



16.11.2022

Learned counsel for the appellant present.

Despite repeated orders dated 21.04.2022 and 15.06.2022, notices have not been issued to the respondents for submission of reply/comments, therefore, explanation be called from the concerned official. Fresh notices be issued to the respondents through registered post and to come up for submission of reply/comments on 13.12.2022 before the S.B at Camp Court Abbottabad. In case the respondents failed to submit reply/comments despite service of notice upon them, their right for submission of reply/comments shall be deemed as struck off.

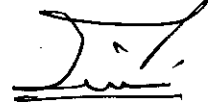
(Salah-Ud-Din)
Member (J)
Camp Court Abbottabad

21.04.2022

Nemo for the appellant. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Notices be issued to the respondents through registered post with the directions to submit written reply/comments on the next date positively, failing which their right for submission of written reply/comments shall be deemed as struck off. Adjourned. To come up for submission of written reply/comments on 15.06.2022 before the S.B at Camp Court Abbottabad.

Notice for prosecution of the appeal also be issued to the appellant as well as his counsel through registered post for the date fixed.



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

15.06.2022

None present for the appellant. Mr. Muhammad Adeel Butt, Additional Advocate General present.

Despite direction notices were not issued. Therefore, fresh notice be issued to respondents for submission of reply/comments. Failing which their right for submission of written reply/comments shall be deemed struck off. Adjourned. To come up for reply/comments on 16.08.2022 before S.B at Camp Court Abbottabad.

Notice for prosecution of the appeal also be issued to the appellant as well as his counsel for the date fixed.



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

S.A No. 1467/2019

01.12.2021

Learned counsel for the appellant present. Preliminary arguments heard.

Points raised need consideration, therefore, the appeal is admitted to regular hearing subject to all legal objections including question of limitation. The appellant is directed to deposit security and process fee within 10 days, where-after notices be issued to the respondents for submission of written reply/comments on 19.01.2022 before the S.B at Camp Court Abbottabad.

Appellant Deposited
Security Process Fee

[Handwritten signature]

[Handwritten signature]

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

19.01.2022

Nemo for the appellant. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present and sought time for submission of written reply/comments. Adjourned. To come up for written reply/comments on 21.04.2022 before the S.B at Camp Court Abbottabad.

Notice for prosecution of the appeal be issued to the appellant as well as her counsel through registered post for the date fixed.


[Handwritten signature]

(Salah-ud-Din)
Member (J)
Camp Court A/Abad

18.03.2021

Appellant present through counsel.

A request for adjournment was made on behalf of appellant as issue involved in the instant case is pending before Larger Bench of this Tribunal. Adjourned. To come up for preliminary hearing on 14/07/2021 before S.B at Camp Court, Abbottabad.


