	1
60.	Ms. Kiran Aflab			
1		GGDC Sabirahod Karak	GGDC Sarai	AVP
, 1	Assistant Professor of		Naurang Lakki	
	Economics (BS-18)		Marwat	
61:	Ms. Sunstina Lecturer in		Retained at	AVP
	Economics (BS-17)	GGDC Admits Dir	GGDC Adenzai	
<u> </u>	-	Lower	Dir Lower	
62.	Ms.Sadia Kokab	<u> </u>		Vice S.No.21
1	Lecturer in English (US-	S The state of the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second seco	Nowshera	· · , sjer or recessioners
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63.	Ms: Rebia Gul Assistant	CCDC Lord Physic	GGPGC Mardan	of BS-19 in OPS
0.3.			dande biami	0102-12-12-012
/ -	Professor of Physics	l virtima		
/	(BS-18)			
<b>[</b> 64:		Under transfer from		Her transfer order is
HI	Lecturer in Political		GGDC Havelian,	hereby withdrawn
	Science (BS-17)	GGDC Balako: Mansehra		I
65.	Ma Azia Un Nisa		Adjusted st	Against BS-18
\ i	Lecturer in Political	GGDC Kernal Sher Khan	GGDC Yar	· · · · · · · · · · · · · · · · · · ·
- \	Science (BS-17)	Swabi to GGDC Maneri		
11		Swabi		
766.	Ms. Zarjakhta Farbat	Under tracisfer from	GFCW Peshawar	AVP /
	Lecturer in Law (BS-17)	GGDC Besha Khan	7	4.17
VI	the state of the same of the same of	Peshawar to GGDC Dara		
/ 1	<b>*</b> .	Adam Khel Kohat		
67	Ms. Sheena Urooj	GGIXC Nowaltera	GGDC Tajo Bibi	Was Castes
197	Lecturer in Physics (DS-		Charadda	Aire andrea
1			Curundan	
<b></b>				
68.	Ms, Sumaira Sardar Lecturer in Physics (BS	COLC 110 BIO	GGDC Nowshern	Vice Sno.67
1	Lecturer in Physics (DS-	Chairagas		
سبند	171			
69		Under transfer from	Retained at	Vice S.No.70
1	in Undu (85-17)	GFCW Peshawar to	GFCW Peshawar	,
1	•	GGDC Dara Adum Khel		
L		Kolist		I
70.	. Ms. Maryam Kani	GFCW Perhawar	GODC Dara	Vice Sno.69
-	Lectures in Undu (BS-		Adem Khel	
1	171	· · · · · · · · · · · · · · · · ·	Kohat	1
71.	Ms. Nazia Ameer Afridi	GGIXC Hayatabad No.1.	GGDC Zaryab	Vice Sno.72
1 **'	Assistant Professor of	Pestinus	Colony Pestiawar	
1	Psychology (BS-18)	a manager sames,	- Asserted & Programmation	-
72.		CON Teach Files	inore-	1 T. C
150	Assistant Professor of	GGDC Zaryab Colony	GGDC	Vice Sno.71
		Peshawar	Haymabad No.1	-
	Psychology (BS-18)		Peshawar	***************************************
73,		GGDC Dir Upper	GGDC Rustani	AVP
el co.	Lecturer in Chemistry		Mardan	1. ' 2"
	(85-17)			
74		GGDC Timerities	GGDC Swel	LAUD '
,	Assistant Professor of	TO A STREET TO STATE AND	DESCRIPTION OF THE	VAL.
	English (BS-18)		Dher Mardan	-
75	A CONTRACTOR OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY O	GGDC Tank		
1	Lecturer in Zonlagy	ANIV INIK	GGDC Tangi	AVE
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-	(BS-17)		**************************************	The Same Service

