

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**  
**AT CAMP COURT, ABBOTTABAD**

Service Appeal No. 1217/2019

Date of Institution ... 16.09.2019  
Date of Decision ... 16.06.2022

Mst. Nazneen bano, Ex-PHST, Government Girls Primary School Gujjar  
Galli, Phulra Mansehra.

... (Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Elementary &  
Secondary Education Department, Peshawar and three others.

... (Respondents)

Umar Farooq,  
Advocate,

... For appellant.

Muhammad Adeel Butt,  
Additional Advocate General

... For respondents.

Mrs. Rozina Rehman  
Miss. Fareeha Paul


... Member (J)  
... Member (E)

**JUDGMENT**

**ROZINA REHMAN, MEMBER (J):** The appellant has invoked the  
jurisdiction of this Tribunal through above titled appeal with the prayer as  
copied below:

**“On acceptance of appeal, the impugned orders dated  
30.05.2017, 19.08.2017 and 19.08.2019 passed by respondents  
No. 2 & 3 may graciously be set aside and appellant may kindly  
be reinstated into Government service with all back and  
consequential benefits”.**

2. Brief facts of the case are that the appellant was appointed as Primary  
School Teacher on 30.11.1996. She remained posted in different schools. She  
was posted at Government Girls Primary School Gujjar Garri Circle Phulra



in 2015-16, when she applied for medical leave which was allowed, but the respondent No.4 sent her absence report to DEO (Female) Mansehra. She was proceeded against departmentally and was compulsory retired from service on 30.05.2017. She filed departmental appeal which was rejected, hence, the present service appeal.

3. The respondents were summoned and were directed to file comments within 10 days in office failing which their right for submission of written reply/comments would be deemed as struck off. The respondents failed to submit reply on the next date, therefore, their right of submission of written reply was struck off on 20.12.2021.

4. We have heard Umar Farooq Advocate learned counsel for the appellant and Muhammad Adeel Butt, learned Additional Advocate General for respondents and have gone through the record and the proceedings of the case in minute particulars.

5. Learned counsel for the appellant argued that the impugned orders are against law, facts and norms of justice and being based on malafide are liable to be set aside; that no proper procedure was followed before awarding major punishment as no proper inquiry was conducted. Learned counsel submitted that no charge sheet alongwith statement of allegations and show cause notice were even issued to appellant and no proper inquiry was conducted and that she was condemned unheard.

6. On the other hand, it was submitted by the learned AAG that the appeal might be dismissed being badly time barred.

7. From the record, it is evident that appellant was appointed on 30.11.1996. She was proceeded against under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 for the charges of having been willfully absent from duty w.e.f 01.09.2016 till the date of




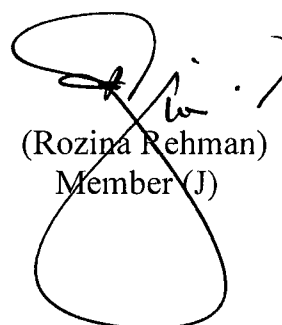
order whereby she was compulsory retired i.e. 30.05.2017 (8 months and 29 days). Show cause notice was issued and served upon her. Inquiry Committee was also constituted and submitted its report where-after, appellant was served with final show cause notice, therefore, major penalty of compulsory retirement was imposed upon her vide order dated 30.05.2017. She filed departmental appeal which is undated. From the contents of appeal, it is evident that the appellant herself admitted her absence from September, 2016 to December, 2016 without leave/permission of the competent authority. This attitude of the appellant amounts to misconduct for which proper departmental inquiry was conducted but she failed to attend the proceedings. Her appeal was also filed being badly time barred vide order dated 19.08.2019. It is well-entrenched legal proposition that when an appeal before departmental authority is time barred, the appeal before Service Tribunal would be incompetent. In this regard reference can be made to cases titled Anwarul Haq v. Federation of Pakistan reported in 1995 SCMR 1505, Chairman, PIAC v. Nasim Malik reported in PLD 1990 SC 951 and State Bank of Pakistan v. Khyber Zaman & others reported in 2004 SCMR 1426.

8. Having considered the matter from all angles in the light of material available on file, we do not find any merit in the instant service appeal which is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

16.06.2022

  
(Fareeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)

**ORDER**  
16.06.2022

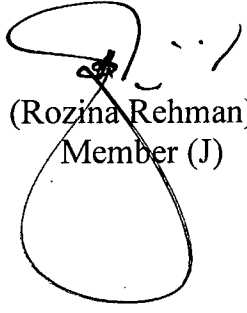
Umar Farooq Advocate for appellant present.

Muhammad Adeel Butt, learned Additional Advocate  
General for respondents present.

Vide our detailed judgment of today, containing 03 pages,  
having considered the matter from all angles in the light of material  
available on file, we do not find any merit in the instant service  
appeal which is hereby dismissed. Parties are left to bear their own  
costs. File be consigned to the record room.

**ANNOUNCED.**  
16.06.2022

  
(Farzeha Paul)  
Member (E)

  
(Rozina Rehman)  
Member (J)

15.06.2022

Counsel for appellant present.

Muhammad Adeel Butt, learned Additional Advocate General for respondents present.

Arguments heard. To come up for order on 16.06.2022 before D.B at Camp Court, Abbottabad.



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

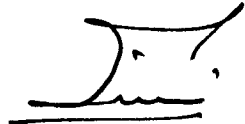


(Rozina Rehman)  
Member (J)  
Camp Court, A/Abad

20.12.2021

Appellant alongwith her counsel present. Mr. Riaz Ahmed Paindakhel, Assistant Advocate General for the respondents present.

Respondents have failed to submit their written reply/comments even today. Vide pervious order dated 27.09.2021 it was directed that the respondents shall submit reply/comments in office within 10 days failing which their right of submission of written reply/comments stands struck off. The right of submission of written reply/comments of respondents thus stands struck off. To come up for arguments on 17.02.2022 before the D.B at Camp Court Abbottabad.




(Salah-Ud-Din)  
Member (J)

Camp Court Abbottabad


17.05 2022

Appellant in person present. Mr. Muhamad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

Appellant requested for adjournment on the ground that her counsel has not turned up from Peshawar. Last opportunity is granted to the appellant to argue the case on the next date positively. To come up for arguments before D.B on 15:06.2022 at camp court Abbottabad.



(Fareeha Paul)  
Member (E)



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

19.05.2021

Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 27.09.2021.



Reader

27.09.2021

Appellant present in person and Mr. Muhammad Riaz Khan, Painsdakhel, Asstt. AG for the respondents present.

