

14th Nov, 2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not gone through the brief of the instant appeal. To come up for arguments on 12.12.2022 before the D.B at Camp Court Abbottabad.



(Salah Ud Din)
Member (Judicial)
Camp Court Abbottabad





(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

18th July 2022

Learned counsel present. Syed Naseer Ud Din Shah, Asst: AG for respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief. Adjourned. To come up for arguments on 19.09.2022 before D.B at camp court Abbottabad.


(Salah Ud Din)
Member(Judicial)



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad


19.09.2022

Appellant present through counsel.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

Arguments were advanced but certain necessary documents are not available which are very much essential for the just decision of case. admittedly, no stay order was granted by any fora in favor of appellant, therefore, she is directed to produce record from November, 2013 to October, 2014 regarding her presence at GGPS Mangal. To come up for arguments on 14 / 11 /2022 before D.B at Camp Court, Abbottabad.

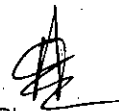

(Fareeha Paul)
Member (E)
Camp Court, A/Abad.


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

02.12.2021

Counsel for the appellant and Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG for the respondents present.

Written reply/comments of respondents No. 1 to 4 have already received and placed on file. Respondent No. 5 (District Accounts Officer, Abbottabad) effected recovery from the appellant on the order of competent authority and there is no need for his reply/comments so far as instant matter is concerned. Case to come up for rejoinder, if any, and arguments on 15.02.2022 before the D. B at camp court, Abbottabad.



Chairman
Camp Court, A/Abad

15.02.2022

Due to retirement of the Hon'ble Chairman, the Tribunal is defunct, therefore the case is adjourned to 20.05.2022 for the same.



Reader

20.05.2022

Counsel for the appellant present. Syed Naseer ud Din, Assistant Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments before D.B on 18.07.2022 at camp court Abbottabad.



(Fareeha Paul)
Member(E)



(Kalim Arshad Khan)
Chairman
Camp Court Abbottabad

14.10.2021

Counsel for appellant and Mr. Muhammad Adeel Butt, Addl. AG alongwith Muhammad Tauseef, ADEO for respondents No. 1 to 4 present. None is present on behalf of private respondent No. 5.

Learned counsel for the appellant has submitted an application for permission to deposit security and process fee. Application is allowed. The appellant is directed to deposit security and process fee within 03 days. Official respondents No. 1 to 4 have already furnished reply/comments at pre-admission stage. Fresh notice be issued to respondent No. 5 as last for submission of written reply/comments on next date. If he fail to submit the requisite reply/comments on the next date, his right for submission of written reply/comments shall be deemed as struck off. Case to come up on 29.11.2021 before the S.B at camp court, Abbottabad.

Appellant Deposited
Security & Process Fee
18/10/21


Chairman
Camp Court, A/Abad

29.11.2021

Counsel for the appellant and Sabir Sultan Senior Auditor for respondent No. 5 alongwith Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG for the respondents present.

Written reply/comments of the respondents are still awaited. Learned AAG is directed to contact the respondents. Last opportunity is granted to the respondents for submission of written reply/comments on next date, failing which their right to submit the reply/comments shall be deemed as struck off. Case to come up on 02.12.2021 before the S.B at camp court, Abbottabad.


Chairman
Camp Court, A/Abad

17.03.2021

Appellant present through counsel.

Riaz Khan Paindakheil learned A.A.G alongwith Toseef ADO for respondents present.

Respondents submitted reply/comments. Learned counsel for appellant made a request for adjournment. adjourned. To come up for preliminary hearing on 18.03.2021 before S.B at Camp Court, Abbottabad.

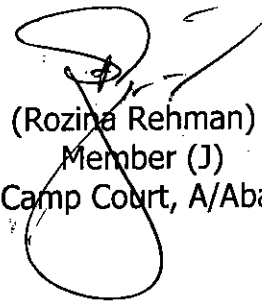


(Rozina Rehman)
Member (J)
Camp Court, A/Abad

18.03.2021

Appellant present through counsel. Preliminary arguments heard. File perused.

Points raised need consideration. Appeal is admitted to regular hearing subject to all legal objections. Appellant is directed to deposit security and process fee within 10 days. To come up for rejoinder, if any, and arguments on 14/07/2021 before D.B at Camp Court, Abbottabad.



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

18.09.2020

Mr. Muhammad Liaqat, Advocate for appellant is present.

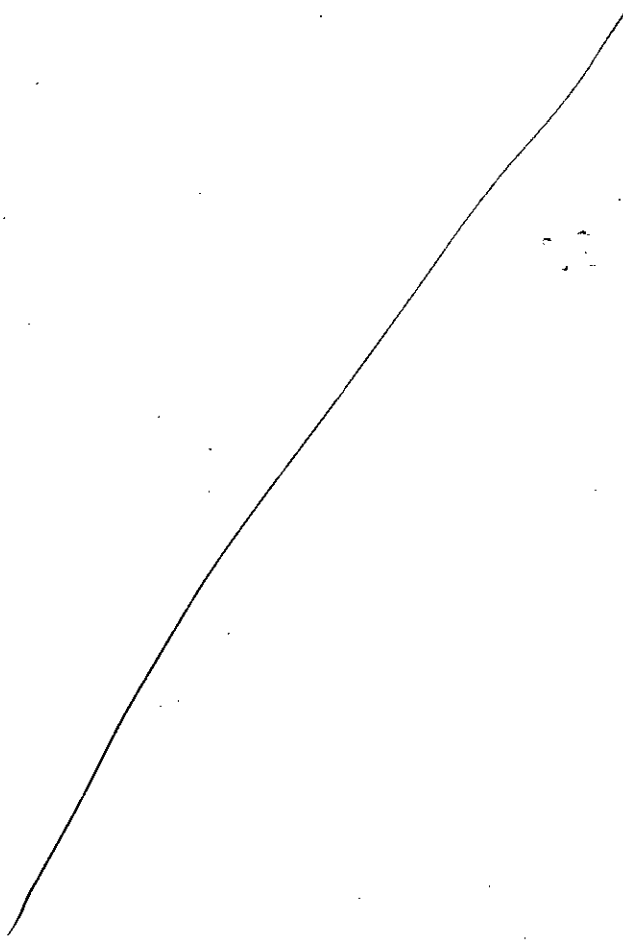
Argument of learned counsel for appellant heard, therefore, it is deemed appropriate to issue pre-admission notice to respondents for 14.12.2020 directing them to submit their reply before S.B at Camp Court, Abbottabad.



(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT ABBOTTABAD

11/11/2020

*Due to COVID-19 case is
ad JOURNAL to 17.03.2021*

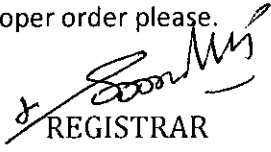




Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 2228/2019


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/12/2019	<p>The appeal of Mst. Shakeela Bibi resubmitted today by Mr. Muhammad Liaqat Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>21-02-20</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Due to covid ,19 case to come up for the same on / / at camp court abbottabad.</p> <p style="text-align: right;">Reader</p> <p>Due to summer vacation case to come up for the same on <u>18</u> <u>9 / 20</u> at camp court abbottabad.</p> <p style="text-align: right;"> Reader</p>

The appeal of Mst. Shakeela Bibi Primary School Head Teacher GGPS Salhad Abbottabad received today i.e. on 06.05.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested. ✓
- 2- Annexures of the appeal may be flagged. ✓
- 3- Affidavit may be got attested by the Oath Commissioner. ✓
- 4- Copy of transfer order dated 02.03.2013 and 08.06.2013 mentioned in para-2&4 of the memo of appeal are not attached with the appeal which may be placed on it.
- 5- Annexures-M & N are missing. ✓
- 6- Copies of salary statement report of ADO mentioned in para-10 of the memo of appeal are not attached with the appeal which may be placed on it.
- 7- Copy of impugned order is not attached with the appeal which may be placed on it.
- 8- Annexure-O of the appeal is illegible which may be replaced by legible/better one.
- 9- Seven more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

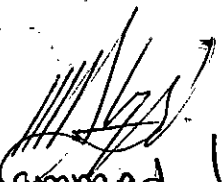
No. 917 /S.T,

Dt. 10/5 /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Hamayun Khan Adv.
High Court A.Abad.

That after the clearing the objection alongwith
6 extra copies file be resubmitted please


Muhammad Liaqat Advocate
High Court Abbottabad

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

Appeal No. 2228 /2019

Shakeela Bibi Primary School Head Teacher, Govt. Girls Primary School
Saihad, Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary
Education Peshawar & others.

...RESPONDENTS

SERVICE APPEAL

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2.	Copy of service book	15 to 29	"A"
3.	Copy of order No. 1261-67 dated 28/02/2013	29(A)	"B"
4.	Copies of transfer/ adjustment order No.2223-25 dated 14/05/2013 and register attendance	30 to 38	"C" & "D"
5.	Copy of order dated 08/03/2013	38(A)39	"E" E1
6.	Copy of vide order No.1296-99 dated 07/10/2013	40	"F"
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9.	Copy of affidavits dated 29/04/2015 and 07/05/2015 and order dated 13/08/2015	53 to 55	"K" & "L"
10.	Copy of Service Appeal	56 to 64	L1
11.	Copies of salary statement, report of ADO	65 to 76	"O", "P" &

	and legal notice dated 12/02/2015		"Q"
12.	Copies of writ petition No.177-A/2015 alongwith C.M No.355A/2016 and order dated 30/05/2016	77 to 80	"R", "S" & "T"
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...APPELLANT

Through

Dated: 02/05 /2017


 (HAMAYUN KHAN)
 Advocate High Court, Abbottabad

MUHAMMAD LIAQAT ADVOCATE

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

Appeal No. _____/2019

Shakeela Bibi Primary School Head Teacher, Govt. Girls Primary School
Salhad, Abbottabad.

...APPELLANT

Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. 715

Dated 06/5/2019

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. District Education Officer (Female) Abbottabad.
4. Sub Division Education Officer (Female), Abbottabad.
5. District Account Officer, Abbottabad.

...RESPONDENTS

Filed to-day

Registrar

6/5/19

SERVICE APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974 AGAINST THE ORDER No.289 dated
17/01/2015 ISSUED BY THE RESPONDENT NO.3
WHEREIN IMPOSITION OF RECOVERY OF
RS.387444/- FROM APPELLANT APPROXIMATELY
@ 5000/- PER MONTH IN THE LIGHT OF FAKE
ABSENT PERIOD W.E.F November 2013 to October
2014, VIDE RESPONDENT NO. 3 RELEASED
PETITIONER SALARY TO THE EXTENT OF RS.
1,36,000/- AND REMAINING RECOVERY IN THE

SHAPE OF DEDUCTION IS DUE AGAINST THE RESPONDENT NO. 3 AND 5, i.e. RS. 90000/- OR WHICH IS PROVED THROUGH RECORD, WAS MADE ARE ILLEGAL, WITHOUT LAWFUL AUTHORITY AND WITHOUT JURISDICTION AND DECISION PASSED BY THE RESPONDENT NO.3 AND 5, NO SHOW CAUSE NOTICE WAS GIVEN, NOR ANY OPPORTUNITY OF HEARING WAS GIVEN TO THE PETITIONER, AND PARTIALLY DECISION WAS MADE AGAINST APPELLANT TO CONCEAL THE MALAFIDE ACT OF RESPONDENT NO.3 REGARDING FREQUENT TRANSFER AND WITHDRAWAL ORDER AND CONSEQUENT THEREUPON, PENALIZE THE APPELLANT.

PRAYER: ON ACCEPTANCE OF INSTANT APPEAL THE PUNISHMENT OF RECOVERY OF AMOUNT AS MENTIONED ABOVE AND SHOWING ABSENTED PERIOD WHICH IS WITHOUT ANY FAULT ON THE PART OF APPELLANT MAY GRACIOUSLY BE SET-ASIDE AND APPELLANT MAY PLEASE BE EXONERATED FROM CHARGES LEVELED AGAINST THE APPELLANT IF ANY

AND ANY PROCEEDING IN THE LIGHT OF
EXPARTE SHOW CAUSE NOTICE AND WITHOUT
GIVING PROPER OPPORTUNITY OF PERSONAL
HEARING TO THE APPELLANT AND ANY
ADVERSE REMARK IN SERVICE RECORD, MAY
GRACIOUSLY BE ALSO EXPUNGED IF MADE
AND ABSENTED PERIOD PRESUMED TO THE
PART OF SERVICE ALONGWITH BENEFIT AND
RECOVERED AMOUNT RS. 90000/- OR WHICH IS
PROVED THROUGH RECORD MAY ALSO BE
RETURN TO APPELLANT FORTHWITH.

Respectfully Sheweth;-

May it please your lordship the brief fact of the instant
appeal are as under:-

1. That appellant was appointed as PTC Teacher in
Education Department vide appointment order
Endst No.12102-6 dated 28/11/1990. Copy of
service book is annexed as Annexure "A".
2. That during the year 2013 petitioner promoted and
transfer from BPS-14 to BPS-15 (SPST to PSHT)

GGPS Kunj to GGPS Toheedabad Circle Nathiagali on the basis of seniority cum fitness vide order No.1261-67 dated 28/02/2013. Copy of order No. 1261-67 dated 28/02/2013 is annexed as Annexure "B".

3. That appellant during posted/ duty in GGPS Toheedabad being aggrieved reported to respondent No.3, while respondent No.3 transferred appellant from GGPS Toheedabad to GGPS Mangal vide transfer/ adjustment order No.2223-25 dated 14/05/2013 and register attendance in respect of Government Girls Primary School, Mangal, from May 2013 to September, 2013 are annexed as Annexure "C" & "D".
4. That one Mst. Aneeza PSHT promoted and transfer from GGPS Mangal to anywhere, again retain and adjusted in same School in place of appellant by the respondent No.3 in the light of affidavit dated 01/06/2013 submitted by Mst. Aneeza PSHT and was compensated and adjusted in GGPS Mangal in place of appellant while order dated 08/06/2013 issued by the respondent No.3 in respect of Mst. Aneeza PSHT in GGPS Mangal.

Copy of order dated 08/06/2013 is annexed as Annexure "E".

5. That after 5 months appellant was again transferred from GGPS Mangal to GGPS Toheedabad vide order No.1296-99 dated 07/10/2013 appellant transfer while order dated 14/05/2013 in respect of GGPS Mangal was cancelled. Copy of vide order No.1296-99 dated 07/10/2013 is annexed as Annexure "F".
6. That appellant after filing of departmental appeal before the respondent No.1 & 2, during pendency of departmental appeal, filed civil suit before the Civil Court Abbottabad on 17/07/2014, while legal notice given to the respondent No.3, on 18/08/2014, vide which appellant transfer from GGPS Mangal to GGPS Toheedabad was challenged while appellant was assumed her duty in GGPS Mangal. Copies of civil suit dated 17/07/2014 in the light of court order and legal notice dated 18/08/2014 are annexed as Annexure "G" & "H".

7. That the appellant being aggrieved filed service appeal No.989/2014 before this Honourable Service Tribunal KPK on 02/08/2014 alongwith status quo application in which Honourable Service Tribunal issued the status quo and suspend the operation of impugned order dated 07/10/2013 passed by the respondent No. 3, in the light of stay order appellant performed her duty in Govt. Girls Primary School, Mangal from May 2013 to October 2014. During the pendency of service appeal respondent No. 3 transfer/ adjustment to appellant from GGPS Toheedabad Circle Nathiagali to GGPS Azizabad Circle Dhamtour vide order Endst No.6966-67 dated 01/11/2014 and register of attendance in respect of GGPS Azizabad from November 2014 to August, 2015 are annexed as Annexure "I" & "J".
8. That the respondent No.3 does not redressal the grievances of appellant during pendency of appeal, the respondent No.3 in this respect obtained affidavits dated 29/04/2015 and 07/05/2015 respectively from the appellant to resolve the grievances of petitioner. Petitioner in term of conditional affidavit service appeal was withdrawn

and the appellant was transferred from GGPS Azizabad to GGPS Salhad vide order No.1334-36 dated 13/08/2015 petitioner is still working in this school. Copy of affidavits dated 29/04/2015 and 07/05/2015 and order dated 13/08/2015 are attached as Annexure "K" & "L". ~~Annex L-1~~

9. That the appellant due to aggrieved by the respondent No.3 file a civil suit before the District Court Abbottabad dated 17/7/2014 in this respect legal notice dated 18/08/2014 was also given to the respondent No.3. Copies of Civil Suit and legal notice ^{already} attached as Annexure "G" & "H".