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		PAGE-05		
S. F	Name & Designation	Present-Station	Posted Station	Remarks
76.	Ms. Nusrat Alam Assistant Professor of Political Science BS-18		1	Vice S.ng,77
77.	Ms. Naseem Bano Lecturer in Political Science (BS-17)	GGDC No.2 Hayatabad Peshawar	GGDC Dargai Chursedda	AVP
78.	Ms. Noteen Kiran, Lecturer in Islamiyat (BS-17)	Under Transfer from GGDC Adenzal Dir Lower to GGDC Khawaza Khela Swat	GGDC Adenzai,	AVP B-19 in OPS
79.	Ms. Naila Gul, Lecturer in Economics BS-17	Under Transfer from GGDC Nowshiers to GGDC Dara Adam Khel	1	Vice S.na.80
80.	Ms. Sehrish Batool, Assistant Professor of Economics BS-18		GGDC Dara Adam Khal	Vice S.no.79
81.	Statistics BS-18	GGDC Khanpur Haripur to GGDC Kotha Swabi	Remined at GGDC Khanpur, Haripur	
82.	Nis. Neelam Sayyed, Lecturer in Psychology BS-17	GGDC Booni Chitral	GGDC Khan Kehi Newshers	AVP
83.	Ms. Ancesa Fawad, Lecturer in Zoology BS- 17	Under transfer from GGDC No.2 Haripur to GGDC Manuchia	Adjusted at GGPGC Haripur	AVP
84.	Assistant Professor in English (IIS-18)	GGDC Gulshan Rehman Peshawar to GGDC Manki Swabi	GGDC Gulshan	Her transfer order is hereby withdrawn
.85.	Ms. Nadia Khursheed Assistant Professor of Maths (BS-18)	GGDC Gulshan Rehman, Peshawar	GODC Manki, Swabi	AVP
86.	Ms. Farzana Khaitak, Assistant Professor of Zoology BS-18	GODC Nowsbern	GGDC No.2 Hipymubad Peshiwar	Vice S.no.87
:87.	Ms. Shaista Hussain, Assixtant Professor of Zoology (BS-18)	GODC NO.2 . Hayatabad Peshawar		Vice Sno,86
88.	Ms. Sadia Qazi, Assistatit Professor of Chemistry BS-18		GGPGC Mordon	Vice S.ng,89
89.	Ms. Asma IJaz Assistant Professor of Chemistry	GGPGC Mardan	GGDC Rustain	Vice S.no.88

#### SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA HIGHER EDUCATION DEPARTMENT

Mardan

#### Endst: No. & Date Even

BS-18

Copy forwarded to the:-

Professor of Chemistry

1. Accountant General Khyber Pakhtunkhwa Peshawar.

2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.

3. Director Higher Education, Khyber Pakhtunkhwa Peshawar.

4. Deputy Director HEMIS Coll Higher Education Department.
5. District Accounts Officers concerned.

6. Principals of the Colleges concerned.

7: Manager, Goyt, Printing Press Khyber Pakhtunkhwa, Peshawar.

B. Officers Concerned.



## GOVERNMENT OF KHYBER PAKHTUNKHWA UIGHER EDUCATION, ARCHIVES & LURARIES DEPARTMENT



Dated Penhawnr the: 13th Detaber, 2021

## NOTHFICATION

Na.SOIC-HDHE/1-2/2021/Forther/Transfer/ The Competent Authority is pleased to order posting/transfer of the following formule Lecturers at colleges mentioned against each with immediate effect in the best public interest:

<b>S.</b> #	Nime & Designation	Present Station	Posted Station	liemarks
1	Ma. Shulla Aslunf,	1		Vice Sam 2
i		College Shabqudar,	College the Women.	Ì
-	(HPS-17)	Churshide	Penhavar	
2.	Ms. Zarlaklita Farfini;	Govi, Franter College	Govi, Girls Depret	Vice Sign, 1/
1		for Women, Peshawar	College Shabqadar,	•
	(BPS-17)	, , , , , , , , , , , , , , , , , , , ,	Charmodda	

### SECRETARY TO GOVE OF KHYDER PAKHTUNKHWA HIGHER EDUCATION DEPARTMENT

### Entist: Na. & Date Even

Capy forwarded to the:-

- 1. Accountant General Khylier Pakhtunkliwa Peshawar.
- 2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
- J. Director Higher Education, Khyber Pakhtunkhwa Peshawar.
- 4. Deputy Director HEMIS Cell Higher Education Department.
- 5. District Accounts Officer Charmodily,
- 6. Principals of the Colleges concerned.
- 7. Officers Concerned.

(Minhentman Jaway Sandar)
Seption Officer (Colleges III)

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Law see

THE REPORT OF THE PARTY.

Annex F

To

director/

The Secretary

**Higher Education** 

Khyber Pakhtunkhwa

Subject: APPEAL / REQUEST FOR REDRESSALOF

GRIEVANCEAGAINST PRE MATURE TRANSFER/ POSTING, ORDER

No. SO { C-III} HE / 1-2 /2021 / Posting / Transfer Dated 13<sup>th</sup>

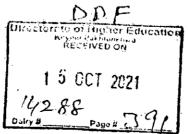
October 2021

Sir

I, ZarlakhtaFarhatLecturer in Law takes this oppurtunityto bring to your kind notice that I am a permanent resident of Hayatabad Peshawarfor the last over twenty six years. But having Charsaddaas my father's domicile, I was posted to GGDC UmerzaiCharsadda where I served for over two years. After that I was posted to GGDC Bacha Khan Peshawar whereby I merely served for a period of one year and was posted out at GGDC Darra Adam Khelon January 06, 2021. Later I was adjusted at the present college in GFCW Peshawar and now again after a period of eight months, I am cross posted with Ms. Shehla AshrafLecture in Law from GGDC ShabqadarCharsadda who had been posted there vide same notification through which I stood postedto GFCW about eight months.