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


14.07.2021

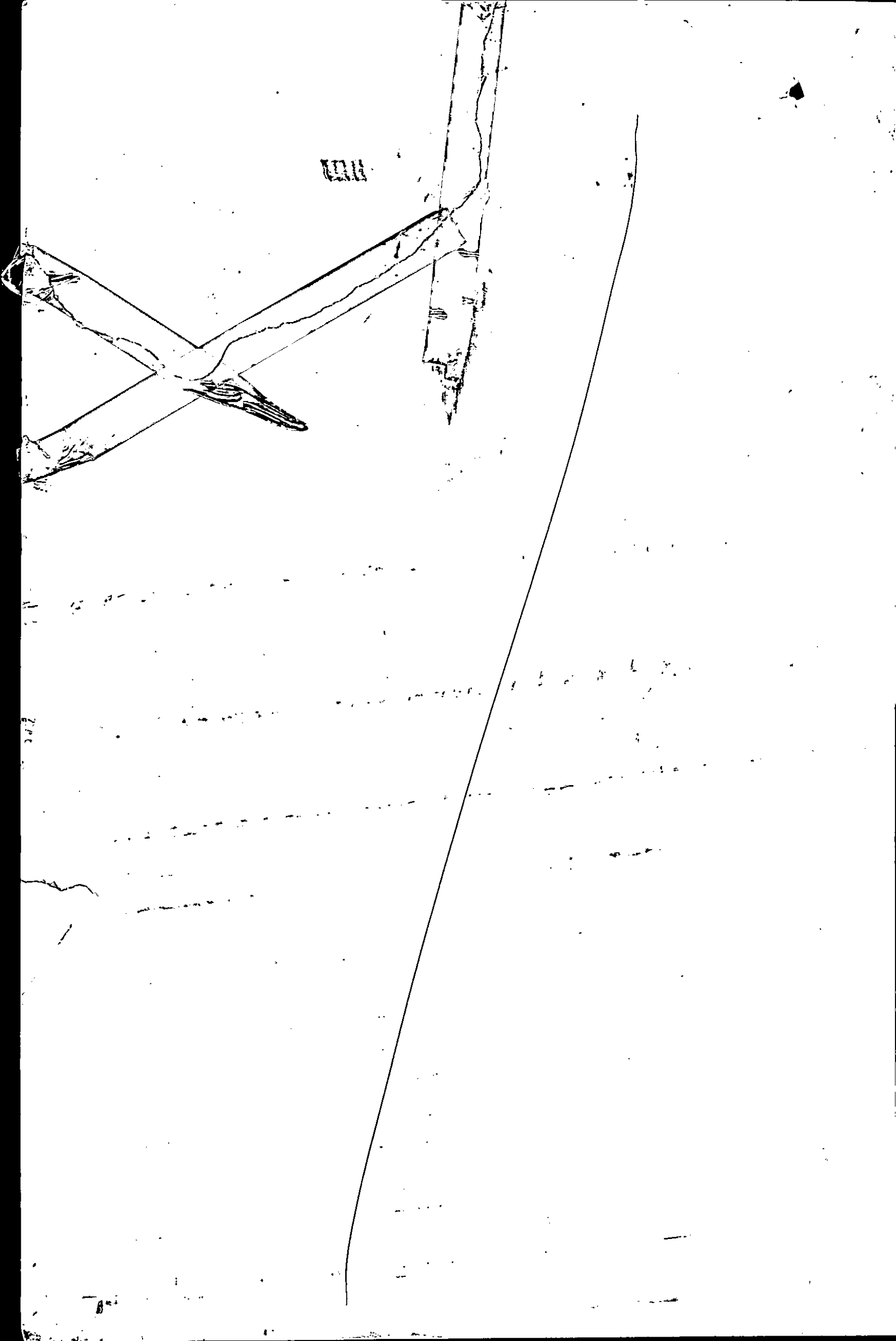
Due to COVID-19, tour to Abbottabad has been cancelled, therefore, case to come for the same as before on 15.10.2021.

Reader

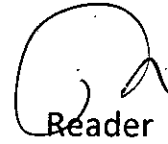
15.10.2021

Nemo for the appellant.
Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as her counsel and to come up for preliminary hearing before the S.B on 01.12.2021 at Camp Court Abbottabad.


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



Due to covid ,19 case to come up for the same on 15/4/20
at camp court abbottabad.


Reader

Due to summer vacation case to come up for the same on
18/9/20 at camp court abbottabad.

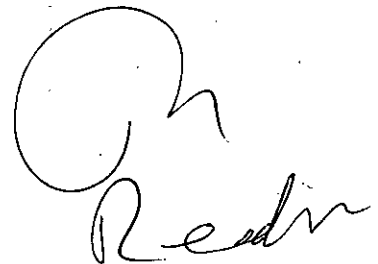

Reader

18.09.2020

Mr. Muhammad Noor, Advocate for the appellant has appeared at the moment i.e 12:04 P.M. According to him Mr. Shareef Khan, Advocate learned counsel for the appellant has proceeded to Kohistan in pursuance of a targeted case in Model Court and requested for adjournment. Adjourned to 15.12.2020 in which to come up for preliminary hearing before S.B at Camp Court, Abbottabad.


(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

Due to covid-19 case is
adjourned to 18-03-2021

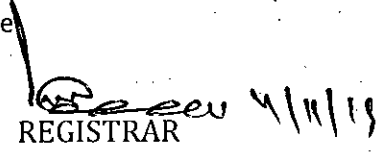



Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 1467/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/11/2019	<p>The appeal of Mst. Naheed Sartaj presented today by Mr. Sharif Khan Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>24-1-2020</u></p> <p> CHAIRMAN</p>
	24.01.2020	<p>Appellant absent. Learned counsel for the appellant absent. Due to general strike of the bar on the call of Khyber Pakhtunkhwa Bar Council, the case is adjourned. To come up for preliminary hearing on 20.03.2020 before S.B at Camp Court Abbottabad. Appellant be put to notice for the date fixed.</p> <p> Member Camp Court, A/Abad</p>