10. That during the period of May 2013 to September 2013 in GGPS Mangal, appellant performed her duties regularly but the respondent No.3 stop her salary on the basis of fake absent period May 2013 to October 2014 to victimize the appellant moreover, the salary statement of appellant from May 2013 to April, 2014 and salary deduction from the account of appellant to AC 7043 DDEO (Female) of June, 2015 and May 2015 are concerned, in this respect ADO Circle give the so-called report which is totally contrary against the

facts and evidence of appellant in this respect the appellant give legal notice dated 17/12/2015 to the ADO concerned. Copies of salary statement, report of ADO and legal notice dated 17/12/2015 are attached as Annexure "O", "P" & "Q".

11. That appellant feeling aggrieved filed writ petition No.177/15 alongwith C.M No.355-A/2016 before the Honourable High Court Abbottabad Bench passed the order dated 30/05/2016 in which direction was given to respondent No.3 & 5 not to deduct the amount from salary of appellant while Honourable High Court directed the appellant to seek proper remedy in proper forum. Copy of writ petition No.177-A/2015 alongwith C.M No.355A/2016 and order dated 30/05/2016 are annexed as Annexure "R", "S" & "T".

12. That appellant after hard struggle not to succeed for the obtaining of inquiry or record and impugned order, therefore, appellant filed departmental appeal without impugned order before the respondents No.1 & 2 on dated 02/01/2019, but uptill now no response was given to appellant more so imposition of recovery is

monitory proceeding against which no limitation was run against the appellant if otherwise appellant have a right to file application for condonation of delay with the permission of court. Copy of departmental appeal dated 02/01/2019 is annexed as Annexure "U".

13. That the appellant time and again reported to the office for the obtaining of impugned order but the respondent No.3 refuse to give the impugned order and other record also in this respect appellant filed application under RTI Act dated 05/05/2018 and 15/01/2019 respectively. Copies of applications under RTI Act, 2013 are annexed as Annexure "V", and Copy of only impugned order was given to applicant on 30-04-19 copy of the order is attached as annex, W
14. That appellant have no other remedy except present appeal before this Honourable Tribunal, inter-alia on the following grounds:-

GROUND:-

- a. That impugned order passed by the respondent No.3 & 5 in respect of

imposition of recovery of Rs.3,87,444/- @ 5000/- per month from the salary of petitioner and due to act of respondent No.3 in the light of frequent transfer order and attendance register of petitioner w.e.f May 2013 to October 2014 in GGPS Mangal shall not be presumed to be absented on the basis of ex parte show cause and ex parte inquiry on the back of petitioner, therefore, impugned order passed by the respondent No.3 may kindly be struck down.

- b. That some record is self explanatory and record of attendance shows the presence of appellant and absented period in the light of evidence of appellant may kindly be presumed to be part of service hence, the total proceeding initiated against the appellant on the basis of malafide act of respondent No.3, therefore, may kindly be set-aside.
- c. That the impugned order in respect of imposition of deduction of salary on the

basis of absent period are illegal, baseless, just to save the skin of respondent No.3, from the illegal frequent transfer order to cancel and escape from the fact and record just to penalize the appellant. Therefore, the impugned order and whole proceeding may kindly be set-aside.

- d. That the impugned order and ex-parte inquiry without adopting the proper mode, not fair and impartial hence liable to be set-aside.
- e. That the act of respondents are against the Article of 11 of the Constitution of Pakistan 1973 which amounts force labour, therefore, appellant is entitled for the recovery of said amount.
- f. That the appellant has been performing her duty in Education Department, dedicatedly and devotedly for the last tow and half decades and there has never been any sort of

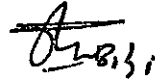
complaint against the appellant, therefore, appellant may also be entitled for the recovery of illegal imposition of amount.

g. That the respondent No.3 did not consider the request of appellant under RTI Act 2013 and did not provide impugned order dated 17/01/2015 within time to laps the time of appellant for the redressal of grievances on the next higher forum, in this respect appellant received the impugned order on 30/04/2019, after the laps of time, therefore, no limitation is run against appellant, and appeal of appellant is well within time.

h. That the present instant appeal is monitory in nature hence limitation is not attracted otherwise if the court is presume that the instant appeal is otherwise time barred the appellant has a right to file application for condonation of delay.

(3)

It is, therefore, humbly prayed that on acceptance of instant appeal the punishment of recovery of amount and showing absented period which is without any fault on the part of appellant may graciously be set-aside and appellant be exonerated from charges leveled against the appellant on the basis of enquiry conducted ex-parte and without hearing appellant and any adverse remark in service record, may graciously also be expunged if made and a absent period presumed to the part of service and recovered amount Rs. 90000/- may also be return to petitioner forthwith.



...APPELLANT

Through

Dated: 02/05 /2019


(MUHAMMAD LIAQAT)
Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



...APPELLANT

11 (14)

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

Appeal No. _____ -A/2019

Shakeela Bibi Primary School Head Teacher, Govt. Girls Primary School
Salhad, Abbottabad.

...APPELLANT

VERSUS

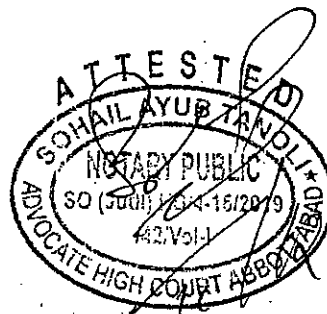
Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary
Education Peshawar & Others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Shakeela Bibi Primary School Head Teacher, Govt. Girls Primary School
Salhad, Abbottabad, do hereby solemnly affirm and declare that the contents
of forgoing service appeal are true and correct to the best of my knowledge
and belief and nothing has been concealed therein from this Honourable
Service Tribunal.



DEPONENT

(For use in Police Department only).

Note:—The ent

15

Heirs,

Annex - A - AH 3/28

Muhammad Liaqat
Advocate

- 1.
- 2.
- 3.

- 1. Name
- 2. Race
- 3. Resi

Verification Roll No. dated received back

- 4. Fat

Left thumb-impression.

- 5. Da
ne:

Passed S.S.C examination
in 1988 under R/No 1949
from B.I.S.E Pesh: obtained

- 6. Es

Qualification	Date	Qualifications	Date
357/550 marks placed in grade "D" Result declared on 13-2-81. English		First Arts	

- 7. P.

Pashtu	SDEO (F) ATD.	B. L. or B. A.	
--------	---------------	----------------	--

- 8. L
S

Passed P.T.C (condensed) course Urdu under R/No 521 obtained 283/500 placed in II div. Result declared on 9-1-95	Pleadership examination
	Training School Final examination

Finger print R.P Female (Abbottabad)	Other qualifications --
--------------------------------------	-------------------------

Drill instructing
Passed Intermediate (A) Exam 98
from court/Quies Abbottabad under
R.No. 23590 and marks
Reserve entries 463 out of 1100
3rd Division. Result
declare on 24-10-1998.

- 9.

- 10

Signature
Divisional Edu. Officer
Female, Abbottabad

N. V. Line to be drawn under the qualification possessed.

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 Shakeela Bibi

2. Race Pathan

3. Residence Nawansher Dhodial ATD.

121-92-423514

16

Attested
Muhammad Liaqat
Advocate

4. Father's name and residence Yahya Khan.

5. Date of birth by Christian era as nearly as can be ascertained 1-2-67 ✓

6. Exact height by measurement 4.10

7. Personal marks for identification A mole on upper side of 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.

Shakeela Bibi

10. Signature and designation of the Head of the Office, or other Attesting Officer. Divisional Education Officer Female (Abbottabad)

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 C, S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature Government servant
G.G.P.S. Pussala		BPS-7-750-31-1370	RS. 750/-			2.12.90	<i>[Signature]</i>
		1095/ <u>1215/-</u>				1.6.91	<i>[Signature]</i>
Munammad Liaqat Advocate		1095/ <u>1215/-</u>				1.12.91	<i>[Signature]</i>
		1095/ <u>1215/-</u>				1.12.92	<i>[Signature]</i>
		1095/				1.12.93	<i>[Signature]</i>
<p>Order of the Accountant General S. W. F. J. Peshawar. Pay fixed in the Revised Pay Scales 1997 of Rs. 1095/- per month G.O. No. 27 M.W.S.P. 1-1-1991 with effect from 1-12-1991 provided best appointment order is made by Dec 91</p> <p>NOTE The falling of payment is recorded. 6 185 RS. 125/- 91 93 Total 3120/- 7.12.91 <i>[Signature]</i></p>							
P.T. G.G.P.S. Pussala		BPS-7-1480-81-2695	1480/-			1.6.94	<i>[Signature]</i>
do	do		1480/-			1.12.94	<i>[Signature]</i>
do	do		RS. 1561/- <u>1480/-</u>			10/95	<i>[Signature]</i>
do	do		RS. 1642/-	1561/-		1.12.95	<i>[Signature]</i>

Signature designation head of the officer in att of column

DECF
[Signature]
DECF
[Signature]
DECF
[Signature]
DECF
[Signature]
DECF
[Signature]

Recon
RS. 185
1000

[Signature]
Abbott
[Signature]
[Signature]
[Signature]

9	10	11	12	13		14	15	
				Leave				
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	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	Government to which debitable		
<i>[Signature]</i> S.D.E.O (F) ATD R.P.	30 $\frac{5}{91}$	scale revised	<i>[Signature]</i> S.D.E.O (F) ATD R.P.		Appointed as P.T teacher		<i>[Signature]</i> Muhaimin Liaqat Advocate	
<i>[Signature]</i> S.D.E.O (F) ATD R.P.	30 $\frac{11}{91}$	expiry	<i>[Signature]</i> S.D.E.O (F) ATD R.P.		in L.A.P.S. Passala on 28.11.90 Endst: No 12/02-6 on fixed pay			
<i>[Signature]</i> S.D.E.O (F) ATD R.P.	30 $\frac{11}{92}$	do	<i>[Signature]</i> S.D.E.O (F) ATD R.P.				<i>[Signature]</i> S.D.E.O (F) ATD R.P.	
<i>[Signature]</i> S.D.E.O (F) ATD R.P.	30 $\frac{11}{93}$	do	<i>[Signature]</i> S.D.E.O (F) ATD R.P.					
<i>[Signature]</i> S.D.E.O (F) ATD R.P.	31 $\frac{5}{94}$	scale revised	<i>[Signature]</i> S.D.E.O (F) ATD Abbottabad R.P.		Service verified from acquittance rolls and other records from 2-12-90 to 30-11-92		<i>[Signature]</i> R.P.	
Recovery of overpayment of RS. 3120 has been recovered from pay bills from 7/93 to 10/94.					Service verified from 1-12-92 to 30-11-93		<i>[Signature]</i>	
<i>[Signature]</i> S.D.E.O (F) ATD R.P.			<i>[Signature]</i> S.D.E.O (F) ATD Abbottabad R.P.		Service verified from 1-12-93 to 30-11-94 from acquittance-rolls & other record kept in his office.		<i>[Signature]</i> R.P. S.D.E.O (F) A Attd.	
<i>[Signature]</i> S.D.E.O (F) ATD Abbottabad R.P.	30 $\frac{11}{94}$	expiry	<i>[Signature]</i> S.D.E.O (F) ATD Abbottabad R.P.		Service verified from acquittance-rolls and other records kept in this office from 1-12-94 to 30-11-95		<i>[Signature]</i> S.D.E.O (Female) R.P. Abbottabad	
<i>[Signature]</i> S.D.E.O (F) ATD Abbottabad R.P.	9 $\frac{1}{95}$	Passed PTC	<i>[Signature]</i> S.D.E.O (F) ATD R.P.		Service verified from acquittance rolls and other records from 1-12-95 to 30-11-96		<i>[Signature]</i> S.D.E.O (Female) R.P. Abbottabad	
<i>[Signature]</i> S.D.E.O (F) ATD R.P.	30 $\frac{11}{95}$	incre	<i>[Signature]</i> S.D.E.O (F) ATD R.P.					
<i>[Signature]</i> S.D.E.O (F) ATD R.P.	30 $\frac{11}{96}$	do	<i>[Signature]</i> S.D.E.O (F) ATD R.P.					

Muhammad Liaqat Advocate

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 head of office or other officer in charge

PTC	off/per		1642 ✓					
Pasala	do		Rs. 1723 ✓	P.M.		1.12.96	Shah	SDEC
do	do		Rs. 1804 ✓	P.M.		1.12.97	Shah	SDEC
PTC G.P.S. Nariyan N. Shehry	do		Rs. 1966 ✓	P.M.	1889 ✓	20.8.98	Shah	SDEC
do	do		Rs. 2047 ✓	P.M.	1966 ✓	01-12-98	Shah	SDEC
do	do		Rs. 2128 ✓	P.M.	2047 ✓	1.12.99	Shah	SDEC
do	do		Rs. 2209 ✓	P.M.	2128 ✓	1.12.2000	Shah	SDEC
do	do		BPS - 7			2220-20-5820	Shah	SDEC
do	do		Rs. 3420 ✓	P.M.		11/12/2001	Shah	SDEC
do	do		3300 ✓			8-6-02	Shah	SDEC
do	do		3420 ✓	P.M.		12/2002	Shah	SDEC
do	do		(2) P.A.					

Office of the Accountant General
 Punjab
 Pay Fixation Party
 1485/1-1520
 M.W.R. 4-4-2002
 with next increment

Office of the Accountant General
 Punjab
 Pay Fixation Party
 2220-20-5820
 3300/1-5820
 M.W.R. 4-4-2002
 with next increment

NOTE: - The
 of payment made 7 4
 records.
 B. 8/1/01 Rs. 1195 to 11/01/01 Rs. 6700 ✓
 B. 12/01/01 Rs. 1200 ✓

Total Rs. 7900/2
 M. Shehry

8	9	10	11	12	13		14	15
					Leave			
					Period	Government to which debitale		
	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	Allocation of period of leave on average pay upto four months for which leave salary is debitale 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.
	<i>[Signature]</i> SDEO(F) MD	30/11/97	Transfer	<i>[Signature]</i> SDEO(F) MD	N.A			Service verified from 1-12-96 to 30-11-97 from acquittance rolls & other record kept in this office.
	<i>[Signature]</i> SDEO(F) A/D	19.8.98	Passed	<i>[Signature]</i> SDEO(F) A/D	N.A			<i>[Signature]</i> SDEO(F) A. Abad. N.A
	<i>[Signature]</i> SDEO(F) A/D	23/10/98	F.A. Exar	<i>[Signature]</i> SDEO(F) A/D				
	<i>[Signature]</i> SDEO(F) A/D	30/11/98	<i>[Signature]</i>	<i>[Signature]</i> SDEO(F) A/D				Sanction to the Advance increments of paying <i>[Signature]</i> accorded by SDEO(F) A/D Wef. 24-10-98 issued Endst. No. 2401-05 dt. 19/7/99.
	<i>[Signature]</i> SDEO(F) A/D	30/11/99	<i>[Signature]</i>	<i>[Signature]</i> SDEO(F) A/D	N.A			
	<i>[Signature]</i> SDEO(F) A/D	30/11/2000	<i>[Signature]</i>	<i>[Signature]</i> SDEO(F) A/D	N.A			
	<i>[Signature]</i> SDEO(F) A/D	30/11/2001	Algom Seal & Revised	<i>[Signature]</i> SDEO(F) A/D	N.A			SDEO(F) A/D
	<i>[Signature]</i> SDEO(F) A/D	7/6/2002	Transfer	<i>[Signature]</i> SDEO(F) A/D	N.A			S-146 pay advice 157/189 @ 2047/- P.M Wef 7/1-7-99
	<i>[Signature]</i> SDEO(F) A/D	30/11/2002	A/P	<i>[Signature]</i> SDEO(F) A/D	N.A			Current No. 173/34 Wef 12/9/99
	<i>[Signature]</i> SDEO(F) A/D	30/11/2003	A/P	<i>[Signature]</i> SDEO(F) A/D	N.A			DAO
	<i>[Signature]</i> SDEO(F) A/D			<i>[Signature]</i> SDEO(F) A/D	N.A			Service verified from 1-12-97 to 30-11-2000 from acquittance rolls & other record kept in this office.
	<i>[Signature]</i> SDEO(F) A/D			<i>[Signature]</i> SDEO(F) A/D	N.A			<i>[Signature]</i> SDEO(F) A. Abad N.A
	<i>[Signature]</i> SDEO(F) A/D			<i>[Signature]</i> SDEO(F) A/D	N.A			Services verified from acquittance rolls and other record kept in this office from 1-12-2000 to 30-11-2002
	<i>[Signature]</i> SDEO(F) A/D			<i>[Signature]</i> SDEO(F) A/D	N.A			Services verified from acquittance rolls and other record kept in this office from 1-12-2002 to 30-11-2003