This appeal was admitted for full hearing on 19.11.2020. Security and process fee were deposited on 04.12.2020. Notices through registered post were sent to respondents No. 3 and 4 but they did not turn up on previous date i.e. 16.02.2021. Learned AAG was present and direction was given for written reply/comments by issuing of notices to the respondents. But none is in attendance on behalf of respondents No. 3 & 4. Learned AAG states that respondent No. 3 and 4 were contacted but their response is awaited as none has turned up from the said offices. Respondents are directed to file written reply/comments within 10 days in office failing which their right of submission of written reply/comments shall be deemed as struck off and the appeal will be heard on the available record without reply of the respondents. Case to come up for arguments on 20.12.2021 before D.B at Camp court, Abbottabad.



Chairman  
Camp Court, A/Abad

21.01.2021


Due to COVID-19, the case is adjourned for the same on 16.02.2021 before D.B.

  
READER

16.02.2021

Junior to counsel for the appellant present. Mr. Riaz Khan Painsdakhel learned Asst. AG present.

Written reply/comments on behalf of respondents not submitted, therefore, notice be issued to respondents for submission of reply/comments on 19.05.2021 before S.B at Camp Court. A/Abad.

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



19.11.2020

Mr. Muhammad Kamran, Advocate, for appellant is present.

The sum total of what has been agitated at the bar by the learned counsel representing appellant is that, he was awarded a harsh punishment disproportionate to the quantum of guilt without observance of codal requirements. Although the question of limitation is involved however, in response thereof the learned counsel submitted that while making computation of the period of limitation, the appeal is within the stipulated period of limitation if the time limit is reckoned from the date of the passage of appellate order passed by the authority concerned while making reference to the Section-4 of the Khyber Pakhtunkhwa Services Tribunal Act, 1974.

The points so agitated at the bar need consideration. 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 the respondents for written reply/comments for 21.01.2021 before S.B at Camp Court, Abbottabad.

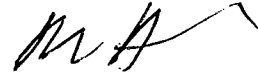
Appellant Deposited  
Security & Process Fee

04/12/20

(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

19.12.2019

Due to general strike of Khyber Pakhtunkhwa Bar Council learned counsel for the appellant is not available today. Adjourned to 17.02.2020 for preliminary hearing before S.B at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad

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

Reader

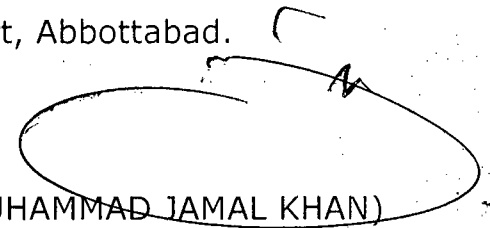
Due to summer vacation case to come up for the same on 11/6  
9 / 20 at camp court abbottabad.



Reader

16.09.2020

Appellant is present in person. Appellant is seeking time for the reason that her counsel is not going to attend the Tribunal today and requested for adjournment. The request is acceded to. File to come up for preliminary hearing on 19.11.2020 before S.B at Camp Court, Abbottabad.



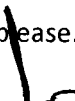


(MUHAMMAD JAMAL KHAN)  
MEMBER  
CAMP COURT ABBOTTABAD

Form- A

FORM OF ORDER SHEET

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

Case No.- 1217/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	02/10/2019	<p>The appeal of Mst. Nazneen Bano resubmitted today by Qazi Taimoor Khan Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 2/10/19</p>
2-	22.11.2019	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>22/11/2019</u></p> <p> CHAIRMAN</p> <p>Appellant absent. Learned counsel for the appellant absent. Adjourn. To come up for preliminary hearing on 19.12.2019 before S.B at Camp Court, A/Abad. Appellant and her counsel be put to notice for the date fixed.</p> <p> Member Camp Court, A/Abad</p>

The appeal of Mst. Naznen Bano Ex-PHST GGPS Gujjar Galli Phulra Mansehra received today i.e. on 16.09.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant. ✓
- 2- Annexures of the appeal may be attested. ✓
- 3- Annexures of the appeal may be flagged. ✓
- 4- Three more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1580 /S.T,

Dt. 17-9 /2019.

Qazi Tamoor Khan Advocate,  
District Court Mansehra

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

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

*Appeal no-1217/2019*

Mst. Nazneen Bano.....Appellant

**Versus**

Government of Khyber Pakhtunkhwa  
through Secretary Elementary &  
Secondary Education Department,  
Peshawar etc.....Respondents

**SERVICE APPEAL**

**INDEX**

S#	Description of documents	Annexure	Page#
1.	Memo of appeal.	-	
2.	Affidavit	-	
3.	Correct addresses of the parties.	-	
4.	Copy of service books	"A"	
5.	Copies of appeal and order/ notification	"B" & "C"	
6.	Copy of order.	"D"	
7.	Wakalat Nama	-	

**Dated 04.09.2019**

*Nazneen*  
**Mst. Nazneen Bano**  
(Appellant)

Through: -

*Q. I*  
**QAZI TAIMOOR KHAN**

**&**

*BK*  
**BABAR ILYAS**  
Advocate High Court,  
District Courts,  
(Mansehra)

①

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

**Service Appeal No. 1217 of 2019**

Mst. Nazneen Bano, Ex-PHST,  
Government Girls Primary School Gujjar  
Galli, Phulra Mansehra.....**Appellant**

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 1257

**Versus**

Dated 16/9/2019

- 1) Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department, Peshawar.
- 2) Director elementary & Secondary Education Department, Peshawar
- 3) District Education Officer (Female) Mansehra
- 4) ASDEO Circle Phulra, Tehsil and District Mansehra.....**Respondents**

**Filed to-day**  
*[Signature]*  
**Registrar**  
16/9/19

**SERVICE APPEAL UNDER SECTION 4  
OF SERVICE TRIBUNAL ACT, 1974  
AGAINST THE IMPUGNED ORDER/  
NOTIFICATION ENDST. NO. 10582-88  
DATED 30.05.2017 AND IMPUGNED  
REJECTION ORDER VIDE NO. 1999  
DATED 19.08.2019 WHEREBY THE  
RESPONDENT NO. 3 IMPOSED MAJOR  
PENALTY OF COMPULSORY  
RETIREMENT FROM SERVICE ON THE  
APPELLANT, WITHOUT ANY  
STATEMENT OF ALLEGATION ANY  
SHOW CAUSE NOTICE, EXPALANATION  
WITHOUT PROPER INQUIRY, WHICH IS  
DISCRIMINATORY, PERVERSE,  
AGAINST THE LAW AND IMPUGNED  
ORDER VIDE DATED 30.05.2017 AND**

Re-submitted to -day  
and filed.