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

In Re: Service appeal No. 1467 of 2019

Mst. Naheed SartajAppellant

VERSUS

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

SERVICE APPEAL

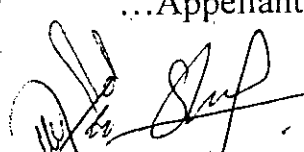
INDEX

S#	Particulars of documents	Annexure	Pages
1	Memo of Service appeal alongwith affidavit.	1-6
2	Application for condonation of delay.	7-9
3	Correct addresses of the parties.	10
4	Copy of the appointment order dated 01.12.2006.	"A"	11
5	Copies of the medical certificates.	"B"	12,13
6	Copy of the order dated 20.04.2019.	"C"	14-15
7	Copy of the departmental appeal.	"D"	16
8	Wakalat Nama.	17

Dated 02.11 .2019

Mst. Naheed Sartaj
...Appellant

Through


SHARIF KHAN
MUSHTAQ AHMED
Advocates Mansèhra.

- 1 -

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

In Re: Service appeal No. ____ of 2019

Naheed Sartaj daughter of Muhammad Sartaj
resident of Bar Paro, Tehsil Palas District Kolai
Palas District Kohistan.....**Appellant**

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar.
2. Director, Elementary and Secondary Education, Government of Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (F) Kohistan.
4. Sub Divisional Education Officer (Female), Kohistan.
5. Assistant Sub Divisional Education Officer (Female), Kohistan.
6. Monitoring Unit (IMU) Kohistan.
7. Head Teacher Government Girls Primary School |Sanga Abad, District Kohistan
.....**Respondents.**

**SERVICE APPEAL UNDER SECTION 4 OF
THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL ACT, 1974 AGAINST
THE IMPUGNED OFFICE ORDER
NO.1198-1210 DATED 20.04.2019 PASSED/**

ISSUED BY REPSODNENT NO.3
WHEREBY MAJOR PENALTY OF
REMOVAL FROM SERVICE W.E.F
01.01.2019 WAS IMPOSED ON THE
APPELLANT.

PRAYER: -

On acceptance of the instant appeal, the impugned order dated 20.04.2019 passed by the respondents regarding removal of the appellant from service may kindly be set aside and the appellant may graciously be reinstated in service with all back benefits.

Respectfully Sheweth!

1. That, the appellant was appointed as PST teacher in Kundal Palas, Tehsil Palas / District Kohistan vide appointment order No.8613-2 dated 01.12.2006.

(Copy of the appointment order dated 01.12.2006 is annexed as annexure "A").

2. That, the appellant performed her duty with great zeal and devotion, sincerity and to the entire satisfaction of her superiors for long time of period till 2019 and thus appellant has 13 years of unblemished service record.

3. That, during the service period, the appellant was transferred to GGPS Sanga Abad Sharakot and during service in the said school, the appellant fell ill and the doctors advised her complete bed rest, therefore, the appellant could not join her duty however, the appellant duly submitted an application to respondent No.7 regarding her illness.

(Copies of the medical certificates are annexed as annexure "B").

4. That, later on, during the illness, the respondent No.3 terminated the service of the appellant without any show cause notice or without affording the opportunity of being heard to appellant vide order Endst. No.1198-1210 dated 20.04.2019.

(Copy of the order dated 20.04.2019 is annexed as annexure "C").

5. That, the appellant filed departmental appeal against the impugned order dated 20.04.2019 before the Director Elementary and Secondary Education, Peshawar which is still unattended to.

(Copy of the departmental appeal is annexed as annexure "D").

6. That, feeling aggrieved from the impugned order, the appellant is filing this service appeal on the following grounds, inter alia: -

GROUNDS

- a. That, the impugned order of removal from service is against the law, facts and principle of natural justice hence being not sustainable in the eyes of law, liable to be set aside.
- b. That, the impugned order is against the spirit of articles 10-A and 25 of the Constitution of Islamic Republic of Pakistan, 1973.
- c. That, the appellant was never been proceeded in accordance with the spirit of law, no inquiry whatsoever has been conducted and proceeded nor the appellant was afforded any opportunity of being heard prior to termination of her services. Similarly, no show cause notice has been issued to the appellant nor the same was served upon the appellant.
- d. That, the appellant has been condemned unheard as no opportunity of defense or personal hearing has been provide to the appellant.