Muhammad Liaqat
Advocate

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 designation head of the office or other officer in all of columns		
G.P.S										
- Kunj AD -	off/Temp		Rs/-	3540/2 P.M.		12/2003	<i>Ar</i>	<i>Ar</i> Dy. (P) P1 Abbr		
- do -	- do -		RS-	3660/- P.M.		1.12.04	<i>Ar</i>	<i>Ar</i> Dy P2 (P) P1 Abbr		
- do -	- do -		RS-	4235/- P.M.		1.7.05	<i>Ar</i>	<i>Ar</i> Dy P3 (P) P1 Abbr		
- do -	- do -		Rs-	4375/- P.M.		1.12.05	<i>Ar</i>	<i>Ar</i> Dy P3 (P) P1 Abbr		
				O/P.						
Muhammed Ullat		<div data-bbox="188 1108 682 1512" data-label="Text"> <p>Office of the ... Pay Fixed at Rs. 2555-140-6755 at Rs. 4235/- with next increment of 01-12-2005</p> <p><i>M. Shah</i> Authorized Officer Pay Fixe ...</p> </div>		<div data-bbox="752 1134 1395 1360" data-label="Text"> <p>The O/P amount amounting to Rs - 7900/- is recoverable. No. recorded on p.6 of S book.</p> </div>						
P.T.C G.P.S										
Kunj AD	Temp. / off			Rs = 4515/- P.M.		07/12/2006	<i>Ar</i>	<i>Ar</i> Dy P1 P2		
				S/Revised dated 21-7-2007						
				<u>Rs 7 = (2940 - 16 = 7740)</u>						
				Rs 5180/- P.M.		07/2/2007	<i>Ar</i>	<i>Ar</i> D P1		
				Rs = 5340/- P.M.		07/12/2007	<i>Ar</i>	<i>Ar</i>		

8	9	10	11	12	13		14	15
					Leave			
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature of Government servant	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	Period	Government to which debitable	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.
	<i>F. S. H. 2</i> Dy D.O. (F) Prry Edu. Abbottabad	30/11/2004	Annual increment	<i>F. S. H. 2</i> Dy D.O. (F) Prry Edu. Abbottabad N.A			<i>G.O.P. Amman</i> vide B.O. No 24288-89 Dt: 15/11/2003 Rs 36000/-	
	<i>F. S. H. 2</i> Dy D.O. (F) Prry Edu. Abbottabad N.A	30/6/05	Scale Revised	<i>F. S. H. 2</i> Dy D.O. (F) Prry Edu. N.A Abbottabad			<i>F. S. H. 2</i> Dy: Dist. Officer (F) Prry Edu: Abbottabad	
	<i>F. S. H. 2</i> Dy D.O. (F) Prry Edu. N.A Abbottabad	30/11/05	Annual increment	<i>F. S. H. 2</i> Dy D.O. (F) Prry Edu. N.A Abbottabad			<i>TOP 45 Oct 2/03</i> Draw a sum of Rs 36000/- as Refundable advance N.P. No 19/03	
	<i>F. S. H. 2</i> Dy D.O. (F) Prry Edu. N.A Abbottabad	30/11/06	A/jme	Dy: D.O. (F) Prry Edu. N.A Abbottabad			<i>NO A.A. O.P.</i> 2/03	
	Muhammad Liaqat Advocate						Services verified from acquittance roll and other record kept in this office from 12-2001 to 30-11-2003	
							<i>F. S. H. 2</i> Dy D.O. (F) Prry Edu. Abbottabad N.A	
							Services verified from acquittance roll and other record kept in this office from 1-12-2003 to 30-11-2004	
	<i>F. S. H. 2</i> Dy: D.O. (F) Prry: A/Abad N.A	30/6/07	Scale Revised	<i>F. S. H. 2</i> Dy: D.O. (F) Prry: A/Abad N.A			<i>F. S. H. 2</i> Dy D.O. (F) Prry Edu. Abbottabad N.A	
	<i>F. S. H. 2</i> Dy: D.O. (F) Prry: A/Abad N.A	30/11/07	A/jme	<i>F. S. H. 2</i> Dy: D.O. (F) Prry: A/Abad N.A			Services verified from acquittance roll and other record kept in this office from 1-12-2004 to 30-11-2005	
	<i>F. S. H. 2</i> Dy: D.O. (F) Prry: A/Abad N.A			<i>F. S. H. 2</i> Dy: D.O. (F) Prry: A/Abad N.A			Services verified from acquittance roll and other record kept in this office from 01-12-2005 to 30-11-2006	
	<i>F. S. H. 2</i> Dy: D.O. (F) Prry: A/Abad N.A			<i>F. S. H. 2</i> Dy: D.O. (F) Prry: A/Abad N.A			<i>F. S. H. 2</i> Dy: D.O. (F) Prry: A/Abad N.A	

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 designation head of the other att officer in all of column
GGPS								
Kunj Aida		<u>Entries Revised</u>						
Rehmatullah Afa			Rs 5180			7/69	<i>[Signature]</i>	Dy. D. P. A.
		BPS 12 (3630 - 260 - 11430)						
u			Rs 5190/-			10/07	<i>[Signature]</i>	Dy. D. C. P. A.
u			Rs 5450/-			12/07	<i>[Signature]</i>	Dy. D. P. A.
		BPS 12 (4355 - 310 - 13655)						
u			Rs 6525/-			7/08	<i>[Signature]</i>	Dy. D. P. A.
u			Rs 6835/-			12/2002	<i>[Signature]</i>	Dy. D. Primary
Muhammad Liaqat Advocate		<u>Entry Revised was in op. 181 appointment.</u>						OFFICER P. OFR. AT R. With
		B. 7 - (750 - 31 - 1370)						
		2-12-90	750/-		Scale Revised			
		B. 7 - 1095 - 60 - 1995						
		1-6-91			1215/-			
		1-12-91			1275/-			
		1-12-92			1335/-			
		1-12-93			1395/-			Scale Revised
		B. 7 - (1480 - 81 - 2695)						
		1-6-94			1885/-			
		1-12-94			1966/-			
		1-12-95			2047/-			
		1-12-96			2128/-			
		1-12-97			2209 + 162 = 2371			FR Adv.

8 Signature of Government servant	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 Leave		14 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 debitable to another Government		
						Period		
							Service verified from acquittance roll and other record kept in this office from 21-11-2006 to 30-11-2007	
	Dy: D.O. (F) Pry: A/Abad N/A	30/9/07	U.P.S	Dy: D.O. (F) Pry: A/Abad N/A				
	Dy: D.O. (F) Pry: A/Abad N/A	30/11/07		Dy: D.O. (F) Pry: A/Abad N/A				
	Dy: D.O. (F) Pry: A/Abad N/A	30/6/08	Revis	Dy: D.O. (F) Pry: A/Abad N/A				
	Dy: D.O. (F) Pry: A/Abad N/A	30/11/2008	A/jan	Dy: Dist. Officer (F) Primary Abbottabad				
	Dy: Dist. Officer (F) Primary Abbottabad	30/3/09	enq Resort					
	2007 OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P PESHAWAR PAY FIXED IN THE REVISED BASIC PAY SCALES 1 OF RS. 2140-160-7740 AT RS. 5180 With Next Increment on							
	Accounts Officer Pay Fixation Party N.W.F.P Peshawar							
	2008 OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P PESHAWAR PAY FIXED IN THE REVISED BASIC PAY SCALES 1 OF RS. 4355-760-13655 AT RS. 65257 With Next Increment on							

Service verified from acquittance roll and other record kept in this office from 21-11-2006 to 30-11-2007

G.P.O. Addy No 57008/
Section vide EPD
(S-L) A-1500
Encl. No 208-30
dated 28-9-2008

Deputy D.O.
Female Primary Education
Abbottabad

Drawn by
Rs = 57000/-
by D.D.O Female
Pzi Bdui ATD.
vide T496

29/1/2008

Dist: Accounts Officer
Abbottabad

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 Government servant	Signature designation head of the other officer in alternate columns
G.O.P.S Rehmatullah		24-10-98		2371/-				
		1-12-98		2452/-				
		1-12-99		2533/-				
		1-12-2000		2614/-				
		1-12-2001		2695/-		Scale Revised		
		B. 7-22-20-120-5820)		4020/-				
		1-12-2001		4190/-				
		1-12-2002		4260/-				
		1-12-2003		4380/-		Scale Revised		
		1-12-2004		4460/-				
		B. 7-25-55-140-6785/-		5675/-				
		1-7-2005		5215/-				
		1-12-2005		5355/-		Scale Revised		
		1-12-2006		5075/-				
	Muhammad Liaqat Advocate		B. 7-29-60-160-7740)		5075/-	Pm	1-7-2007	
		B. 12-36-30-260-11430)						
			Rs	6230/-	Pm	1/10/2007		
			Rs	6490/-	Pm	1/12/2007		
		B. 12-43-55-310-13453)		7785/-	Pm	1/7/2008		
			Rs	8075/-	Pm	1/12/2008		
			Rs	8385/-	Pm	7/12/2009		

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 designation head of the other officer in all of column
PTC GGS Manoj A/Asst	Temp: off.		Rs 750/-			02/12/1990	[Signature]	DY: D [Signature]
n	n		Rs 1095/-			01/91	[Signature]	DY: D [Signature]
n	n		Rs 1185/-			07/91	[Signature]	DY: D [Signature]
n	n		Rs 1215/-			07/92	[Signature]	DY: D [Signature]
n	n		Rs 1275/-			01/93	[Signature]	DY: D [Signature]
Muhammad Liaqat Asst	n		Rs 1723/-			01/94	[Signature]	DY: D [Signature]
n	n		Rs 1804/-			01/94	[Signature]	DY: D [Signature]
n	n		Rs 1885/-			07/95	[Signature]	DY: D [Signature]
n	n		Rs 1966/-			01/1996	[Signature]	DY: D [Signature]
n	n		Rs 2047/-			01/1997	[Signature]	DY: D [Signature]
n	n		Rs 2209/-			24/98	[Signature]	DY: D [Signature]
n	n		Rs 2290/-			07/98	[Signature]	DY: D [Signature]
n	n		Rs 2371/-			07/99	[Signature]	DY: D [Signature]
n	n		Rs 2452/-			07/2000	[Signature]	DY: D [Signature]

8	9	10	11	12	13		14	15
					Leave			
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
Signature of Government servant	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	Period	Government to which debitable	Signature of the head of the office or other attesting officer	Reference to any recorded punishment of censure, or reward or praise of the Government Servant.
23/3	BY: D.O. (PRY: Attd.)	31/5/91	scale revision	[Signature] BY: D.O. (PRY: Attd.)			[Signature]	
30/4	BY: D.O. (PRY: Attd.)	30/11	A/jac.	[Signature] BY: D.O. (PRY: Attd.)			[Signature] Muhammad Liaqat Advocate	
3/3	BY: D.O. (PRY: Attd.)	30/11/92	A/jac.	[Signature] BY: D.O. (PRY: Attd.)				
23/3	BY: D.O. (PRY: Attd.)	30/11/93	A/jac.	[Signature] BY: D.O. (PRY: Attd.)			842	
31/3	BY: D.O. (PRY: Attd.)	31/5/94	scale revision	[Signature] BY: D.O. (PRY: Attd.)			5/12/09	
13/3	BY: D.O. (PRY: Attd.)	30/11/94	A/jac.	[Signature] BY: D.O. (PRY: Attd.)			Diagram Account of Pay 14/09 to 30/11/09 for Annual increment for un-traind period amounting to Rs 10194/- + pay 43 = 8075/- PM allowed w.e.f. 1/12/09	
23/3	BY: D.O. (PRY: Attd.)	30/11/95	A/jac.	[Signature] BY: D.O. (PRY: Attd.)				
23/3	BY: D.O. (PRY: Attd.)	30/11/96	A/jac.	[Signature] BY: D.O. (PRY: Attd.)				
31/3	BY: D.O. (PRY: Attd.)	30/11/97	A/jac.	[Signature] BY: D.O. (PRY: Attd.)			District Comptroller of Accounts Abbottabad	
31/3	BY: D.O. (PRY: Attd.)	23/10/98	02-Adv. Doc: FA.	[Signature] BY: D.O. (PRY: Attd.)				
31/3	BY: D.O. (PRY: Attd.)	30/11/98	A/jac.	[Signature] BY: D.O. (PRY: Attd.)			Service Verified From the Acq. Roll/Other Official Record w.e.f. 1-12-08 to 30-11-09	
31/3	BY: D.O. (PRY: Attd.)	30/11/99	A/jac.	[Signature] BY: D.O. (PRY: Attd.)				
31/3	BY: D.O. (PRY: Attd.)	30/11/2000	A/jac.	[Signature] BY: D.O. (PRY: Attd.)			By D.O (F) Pry Edu. Abbottabad	
31/3	BY: D.O. (PRY: Attd.)	30/11/2001	A/jac.	[Signature] BY: D.O. (PRY: Attd.)			Services Verified from Acq Rolls and other records of This office w.e. from 1-12-09 To 31-11-2009	

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 designated head of the other officer in column
PTC GGRS Unit A/B/C	Temp: off		R=2533/Ann			07/12/2001	Stu B:4	
			R=2700/Ann			07/12/2001	Stu B:4	
			R=3900/Ann			07/12/2002	Stu B:3	
			R=4020/Ann			07/12/2003	Stu B:3	
Muhammad Liaqat Advocate			R=4140/Ann			07/12/2004	Stu B:4	
			R=4795/Ann			07/2/2005	Stu B:3	
			R=4935/Ann			07/12/2005	Stu B:4	
			R=5075/Ann			07/12/2006	Stu B:4	
			R=5800/Ann			07/2/2007	Stu B:4	
			R=5970/Ann			07/10/07	Stu B:4	
			R=6230/Ann			07/12/2007	Stu B:5	
			R=7455/Ann			07/2/2008	Stu B:5	
			R=7765/Ann			07/12/2008	Stu B:5	
			R=8075/Ann			07/12/2008	Stu B:5	

8	9	10	11	12	13		14	15
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
	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	Period	Government to which debitable	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.
B-4	DY: D.O (F) PRY: Atd.	07/11/2001	scale revision	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/11/2002	Applc.	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/11/2003	Applc.	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/11/2004	Applc.	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/6/2005	scale revision	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/11/2005	Applc.	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/11/2006	Applc.	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/6/2007	scale revision	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/9/2007	scale up-grade	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/11/07	Applc.	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/6/2009	scale revision	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/4/08	Applc.	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/1/2009	Applc.	B-4 DY: D.O (F) PRY: Atd.				
B-4	DY: D.O (F) PRY: Atd.	30/11/2010	Applc.	B-4 DY: D.O (F) PRY: Atd.				