*[Signature]*  
**Registrar**  
2/10/19

2

**19.08.2019 IS LIABLE TO BE SET  
ASIDE.**

**PRAYER: -**

On acceptance of appeal, the impugned order dated 30.05.2017 and 19.08.2017 and 19.08.2019 passed by respondents Nos. 2 & 3 may graciously be set aside and appellant may kindly be re-instated into Government service with all back and consequential benefit, any other relief/remedy which this August Tribunal deem fit and proper, that may also be awarded in favour of appellant.

**Respectfully Sheweth!**

1) That, appellant was appointed as Primary School Teacher (PST) on 30.11.1996 and since than the appellant is serving the department with great zeal and zest.

**(Copy of service book is annexed as Annexure "A").**

2) That, during the period of service, the appellant remained posted in different schools of far-flung areas of District Mansehra, the appellant performed her duties being a female, regularly and honestly without any stigma on the service record of appellant.

3) That, during the year 2015, 2016 the appellant was posted at Govt. Girls Primary School Gujjar Galli, Circle

3

Phulra (Mansehra) very far-flung and remote areas of District Mansehra, wherein the appellant was on medical leave, whereupon respondent No. 4, send absent report to DEO (Female) Mansehra/ respondent No. 3.

- 4) That, the respondent No. 3 had taken stern action against the appellant and constituted so-called inquiry, wherein the respondent No. 3 alleged absence of appellant from duty.
- 5) That, appellant performing her duties regularly, without any break, respondent No. 3 malafidely reported the absence of appellant, wherein no explanation, show cause notice and proper inquiry was conducted by respondent No. 3.
- 6) That, ultimately the respondent No. 3 passed the impugned order/ notification No. 10582-88 dated 30.05.2017 of compulsory retirement from service.  
**(Copies of appeal and order/ notification are annexed as Annexure "B" & "C").**
- 7) That, the appellant filed an departmental appeal against the impugned order vide dated



30.05.2017, whereupon the appeal of the appellant has been rejected by the respondent No. 2 vide rejection order No. 1999, dated 19.08.2019.

(Copy of order is annexed as Annexure "D").

That, the appellant being aggrieved from the impugned order seeking the gracious indulgence of this Honourable Tribunal, inter-alia on the following amongst other grounds: -

**GROUND:** -

- A) That, the impugned order dated 30.05.2017 and impugned rejection of appeal order dated 19.08.2019 are against the law, facts, norms of justice, arbitrary, fanciful, perverse, without lawful authority, based on malafide, unconstitutional and against the relevant rules and regulation, hence, not maintainable and liable to be set-aside.
- B) That, no procedure has been followed before awarding appellant order of compulsory retirement and in this regard no proper inquiry has been conducted.
- C) That, as per law respondents/ department was support to be issued statement of allegation, show cause

notice as well as proper inquiry as per law was to be conducted without restoring to mandating legal requests, respondent No. 3 issued compulsory retirement order of appellant at his own whims and wishes.

- D)** That, when law prescribed something which is to be done in a particular manner that must be done in that manner.
- E)** That, real facts have been kept concealed from the higher authorities as the original attendance register was misplaced from the respondent No. 4 and she just to save her own skin, leveled balled allegations against the appellant, whereas so-called absence report is against the law, facts and against the norms of natural justice.
- F)** That, the so-called allegations leveled against the appellant are baseless, concocted and on the basis of so-called allegations, so called inquiry was conducted without legal formalities and procedure which is against the law and services rule.

- G)** That, as per law respondents/ department was suppose to be issue statement of allegation, show cause notice as well as proper inquiry as per law was to be conducted without sorting to mandating legal request, such act of respondents/ department is against the services rules.
- H)** That, when the law prescribe something which is to be done in particular manner that must be done in that manner, the inquiry report with regard to the order of compulsory retirement is totally against the inquiry, recommendation although the inquiry on the basis of concealment of facts which is against the natural justice and fundamental right of the appellant.
- I)** That, the impugned order as well as so-called inquiry report offends all norms of justice, fair-play, equity and respondents have transgress upon their jurisdiction while issuing the impugned order.
- J)** That, other legal and factual points will be agitated before this Honourable Tribunal at the time of arguments.

(7)

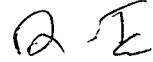
It is, therefore, most humbly prayed that on acceptance of appeal, the impugned order dated 30.05.2017 and 19.08.2017 and 19.08.2019 passed by respondents Nos. 2 & 3 may graciously be set aside and appellant may kindly be re-instated into Government service with all back and consequential benefit, any other relief/remedy which this August Tribunal deem fit and proper, that may also be awarded in favour of appellant.

Dated 04.09.2019

  
**Mst. Nazneen Bano**  
(Appellant)

Through: -

**QAZI TAIMOOR KHAN**  
&



**BABAR ILYAS**  
Advocate High Court,  
District Courts,  
(Mansehra)



**VERIFICATION**

I, MST. NAZNEEN BANO, EX-PHST, GOVERNMENT GIRLS PRIMARY SCHOOL GUJJAR GALLI, PHULRA MANSEHRA DO HEREBY VERIFY THAT THE CONTENTS OF FORE-GOING APPEAL ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

  
**MST. NAZNEEN BANO**  
(DEPONENT)

8

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

Mst. Nazneen Bano.....**Appellant**

**Versus**

Government of Khyber Pakhtunkhwa  
through Secretary Elementary &  
Secondary Education Department,  
Peshawar etc.....**Respondents**

**SERVICE APPEAL**

**CORRECT ADDRESSES OF THE PARTIES**

**Respectfully Sheweth!**

Correct addresses of the parties are as  
under: -

**APPELLANT**

Mst. Nazneen Bano, Ex-PHST, Government  
Girls Primary School Gujjar Galli, Phulra  
Mansehra

**RESPONDENTS**

- 1) Government of Khyber Pakhtunkhwa  
through Secretary Elementary &  
Secondary Education Department,  
Peshawar.
- 2) Director elementary & Secondary  
Education Department, Peshawar
- 3) District Education Officer (Female)  
Mansehra
- 4) ASDEO Circle Phulra, Tehsil and District  
Mansehra

**Dated 04.09.2019**

**Mst. Nazneen Bano**  
(Appellant)

Through: -

**QAZI TAIMOOR KHAN**

**&**

**BABAR ILYAS**

Advocate High Court,  
District Courts,  
(Mansehra)

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

Mst. Nazneen Bano.....Appellant

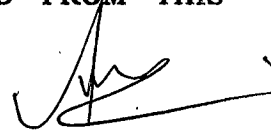
**Versus**

Government of Khyber Pakhtunkhwa  
through Secretary Elementary &  
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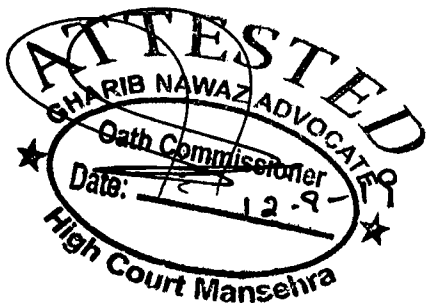
**SERVICE APPEAL**

**AFFIDAVIT**

I, MST. NAZNEEN BANO, EX-PHST, GOVERNMENT  
GIRLS PRIMARY SCHOOL GUJJAR GALLI, PHULRA  
MANSEHRA DO HEREBY SOLEMNLY AFFIRM AND  
DECLARE ON OATH THAT NO SUCH SUBJECT MATTER  
APPEAL HAS EVER BEEN FILED BEFORE THIS  
HONOURABLE TRIBUNAL NOR PENDING NOR  
DECIDED. THAT THE CONTENTS OF FORE-GOING  
AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST  
OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS  
BEEN CONCEALED OR SUPPRESSED FROM THIS  
HONOURABLE TRIBUNAL.