- e. That, no charge sheet, statement of allegation or final show cause notice has been issued nor any regular or fact finding inquiry has been conducted which is mandatory under the law before awarding major or minor penalties.
- f. That, the impugned order has been issued with retrospective effect which is against the law and a void order.
- g. That, the alleged allegations of absence from duty by the respondents is totally wrong and without any fact. Had the respondents inquire the matter then the real facts regarding illness of the appellant would be brought in their knowledge.
- h. That, the appellant is jobless since then and the whole family of the appellant face miserable condition.
- i. That, as per the settled dictums of superior courts, no hard punishment can be awarded in absence of any employee.
- j. That, the absence of the appellant is based on strong and cogent reasons and that cannot be termed or declared as willful. Furthermore, the findings so recorded by the respondents while issuing the termination order are factually erroneous and legally incorrect. The respondents have bypassed the relevant law, rules and



regulations on the subject while imposing major penalty upon the appellant.

- k. That, the appellant seeks permission to advance other grounds during course of arguments.

.....PRAYER.....

It is, therefore, most humbly prayed that on acceptance of the instant appeal, the impugned order dated 20.04.2019 regarding removal of the appellant's service being void and illegal may kindly be set aside and the appellant may kindly be reinstated in service with all back benefits.

Dated 02.11.2019

Mst. Naheed Sartaj
...Appellant

Through


SHARIF KHAN
MUSHTAQ AHMED
Advocates Mansehra.

AFFIDAVIT

I, Naheed Sartaj daughter of Muhammad Sartaj resident of Bar Paro, Tehsil Palas District Kolai Palas District Kohistan, appellant, do hereby solemnly affirm and declare on oath that the contents of the foregoing appeal are true and correct and nothing has been concealed from this Honourable Court.

Dated 02.11.2019


Mst. Naheed Sartaj
(DEPONENT)

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

In Re: Service appeal No. ____ of 2019

Naheed SartajAppellant

VERSUS

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

SERVICE APPEAL

**APPLICATION FOR
CONDONATION OF DELAY**

Respectfully Sheweth!

Applicant submits as under: -

1. That, the appellant is filing the accompanying appeal, the contents of which may graciously be considered as integral part of the instant petition.
2. That, the appellant has brought a good prima facie case and balance of convenience also lies in favour of the appellant.

3. That, the valuable rights of re-instatement in service of the appellant as PST Teacher are involved.
4. That, delay in filing the accompanying appeal is not deliberate nor was in control or reach of the appellant being an ill lady but was due to non-communication by respondent No.2 and department till to date told the appellant should wait for re-instatement.
5. That, the impugned removal order has been issued with retrospective effect which is void order and according to this Honourable Tribunal full Bench judgment titled Rahim-ud-Din Vs. IG police and others appeal No.562/2016 decided on 02.03.2018 and many other judgments Shoukat Ali Vs. SPFRP Mulakhel region and others appeal No.957/2019 decided on 07.12.2017 etc. delivered that retrospective order is void order and no limitation shall run against the void order.
6. That, the apex Supreme Court of Pakistan held in various judgments that the cases shall be decided on merits rather than technicalities.
7. That, the appellant shall suffer irreparable loss if the delay is not condoned.

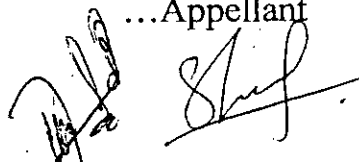
.....PRAYER.....

It is, therefore, most humbly prayed that on acceptance of the instant petition, the delay in filing the appeal may graciously be condoned on humanitarian grounds as well and may very magnificiously be decided on its merits in the interest of justice.

Dated 02.11.2019

Mst. Naheed Sartaj
...Appellant

Through

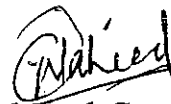


**SHARIF KHAN
MUSHTAQ AHMED**
Advocates Mansehra.

AFFIDAVIT

I, Naheed Sartaj daughter of Muhammad Sartaj resident of Bar Paro, Tehsil Palas District Kolai Palas District Kohistan, appellant, do hereby solemnly affirm and declare on oath that the contents of the foregoing application are true and correct and nothing has been concealed from this Honourable Court.

Dated 02.11.2019



Mst. Naheed Sartaj
(DEPONENT)

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

In Re: Service appeal No. _____ of 2019

Mst. Naheed SartajAppellant

VERSUS

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

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

APPELLANT

Naheed Sartaj daughter of Muhammad Sartaj
resident of Bar Paro, Tehsil Palas District Kolai
Palas District Kohistan.