Attest
Muhammad Liaqat
Advocate

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 designated head of the other officer in a column
Muhammad Liaqat Advocate			Rs. 8385/-			1-12-2010	[Signature]	[Signature]
			BPS No. 12 (7000-500-22000)					
			13500/-			1-7-11	[Signature]	[Signature]
			14000/-			1-12-2011	[Signature]	[Signature]
			14500/-			1-12-2012	[Signature]	[Signature]
<p>2009</p> <p>OFFICE OF THE ACCOUNTANT GENERAL NWFP, PESHAWAR</p> <p>Pay Verified in the Adjustment B.P.S. 2008 In Light of the Govt. of N.W.F.P. Finance Department Notification No. F.D. (PRC) 5-2/2002, Dated 30-3-2009 with No. Annex upto 30-3-2009</p> <p>Pay Scale of Rs. 5553/- 13600/- (1-4-2009)</p> <p>Pay Verified Rs. 7765/- W.E.F. 1-4-2009 with Next Increment on 1-12-2009</p> <p>Manzoor 19-7-01/ Account Officer Pay Fixation Party NWFP, Peshawar</p>			<p>Basic Pay Scale 2011</p> <p>of The Accountant General</p> <p>Khyber Pakhtun Khawa Peshawar</p> <p>Pay Fixed in R.B.R.S. 2011</p> <p>of Rs. 7000 - 500 - 22000</p> <p>At Rs. 13500/- P.M.W.F.F.</p> <p>With Next Increment on</p> <p>Manzoor 12/7/11 Account Officer Pay Fixation Party K. Pakhtun Khawa Peshawar</p>			<p>1-07-2011</p> <p>1-12-2011</p>		
<p>UT</p> <p>7765/12</p>			<p>BPS No. 15 (8500-700-29500)</p> <p>14800 + 700</p> <p>Rs 15500/- PM</p> <p>Rs 16200/- PM</p>			<p>10-13</p> <p>1-13</p>		

8	9	10	11	12	13		14	15	
					Leave				
Signature of Government servant	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	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	Government to which debitable		
	<i>[Signature]</i> D.Y.O. (F) PRY. Aid			<i>[Signature]</i> D.Y.O. (F) PRY. Aid				<i>[Signature]</i> Muhammad Liaqat Advocate	
	<i>[Signature]</i> D.Y.O. (F) PRY. Aid	30-6-11	S/R	<i>[Signature]</i> D.Y.O. (F) PRY. Aid				<i>[Signature]</i> By District Officer Female Pr. Aid.	
	<i>[Signature]</i> D.Y.O. (F) PRY. Aid	30-11-2011	A/R	<i>[Signature]</i> D.Y.O. (F) PRY. Aid					
	<i>[Signature]</i> By District Officer Female Pr. Aid	30-11-12	A/R	<i>[Signature]</i> S.D.E.O. (F) Abbottabad				<p>Granted Medical leave on full pay w.e.f 11/4/2012 to 10/5/12 (30 days) and Earned leave w.e.f 18/5/12 to 01/6/2012 (15 days) on full pay.</p> <p>End No: 12329</p> <p>Date 4/7/2012</p>	
	<i>[Signature]</i> S.D.E.O. (F) Abbottabad	3-7-2013	Promoted BPS 15	<i>[Signature]</i> S.D.E.O. (F) Abbottabad					
<p>NOTIFICATION</p> <p>Promoted PST to SPSHT BPS-15 vide DEO (F) Endst No. 1261-67/EB/PST Dated 02-03-2013 at S. No. 195 G.G.P.S. Tehsil Abbottabad took over charge our 10-03-2013</p>									
				<i>[Signature]</i> Sub: Divisional Education Officer (F) Abbottabad				<i>[Signature]</i> D.Y.O. (F) PRY. Aid	
	<i>[Signature]</i> S.D.E.O. (F) Abbottabad	30-11-2013	A/R	<i>[Signature]</i> S.D.E.O. (F) Abbottabad				<i>[Signature]</i> S.D.E.O. (F) Abbottabad	
	<i>[Signature]</i> S.D.E.O. (F) Abbottabad							<i>[Signature]</i> S.D.E.O. (F) Abbottabad	
								<i>[Signature]</i> S.D.E.O. (F) Abbottabad	

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 designated head of the office or other officer in charge of column
<p>Entries revised due to allow premature increment vide Govt of KPK Finance Deptt No. FD/SOSRI/2-123/2014 Dated 30-5-2014</p>								
(3630-260-11430)		6230P260 = B = 6490/- PM.				01-12-07	<u>Sub</u>	
(4355-310-14855)			B = 7765/-	B = 8075/-		01-7-08		
(7000-500-22000)			B = 8385/-	B = 8695/-		01-12-08	<u>Sub</u>	
(8500-700-29500)		15500 + 700 = B = 16200/- PM.	B = 14000/- ✓	B = 14500/- ✓		01-12-09		
Muhammad Liaqat Advocate			B = 15000/- ✓			01-12-10		
	12					10-3-13	<u>Sub</u>	
	14000/11		B = 16900/- ✓	B = 17600/- ✓		01-12-13	<u>Sub</u>	
	15					01-12-14		
	22750/15					1 7/2015	<u>Sub</u>	

Sub-Divisional Education Officer, Peshawar

Office of the Accountant General
 181/Box Pakhtun Khwa Peshawar
 Pay Fixed in the Revised Basic Pay Scales
 Adj. 7000 500 22000 12
 Pay Fixed @ Rs 14000/- w.e. 01-07-2013
 R.O. Rs 985 900 38500 15
 Pay Fixed @ Rs 22750/- w.e. 01-07-2015
 Date of Next Increment is on 01-12-2015

Accounts Officer
 Pay Fixation Party
 Peshawar

Rs 23655/-

Rs 29127/-

12/15

1/16

Approved
 Muhammad Usman
 Advocate

Signature of Government Servant	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 debitable to another Government			
					Period			Government to which debitable
<p>Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8</p>	<p>Date of termination of appointment</p>	<p>Reason of termination (such as promotion, transfer, dismissal, etc).</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Nature and duration of leave taken</p>	<p>Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Reference to any recorded punishment or censure, or reward or praise of the Government Servant.</p>	
<p>Sub Divisional Education Officer (F) Abbottabad</p>	<p>30/11/15</p>	<p>Spine</p>	<p>Sub Divisional Education Officer (F) Abbottabad</p>	<p>Period</p>	<p>Government to which debitable</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Reference to any recorded punishment or censure, or reward or praise of the Government Servant.</p>	
<p>Sub Divisional Education Officer (F) Abbottabad</p>	<p>30/11/15</p>	<p>Spine</p>	<p>Sub Divisional Education Officer (F) Abbottabad</p>	<p>Period</p>	<p>Government to which debitable</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Reference to any recorded punishment or censure, or reward or praise of the Government Servant.</p>	
<p>Sub Divisional Education Officer (F) Abbottabad</p>	<p>30/11/15</p>	<p>Spine</p>	<p>Sub Divisional Education Officer (F) Abbottabad</p>	<p>Period</p>	<p>Government to which debitable</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Reference to any recorded punishment or censure, or reward or praise of the Government Servant.</p>	

Growth of earned leave w.e.f 16/9/16 to 25/9/2016 (10 days) output pay vide D.E.O (F) ATD Enrol NO-6837-38 Dated 17/10/16

114
 9.114
 Drawn arrear of Pay + Allowances w.e.f 16/9/16 to 31/12/16
 due to allowed B.P. amounting to Rs. = 14817/-
 DAG
 ATD
 17/11/2016

5648
 18/11/2014

Pay active @ Rs 16200/- w.e.f 1/11/14 and drawn pay w.e.f 5/15 to 31/10/14 Rs 194112/-
 District Account Officer
 Abbottabad

T.No/S.No 241 Date 9/12/14
 Drawn Arrear of Pay + Allowances w.e.f 1/4/14 to 31/12/14 amounting to Rs. 6950/-
 Due to Placed premature increment and B.P. @ 17000/-

D.E.O (F) ATD

Sanction to the point of C.P.F. ad Adm account to Rs. 25000/- Refundable Basis vide D.E.O (F) ATD No-2303-4 dated 3/8/2017

Sub Divisional Education Officer (F) Abbottabad

(For use in Police and other similar Departments).

RECORD OF POSTINGS.



District and post	No. of District Order	Date	District and post	No of District Order	Date
<p><i>See on</i> <i>next newly</i> <i>S. Book</i> <i>attached</i></p>					
	<i>Ry 303107</i>			<i>12</i> <i>16</i>	

26

(For use in Police and other similar Departments).

RECORD OF POSTINGS.

District and post	No. of District Order	Date	District and post	No of District Order	Date
			<p>Drawn Rs=250000/- @=10000/-Pm Duro 55 04-04-17</p> <p>04-04-17</p> <p>AD</p>	<p>24-15 25-16</p> <p>Service Verified From 01-12-2013 to 30-11-2015 from Acq: Rolls and other record of this office.</p> <p>S.D.E.O. (F) Abbottabad</p> <p>Granted ex-Servicemen leaves for 22 days on full pay under Sec (P) A Tel Bndst=No-5784-85 Dated=29/8/17</p>	
				<p>Service Verified From 01-12-2014 to 30-11-2015 from Acq: Rolls and other record of this office.</p> <p>Sub Divisional Education Officer (F) Abbottabad</p>	
				<p>Service Verified From 01-12-2016 to 30-11-2017 from Acq: Rolls and other record of this office.</p> <p>S.D.E.O. (F) Abbottabad</p>	
				<p>Service Verified from 01-12-2015 to 30-11-2016 from Acq: Rolls and other record of this office.</p> <p>Sub Divisional Education Officer (F) Abbottabad</p>	

(For use in Police and other similar Departments).

RECORD OF POSTINGS.

District and post	No. of District Order	Date	District and post	No of District Order	Date

(For use in Police Department only)

A.H. 1428
Muhammad Liaqat
Private

Note: Iner 9 and

rs:

27

Name

Race:

Resid

ification Roll No..

dated

received back

4. Fath

Left Thumb Impression

5. Date near

6. Exa

Qualification	Date	Qualification	Date
English		First Arts	
Shikho		B.L. Or B.A.	
adu		Pleadership examination	
an-drawing		Training School Final examination	
nger Print		Other qualification:	
trill Instructing			
court Duties			
eserve Duties			

Port

N.B. Line to be drawn under the qualification possessed.

3 *Next V*

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

M. A. S.
M. A. S.
M. A. S.
M. A. S.
M. A. S.

(28)

1. Name: *Shekela Bibi*

2. Race:

3. Residence:

4. Father's name and residence:

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

6. Exact height by measurement:

7. Personal marks for identification:

8. Left hand thumb and finger impression of (Non-Commuted) officer:

Little Finger



Ring Finger



Middle Finger



Fore Finger



Thumb



9. Signature of Government Servant:



Shekela

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

1	2	3	4	5	6	7	8
Name of Post	Substantive Whether substan- tive of officiating And whether permanent or temporary	Officially stated in substantive appointment (If) Whether service counts for pension Under Art. 37 of C.S.	Pay in substantive post	Additional pay for officiating	Other allowance falling under the term 'pay'	Date of Appointment	Signature of Government Authority
S.A.S Said			Rs 3030/-			12 1/77	[Signature]
161210-1330-36020			Rs 36020/-			7 1/77	[Signature]
			Rs 37400/-			12 1/77	[Signature]
Muhammad Liaqat Advocate							[Signature]

0	10	11	12	13		14	15
				LEAVE			
Name of the holder of the office	Date of termination or expiration of appointment	Reason of termination (such as promotion, transfer, raised, etc)	Signature of the head of the office or other assisting officer	Name and designation of leave taker	A portion of the name of leave taker to be written on or leave salary deposited to another Government	Signature of the head of the office or other assisting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Period	Government to which transferred		
S.D.E.O (F) Abbottabad	30/7/81	SJR	S.D.E.O (F) Abbottabad				
S.D.E.O (F) Abbottabad	30/11/81	A/uc	S.D.E.O (F) Abbottabad			Service Verified From 01-11-2016 to 30-11-2017	Post Acq. Staffs and other record of this office.
S.D.E.O (F) Abbottabad			S.D.E.O (F) Abbottabad				S.D.E.O (F) Abbottabad
S.D.E.O (F) Abbottabad						Ali Ahmad	
						Mulla Muhammad Iqbal Ahmad	

1	2	3	4	5	6	7	
Name of Post	Substantive Whether substan- tive of 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 Governor
B. 9302							
Muhammad Liaqat Advocate							

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Annex "B"

9	10	11	12	13		14	15	
				Leave				
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	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	Government to which debitable		
<p>Signature of Dy. S.O. (F) PRY. Aid</p>					Service Verified From the Acq. Roll/Other Official Record w.e.f. 12-2010 to 30-11-2011			
<p>Signature of Dy. S.O. (F) PRY. Aid</p>	30-6-11	S/R	Signature of Dy. S.O. (F) PRY. Aid					
<p>Signature of Dy. S.O. (F) PRY. Aid</p>	30-11-2011	A/W	Signature of Dy. S.O. (F) PRY. Aid				By District Officer, Female Prv. Aid: <i>[Signature]</i>	
<p>Signature of Dy. S.O. (F) PRY. Aid</p>	30-11-12	A/W	S.D.E.O. (F) Abbottabad				<i>[Signature]</i>	Muhammed Liaqat Advocate
<p>Signature of S.D. (F) Abbottabad</p>	9-3-2013	Personal BPS 15	S.D. (F) Abbottabad		<p>Granted medical leave on full pay w.e.f. 11/4/2012 to 10/5/12 (30 days) and earned leave w.e.f. 18/5/12 to 01/6/2012 (15 days) on full pay.</p> <p>End No: 12329</p> <p>Date 4/7/2012</p>			
<p>NOTIFICATION Promoted PST to SPSHT BPS-15 vide DEO (F) Endst No.1261-67/EB/PST Dated 02-03-2013 at S No. 195 G.P.S Tehsil Abbottabad took over charge our. 10-03-2013 took over Charge our</p>								
			Sub: Divisional Education Officer (F) Abbottabad					
<p>Signature of S.D.E.O. (F) Abbottabad</p>	30-11-2013	A/W	S.D.E.O. (F) Abbottabad		Service Verified From the Acq. Roll & Other Official Record w.e.f. 12-11 to 30-11-2012			
<p>Signature of S.D.E.O. (F) Abbottabad</p>					Service Verified From the Acq. Roll & Other Official Record w.e.f. 12-13 to 30-11-2013			

Shakeela dated 14-5-2013

30

10

DISTRICT EDUCATION OFFICER (F) ABBOTTABAD.

The following adjustment of PSHT BPS-15 is hereby made in the interest of with immediate effect.

Annex 2

No.	Name of Teacher	Present School	Posting school	Remarks
576	Shakeela Bibi, PSHT	GGPS Toheed Abad	GGPS Mangal	Being senior
656	Syeda Zahida, PSHT	GGPS Kali Dar	GGPS Kholy Mangal	V/S.No.3 Being Senior
3	1026 Shabnam Farooq, PSHT	GGPS Kholy Mangal	GGPS Kali Dar	V/S.No.2 H. S. Tal

Note: Charge report should be submitted to all concerned.

Muhammad Liaqat
Advocate

DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD.

Endst: No. 2223-25/BB/PSHT Dated 14/5/2013.

Copy to the:

1. Sub Divisional Education Officer (F) Abbottabad.
2. District Accounts officer Abbottabad.
3. ADOs Concerned Circle.

DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD.