MST. NAZNEEN BANO  
(DEPONENT)



(10)

Ammerker <sup>(A)</sup>

(A)

A/C No. 12038/17a.

Old Nic No. 123-92-350066

NEW Nic No = 13503-8682223-2

PERSONAL No = 00256138

*[Faint, illegible stamp or signature]*

(Police Department only)

The com  
Of the following PS  
service with eff

S.No

in Govt. Girls Elementary College  
Te Mansehra under Roll No 2557  
43 out of 1200. Session 1993-94.

2. 180/1000

②

② Passed Matric Exem: from BISE, Peshawar  
under Roll No 4373 obtaining marks 468 out of 850.  
Session 1990.

③

③ Passed PA Exem: from BISE, Abbottabad under  
Roll No. 1847 obtaining mark 521 out of 1100. 2nd division  
Session 1992.

④

④ Passed BA, Exem: from University of Peshawar under  
Roll No. 59645 7756 obtaining marks 287 out of  
550. 2nd Division. Session 1996.  
Date of results 9.4.1997

Qualifications	Date	Qualifications	Date
English		First Arts	5.9.98
Pushto		B.L. or B.A.	
Urdu		Pledership Examination	
Plan-Drawing		Training School Final Examination	
Finger Print		Other Qualifications:—	
Drill Instructing			
Court Duties			
Reserve Duties			

A. H. Khan  
Taimur Khan  
Advocate High Court,  
Federal Shariat Court, Mansehra



Note:— The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

1. Name: NAZARIN BANO

2. Race: ALBAN

3. Residence: House No. 2431, Mithalbah Kanger Mastid, Tehsil Disha, Manserwah

4. Father's name and residence: Muhammad Fareedon

5. Date of birth by Christian era as nearly as can be ascertained: 4-4-1974

6. Exact height by measurement: 5-4  
at Seventy four  
Feet, April Nineteen Hundred

7. Personal marks for identification: Wound mark a under right eye

8. Left hand thumb and Finger Impression of (Non-Gazetted) Officer.

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government Servant

10. Signature and Designation of the Head of the Office, or other Attesting Officer.

*Signature*  
*5-9-58*

*Attest*  
*0-1-7*

(12)

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 of R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
GGPS Karkala		BPS No. 8	Rs. 1480/-	Rs. 1480-81-2695		10/12/96	[Signature]
—//—	Revised Entries in	BPS No. 9	Rs. 1605/-	Rs. 1605-97-3060		10/12/96	[Signature]
GGPS, Karkala			1605/- ✓			10/12/96	[Signature]
—//—			1702/- ✓			1/12/97	[Signature]
—//—			1797/- ✓			1/12/98	[Signature]
—//—			2090/- ✓			1/6/99	[Signature]
Ahl Seric			2090/- ✓			1/9/99	[Signature]
—//—			2187/- ✓			1/12/99	[Signature]
—//—			2284/- ✓			1/12/2000	[Signature]
		BPS No. 9 Rs. 2410-145-6760					
GGPS Ahl Seric	OAD	2381/-	3570/-			1/12/01	[Signature]
—//—		145					
—//—			3715/-			1/12/02	[Signature]
—//—			145				
—//—			3860/-			1/12/03	[Signature]

A. H. Khan  
Advocate & High Court,  
Federal Court & High Court,  
F

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Signature of the head of the office or other attesting officer in columns 1 to 8.	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government		
				Period	Government to which debitabale		
<i>[Signature]</i>	30/11/97	Passed F.A 2nd Division	<i>[Signature]</i>				Appointed as P.T. Teacher vide DEO (F) Pay: Manshehra under Condst: No. 3011-3113 dated 30/11/96.
<i>[Signature]</i>	30/11/97	Incra	<i>[Signature]</i>				
<i>[Signature]</i>	30/11/98	Incra	<i>[Signature]</i>				Service verified from Acq: Roll and other office record from 10-12-1996 to 30-11-1997
<i>[Signature]</i>	31/5/99	Revised Entry 3 Advance promotion being B.A	<i>[Signature]</i>				
<i>[Signature]</i>	31/8/99	Transf	<i>[Signature]</i>				
<i>[Signature]</i>	30/11/99	Incra	<i>[Signature]</i>				
<i>[Signature]</i>	30/11/2000	-	<i>[Signature]</i>				Document: 1824/2 in Acq V Awarding of B-9 with 10-12-1997 vide T. No 593 dt 1/2
<i>[Signature]</i>	30/11/01	Scale Revisal	<i>[Signature]</i>				
<i>[Signature]</i>							3 Inc: BA subject to sanction
<i>[Signature]</i>							Service verified from 30-1-98 to office record of this office
<i>[Signature]</i>							Service verified from 30/11/99 from Acq: Roll and other office record of this office
<i>[Signature]</i>							Service verified from 30/11/99 from Acq: Roll and other office record of this office
<i>[Signature]</i>	30/11/04	Incra	<i>[Signature]</i>				Verified with effect from 1-12-99 to 30-11-2000 by the Acq: Roll & other record of this Office.

(2001)  
 Office of the Accountant General  
 N. W. F. E. Peshawar.  
 Pay Fixed in the revised basic pay scale 2001  
 of Rs: 2400-145-6760 (BPS 7)  
 at Rs: 3570/- P.W.F.F.1-12-2001  
 with next increment on 1-12-2001  
 Accounts Officer  
 Pay Fixed in Party N. W. F. Peshawar

Service verified from 1-12-98 to office

Service verified from 30/11/99 from Acq: Roll and other office record of this office

Verified with effect from 1-12-99 to 30-11-2000 by the Acq: Roll & other record of this Office.  
 S.D.E. O (Female)  
 Manshehra.