It may not be out of place to mention that the sameMs. Shehla Ashraf was posted toShabqadar CollegeCharsaddaafter spending a period of seventeen years (without a break)at GGDC No.1 Hayatabad College.Her grounds may be too compassionate that the competent authority posts her back to Peshawar but I too hereby approach your kind honour to reconsider my request on the following pleas.

1) I am an unmarried female living with my father at Hayatabad Peshawar. KPK Civil Servants Act 1973 provides that such



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female unmarried officers will be treated with compassion for postings /transfers to out station.

2) I already spent a period of over two years in my domiciled district Charsadda(Umerzai). Posting out back to the same district after a few months calls forstrong reconsideration by the authorites. Posting out of an employee prematurely after about eight months does not fall even with legality of the matter. I am entitled to serve for two years at the present station / positioned. It has not only happened now but its the third consecutive time in last eight months time that such orders have been passed to uproot me. Thus subjecting me to mental / psychological and physical stress. According to Section 10 clause (iv) of KPKCivil Servants Act 1973 rules an officer must spend a period of two years in settled area and one and a half year tenure in remote area in case of a transfer.

In view of the above I request that my case for cancellation of the above notification be reconsidered and I be allowed to perform my duties at the current station.

Yours sincerely

ZarlakhtaFarhat d/o

Col Retired FarhatUllah

Lecturer in Law

GFCW Peshawar.

rate: 14/10/2021

Copy forwarded to

- 1) Director Higher Education
- 2) Principal GFCW

3) Mr. Kamran Bangash provincial minister for Higher Education , Archives & Libraries

to !



E-mail:- dhekpkpesh@gmail.com Facebook.com/dhekppeshawar

Fax # 091-2260181 Twitter.com/dhekppeshawar1 .

A'A-V/Esti: Branch/A-12/84s. Zarlakhiá Farbat/ Law

Dated Peshawar the

To

The Secretary, Govt: of Khyber Pakhtunkhwa, Higher Education Department, Peshawar.

SUBJECT:

APPEAL/REQUEST FOR REDRESSAL OF GRIEVANCE AGAINST PRE-MATURE TRANSFER/ POSTING, ORDER.

السلام عليكم /Respected Sir

1 am directed to refer to your letter No. SO(C-III)/HED/1-2/Ms.Zarlakhta Farhat/ LEC. Law/2021 dated 29.10.2021 on the subject noted above & to state that 03-teachers are working against one (01) sanctioned post in the subject of Law at Govt; Frontier College for Women, Peshawar & one (01) working against one (01) sanctioned post at Govt; Girls Degree College, Shabqadar (Charsadda).

It is pertinent to mention here that tenure of Ms. Zarlakhta Farhat, Lecturer in Law at Govt; Frontier College for Women, Peshawar is 02/2021 & tenure of other 02-teachers of Law at the said college are also immature (copy of service history of the lady concerned is enclosed).

Factual position of the case is submitted as desired, please.

With best regards

DY. DIRECTOR (FEMALE)

## POW ER OF ATTORNEY

BEFORE THE	Honible S	ervice Pribung	J, KP	(A)
	11	No	of 2021	(28)
	Zarlaktta			

VERSUS of KP and Others

I/we

appoint & constitute **SHAH | DURRANI | KHATTAK** (a registered law firm) as counsel in the above mentioned case, to do all or any of the following acts, deeds and

- 1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal or any other court/tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
- To sign, verify and file Plaint/Written Statement or withdraw all proceedings, 2. petitions, suit appeals, revision, review, affidavits and applications for compromise or withdrawal, or for submission to arbitration of the said case, or any other document, as may be deemed necessary or advisable by him for proper conduct, prosecution or defence of the said case at any stage.
- 3. To do and perform all other acts which may be deemed necessary or advisable during the course of the proceedings.

#### AND HEREBY AGREE:-

- a) To ratify whatever the said Advocates may do in the proceedings in my
- b) Not to hold the Advocates responsible if the said case be proceeded ex-parte or dismissed in default in consequence of their absence from the Court/Tribunal when it is called for hearing or is decided against me/us.
- That the Advocates shall be entitled to withdraw from the prosecution of c) the said case if the whole OR any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Power of Attorney/Wakalat Nama hereunder the contents of which have been read/explained to me/us and fully understood by me /us this\_

Signature of Executant(s)

Accepted subject to term regarding payment of fee.

ALI GOHAR DURRANI

Advocate High Court

0332-929742

**BABAR KHAN DURRANI** 

Advocate High Court

HANNAH ZAHID DURRANI Advocate

**7ΔRΔK SHΔH** 

Advocate High Court

MOHAMMAD KHAN

khan

Advocate

**EELUM GUL** Advocate

SHAH | DURRANI | KHATTAK (a registered law firm)

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