28 رجسٹر حاضری مدرسین گورنمنٹ گریڈ پرائمری سکول مانگل

ابتداء نومبر 2013
 عینہ بی بی، مختار بیگم، شکرہ بی بی، موسم ایاز

تاریخ	ادب	مختار بیگم	شکرہ بی بی	موسم ایاز	عینہ بی بی
1	P	P	S.B	M.B	C Leave
2	P	P	S.B	M.B	M.B
3	P	P	C	M.B	M.B
4	P	P	S.B	M.B	M.B
5	P	P	S.B	M.B	M.B
6	SUN	D	SUN	D	SUN
7	P	P	S.B	M.B	M.B
8	P	P	S.B	M.B	M.B
9	P	P	S.B	M.B	M.B
10	P	P	C	M.B	M.B
11	P	P	S.B	M.B	M.B
12	P	P	S.B	M.B	M.B
13	SUN	D	SUN	D	SUN
14	P	P	C	M.B	M.B
15	On Meeting				
16	P	P	S.B	M.B	M.B
17	SUN	D	SUN	D	SUN
18	P	P	S.B	M.B	M.B
19	P	P	S.B	M.B	M.B
20	SUN	D	SUN	D	SUN
21	P	P	S.B	M.B	M.B
22	P	P	S.B	M.B	M.B
23	P	P	S.B	M.B	M.B
24	P	P	S.B	M.B	M.B
25	P	P	S.B	M.B	M.B
26	SUN	D	SUN	D	SUN
27	P	P	S.B	M.B	M.B
28	P	P	S.B	M.B	M.B
29	P	P	S.B	M.B	M.B
30	P	P	S.B	M.B	M.B
31	P	P	S.B	M.B	M.B

حرف	حال	سابقہ	بیزان	حال	سابقہ	بیزان	حال	سابقہ	بیزان
1	01	03	04	03	09	12	03	10	13

Head Teacher
 P. Primary Schoc
 Mangul ATD

34 رجسٹر حاضری مدرسین گورنمنٹ گریڈ پرائمری سکول مانگل

ابتداء نومبر 2013
 عینہ بی بی، مختار بیگم، شکرہ بی بی، موسم ایاز

تاریخ	ادب	مختار بیگم	شکرہ بی بی	موسم ایاز	عینہ بی بی
1	P	P	S.B	M.B	C Leave
2	P	P	S.B	M.B	M.B
3	SUN	D	SUN	D	SUN
4	P	P	S.B	M.B	M.B
5	P	P	S.B	M.B	M.B
6	SUN	D	SUN	D	SUN
7	P	P	S.B	M.B	M.B
8	P	P	S.B	M.B	M.B
9	P	P	S.B	M.B	M.B
10	SUN	D	SUN	D	SUN
11	P	P	S.B	M.B	M.B
12	P	P	S.B	M.B	M.B
13	P	P	C	M.B	M.B
14	On Meeting				
15	P	P	S.B	M.B	M.B
16	SUN	D	SUN	D	SUN
17	P	P	S.B	M.B	M.B
18	P	P	S.B	M.B	M.B
19	P	P	S.B	M.B	M.B
20	P	P	S.B	M.B	M.B
21	P	P	S.B	M.B	M.B
22	P	P	S.B	M.B	M.B
23	P	P	S.B	M.B	M.B
24	SUN	D	SUN	D	SUN
25	P	P	S.B	M.B	M.B
26	P	P	S.B	M.B	M.B
27	P	P	S.B	M.B	M.B
28	P	P	S.B	M.B	M.B
29	P	P	S.B	M.B	M.B
30	P	P	S.B	M.B	M.B
31	P	P	S.B	M.B	M.B

حرف	حال	سابقہ	بیزان	حال	سابقہ	بیزان	حال	سابقہ	بیزان
1	01	03	04	03	04	05	04	04	05

Head Teacher
 P. Primary Schoc
 Mangul ATD

Ahesal
 Muhammad Liaqat
 At. U. 618

36 رجسٹر حاضری مدرسین گورنمنٹ پرائمری سکول لاہور

عینہ بی بی	مختار بیگم	موسم ایاز
PSHT	PST	P.S.H.T

تاریخ	صبح	دوپہ	شب	تاریخ	صبح	دوپہ	شب
1	SUN	DAY	SUN	1	SUN	DAY	SUN
2	P	P	S.B	2	P	P	S.B
3	P	P	S.B	3	P	P	S.B
4	P	P	S.B	4	P	P	S.B
5	P	P	S.B	5	P	P	S.B
6	P	P	S.B	6	P	P	S.B
7	P	P	S.B	7	P	P	S.B
8	P	P	S.B	8	P	P	S.B
9	SUN	DAY	SUN	9	SUN	DAY	SUN
10	P	P	S.B	10	P	P	S.B
11	P	P	S.B	11	P	P	S.B
12	P	P	C Leave	12	P	P	C Leave
13	P	P	S.B	13	P	P	S.B
14	P	P	L Leave	14	P	P	L Leave
15	P	P	S.B	15	P	P	S.B
16	SUN	DAY	SUN	16	SUN	DAY	SUN
17	P	P	S.B	17	P	P	S.B
18	P	P	S.B	18	P	P	S.B
19	P	P	S.B	19	P	P	S.B
20	P	P	S.B	20	P	P	S.B
21	P	P	S.B	21	P	P	S.B
22	P	P	S.B	22	P	P	S.B
23	SUN	DAY	SUN	23	SUN	DAY	SUN
24	P	P	C Leave	24	P	P	C Leave
25	P	P	S.B	25	P	P	S.B
26	P	P	S.B	26	P	P	S.B
27	P	P	S.B	27	P	P	S.B
28	P	P	S.B	28	P	P	S.B
29	P	P	C Leave	29	P	P	C Leave
30	SUN	DAY	SUN	30	SUN	DAY	SUN
31	P	P	S.B	31	P	P	S.B

حالت	حالت	حالت	حالت	حالت	حالت	حالت	حالت
0	0	0	18	15	03	14	16

Hand Teacher
GG Primary Sch

Attested
Muhammad Liaqat
Advocate

36 رجسٹر حاضری مدرسین گورنمنٹ پرائمری سکول لاہور

عینہ بی بی	مختار بیگم	موسم ایاز
PSHT	PST	P.S.H.T

تاریخ	صبح	دوپہ	شب	تاریخ	صبح	دوپہ	شب
1	SUN	DAY	SUN	1	SUN	DAY	SUN
2	P	P	S.B	2	P	P	S.B
3	P	P	S.B	3	P	P	S.B
4	P	P	C Leave	4	P	P	C Leave
5	P	P	C Leave	5	P	P	C Leave
6	P	P	S.B	6	P	P	S.B
7	P	P	S.B	7	P	P	S.B
8	P	P	S.B	8	P	P	S.B
9	SUN	DAY	SUN	9	SUN	DAY	SUN
10	P	P	S.B	10	P	P	S.B
11	P	P	S.B	11	P	P	S.B
12	P	P	S.B	12	P	P	S.B
13	P	P	S.B	13	P	P	S.B
14	P	P	S.B	14	P	P	S.B
15	SUN	DAY	SUN	15	SUN	DAY	SUN
16	P	P	S.B	16	P	P	S.B
17	P	P	S.B	17	P	P	S.B
18	P	P	S.B	18	P	P	S.B
19	P	P	C Leave	19	P	P	C Leave
20	P	P	S.B	20	P	P	S.B
21	P	P	S.B	21	P	P	S.B
22	P	P	S.B	22	P	P	S.B
23	SUN	DAY	SUN	23	SUN	DAY	SUN
24	P	P	S.B	24	P	P	S.B
25	P	P	S.B	25	P	P	S.B
26	P	P	S.B	26	P	P	S.B
27	P	P	S.B	27	P	P	S.B
28	P	P	S.B	28	P	P	S.B
29	P	P	S.B	29	P	P	S.B
30	SUN	DAY	SUN	30	SUN	DAY	SUN
31	P	P	S.B	31	P	P	S.B

حالت	حالت	حالت	حالت	حالت	حالت	حالت	حالت
0	0	0	18	15	03	14	16

Hand Teacher
GG Primary Sch

رجسٹر حاضری مدرسین گورنمنٹ پرائمری اسکول ماٹیل

ابتداء 2014ء
 قنبرہ کی
 قنبرہ کی
 قنبرہ کی

روز	تاریخ	وقت	حاضر	غائب	بیمار	سزا	نوٹس	ملاحظات
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حاضر	غائب	بیمار	سزا	نوٹس	ملاحظات
08	04	04	0	0	0
Head Teacher GO Primary School Matil					

رجسٹر حاضری مدرسین گورنمنٹ پرائمری اسکول ماٹیل

ابتداء 2014ء
 قنبرہ کی
 قنبرہ کی
 قنبرہ کی

روز	تاریخ	وقت	حاضر	غائب	بیمار	سزا	نوٹس	ملاحظات
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حاضر	غائب	بیمار	سزا	نوٹس	ملاحظات
08	04	04	0	0	0
Head Teacher GO Primary School Matil					

Attested
 Muz
 Muhammad Liaqat
 Aurulab

31/1/14
 Head Teacher
 GO Primary School
 Matil

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (F) A.ABAD.

No. 542 /

Dated 08/06/2013.

38-A

Annex E

To

The District Education Officer
(Female) Abbottabad.

Subject:

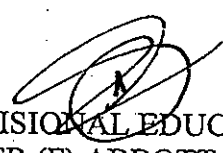
WITH DRAWL OF REFUSAL/ ADJUSTMENT.

Ali Adil
Muhammad Liaqat
Advocate

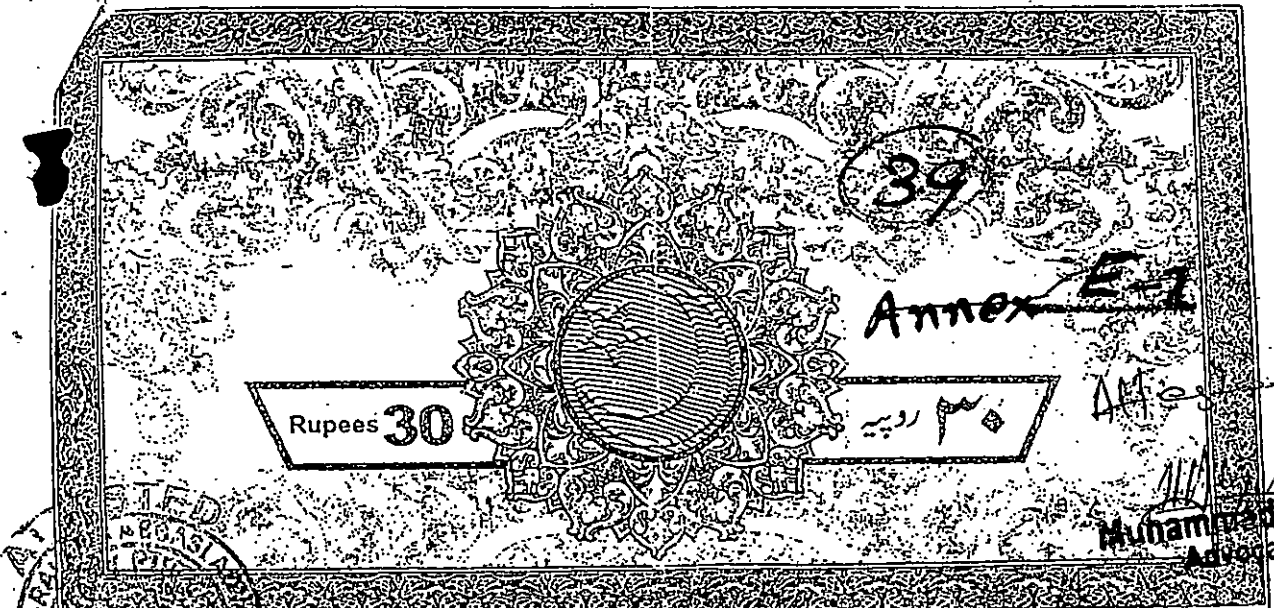
Memo:

Enclosed please find herewith an application and affidavit in original from Mst: Aneza Bibi, PSHT GGPS Mangal which is self explanatory that she may be retained in same school in BPS-15 against PSHT and her previous refusal for up gradation to BPS-15 may be treated as null and void.

Submitted for further necessary action please.



SUB DIVISIONAL EDUCATION
OFFICER (F) ABBOTTABAD



یک وقت اسٹاٹس کا یعنی = 30 روپے " بیان حلفی "

فدہ سعادت عزیزہ بی بی و خدیجہ محمد دین زویہ جاوید اجال سکول بچی ٹوٹ
 ڈیوٹ فائلنگ درازہ قریب ضلع ایبٹ آباد جال P.T.C پتہ ڈیوٹ فائلنگ درازہ ایبٹ
 سکول فائلنگ کی بیوی حلقہ ایبٹ آباد کہ من حلقہ نے قبل از میں ایک بیان
 حلفی تحریر 27/4/2013 دیا تھا جس میں کو حلقہ واپس لے کر نئی بیان حلفی 7/7
 تحریر کر کے دے رکھی ہو گی کہ " من حلقہ کو جس گریڈ میں promote کیا
 گیا ہے اور جہاں آ رہی ہو گی " من حلقہ اس آرڈر
 اور promotion کے تحت ص G.G.P سکول فائلنگ
 میں ص رہی ہو گی نہ گریڈ اور ص نام لے گا
 لکھنا ایبٹ حلفی سند آ کر ہے اور بقیہ بیان
 حلفی تحریر 27/4/2013 سندھ واپس لے گا ۔

01-06-2013

سعادت عزیزہ بی بی حلقہ ایبٹ P.T.C پتہ فائلنگ ایبٹ آباد

Name: MUHAMMAD NAZIR
 Registration & Fee Dated: 30-05-2001
 Nature of Practice: Pleader/Writer Grade 2nd
 Place of Practice: Abbottabad
 Date: 27/4/13
 Cost so far: Rs. 0/-
 Signature: [Signature]

Station	Havelian	GGPS, Tatraela	Nathia
ALLI	Havelian	GGPS Pulkote	
	Havelian		

(19) (40)

Annex

All of al
Muhammad Liaqat
Advocate

Annex F

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) ABBOTTABAD.

ADJUSTMENT.

As approved by the competent authority the following PSHT female, are hereby adjusted in the schools noted against their names in their own Pay & Grade in the interest of public service with immediate effect.

<u>S.No.</u>	<u>Name of Teacher / School</u>	<u>School where adjusted</u>	<u>Remarks.</u>
1.	Aneeza Bibi, PSHT GGPS Mangal ATD	GGPS Mangal	Post already occupied.
2.	Shakila Bibi, PSHT GGPS Mangal	GGPS Toheed Abad	Ag: V.Post

DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD.

Dated 07/10/2013.

Endstt: No. 1296-99 /Adj::/PSHT

Copy to the:

1. District Education Officer (F) Abbottabad.
2. ADQs Circle.
3. Head Teacher concerned Schools.
4. Official Concerned.

SUB DIVISIONAL EDUCATION
OFFICER (F) ABBOTTABAD.