Tahir Khan  
 Advocate  
 Federal Shari

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government S
G.G.P.S, Ahl Seri		(15)	4005/-			12/04	<i>[Signature]</i>
<u>BPS, No 9 Rs, 2770-165-7720</u>							
S.P.S, Ahl Seri			4585/-			01/05	<i>[Signature]</i>
— 11 —			4750/-			01/05	<i>[Signature]</i>
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: auto;"> <p>Office of the Pay Fixing officer at No. 2770-165-7720 at Rs. 4585/- <i>[Signature]</i> Pay Fixing Officer</p> </div>							
<u>BPS, No 9. RS 2770-165-7720</u>							
G.G.P.S Ahl Seri			4915/-			12/06	<i>[Signature]</i>
Ahl Seri				S. 415	10/4		<i>[Signature]</i>
Taimur Khan Advocate High Court, Federal Shariat Court Manshera				Pay inactive computer form is not received			<i>[Signature]</i>

9 Signature and Name of the head of the office or other attesting officer in columns 1 to 8	10 Date of termination of appoint- ment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	13 Nature and dura- tion of leave taken	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Allocation of period of leave on average pay upto four months for which leave salary is debit- able to another Government	Government to which debit- able		
3 D.D.O. (F) Manshehra	30/05	Pay Revised	[Signature]				30/11/01	1/12/2000
D.D.O. (F) Manshehra	30/05	Inc.	[Signature]					Service verified w.e.f 1/12/01 to 30/11/03 from office record of this office
D.D.O. (F) Manshehra	30/06	Inc	[Signature]					
2529 D.D.O. (F) Manshehra	1/12/06							
D.D.O. (F) Manshehra	01/12/05							Service verified w.e.f 1/12/03 to 30/11/04 from office record of this office
487 D.D.O. (F) Manshehra	6/1/06							
D.D.O. (F) Manshehra	30/11/07							
D.D.O. (F) Manshehra	30/07							
D.D.O. (F) Manshehra	31/10/04							
D.D.O. (F) Manshehra	12/05							
D.D.O. (F) Manshehra	11/09							Service verified from office record w.e.f 1/09 to 30/11/05

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1. Name of Post	2. Whether substantive or officiating and whether permanent or temporary	3. If officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art 371	4. Pay in substantive Post	5. Additional Pay for officiating	6. Other emolument falling under the term "Pay"	7. Date of Appointment	8. Signature of Government
G.G.P.S. AHL seri		BPS No. 9 Rs, 3185-190-8885	5655/-			17/07	
u			5845/-			17/07	
u		BPS No. 9 Rs, 3820-230-10720	7040/-			12/08	
u							
u		BPS No. 12 Rs, 3630-260-11420	5970/-			21/07	
u							
u		BPS No. 12 Rs, 4355-310-13655	7145/-	7775/-		17/08	
u			7455/-			17/08	
u			7765/-			17/09	
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26/12

Perceuse in 12/08  
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 of pay 811Rm 21/2 30/11  
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 and all 3131 due to  
 elle. D.P.S. 12.

A. W. Man

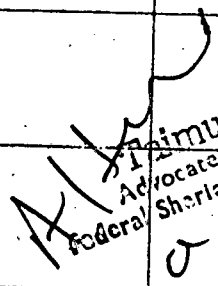
Talwar Man  
 Advancing Court  
 and Shriar Court Man

Signature and name of the head of the office or other attesting officer in column 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Leave Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Period		
Dy: D.O (F) MANSEHRA	30/11/07	mer.	Dy: D.O (F) MANSEHRA			with effect from 1/12/05 to 30/11/06 by the Dy: D.O (F) of this Office.	Dy: D.O (F) MANSEHRA
Dy: D.O (F) MANSEHRA	30/6/08	S/R	Dy: D.O (F) MANSEHRA				
Dy: D.O (F) MANSEHRA	30/11/08	E/Revised due to allowed BPS-12. w.e.f 1/10/07.	Dy: D.O (F) MANSEHRA			Notification of gradation of Scale in BPS-12 w.e.f 10/10/07 issued vide EDO/CS Manselra No. 18485-18634 dated 29/7/08	
Dy: D.O (F) MANSEHRA	30/6/08	S/R	Dy: D.O (F) MANSEHRA				Dy: D.O (F) MANSEHRA
Dy: D.O (F) MANSEHRA	30/11/08	mer.	Dy: D.O (F) MANSEHRA				
Dy: D.O (F) MANSEHRA	30/11/09	mer.	Dy: D.O (F) MANSEHRA			5-21/22 17/12 Dy: D.O (F) MANSEHRA	Dy: D.O (F) MANSEHRA
Dy: D.O (F) MANSEHRA	30/11/08	mer.	Dy: D.O (F) MANSEHRA			5-31/27 ending by 222/2	Dy: D.O (F) MANSEHRA
Dy: D.O (F) MANSEHRA	30/9/08	mer.	Dy: D.O (F) MANSEHRA			S. 3072 19/11	Dy: D.O (F) MANSEHRA
Dy: D.O (F) MANSEHRA	30/9/08	mer.	Dy: D.O (F) MANSEHRA			Dy: D.O (F) MANSEHRA	Dy: D.O (F) MANSEHRA

Taimur Khan  
Advocate High Court  
Peshawar

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1	2	3	4	5	6	7	8	9
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant	Signature of the Officer
<del>Sub</del> Sani Gali			8085/-			1/12/10	[Signature]	[Signature]
		BPS No-12 Rs 7000-500-22000	13000/-	13000/-		1/12/11	[Signature]	[Signature]
<del>Sub</del> Charan			13500/-			1/12/11	[Signature]	[Signature]
<del>Sub</del> u			14500/-			1/12/12	[Signature]	[Signature]
<del>Sub</del> u			15000/2			1/12/13	[Signature]	[Signature]
<u>BPS No-15 Rs 8500-700-29500</u>								
<del>Sub</del> u			14800/2			26/2/13	[Signature]	[Signature]
			700/2					
			15500/2					
m Gujan Gali			16200/-			1/12/13	[Signature]	[Signature]
<del>Sub</del> Gujan Gali			16900/2			1/12/14	[Signature]	[Signature]

  
 Muzimur Khan  
 Advocate High Court,  
 Federal Shariat Court, Mansehra.