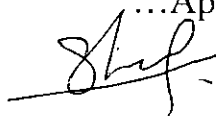
RESPONDENTS

1. Government of Khyber Pakhtunkhwa through
Secretary Elementary and Secondary Education,
Peshawar.
2. Director, Elementary and Secondary Education,
Government of Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (F) Kohistan.
4. Sub Divisional Education Officer (Female),
Kohistan.
5. Assistant Sub Divisional Education Officer
(Female), Kohistan.
6. Monitoring Unit (IMU) Kohistan.
7. Head Teacher Government Girls Primary School
|Sanga Abad, District Kohistan.

Dated 19.10.2019

Mst. Naheed Sartaj
....Appellant

Through



**SHARIF KHAN
MUSHTAQ AHMED**
Advocates Mansehra.

18
OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS AND LITERACY
KOHISTAN AT DASSU

Annex 'A'

APPOINTMENT ORDER.

Consequent upon the approval of Departmental Selection Committee the competent authority has been pleased to appoint the following (Female) FAFSc: Passod (Untrained) Fresh candidates of Tehsil Dassu/ Pattan/ Palas (Union Council wise) against the vacant Posts of PTC in BPS-06 (Rs.2485-125-6235) Fixed plus usual allowances as admissible under the rules, on contract basis for a period of three years according to the Merit policy issued by the Government of NWFP Schools & Literacy Department in the Schools noted against each with immediate effect in the interest of public service.

S.No	Name of candidate	Father's Name	Residence/ U/C	Appt as	School where posted		Remarks
1	Kulsoom Bibi	Rehmat	Batira	PTC	GGPS	Bataira	Agst.V.Post
2	Gul Naz	Chand Babo	Kuz Para	PTC	GGPS	Khara Gaddar	Agst.V.Post
3	Nabeed Sirtaj	Sirtaj	Kuz Para	PTC	GGPS	Kundal	Agst.V.Post
4	Hijrat	M.Noan	Bankad	PTC	GGPS	Dheri Charouna	Agst.V.Post

CONDITIONS:-

- 1 Their appointments are purely on temporary basis and liable to termination at any time / stage without assigning any reason/notice.
- 2 Their Certificates if not verified earlier, should be verified by the DDO (M) i.e. Mr.Abdur Rehman I/C DDO (F) S&L Kohistan before handing over their charge.
- 3 Charge reports should be submitted to all concerned,
- 4 No TADA is allowed to any one.
- 5 They will be governed by such rules and regulations enforced and as prescribed by the Government from time to time for the category of the Government Servants to which they belong.
- 6 In case any of the above candidates failed to assume the charge of their posts within fifteen days, their appointments will automatically stand cancelled.
- 7 They should not be allowed to take over charge if their age is less than 18-years and above 35-years.
- 8 They should produce age and health certificate from EDO Health Kohistan before taking of charge.
- 9 They should not be handed over charge and their salaries should not be drawn by Drawing & Disbursing Officers concerned till verification of their Degrees/ Certificates e.t.c from the concerned Universities/ Boards/ Institutions by the concerned DDO's.

301-
Executive District Officer
Schools & Literacy Kohistan

Endst:No. 86-13-21 / App/PTC's (M)U/C Wise Merit /2006 Dated Kohistan the 1/12 /2006.

Copy of the above is forwarded to:-

- 1 Director Schools & Literacy NWFP Peshawar.
- 2 P/S to Minister of Education NWFP Peshawar.
- 3 P/S to Secretary Government of NWFP (S & L) Department Peshawar.
- 4 District Nazim Kohistan
- 5 District Coordination Officer Kohistan with reference your Notification No.10232-36 dated 20/11/2006 & 10/07-10 dated 2/11/2006.
- 6 District Accounts Officer Kohistan.
- 7 District Officer Schools & Literacy Kohistan.
- 8 Deputy District Officer (F)S&L Kohistan.
- 9 Candidates concerned.