Muhammad Sarwar
Advocate High Court
Abbottabad

اعدالت صائب سنیر سکول چی جھاب ایب آباد

حاجہ شکیلہ بی بی زومہ ٹیچر سیکول حال گورنمنٹ گریڈ پرائمری سکول حائل
ایب آباد

Attest
Muhammad Liaqat
Advocate

تہام

- 1 ڈسٹرکٹ ایجوکیشن آفیسر زمانہ ایب آباد
- 2 سب ڈیوٹی ٹریل ایجوکیشن آفیسر زمانہ ایب آباد
- 3 ڈسٹرکٹ ایجوکیشن آفیسر ایب آباد
- 4 پیڈسٹرس گورنمنٹ گریڈ پرائمری سکول حائل
- 5 اینزوی پی PSH گورنمنٹ گریڈ پرائمری سکول حائل

دعویٰ میراد صدور ڈگری حکیم انیسامی دینی پیر خدن مد علیہ
 کہ وہ ہوا نام بہار آرڈر نمبر 99-1296 حورہ 7¹⁵ کی
 2013
 آج سے مدعیہ کو گورنمنٹ گریڈ پرائمری سکول تحصیلہ آباد کا چارج
 لینے اور مدعیہ کی موجودہ سکول سے حائل کرنے اور
 دہلی کی لکے سے حائل کرنے اور مدعیہ کے فرائض انجام دینی میں
 حاضرت کرنے اور مدعیہ پر کسی کو زبردستی چارج دلوانے اور
 مدعیہ کی تنخواہ بند کرنے یا کٹوانے سے اور مدعیہ کا

کا غیر قانونی آرڈر ممنوع ہونے تک کوئی بھی ایجنسی
انڈیم بورڈ مدعیہ کے حقوق پر اثر انداز ہو۔ علی الترتیب
بازر ممنوع رہیں

Ati add
Muhammad Lia
Advocate

ماتہ یوسف اور بی بی فیض
ماتہ یوسف اور بی بی فیض
2007/2008

پارہ 1 - درج ذیل طرح ہے

1۔ پیکر مدعیہ کے ایجنٹ سے بطور PTC اور گدہ پروویس
PST/IT ٹیپر ملنے سے اور 22 جولائی سے اپنے رائلٹی
انجام دے رہی ہے اور حال گورنمنٹ ٹریڈنگ ایجنسی کے
ماتل سے کھینچا ہے۔ تاہم حافی شہزاد کف دہری سے

2۔ یہ کہ صوفیہ 145 کو مدعیہ کو 15 PPS دیکر گورنمنٹ
ٹریڈنگ ایجنسی کے ذریعہ آگیا ہے اور گورنمنٹ ٹریڈنگ ایجنسی کے ماتل
سے تبدیل کیا گیا تھا۔ تاہم اس سفر آرڈر کف ہے

3۔ یہ کہ عین 4 ماہ قبل مدعیہ کو دوبارہ نذر لے
غیر قانونی ٹریڈنگ ایجنسی 98-99 صوفیہ 1296
7 10/13

غیر قانونی آرڈر منسوخ ہونے تک کوئی بھی ایک
تادمہ جو کہ مدعیہ کے حقوق پر اثر انداز ہو، علی الاطلاق
باز و ممنوع رہیں

Ati add
Muhammad Lia
Advocate

ماترہ تفصیلاً درج ذیل میں
ماترہ تفصیلاً درج ذیل میں
200/- روپے
2007 روپے

پارہ 3 - دعوئی ذیل میں ہے

- 1۔ بہر مدعیہ محمد ایجوکیشن سینٹر بطور P.T.C اور گد پیر پورس
P.S.H.T ٹیچر ملزم ہے اور 22 جولائی سے اسے رخصت
انجام دیا گیا ہے اور حال گورنمنٹ گریڈ پرائمری سکول
ماترہ سے کھینچا گیا ہے۔ تاہم حافی صاحبہ نے دعویٰ ہے
- 2۔ یہ کہ مدعیہ 14⁵ 2013 کو مدعیہ کو B.P.S. 15 دیکر گورنمنٹ
گریڈ پرائمری سکول کو حصہ آباد سے گورنمنٹ پرائمری سکول ماترہ
سے تبدیل کیا گیا تھا اور 4 ماہ پرائمری گورنمنٹ دور لے رہی ہے
- 3۔ یہ کہ عین 4 ماہ گد مدعیہ کو دوبارہ بذریعہ
غیر قانونی آرڈر 98-99 1296 صورت 7
10
13

کہ دوبارہ لمفویڈ بار سکول سے ڈرائنگ کر دیا گیا ہے

Attest
Muhammad Liaqat
Advocate

لمفویڈ آبار سکول عدویہ کو 30 کلو میٹر دور کرنا ہے

اور پے کھی hilly ایریا میں عدویہ کر دینا کرنا ہے

اور دوبارہ اسی ٹریک میں تعمیرات کرنا اور یہ 3/4 ماہ

کے بعد ڈرائنگ کرنا - اور تبدیلی پر Ban موقوف

کا باوجود بار بار تبدیل کرنا غیر قانونی اور غیر لینی اختیارات

کے ناجائز استعمال ہے جو عدویہ کے حقوق کو کالعدم کر دیتا ہے۔

4۔ یہ کہ عدویہ کو پے سے ا/c سے out of رکھا گیا ہے

جو کہ محکمہ کی پالیسی کے متعارف ہے اس کے باوجود

عدویہ کے فیصلے کو انجام دیا گیا ہے۔

5۔ یہ کہ رعایہ نے اس کے ابتدائی ڈرائنگ والی ڈرائنگ کو

لے لیا اور اس کے استعمال کے عدویہ کو بدنام کیا اور

تبدیل کرنے کی خاطر آٹا اور ڈرائنگ کر دیا اور اس سے

رعایہ نے بھی ساری ڈرائنگ کے وقت سے سب سے

بیمار کا کوئی نہ کر اس طرح کے آرڈر ڈرائنگ میں

گھر جن کا سب سے تعلق ہے عدویہ کے 25 سالوں

والی ڈرائنگ کو لے لیا اور اس کے خلاف اس کی آواز

دے کر صرف ایک آواز کے دوسری نہ

16۔ برآمدہ عدلیہ کے بارے میں عدلیہ کے بارے میں کیا اور

تعمیرات ایسے ہی کیے گئے جو سیاسی لوگ دہشت گرد

Attested

Muhammad Liaqat
Advocate

کا نام ہے دفتر آجاتے ہیں جن کی رقم سے عدلیہ

نے نے عدلیہ کو دھوکے دیکر اپنے دفتر سے نکال دیا

اور ساتھ ہی عدلیہ کے بارے میں کو حکم دیکر عدلیہ کو

تجواز سے محروم کر دیا گیا تاکہ فاسف کرنے پر مجبور

ہو سکے ان حالتوں کی رقم سے دعویٰ عدا کی

مذمت آفرینی

7۔ برآمدہ ہمارے دعویٰ ملوث ادارے اور ہمارے حوالے

عدلیہ کے قلعے انفار سے اندر حدود عدلیہ ہذا میرا جو

حاصل ہوئی کہ عدلیہ ہذا کو امتیاز کا نام حاصل ہے

8۔ دعویٰ عدا اندر مندرجہ ہے۔

9۔ یہ کہ دعویٰ کو عدلیہ سے مستثنیٰ ہے

10۔ عدلیہ کے بارے میں دعویٰ عدلیہ کے بارے میں عدلیہ

محمد رتاد کی
ادویہ و دوا
کی بجائے

11۔ عدلیہ کے بارے میں عدلیہ کے بارے میں عدلیہ

17
16

برآمدہ عدلیہ کے بارے میں

محمد رتاد کی
ادویہ و دوا
کی بجائے

محمد رتاد کی
ادویہ و دوا
کی بجائے

کفالت صحت سیرتیل حج و عمرہ ایسے ایسے

شکریہ بی بی نیلم DEO. F. ایسے ایسے

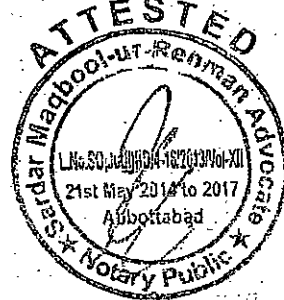
دعویٰ حکم استماعی بخیرہ

Attested

Muhammad Liaqat
Advocate

بیان صحتی

معاذ بیان جوں کہ جملہ سرنت دعویٰ
دست و پا جوں کہ کئی اور عیالیت خدا
سے حقیقی دیگر شہدوں نے ویسا کیا ہے اور
مجموعیہ سے دعویٰ ایسے بخیرہ کئی کئی دفع
عدالت سے زکریہ کو لیا ہے



17/7/14

کہہ بیان صحتی سیرتیل حج و عمرہ ایسے ایسے
17/7/14

شکریہ بی بی نیلم حال کفالت کفالت کفالت کفالت
ایسے ایسے

Muhammad Liaqat

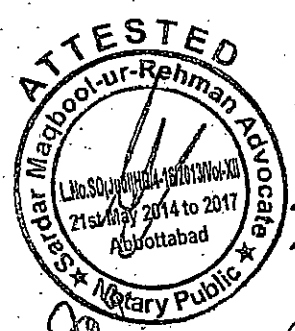
Attested
Muhammad Liaqat
Advocate

ہو گیا لکن میں نے اور حکم انسانی جاری
ہونے سے مدعا علیہم کو کوئی نقصان نہ ہے
اور مدعا کو ناممکن لکھی نقصان ہے
مقدمہ متوازن میں اگر حکم انسانی جاری نہ کیا گیا
تو مقدمہ کا مفصلہ ہی ختم ہو جاتا ہے۔

گنڈا استدعا صحیح منظور کی درخواست
ہو گیا حکم انسانی جاری فرمایا
17.7.14

سید علی علی صاحب کورٹ گنڈا لکھنؤ کالج قانصل ایبٹ آباد

لکھنؤ / بیان صحت



مدعا لکھنؤ میں جاری ہے کہ
مگر اس وقت درخواست درج
فرج ہو گیا کوئی بھی ادارہ
جو اس سے متعلق نہ لکھا گیا ہے
17.7

سید علی علی

کھلت صاب سیر کی حج صاب اپنا نام

شہید علی نام DEOF اپنا نام

Muhammad Liaqat
Advocates

دعویٰ حکم امتناعی

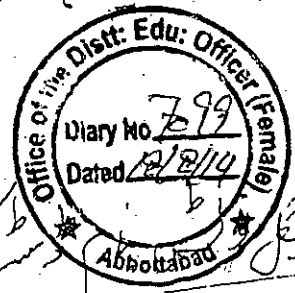
درخواست محمد صبح امتناعی عارضی پر صدف مدعا علیہ
تہ وہ مدعیہ کو نام بنیاد غیر قانونی آرڈر کی اور
یہ گورنمنٹ پرائمری گزٹنگ سکول مانسہرہ سے خارج صورت
اور حاضری لگانے کی کوئی گزٹنگ سے منع کرنے اور نتوان
بند کروانے اور مدعیہ کو زبردستی گورنمنٹ پرائمری
سکول کو صبح کو تھانہ کرنے سے اور کوئی
کسی ایسا حکم یا اقدام جو کہ مدعیہ کے حقوق کا گندہ
اثر انداز پر بار و منوع ہیں

صالح کی درخواست ذیل عرض ہے -

- 1 یہ کہ خدمت عنوان آج عدالت آنحضرت دالہ نامہ حج صبح
- 2 درخواست خدا کو دعویٰ کا لڑی ہو تصور خرابی دے
- 3 یہ کہ خدمت عنوان باری التکر میں کافی مضبوط
- 4 اور مدعیہ کہ گناہی کی واقعہ اس پر ہے
- 3 یہ کہ خدمت عنوان میں حکم امتناعی عارضی

Annex II

ط دسٹرکٹ کورٹس
ایبٹ آباد



ADOL
Mention the date
on the date
A

ط دسٹرکٹ ایجوکیشن آفیسر (زنانه) ایبٹ آباد

اسم علیکم! یہ کہ بحیثیت وکیل مسماہ شکیلہ کابی PHST متعینہ گورنمنٹ

گورنمنٹ پرائمری سکول مانگل ایبٹ آباد آپ کو درج ذیل قانونی نوٹس ارسال ہے۔

1۔ یہ کہ آپ کے دفتر سے میری موٹو کو بذریعہ آرڈر نمبر 99-1296 مورخ 7/10/13

کو GPS توجیہ آباد ایبٹ آباد میں سفر فرمایا گیا جو کہ خلاف قانون و ضابطہ
ہوئے گا بنا پر بذریعہ من وکیل مورخ 8/2014 کو بعد ضابطہ حاجی کاروائی کا ایک

عدر آئیٹل ڈائریکٹنگ جس کے ہمراہ ایک عدد درخواست لمبراد رسا جانے عملدرآمد
حکم مذکورہ کو دائر شہ ہے آمد آنجناب کو رسا بند بننے بنا یا جا چکے۔
دقتلہ درخواست لکھی

2۔ یہ کہ درخواست مذکورہ کی بابت درخواست پر Early Hearing کی درخواست

کوئی دیکھی آمد Case مورخ 5/14 کیلئے مقرر شدہ ہے۔ جس میں درخواست
مذکورہ کے details ہونے سے قری امکانات بطلان ضابطہ ہیں۔

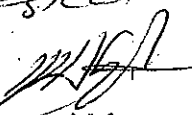
3۔ یہ کہ بعد وصولی نوٹس ہوا قانوناً آنجناب میری موٹو کو تاحصلہ درخواست

Parent نوٹس کا خارج ہوئے گا حکم جاری کرنے یا کسی بھی طرح میری
موٹو کو خارج ہوئے گا جو مجبور کرنے کی مجاز نہیں

لہذا آنجناب کو جناب کے وسیع تر قانونی مفاد میں اطلاع باور کیا جاتا ہے
کہ تاحصلہ درخواست میری موٹو کو زیر تراع حکم جو Competent فورم پر

زیر تراج ہے، عملدرآمد پر مجبور نہ کیا جائے بصورت دیگر میری
موٹو قانونی حق محفوظ رکھتا ہے کہ وہ عدالت مجاز سے رجوع کر کے دادرسی

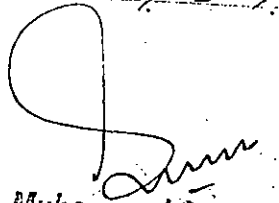
875 /

Attest

Muhammad Liaqat
Advocate

طلب کر جس کے جملہ فریم و عرصہ کی ذمہ داری آجباب کی ذمہ داری
خاص درپوشی کیونکہ غیر قانونی حکم کو سرکاری حیثیت میں کوئی کھنڈ
(Indemnity) -

شکریہ
المرتوم 8
18-2014

محمد سردار ایجوکیشن پرائیویٹ لٹریچر ڈپارٹمنٹ
DPA اسٹریٹ انار فون نمبر 2364041-0331


Muhammad Sarwar
Advocate (High Court)
Alhambra

نوٹ: ذیل میں ہر ایک کا پی ایچ ڈی دفتر میں برائے قانونی کارروائی منظور رکھی جا رہی ہے۔

Annex I

49

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

ADJUSTMENT

To dispose off the Court issue, Mst: Shakeela Bibi, GGPS, Tehed Abad is hereby adjusted at GGPS, Asia Abad vice Mst: Nighat Bibi PSMT is transferring to Rawal Pindi District, her own Pay & Grade/BPS in the interest of public service.

Due to the heavy enrolment in the school, Mst: Shakeela PSMT is hereby directed to work at GGPS, Asia Abad till the issuance of the Transfer Order from the Provincial Govt.

NOTE

1. No TA/DA/TC is allowed.
2. Charge report should be sent to all concerned.
3. This order will take place on 1-II-2014.

Samina Akter
 DISTRICT EDUCATION OFFICER (F)
 A B B O T T A B A D

Encl No. 6966-67 / Dated A/Abad, the 01/11/2014.
Copy to:-

1. The DAO, Abbottabad.
2. The SDEO (F) Abbottabad.

Ca
 DISTRICT EDUCATION OFFICER (F)
 A B B O T T A B A D

30/11/2014
1/11/2014
30/11/2014

(1)

رجسٹر حاضری مندورین

بابت ماہ: ایس پی این:

ردیف	نام	تاریخ	وقت آمد	وقت خروج	نوع غیبت	تفصیلات
1						
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Mubammad Liaqat
Advocate

(15)

بھاری	سابقہ	بھاری	بھاری

تفریق	بھاری	سابقہ	بھاری	بھاری	بھاری	بھاری	بھاری
انفارمیشن	3	0	1	3	0	1	3
تفصیلات							
بھاری							
بھاری							

دستخط بھاری

Accepted

(48) (51)

Muhammad Liaqat
Advocate

رجسٹر حاضری مندر آج

بابت ماہ

نام	تاریخ	وقت	حالت
پہلے	12-35	7:30	1
پہلے	12-35	7:30	2
Leave	12-35	7:30	3
پہلے	12-35	7:30	4
پہلے	12-35	7:30	5
پہلے	12-35	7:30	6
پہلے	12-35	7:30	7
پہلے	12-35	7:30	8
پہلے	12-35	7:30	9
Leave	12-35	7:30	10
پہلے	12-35	7:30	11
پہلے	12-35	7:30	12
پہلے	12-35	7:30	13
پہلے	12-35	7:30	14
پہلے	12-35	7:30	15
پہلے	12-35	7:30	16
پہلے	12-35	7:30	17
پہلے	12-35	7:30	18
پہلے	12-35	7:30	19
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پہلے	12-35	7:30	21
پہلے	12-35	7:30	22
پہلے	12-35	7:30	23
پہلے	12-35	7:30	24
پہلے	12-35	7:30	25
پہلے	12-35	7:30	26
پہلے	12-35	7:30	27
پہلے	12-35	7:30	28
پہلے	12-35	7:30	29
پہلے	12-35	7:30	30
پہلے	12-35	7:30	31