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9	10	11	12	13		14	15
Signature and designation of the head of the office or other attesting officer in columns 1 to 8	Date of termination of appointment	Reason of termination such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Name and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government		
				Period	Government to which debit		
<del>SDEO (F) Manshehra</del>	30 <sup>6</sup> / <sub>11</sub>	S/R	<del>SDEO (F) Manshehra</del>	Same as per GPF Advance			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>11</sub>	MW	<del>SDEO (F) Manshehra</del>	Amounting to Rs. 4500/- vide			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>12</sub>	MW	<del>SDEO (F) Manshehra</del>	EDO KASE Manshehra No 48			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	4686-87 dated 8/4/2010.			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	BY D.O (F) MANSEHRA			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	@ Draw Rs 22500/- incl T-No 50			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	dt - 26-4-2010			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	@ Draw Rs 22500/- incl			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	TNO 5094 dt 26-4-2010			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	Rs 45000/-			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	8.154			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	6/9			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	Pay Action in			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	9/26/16			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	Service verified wef 1/12/10 to			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	30/11/12. From office record of			
<del>SDEO (F) Manshehra</del>	30 <sup>11</sup> / <sub>13</sub>	MW	<del>SDEO (F) Manshehra</del>	of this office.			
<del>SDEO (F) Manshehra</del>	30 <sup>6</sup> / <sub>11</sub>	S/R	<del>SDEO (F) Manshehra</del>	Service verified wef 1/05			
<del>SDEO (F) Manshehra</del>	30 <sup>6</sup> / <sub>11</sub>	S/R	<del>SDEO (F) Manshehra</del>	to 30/11/10. from office record			
<del>SDEO (F) Manshehra</del>	30 <sup>6</sup> / <sub>11</sub>	S/R	<del>SDEO (F) Manshehra</del>	of this office.			

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Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371	Pay in substantive Post	Additional Pay Relating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government
	BPS No. 15		21845/-	905-38135		7/15	
gals, Chalda Gali			22750/-			1/12/15	
		BPS No. 15 Rs, 13510-11200-47110				7/16	
Chalda Gali			28070/-			12/16	
			29190/-				

A. Hameed

Justice Khan  
 Federal High Court,  
 Federal Shariat Court, Mansehra

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9	10	11	12	13		14	15	
Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
					Allocation of period of leave on average pay upto four months for which leave salary is debitale to another Government	Government to which debitale		
SDEO (Female) Manshehra	30/11/15	11 A/D	SDEO (Female) Manshehra		Service verified w.e.f 1/2/2010 to 30/11/2012		12 DEO (F) Manshehra	
SDEO (F) Manshehra	30/11/15	8/R	SDEO (F) Manshehra					
Sanction for Advance Amounting to Rs 100000/- Issued vide DRO (F) Manshehra under Endst. No. 13092-96 dt. 28/12/15				Promoted in BPS-12 to B-15 w.e.f 26/2/2013 Issued Promotion order vide DEO (F) Manshehra Endst. No. 1281-399 & 1901-221 dated 26/2/2013 & vide SO (BTA) 1-18/5/SE/2012 dt. 11/2.				
SDEO (F) Manshehra	30/11/16	11 A/D	SDEO (Female) Manshehra				SDEO (F) Manshehra	
Inv. 945 dt. 20/2				under taking				
Duty Charge in B-15 @ Rs 15000/- for 2/2014 & Drawn Diff. of Pay w.e.f 13/3 to 31/4 Amounting to Rs. 13260/-				I Nazneem Pst given an undertaking that if any over made to me in the result of incorrect fixation of pay in BPS-15. The overpayment may be recovered from my pay/pension at any time.				
Tairun Khalil				SDEO (F) Manshehra				
Advocate High Court, Federal Shariat Court, Manshehra.				Service Verified for the Period w.e.f 1/12/12 to 30/11/13 from the Acq. Rolls & other records of this office. SDEO (F) Manshehra				

9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting Officer	13 Nature and duration of leave taken	13 Leave Allocation of period of leave on average pay upto four months for which leave salary is debitabale to another Government	14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Serv
					Period	Government to which debitabale	
					<p>Drawn GP fund Adv Rs. 100,000/- No 1235 dt. 1/1/2016 Ru @ 278/- No 28 of 2007 Twp. 448</p> <p>DISTRICT ACCOUNTS OFFICER MANSEHRA</p>		
					<p>Recovery of onday @ Rs. 1267/- due to absent from duty as per report by MMU</p>		
					<p>SDEO (Female) Mansehra</p>		
					<p>Services verified with effect from 1-12-2013 to 30-11-2014 by the Acct Roll &amp; other records of this Office.</p>		
					<p>SDEO (Female) Mansehra</p>		
					<p>Services Verified with effect from 1-12-2014 to 30-11-2015 by the Acct Roll &amp; other records of this Office.</p>		
					<p>SDEO (Female) Mansehra</p>		
					<p>Service verified w.e.t. 1-12-2015 to 11-11-2016 from the office</p>		
					<p>SDEO (F) Mansehra</p>		

Advocate High Court,  
Federal Shariat Court Mansehra.

Amruse - (B)

عزت مآب محترم جناب ڈائریکٹر ایگزیکیوٹو ایجوکیشن صوبہ خیبر پختون خواہ پشاور۔

عنوان: اپیل برائے معافی

جناب عالی۔

مودبانہ گزارش ہے کہ سائلہ گورنمنٹ گرلز پرائمری سکول جھنگلی میں محشیٹ ہیڈ ٹیچر اپنے فرائض منصبی سرانجام دے رہی تھی۔ سائلہ چند گزارشات آپ جناب کی خدمت میں عرض کرنا چاہتی ہے اور امید کرتی ہے کہ آنجناب ہمدردانہ طور پر اسے دیکھیں گے۔ جس کے لیے سائلہ تہ دل سے تاحیات آپ جناب کے لیے سر بسجود دعا گو رہے گی۔  
۱۔ یہ سائلہ کی تقریبی رورہ 30/06/1996 کو گورنر پرائمری سکول کرکھا میں ہوئی تھی جو کہ ایک پہاڑی اور دشوار گزار علاقہ تھا اور اس وقت ذرائع آمد و رفت نہ ہونے کے برابر تھے۔

۲۔ یہ سائلہ اس دن سے لے کر آج تک دو دروازے علاقوں میں اپنے فرائض منصبی سرانجام دیتی آ رہی ہے۔ کیونکہ سائلہ ایک غریب خاندان سے تعلق رکھتی ہے اور یہ کہ سائلہ کا کوئی سیاسی یا اس طرح کا اور کوئی اثر و رسوخ نہیں ہے جس کو استعمال کرتے ہوئے میں بھی کبھی اپنے گھر کے قریب سروس کر سکتی لہذا 1996 سے لیکر آج تک میں ایک پہاڑ سے دوسرے پہاڑ پر ہی اپنی ڈیوٹی دیتی آئی ہوں۔