140
Executive District Officer
Schools & Literacy Kohistan

پہلی برائے بیرون برائے
فیڈرل گورنمنٹ پبلیکلینک اسلام آباد

نمبر شمارہ

(E) نام: Nabeed
 باپ/شہر کا نام: Umar
 پتہ:
 تعلقہ:
 ڈسٹرکٹ:

علاقہ: 2

واپس کا دورہ: 10/18

G2P140

GA 14 + weeks

90. ↑ vomiting
spotting off a dm.
lower abdominal pain

- ad
- Tas. Diphenhydramine 1 - 1 - 1
 - by Gravibone 1m
 - x 2 weeks
 - Tas. Folic Acid 1 - 1 - 1
 - Tas. Unicef 1 - 1 - 1
 - Umar



MOTHER CHILD HEALTH CENTRE
PAKISTAN INSTITUTE OF MEDICAL SCIENCES
G-8/3, ISLAMABAD

Your Ref. No. _____

Date: 13/5/2019

Our Ref. No. _____

To whom it may concern

It is stated that patient named Mrs Umar is

booked in MCH unit I

She delivered by EmLSCS on 3/5/2019 at 5:30 pm.

She is advised maternity leave as per rules

and regulations.

Musarat
Dr Musarat Batool
AP, MCH Unit I

Dr. Musarat Batool 13/5/2019
Assistant Professor (Gynae/Obs)
MCH-II PIMS, Islamabad

Annex C

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) KOHISTAN

NOTIFICATION

Whereas the following teachers were reported wilful absent from duties by the concerned Assistant Sub-Divisional Education Officers (Female), Sub-Divisional Education Officers (Female) and Independent Monitoring Unit (IMU) Kohistan.

And whereas on the report of the visiting officers, this office issued show cause notices at home address through registered posts but neither the teachers joined their duties nor submitted convincing replies within the stipulated time (15 days) before the committees constituted for personal hearing vide this office letter no. 394-98 dated 11-02-2019 and the same were conveyed to the teachers in time.

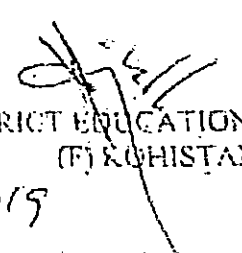
And whereas final show cause notices were issued through two leading newspapers i.e. Daily "Hazara News" Mansehra and Daily "Akhbar" Abbottabad dated 26/02/2019 in which teachers were directed to assume their duties and submit reason (s) of their wilful absence but neither they attended their schools nor submitted convincing replies before the committee within the stipulated period mentioned in the newspaper. Now in view of the above facts I, Mr. Khurshid Ahmed, being competent authority, as District Education Officer (Female) Kohistan, is fully satisfied to impose major penalty of **REMOVAL FROM SERVICE** upon the teachers under rule 4b(iii) of E&D Rules 2011 with effect from the dates mentioned against each.

S#	NAME OF TEACHER	NAME OF SCHOOL	DATE OF REMOVAL FROM SERVICE.
1	Lazhaba (G-4)	GGPS Pashot	01-10-2016
2	Sadaf Zeb	GGPS Pashot	01-10-2017
3	Raqiba	GGPS Ser Garhi	01-10-2017
4	Asma	GGPS Ser Garhi	01-10-2017
5	Farzana Wali	GGPS Jhakh Lohi	01-04-2018
6	Shaheen Zameer	GGPS Lohi Dader	01-10-2018
7	Gul Bibi	GGPS Baja Lohi	01-04-2018
8	Nuzhat Ara	GGPS Harban kot	01-05-2018
9	Tahmina Koochi	GGPS Kuz Kamila	01-01-2017
10	Zohra Bibi	GGPS Kherza Khail Dader	01-10-2015
11	Naginu Otail (G-4)	GGPS Baja-Lohi	01-05-2016
12	Shagufta Kiran	GGPS Dhoop Lohi	01-01-2019
13	Gul Bibi	GGPS Serai Shah	01-04-2018
14	Zarina	GGPS Kemia Abad	01-01-2019
15	Salma Bibi	GGPS Kemia Abad	01-01-2019
16	Shakira	GGPS Mehran Abad	01-03-2018
17	Masooma	GGPS Ghee Harban	01-04-2018
18	Latifa	GGPS Ghee Harban	01-01-2019
19	Johajra Bibi	GGPS Bar Dak	01-04-2018
20	Rasheeda Bano	GGPS Serto Kandla	01-10-2017
21	Rehana	GGPS Seri Gabriel	01-01-2019
22	Sara Qayum	GGPS Seri Gabriel	01-11-2018
23	Aisha Sadiq	GGPS Soyul Jashoi	01-04-2018
24	Bibi Hawa (G-4)	GGPS Awaysach	01-12-2016
25	Fahmeeda	GGPS Bhati Kuz Shrial	01-11-2017