رجسٹر حاضری مندر آج

بابت ماہ

نام	تاریخ	وقت	حالت
پہلے	12-35	7:30	1
پہلے	12-35	7:30	2
Leave	12-35	7:30	3
پہلے	12-35	7:30	4
پہلے	12-35	7:30	5
پہلے	12-35	7:30	6
پہلے	12-35	7:30	7
پہلے	12-35	7:30	8
پہلے	12-35	7:30	9
Leave	12-35	7:30	10
پہلے	12-35	7:30	11
پہلے	12-35	7:30	12
پہلے	12-35	7:30	13
پہلے	12-35	7:30	14
پہلے	12-35	7:30	15
پہلے	12-35	7:30	16
پہلے	12-35	7:30	17
پہلے	12-35	7:30	18
پہلے	12-35	7:30	19
پہلے	12-35	7:30	20
پہلے	12-35	7:30	21
پہلے	12-35	7:30	22
پہلے	12-35	7:30	23
پہلے	12-35	7:30	24
پہلے	12-35	7:30	25
پہلے	12-35	7:30	26
پہلے	12-35	7:30	27
پہلے	12-35	7:30	28
پہلے	12-35	7:30	29
پہلے	12-35	7:30	30
پہلے	12-35	7:30	31

تفریق	مال	سابقہ	میزان	مال	سابقہ	میزان	مال	سابقہ	میزان	مال	سابقہ	میزان
1	0	1	3	1	2	3	0	3	7	3	4	12
0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0	0	0	0	0
1	0	1	3	1	2	3	0	3	7	3	4	12

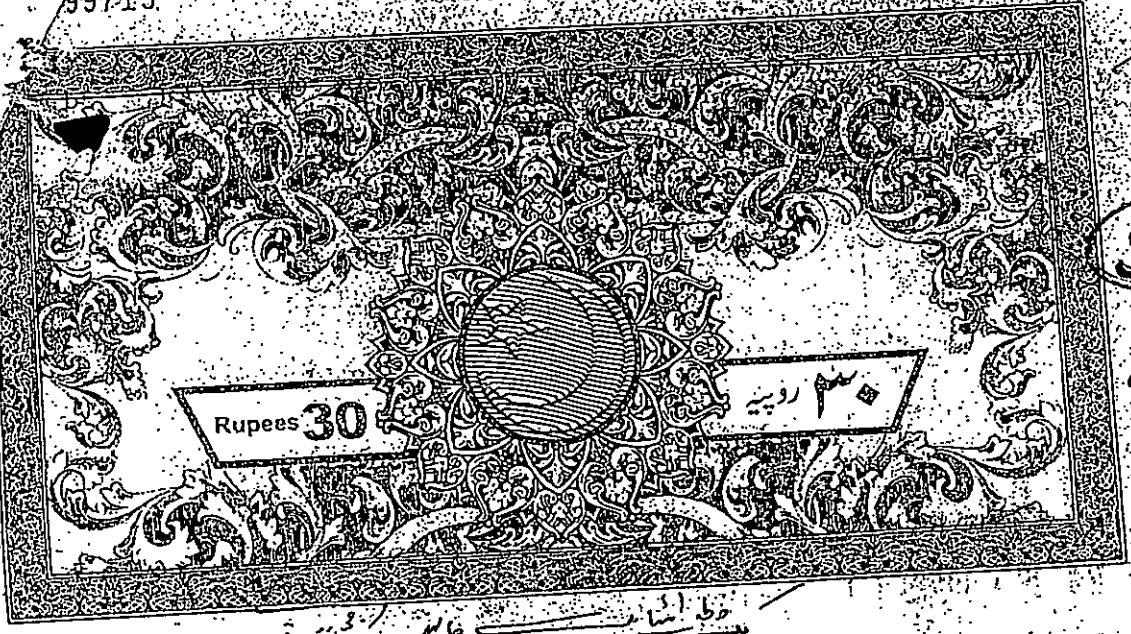
دستخط میزبان

419

S3

Annex 'K'

Muhammad Liaqat
Advocate



قلم اسنادی

بیان صلہ
 محمد معراج کھیل خان سے زرہ بیگم کے لئے
 زرہ بیگم کی طرف سے محمد معراج کھیل خان کو
 مبلغ 30 روپے کی رقم بطور صلہ کی ہے۔
 یہ رقم محمد معراج کھیل خان کی طرف سے
 زرہ بیگم کو بطور صلہ کی ہے۔
 اس صلہ کی تصدیق محمد معراج کھیل خان
 کی طرف سے کی گئی ہے۔



29/04/2015

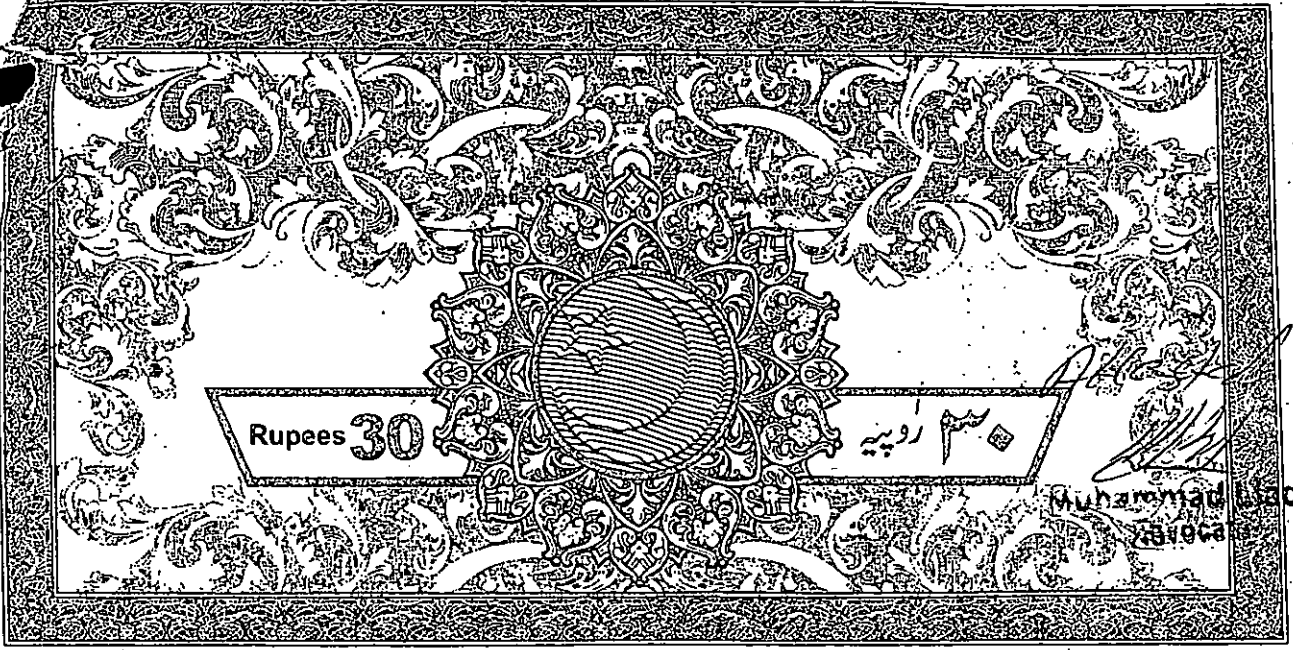
29/04/2015

13/01-2768528.2

محمد معراج کھیل خان

DFU
115/116

14/6/2016



یک قطعہ اسٹامپ مائیتی / 3 روپے

بیان حلفی :

منگہ سماۃ شکیلہ بی بی زوجہ محمد سہیل خان ساکن محلہ
 قاضی ڈھور ڈیال ڈانخانہ کواں شہر۔ حلفاً بیانی یہ کہ
 من مقررہ کو اپنی لیونین کو نیشنل میں کہیں بھی ٹرانسفر کیا جاوے۔

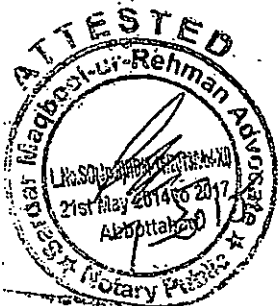
تو من مقررہ عدالت سے اپنا ٹرانسفر کا کیس واپس
 لے گی۔ مراتب بالادرس۔ مل۔ کوئی دوسرے

مخفی کو
 لکھنا بیان حلفی
 ندا غریب

المرفوعہ
 07/05/2015

الک 2-2768529-13101
 سماۃ شکیلہ بی بی زوجہ کو رہ

Attest



55 Annex 'L'

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

ADJUSTMENT

As ordered by the Honourable Service Tribunal, Khyber Pakhtunkhawa, Peshawar under Appeal No. 989/2014, Mst: Shakeela Bibi PSHT (Aggrieved) is hereby adjusted against vacant post of PSHT, GGPS, Salhad, Abbottabad on her own Pay & BPS/Grade in the best interest of Public Service with effect from the date of Taking over charge:-

Saminah Altaj
District Education Officer
(Female) Abbottabad.

Endst No. 1334-36 Dated Abbottabad, the 13/8/2015.

Copy to:-

1. The Honourable Registrar, Khyber Pakhtunkhawa Service Tribunal, Peshawar.
2. The BAO, Abbottabad.
3. The SDEO (Female) Abbottabad.

Saminah Altaj
District Education Officer
(Female) Abbottabad.

Muhammad Liaqat
Muhammad Liaqat
Advocate

SG Annex 'L-1'

THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.

Service Appeal No. 989 12014

Shakeela Bibi W/o Muhammad Sohail Khan presently Government Girls Primary
School Mangal, Abbottabad.

...APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Government of Khyber
Pakhtunkhwa Elementary & Secondary Education Department, Peshawar.
2. Directorate of Elementary & Secondary Education, Peshawar through Director
Education.
3. District Education Officer (Female), Abbottabad.
4. District Accounts Officer, Abbottabad.
5. Aneeza Bibi PHST, Government Girls Primary School Mangal, Abbottabad.

Muhammad Liaqat
Muhammad Liaqat
Muhammad Liaqat
Advocate

...RESPONDENTS

APPEAL U/S 4 OF NWFP SERVICE TRIBUNAL ACT, 1974
AGAINST THE OFFICE ORDER NO.2223-25 DATED
11.05.2013 ISSUED BY THE RESPONDENT NO.3
WHEREBY THE APPELLANT WAS TRANSFERRED FROM
GOVERNMENT GIRLS PRIMARY SCHOOL TOHEEDABAD
TO MANGAL AND AFTER FOUR MONTHS RESPONDENT
NO.3 VIDE LETTER NO.1296-99 DATED 07.10.2013 SAME
SCHOOL TOHEEDABAD AND RESPONDENT NO.5 WHO
IS VERY MUCH JUNIOR FROM THE APPELLANT
TRANSFERRED GOVERNMENT GIRLS PRIMARY
SCHOOL MANGAL IN PLACE OF APPELLANT WHICH IS
PRE-MATURE, ILLEGAL, AGAINST THE TRANSFER

RULE AND POLICY OF THE GOVERNMENT OF NWFP,
MALAFIDE, POLITICAL INFLUENCE AND HIGH
HANDEDNESS OF THE RESPONDENTS.

Alleged
Muhammad Lia
Advocate

PRAYER:-


ON ACCEPTANCE OF THE INSTANT
APPEAL, RESPONDENT NO.3 MAY GRACIOUSLY BE
ORDERED TO WITHDRAW HIS HER ORDER NO.1296-99
DATED 07.10.2013 SERIAL NO.2 AND APPELLANT MAY
GRACIOUSLY BE ALLOWED TO PERFORM HER DUTIES
IN GOVT. GIRLS PRIMARY SCHOOL MANGAL
ABBOTTABAD.

Respectfully Sheweth,

*The facts giving rise to the present appeal are as
under:-*

1. That, the appellant was appointed as Primary School Teacher in Education Department before 22 years and has served the department for 22 years.
2. That, the appellant is performing her duties to the entire satisfaction of her superior as well as the community where she is serving as a teacher. The appellant has never given the chance of complaint to the local public as well as the department.

3. That, the appellant served as a PTC teacher at Govt. Primary School Kunj Abbottabad and was promoted to the BPS-15 as PHST at Toheedabad hilly area appellant performed her duty at station as PHST without any complaint. *(Copies of the transfer order and promotion list are annexed as Annexure "A")*
4. That, the appellant was transferred from Govt. Girls Primary School Toheedabad to Govt. Girls Primary School Mangal on 14.05.2013. *(Copies of transfer order is annexed as Annexure "B")*
5. That, respondent No.5 is using the political influence and with collusion of respondents No.2 & 3 has thrown the appellant at distant 130 Km away in School namely Toheedabad. Appellant already posted their before this transfer order, *and respondent No 5 is most Junior in BPS 14 as per rule she is not eligible to the Senior post appellant is in BPS 15.*
6. That, the respondent No.2 was refused her promotion of BPS-15 due to this appellant was thrown to station to another station just as a rolling stone. *Affidavit of respondent No.5 and copy of transfer and promotion adjustment order are annexed as Annexure "C" & "D")*
7. That, the appellant with one year three times transferred, one is Kunj to Toheedabad (Nahia Gali) Hilly area on

Attest

 Muhammad Liaqat
 Advocate

(59)

dated 02.03.2013 and after two month on 14.05.2013 re-transferred from said station to Mangal and after three months on 07.10.2013 transferred for Mangal to Toheedabad which is arbitrary, and injustice for a lady teacher. (Copies of transfer order dated 07.10.2013 is annexed as Annexure "A" & "B".)

Attorney
Muhammad L
Advocate

8. That, the larger number of teachers who were working at the same station from the more than 20 years in Abbottabad City having political background have not been disturbed as the appellant who has no such background why respondent NO.5 snatched the attendance register and never transfer to any other station.
9. That, the appellant is married and permanent resident of Nawansher, Abbottabad and have four children and there is no body to take care of innocent children because husband of the appellant is in abroad and no elder member of her looking after the home affairs.
10. That, the respondent No.5 is junior teacher than the appellant and also refused her promotion. Affidavit is available on record due to this no one should be promoted one when she refused, this the highly malafide of respondents and contrary to the policy of the department and no value of this transfer in the eye of law.

11. That, feeling aggrieved of the same, appellant preferred departmental appeal before respondent No.3 on 22.10.2013 but no result within the statutory period and false pretext given to the appellant till today. (Copy of appeal and ^{o.k.e.z.s} various applications are attached as Annexure "F" & "G")

Attd
Muhammad
Advoc

12. That, the appellant has not left the charge of her duty in the same school. The copy of attendance sheet is annexure. Thus appellant has come to his Hon'ble Tribunal after expiry of prescribed period of appeal assailing the impugned order, inter-alia, on the following grounds:-

G R O U N D S :-

- a. That, impugned order is pre-mature, void, illegal, without lawful authority, against the policy of the Government, arbitrary, perverse and Smacks of favoritism, nepotism, result of illegal exercise of power and it has been issued under the political influence and has ignored the merits.
- b. That, impugned order is malafide, discriminatory and against the public policy hence, liable to be set aside.

- c. That, impugned order is against the tenure policy of the Government and is in violation of principle of natural justice and law.
- d. That, impugned order is wholly without lawful power and called for interference by this Honourable Tribunal where civil servant was transferred out of Union Council according to the transfer policy of the Government must be transferred against the vacant post whereas respondent No.3 malafidely adjusted the respondent No.5 in place of appellant at Govt. Primary School Mangal, Abbottabad which was transferred from Sajikot to Mangal, Abbottabad.
- e. That, public representative have nothing to do with the internal affairs of the Department and the employees hence, at the behest and instance of public representative, any order passed against the rights of an employee or official shall be a nullity in the eye of law and deserve to be set aside.
- f. That, the appellant seeks leave of this Honourable Tribunal to agitate additional grounds at the time of hearing of this appeal.
- g. That, the instant appeal is well within time.

Adil
MU
Muhammad Liaq
Advocate

6/1

62

It is, therefore, humbly prayed that on acceptance of the instant appeal, respondent No.3 may graciously be ordered to withdraw his her order No.1296-99 dated 07.10.2013 serial No.2 and appellant may graciously be allowed to perform her duties in Govt. Girls Primary School Mangal, Abbottabad.

Through:

(MUHAMMAD SARWAR TANOLI)
Advocate High Court, Abbottabad.