۳۔ جناب عالی میں بھی ایک انسان ہوں اور اس ملک کی شہری ہوں میرا بھی حق بنتا تھا کہ پوری سروس میں کم از کم ایک بار تو اپنے گاؤں میں سروس کرتی مگر چونکہ آفسیئر تک میری رسائی نہ تھی اور سیاسی لوگوں تک رسائی حاصل کرنا بھی میرے بس میں نہ تھا جس کی وجہ سے مجھے یا مجھ جیسی کوئی ٹیچر ز اپنی تمام سروس دو دروازے مشینز پر کرنے پر مجبور ہیں جبکہ سیکڑوں ٹیچرز ایسی ہیں جو کسی سیاسی باکھی کا استعمال کرتے ہوئے بڑی پوری سروس ہوم سٹیشن پہنچا رہی ہیں۔ جب تک کہ ان کے تہمت اور دو دروازے علاقوں میں ڈیوٹی لینا مقصود ہو تو وہ پھر مجھے غریب اور نادار لوگوں سے ڈیوٹی لی جاتی ہے اور اگر کسی وجہ سے ہم ایسا نہ کر سکتے تو نوکری سے برطرف کر دیا جاتا ہے یا جبری ریٹائر کیا جاتا ہے ایک میٹ ضائع کیے بغیر ہمارے بچوں کے منہ سے نوالا چھین لیا جاتا ہے اور ہمیں بے یار و مددگار چھوڑ دیا جاتا ہے کیوں کہ ہم وہ غریب اور بد نصیب لوگ ہوتے ہیں جن پہ پتہ نہ تھا کیا جائے وہ خاموش رہتے ہیں جبکہ کئی لوگوں کو دیکھا ہے جو بغیر نوکری کرتے ہوئے تنخواہ لیتی رہی ہیں ان سے پوچھنے تک کی جرات کرنا محال ہوتا ہے۔

۴۔ جناب عالی آپ سے درد آندانہ اپیل کی جاتی ہے کہ:-

۱۔ میں ماہ ستمبر 2016 سے دسمبر 2016 تک سکول سے غیر حاضر رہی ہے، سائلہ بیمار تھی اور چلنے پھرنے میں بہت دشواری ہو رہی تھی کیونکہ سائلہ کو سانس کی تکلیف تھی جس کی وجہ سے سائلہ چلنے میں بہت تکلیف اٹھاتی پڑتی ہے جس کی وجہ سے سائلہ غیر حاضر رہی۔ جس کی وجہ سے جناب ڈی ای او صاحب نے سائلہ کے خلاف ایک طرف کارروائی کرتے ہوئے سائلہ کو جبری ریٹائر کرنے کے حکم صادر فرمایا ہے۔ بتائے اس کے کہ سائلہ کی اس تکلیف کو مد نظر رکھتے ہوئے سائلہ کو کسی قریبی سکول میں تبدیل کیا جاتا ہے یہاں پہ سائلہ احسن طریقہ سے اپنی ڈیوٹی کرتی، سائلہ کو جناب عالی نے بغیر حقائق جاننے کے نوکری سے جبری ریٹائر کر دیا ہے، میں مانتی ہوں میں سکول سے باہر مجبوری غیر حاضر رہی مگر یہ بھی تو دیکھیں کہ یہ ضروری تھا کہ میں اپنی تمام سروس آڈٹیشن پہ ہی کرتی لیا میرا کوئی حق نہیں تھا کہ پوری سروس میں کم از کم ایک بار اپنے ہوم سٹیشن پہ سروس کرتی۔ مگر کیونکہ میں نے کبھی سیاسیوں کا سہارا نہیں لیا، جس کی وجہ سے سائلہ کو حشمہ دو دروازے پہاڑی علاقوں کے مختلف سکولوں میں سروس کروائی گی۔ اب جبکہ باہر مجبوری میں رسکا انہیں نہ سکا، آج ۱۰۔ ۱۱۔ ۱۲۔ ۱۳۔ ۱۴۔ ۱۵۔ ۱۶۔ ۱۷۔ ۱۸۔ ۱۹۔ ۲۰۔ ۲۱۔ ۲۲۔ ۲۳۔ ۲۴۔ ۲۵۔ ۲۶۔ ۲۷۔ ۲۸۔ ۲۹۔ ۳۰۔ ۳۱۔ ۳۲۔ ۳۳۔ ۳۴۔ ۳۵۔ ۳۶۔ ۳۷۔ ۳۸۔ ۳۹۔ ۴۰۔ ۴۱۔ ۴۲۔ ۴۳۔ ۴۴۔ ۴۵۔ ۴۶۔ ۴۷۔ ۴۸۔ ۴۹۔ ۵۰۔ ۵۱۔ ۵۲۔ ۵۳۔ ۵۴۔ ۵۵۔ ۵۶۔ ۵۷۔ ۵۸۔ ۵۹۔ ۶۰۔ ۶۱۔ ۶۲۔ ۶۳۔ ۶۴۔ ۶۵۔ ۶۶۔ ۶۷۔ ۶۸۔ ۶۹۔ ۷۰۔ ۷۱۔ ۷۲۔ ۷۳۔ ۷۴۔ ۷۵۔ ۷۶۔ ۷۷۔ ۷۸۔ ۷۹۔ ۸۰۔ ۸۱۔ ۸۲۔ ۸۳۔ ۸۴۔ ۸۵۔ ۸۶۔ ۸۷۔ ۸۸۔ ۸۹۔ ۹۰۔ ۹۱۔ ۹۲۔ ۹۳۔ ۹۴۔ ۹۵۔ ۹۶۔ ۹۷۔ ۹۸۔ ۹۹۔ ۱۰۰۔

Taimur Khan  
Advocate High Court,  
Federal Shariat Court Mansehra.

(8)

4

چھٹیاں بنتی ہیں اگر آپ جناب رحم کرتے ہو فیصلہ فرمادیتی تو میری چھٹی منظور کر دیتی۔ میں نے کئی بار دفتر حاضر ہو کر چھٹی کے لیے کوشش کی مگر دفتری معاملات (جو سب کے نوٹس میں ہیں) کچھ اس طرح تھے کئی میں چھٹی لینے میں کامیاب نہیں ہو سکی۔

یہ کہ سانلہ کے چھوٹے چھوٹے بچے ہیں اور سب بچے ابھی سکولوں میں پڑھنے والے ہیں جبکہ سانلہ کا اور کوئی انکم کا ذریعہ بھی نہیں جس سے سانلہ کا گھر کا نظام چل سکے۔ جبکہ آپ کے اس فیصلہ سے سانلہ معاشی طور پر تباہ و برباد ہو جائے گی۔ آپ سے درداد آمدانہ ایبل کی جاتی ہے کہ سانلہ کے گھریلو حالات ایسے نہیں ہیں کہ سانلہ ان حالات سے مقابلہ کر سکے تو آپ جناب سانلہ کے حالات کو مد نظر رکھتے ہوئے سانلہ پر رحم کریں اور سانلہ کی نوکری بحال کریں سانلہ جبری ریٹائر ہونے سے مزید مسائل کا شکار ہو جائے جس سے سانلہ کے بچوں کا مستقبل بھی متاثر ہوگا۔