/5

26	Bushra Hafeez	GGPS Bhali Kuz Shiryal	01-01-2019
27	Salma	GGPS Momin Abad	01-01-2019
28	Safia Zareen	GGPS Sanga Abad	01-01-2019
29	Nalheed Sartaj	GGPS Sanga Abad	01-01-2019
30	Mehnaz	GGPS Borsar Shered	01-11-2017
31	Aisha Qureshi	GGPS Hubib Abad	01-11-2017
32	Shema	GGPS Jaran Ranolia	01-01-2019
33	Durkinana	GGPS Kas Dobair	01-05-2017
34	Robina Syed	GGPS Ali Abad	01-11-2018
35	Nasreen Sultan	GGPS Tares	01-12-2018
36	Fatima Akhtar	GGPS Serzahab Abad	01-02-2019
37	Rizwana Bibi	GGPS Z K Abad	01-12-2018
38	Mufeed Akhtar	GGPS Sher Abad	01-12-2018


NOTE: Any teacher who is found involved in any embezzlement of fund/conditional grant, she will be proceeded for FIR/Anti-corruption proceedings as and when reported at any stage. Concerned DDOs are directed to recover the payment (if any) made for absence period out of their GPF etc.


 DISTRICT EDUCATION OFFICER
 (F) KOHISTAN

Encls No: 1198-1210 Dated: 20-04-2019

Copy for information to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Kohistan.
3. Deputy Commissioner Kohistan Lower.
4. Deputy Commissioner Kofai Palas Kohistan.
5. District Monitoring Officer Kohistan.
6. DEO (M) Kohistan Lower & Kofai Palas Kohistan.
7. District Accounts Officer Kohistan.
8. PA to Advisor to CM for Elementary & Secondary Education Khyber Pakhtunkhwa.
9. PA to Secretary (E&SE) Govt of Khyber Pakhtunkhwa Peshawar.
10. All concerned teachers.
11. PA to DEO (M/F) Kohistan.
12. Office copy.


 DISTRICT EDUCATION OFFICER
 (F) KOHISTAN

بخدمت جناب ڈائریکٹر ایجوکیشن صاحب

درخواست برآمد بحالی بلازمت براسامی PST گریڈ-12

جناب عالی!

سائلہ حسب ذیل عرض رساں ہے۔

- (1) یہ کہ من سائلہ بطور PST گریڈ 12 گورنمنٹ گریڈ پرائمری سکول سنگھ آباد شراکوٹ ضلع کوئی پالس کوہستان ڈیوٹی سرانجام دے رہی تھی اور مورخہ 20-04-2019 سے قبل شدید بیمار تھی اور ڈاکٹر نے من سائلہ کو آرام کرنے کا مشورہ دیا تھا۔ (ڈاکٹر لٹرف ہے)
- (2) یہ کہ بیماری کے دوران من سائلہ اس قابل نہ تھی کہ سکول جاسکوں جس کی نسبت من سائلہ نے سکول ہیڈ مسٹریس کو چھٹیوں کی نسبت درخواست گزاری تھی۔
- (3) یہ کہ مورخہ 20-04-2019 کو بروئے انڈوسمنٹ نمبر 1198-1210 جاری کردہ ڈسٹرکٹ ایجوکیشن آفیسرہ (زنانہ) کوہستان نے من سائلہ کو ملازمت سے Terminate کر دیا حالانکہ من سائلہ بوجہ بیماری کے زیر علاج تھی۔
- (4) یہ کہ من سائلہ ایک شریف اور غریب گھرانے سے تعلق رکھتی ہوں، گھرانے کی کفالت کی ذمہ داری من سائلہ کے کندھوں پر ہے، شادی شدہ ہوں اور شوہر ہیریزگار ہے۔
- (5) یہ کہ من سائلہ کو اسامی مذکورہ بالا پر بحال فرمایا جاوے، من سائلہ مستقبل میں متعلقہ ادارے کے قواعد و ضوابط کی پاسداری کرونگی، بلاوجہ ڈیوٹی سے غیر حاضر نہیں رہونگی، اور افسران بالا کے احکامات کی وقتاً فوقتاً تعمیل کرونگی۔

لہذا آپ جناب سے التماس ہے کہ من سائلہ کو اسامی مذکورہ بالا پر بحال کرنے کے احکامات صادر فرمایا کر منظور فرمائیں۔ من سائلہ بمعہ اہل خانہ آپ کی وراثی عمر اور خاتمہ بالا ایمان کے لئے دعا گو رہیں گے۔

الرقوم: 24 اپریل 2019

انٹالہ

ناہیدہ سرتاج دختر محمد سرتاج

موبائل نمبر: 0345-8873551

وکالت نامہ

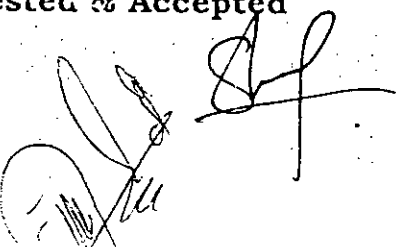
بعدالت جناب! سر و سز ٹریڈ سیرول جسٹریٹ لٹریچر اور
ناہید سرتاج نام حکومت جسٹریٹ لٹریچر اور
دعویٰ یا جرم سر و سز اے بی ایل منجانب ایبلا سٹ
باعث تحریر آئیکہ!

اندریں مقدمہ عنوان بالا میں اپنی طرف سے برائے پیروی و جواب دہی بمقام
شمارہ ایب اے اے
شرف احمد ایڈووکیٹ / شرف خان ایڈووکیٹ اے بی اے کورٹ

کو بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رُو و بعدالت حاضر ہوتا رہوں گا اور بوقت پکارے
جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر منظر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور
پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر
مقام کچہری کے علاوہ کسی اور جگہ سماعت ہو یا کچہری کے اوقات کے آگے پیچھے یا بروز تعطیل سماعت ہونے پر منظر کو کوئی
نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و
نظر ثانی، اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء
کرنے اور ہر قسم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد دہاشی و رضی نامہ و
دستبرداری و اقبال و دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کطرفہ درخواست حکم اتناہی یا فیصلہ
قبل ازیں ڈگری و اجراء ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ پیروی مختار نامہ کرنے کا مجاز ہوگا۔ بصورت
ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا ایڈووکیٹ کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو
بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو
صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے
برخلاف نہیں ہوگا۔ مجھے کل ساختہ پرداختہ موصوف مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سنداً
رہے۔ مضمون وکالت نامہ سن لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

المقوم: 02-11-2019

Attested & Accepted



"B"

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

No.

TB

Appeal No. 14787 of 20 19

Nasheed Surtaj Appellant/Petitioner
Versus

Through Secy. Govt. Pesh. Respondent
Respondent No. 7

Notice to:

Head Teacher Govt. Girls Primary School Sanganabad Kharistan

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 19-12-2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of ~~appeal~~ is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 12/12

Day of Dec 20 21

at Camp Court P. A. Road

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"E"

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

No.

113

Appeal No. 1467 of 2021

Nabeed Sarfraz Appellant/Petitioner

Versus

Through Secy. Estab. H.P.U. Pesh. Respondent

Respondent No. I

Notice to:

Genl. of H.P.U. Through Secy. Education
Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 19-1-2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement along with any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No. dated~~

Given under my hand and the seal of this Court, at Peshawar this 19/11/21

Day of Dec 3 2021

at Camp Court Peshawar
9/1/22

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

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

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

No..

1/3

Appeal No. 1467 of 20 19

Naveed Sartaj Appellant/Petitioner

Versus

Imdad Begum, Edna. K.P.C Respondent

Respondent No. 2

Notice to: —

Director, E.O: 2 Sec: Education Dept: of
K.P.C Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 19-1-2022 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 10/1/22

Day of Date;20 21

at Camp Court A. Shah
5-1-22

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

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"A"

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

No.

TB

APPEAL No. 1467 of 20 19

Nawaz Sartaj

Appellant/Petitioner

Versus

Through Begum Farah Pk Pk

RESPONDENT(S)

Counsel
Notice to Appellant/Petitioner

Sharif Khan & Mushatay
Advocate High Court
at Mardan.

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 21-4-2022 at 9:00 AM

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

of Camp Court A Street

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

"A"

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

TB

No.

1467

APPEAL No..... of 20.....

19

Nahed Sartaj

Appellant/Petitioner

Versus

Through Genl. Edw. M. P. Pesh.

RESPONDENT(S)

Notice to Appellant/Petitioner

*Nahed Sartaj D/O M. Sartaj
R/O Bar Para Tehsil Palas
Distt. Kalai Palas Distt. Kalistan*

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on..... at.....

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

at Camp Court A. Akbar

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.