جناب عالی آپ سے پُر زور ایبل کی جاتی ہے کہ سانلہ کے ریٹائر میٹ آرڈر واپس کر سکتے ہوئے سانلہ کو کسی تفریحی سکول میں تعینات کیا جائے کیونکہ سانلہ نے آج تک تمام سروس گھر سے میلوں در دراز پہاڑی علاقوں میں ہی کی ہے اور سانلہ کو کبھی بھی ٹھکانے گھر کے قریب نوکری کرنے کا موقع نہیں دیا۔ آپ جناب سے درداد آمدانہ ایبل کی جاتی ہے کہ سانلہ کے ساتھ رحم والا معاملہ کیا جائے اور سانلہ کو اپنی سروس میں بحال کیا جائے۔ سانلہ آپ جناب سے وعدہ کرتی ہے کہ اسلندہ آج کبھی بھی موقع نہیں دیا جائے۔ اگر سانلہ کے بارے میں اسلندہ غیر حاضری کی رپورٹ آئے تو سانلہ کو نوکری سے برخاست کر دیں میں کوئی ایبل نہیں کروں گی۔ سانلہ کو پہلی اور آخری بار معاف کیا جائے جس کے لیے سانلہ آپ کے لیے دعا گو رہے گی۔

اللہ اعلم

سانلہ نازنین بانو ہیڈ ٹیچر گورنمنٹ گراؤ پرائمری سکول گجرگلی سرکل پھلوہ ضلع مانسہرہ

شخصی کارڈ نمبر 2-13503-8682223

25-06-2017

A. Mian

A. Mian  
Advocate High Court  
Federal Sharqat Court Mansuhera.

26 Annexure C

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA**

**NOTIFICATION**

1. **WHEREAS**, Mst: Nazneen Bano PSHT GGPS Gujjar Gali was proceeded against under the Khyber Pakhtunkhawa Govt. Servant (Efficiency & Disciplinary Rules 2011 for the charges of having been willfully absent from his duty w.e.f. 01.09.2016 to up till now (08 months 29 days)
2. **AND WHEREAS** show cause notice issued vide Edst; No 18360-64 dated 01.09.2016 was served upon Mst: Nazneen Bano PSHT GGPS Gujjar Gali.
3. **AND WHEREAS**, Inquiry committee was constituted comprising the following officers to Conduct formal inquiry against the accused PSHT for the charges leveled against her in accordance with the rules.

- i. Miss Farhat Sultana Head Mistress GGHS Reerh. Chairperson
- ii. Miss Fareeda Zaman Head Mistress GGHS Sawan Mera. Member

4. **AND WHEREAS** Inquiry committee after having examined the charges/evidence on record and explanation of the accused official has submitted the report.
5. **AND WHEREAS** Mst: Nazneen Bano PSHT GGPS Gujjar Gali has been served with final show cause notice. She was not present in school and she failed to satisfy the competent authority in personal hearing.
6. **AND, WHEREAS** the Competent authority (District Education Officer Female) Mansehra after having considered the charges and evidence on record, enquiry report that, she has been failed to submit the satisfactory reply in response to the show cause notice is of the view that the charges against the accused official have been proved.

**NOW THEREFORE**, in exercise of the power conferred under section 14 Khyber Pakhtunkhawa Govt. Servant (Efficiencies and discipline) rule 2011, the District Education Officer (Female) Mansehra being the competent authority is pleased to impose **major penalty of (Compulsory Retirement)** upon Mst Nazneen Bano PSHT GGPS Gujjar Gali with immediate effect)

**DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA**

Endst: No. 1058288 /AE-III (F)/PST

Dated Mansehra the 30/5 2017

Copy to:-

1. The Director (E&SE) Khyber Pakhtunkhawa Peshawar.
2. The Deputy Commissioner Mansehra.
3. The District Monitoring officer Mansehra.
4. The District Account office Mansehra.
5. The SDEO (F) Mansehra.
6. The Teacher concerned.
7. Office file.

**DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA**

*A. H. Khan*  
**A. H. Khan**  
Advocate High Court,  
Federal Shariat Court Mansehra.

30/5/17



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.

No. 1999 /FNo.569/F/General Appeal

Dated Peshawar the 19/8/ /2019

To

Mst. Nazneen Bano Ex-PSHT  
Govt Girl Primary School,  
Gujjar Gali Circle Phulra,  
District Mansehra

Subject:- APPEAL

I am directed to refer to your appeal Dairy No.178 dated 01/07/2019 on the subject cited above and to inform you that the competent authority has rejected your appeal on the basis of the time barred.

Deputy Director Female  
(E&SE) Khyber Pakhtunkhwa

Taimur Khan  
Advocate High Court,  
Federal Shariat Court Mansehra.





2019-20

General Secretary  
District Bar Association  
Manshera

DBAM No. \_\_\_\_\_

144

S.No \_\_\_\_\_

20735

BC No. \_\_\_\_\_

10 - 2757

Fee Rs. 100/-

Name of Advocate \_\_\_\_\_

فانسی شہزاد خان

وکالت نامہ

بعدالت: ممبر سرور سندھ سوسائٹی

عنوان: محمد خان شہزاد خان

بنام: محمد علی

منجانب: محمد علی (اسٹیبلشمنٹ)

نوعیت مقدمہ: اسٹیبلشمنٹ

باعث تحریر آنکہ

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دہی بمقام تور الکرہ کے لئے  
محمد خان شہزاد خان ب محمد علی کے خلاف درخواست نمٹانے کے لئے  
 کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بوقت پکارے  
 جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ  
 میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام پکھری کے علاوہ  
 کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ پکھری کے علاوہ  
 کسی اور جگہ سماعت ہوا یا پکھری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار  
 نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست  
 بیان حلفی و تصدیق کرنے اور اسپر دستخط کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور قسم کاروبار وصول  
 کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپر دہاشی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا  
 بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری کی طرف درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف  
 کر بشرط ادائیگی علیحدہ محنتانہ ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدوراں مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا پیر سٹر کو  
 بجائے خود یا اپنے ہمراہ مقرر کریں اور مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو  
 اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت  
 میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پر داختہ وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔  
 لہذا وکالت نامہ لکھ دیا ہے اور دستخط/انگوٹھا ثبت کر دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے۔

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ACCEPTED

Taimur Khan  
Advocate High Court,  
Federal Shariat Court Manshera.