...APPELLANT
Muhammad
Advocate

Dated:- 27/10/2014

VERIFICATION:-

Verified that the contents of the instant Appeal are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Tribunal.

Dated:- 27/10/2014

...APPELLANT

64

order No.1296-99 dated: 07.10.2013 and also directed to release the salary of appellant, till final decision of the instant appeal.

[Signature]
...APPELLANT

Through:

[Signature]
Muhammad Liaqat
Advocate

Dated:- 2/8 /2014

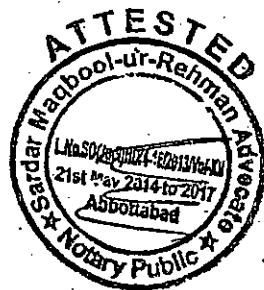
(MUHAMMAD SARWAR TANOLI)
Advocate High Court, Abbottabad.

AFFIDAVIT:-

I, *Muhammad Sarwar Tanoli Advocate*, counsel for the *appellant*, do hereby declare that the contents of instant *application* are true and correct as per information furnished by my *client* and that nothing has been concealed from this Honourable Tribunal.

[Signature]
DEPONENT
[Signature]
...ADVOCATE

Dated:- 2/8 /2014



2-8-2014

P Sec: 005
AD6128
Muzaffargarh 2013
Education Schools

Sl. No. 00005594
Name: SHAKILA BTBI
PRIMARY SCHOOL TEACHER
No. 12192423514
Interest Applied
12 - Active Temporary

NTN: 0
GPF #: EDU/ 015263
Old #: 9990227656

PAYS AND ALLOWANCES		AD6128	213
2001-Basic Pay		14,500.00	245
2000-House Rent Allowance		1,306.00	
2010-Convay Allowance 2005		2,720.00	
2000-Medical Allowance		1,000.00	
2008-Adhoc Allowance 20100 50%		4,192.00	
2010-Adhoc Relief Allow 2011		1,258.00	
2018-Adhoc Relief Allow (2012)		2,900.00	
Gross Pay and Allowances		27,876.00	
DEDUCTIONS:			
2001-Balance	72,826.00		
2001-Benevolent Fund		1,160.00	
2011-Edi Group Insurance		180.00	
2004-Group Insurance		13.00	
200-Exp. Edc. Fund KPK		115.00	
		100.00	
Total Deductions:		1,568.00	
NET AMOUNT PAYABLE		26,308.00	

Annex 00

65

Subtr: 7,200.00
1,160.00
180.00
13.00
115.00
100.00

D.O.B	01.02.1967	EP Quota	3700-0
2 Years Or Months	000 Days	NATIONAL BANK OF PAKISTAN	BRANCH: Muzaffargarh
		MCM	8RY

Abbocabad

ACCOUNTANT GENERAL GENERAL INVESTMENT
P. Set. 005, Honth June 2012
AD6125



EDUCATION SCHOOLS
ABDOLHABAD

Form # 0000394
Name: SHAKIBA RIZI
PRIMARY SCHOOL TEACHER
12192423514

NTN: 0
GPF #: EDU/ 015283
Old #: 9990227656

12 - Active	AD6125	842
PAID AND ALLOWANCES		
0001-Basic Pay		14,500.00
1070-House Rent Allowance		1,306.00
1110-Convey Allowance 2005		2,720.00
1300-Medical Allowance		1,000.00
1368-Adhoc Allowance 2010@ 50%		4,192.00
1370-Adhoc Relief Allow 2011		1,255.00
1418-Adhoc Relief Allow (2012)		2,900.00

66

Gross Pay and Allowances 27,876.00

DEDUCTIONS:		
015-Balance	74,986.00	
0201-Benevolent Fund		1,160.00
0211-Addl Group Insurance	7,200.00	155.00
0204-Group Insurance		13.00
0290-Dep. Edu. Fund KPK		115.00
		100.00

Total Deductions 1,568.00

AMOUNT PAYABLE 26,308.00

D. O. P 01.02.1967 22 Years 07 Months 000 Days	LFP Quota: NATIONAL BANK OF PAKISTAN 2640-0	QUALIFYING SERVICE PROMOTER AID
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Abdullah
 PAYMENT ADVICE
 No. # 00005394 Buckle: 0
 SHAKIRA BIRI
 PRIMARY SCHOOL TEACHER
 CNIC No. 12192423514
 H. Interest Applied
 12 Active Temporary

NTN: 0
 GPF #: EDW 015283
 Old #: 99990227656
 AD6128 -12

Basic Pay	14,500.00	
House Rent Allowance	1,304.00	
Convey Allowance, 2005	2,720.00	
Medical Allowance	1,000.00	
Adhoc Allowance 2010@ 50%	4,192.00	
Adhoc Relief Allow 2011	1,258.00	
Adhoc Relief Allow (2012)	2,900.00	
Adh. Rel. Allow All-2013	2,175.00	
Total Pay and Allowances	30,051.00	
DEDUCTIONS:		
Gr. Balance	14,379.00	Subtra: 1,160.00
Gr. Incentive Fund		180.00
Gr. Adh. Group Insurance	7,200.00	13.00
Gr. Group Insurance		115.00
Gr. Emp. Edu. Fund KPK		100.00
Total Deductions	1,568.00	
		28,483.00

(62)

SHAKIRA BIRI
 D.O.B. 01.02.1967
 22 Years 00 Months 000 Days
 LEE Sulta
 NATIONAL BANK OF PAKISTAN
 2950-0
 MCM 2RY

Abbotabad
 PAYMENT SLIP
 Form No: 00005894 Buckle: 0
 Name: SHAKILA BIBI
 PRIMARY SCHOOL TEACHER
 CNIC No. 12192429514
 Interest Applied
 Active Temporary

GOVERNMENT OF PAKISTAN
 ACCOUNTANT GENERAL FEDERAL GOVT
 P Sec: 003
 AD7043 Deputy District Officer (Fe
 Education Schools

NTN: 0
 GPF #: EDU/ 015283
 Old #: 9990227656

PAYS AND ALLOWANCES		AD7048	49
1000 Basic Pay		14,500.00	
1000 House Rent Allowance		1,306.00	
1110 Convey Allowance 2005		2,720.00	
1300 Medical Allowance		1,000.00	
1440 Adhoc Allowance 2010@ 50%		4,192.00	
1570 Adhoc Relief Allow 2011		1,258.00	
1612 Adhoc Relief Allow (2012)		2,900.00	
2140 15% Adhoc Relief All-2013		2,175.00	
Gross Pay and Allowances		30,051.00	
DEDUCTIONS:			
GPF Balance	85,539.00		
2006 Recovery loan Pri. Instal	Sal: 7,100.00	Subtra:	1,160.00
2101 Benevolent Fund			100.00
2211 Adm Group Insurance			180.00
2204 Group Insurance			13.00
2204 Emp. Edu. Fund KPK			115.00
			100.00
Total Deductions			1,668.00
			28,383.00

68

D.D. No. 01.03.1967
 22 Years of Service 000 Days
 LFR Quota
 NATIONAL BANK OF PAKISTAN
 2960-0
 OF PAKISTAN
 MUM 2AY

Abbottabad

GOVERNMENT OF PAKISTAN
MINISTRY OF NATIONAL EDUCATION
ACCREDITED GENERAL INTERMEDIATE BOARD

P. Sec: 003 North, September 2013
AD7043 Deputy District Officer (Fa)



Pers # 00005394 Buckle: 0
SHAKILA BIBI
PRIMARY SCHOOL TEACHER
No. 12192431314
Date of Interest Appraisal
12 Active ~~...~~

MTN: 0
GFF #: EDU/ 015283
Old #: 99970227656

RATES AND ALLOWANCES:		AD7043	143
2001-Basic Pay		14,500.00	
1000-House Rent Allowance		1,306.00	
1210-Convey Allowance 2005		2,720.00	
1000-Federal Allowance		1,000.00	
1048-Adhoc Allowance 2010@ 50%		4,192.00	
1070-Adhoc Relief Allow 2011		1,255.00	
1013-Adhoc Relief Allow (2012)		2,900.00	
1048-10% Adhoc Relief All-2013		2,175.00	
Gross Pay and Allowances		30,051.00	
DEDUCTIONS:			
3000-Balance	86,699.00		
3006-Recovery loan Pri. Instal	Bal: 7,000.00	Subre: 1,160.00	
3501-Savevolent Fund		100.00	
3511-Aid1 Group Insurance		180.00	
3604-Group Insurance		13.00	
3000-Exp. Edu. Fund KPK		115.00	
		100.00	
Total Deductions		1,668.00	
			28,383.00

69

D. U. R 01.02.1967 22 Years 10 Months 000 Days	LEF Quota: NATIONAL BANK OF PAKISTAN 2960-0	30,051.00 NATIONAL BANK OF PAKISTAN PAY
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AD7043

GOVERNMENT OF PAKISTAN
ACCOUNTS GENERAL DEPARTMENT
DISTRICT OFFICE
F. Sec: 003, Month: October 2012
AD7043 Deputy District Officer (Fe
Education Schools

Sl. No: 00005394
Name: SHAKILA KHAN
PRIMARY SCHOOL TEACHER
CNIC No: 12122423E14
Interest Applied
12 Active

NTH: 0
CPF #: EDU/ 015283
Old #: 99990227656

PAYE AND ALLOWANCES		AD7043
001- Basic Pay		14,500.00
100- House Rent Allowance		1,305.00
110- Convey Allowance 2005		2,720.00
100- Medical Allowance		1,000.00
148- Adhoc Allowance 2010@ 50%		4,192.00
170- Adhoc Relief Allow 2011		1,258.00
115- Adhoc Relief Allow (2012)		2,900.00
148- 15% Adhoc Relief All-2013		2,175.00
Gross Pay and Allowances		30,051.00
DEDUCTIONS:		
001- Balance	57,857.00	Subtr: 1,160.00
106- Recovery Loan Pri. Instal	Bal: 6,900.00	100.00
101- Benevolent Fund		180.00
111- Addl Group Insurance		13.00
104- Group Insurance		115.00
150- Emp. Edu. Fund XPK		100.00
Local Deductions:		1,668.00
		28,383.00

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B.O.B 01.02.1967	LFF Quota NATIONAL BANK OF PAKISTAN 2760-0	QUALIFYING SERVICE PROMOTION AID
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RAJSHAH

P. Sec: 005, Rajshahi, February 2014
AD7043 - Deputy District Officer (Fe

Education Schools

HTN: 0
BPF #: EDU/815283
Old #: 99990227656

BUCKLE: 0
SHAKILA BIST.
PRIMARY SCH: HEAD TEACHER
CN: 12193423514
Interest Applied
15 Active Temporary

AD7043 813

PAYS AND ALLOWANCES:

0001-Basic Pay	16,200.00
1000-House Rent Allowance	1,566.00
1300-Medical Allowance	1,000.00
1305-Change Allowance	40.00
1945-Adhoc Allowance 2010@ 50%	4,192.00
1970-Adhoc Relief Allow 2011	1,258.00
2118-Adhoc Relief Allow (2012)	3,240.00
2148-15% Adhoc Relief All-2013	2,430.00



Gross Pay and Allowances 29,926.00

DEDUCTIONS:

17-Payable	0.00	Deducted	0.00	TAX (360%)	21.00
SPT Balance	93,219.00			Subtr:	1,520.00
2106-Recovery loc. Fri. Instal		Hal:	6,500.00		100.00
2501-Benevolent Fund					190.00
2511-Addl Group Insurance					13.00
2604-Group Insurance					115.00
2690-Exp. Edu. Fund KPK					100.00

Total Deductions: 2,049.00

P. SAFA (MUNA) 27,877.00

D. O. B
01.02.1967
23 Years 03 Months 000 Days

LFP Quote:
NATIONAL BANK
7940-0

QUALIFYING SERVICE
OF PAKISTAN
RAJSHAH

1 10YQA TMBNYAT

Abotabad



P Sec: 003, Month: March 2014
AD7043 Deputy District Officer (Fe

EDUCATION SCHOLAR

Doc No: 00003374
SHAKILA BEDI
PRIMARY SCH. HEAD TEACHER
CNIC No. 12192428514

NTN: 0
SPF #: EDU/015283
Old #: 99990227656

Interest Applied
IS Active

AD7043 240

PAYE AND ALLOWANCES		
0001 Basic Pay		16,200.00
1000 House Rent Allowance		1,556.00
1000 Medical Allowance		1,000.00
1005 Change Allowance		40.00
1005 Adhoc Allowance 2010E 50%		4,192.00
1005 Adhoc Relief Allow 2011		1,258.00
1005 Adhoc Relief Allow (2012)		3,240.00
1005 Adh. Relief Allow All-2013		2,430.00
Gross Pay and Allowances		29,926.00
DEDUCTIONS:		
1000 Payable	0.00	Deducted 0.00
1000 Balance	94,739.00	TAX (3609) 26.00
2006 Recovery loan Pri. Instal	Sal:	Subtr: 1,520.00
2001 Benevolent Fund		100.00
2001 Adh. Group Insurance		180.00
2004 Group Insurance		13.00
2004 Cap. Ed. Fund RPK		112.00
		100.00
Total Deductions		2,054.00
		27,872.00

72

D. S. E
01.02.1967
LFP Quota:
NATIONAL BANK OF PAKISTAN
2000-0

QUALIFYING PER MEE
OF PAKISTAN
BY

CIVIL SERVICE

GOVERNMENT OF PAKISTAN
ACCOUNTS GENERAL

P Sec: 002, Month: April 2013
AD7043 Deputy District Officer (Fa)

0000537 BUCKLE: 0
SHAKILA BIBI
PRIMARY SCH: HEAD TEACHER
CIN No. 12192423514
Date of Appointment: 01.02.1967
Status: Active

EDUCATION SENDER'S
NTN: 0
GPF No: EDU/1025293
Old # 99990227656

AD7043 212

GROSS PAY AND ALLOWANCES:		
2401-Basic Pay		16,200.00
1200-House Rent Allowance		1,566.00
1210-Travel Allowance 2005		2,720.00
1300-Medical Allowance		1,000.00
1305-Change Allowance		40.00
1243-Adhoc Allowance 2010@ 50%		4,192.00
1970-Adhoc Relief Allow 2011		1,258.00
2110-Adhoc Relief Allow (2012)		3,240.00
2148-15% Adhoc Relief All-2013		2,430.00
Gross Pay and Allowances		32,646.00
DEDUCTIONS:		
17 Payable	0.00	Deducted 0.00
CPF Balance	72,259.00	
1504-Recovery Loan Pri. Instal	6,300.00	
3301-Benevolent Fund		100.00
2511-Addl Group Insurance		180.00
3404-Group Insurance		13.00
3090-Exp. Edu. Fund RPK		115.00
		100.00
Total Deductions		2,149.00
NET MONTHLY PAYABLE		30,497.00

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2.9.5
01.02.1967
25 Years (5 Months) 000 Days

LFP Quota
NATIONAL BANK OF PAKISTAN
2960-0

QUALIFYING SERVICE
OF PAKISTAN

74 Annexure 3

Report: Mst. Shereeh Bibi G.G.P.S. Salkhad

Shereeh Bibi was promoted PHST-BP15 dated 28 Feb, 2013
was adjusted in G.G.P.S. Toheed Abad circle Mathia Gali.

Due to non availability of post in circle A.T.O. But unfortunately she could have not perform her duty there. So, she was transferred to G.G.P.S. Mangal circle Q.A.Bad (which was a fake order issued without signature of the then SDOEO).

She was habitual of quarrelling nature. So, created problems in the said school. She approached the Department & requested for adjustment in some nearby station of Mangal. Moreover filed a case in court also. On the decision of court she was adjusted in G.G.P.S. Aziz Abad circle Shamtan temporarily. Later on she was transferred to G.G.P.S. Salkhad.

It is worth mentioning that the period when she was working in G.G.P.S. Mangal circle Q.A.Bad she was actually posted in G.G.P.S. Toheed Abad. So, she has been marked absent from the said school in IMU Report. As well pay was stopped w.e.f (02-03-2013 to 13/5/2013 (71 days) & 7/10/2013 to 1/11/2014 (345 days)) IMU Report attached & copy of Attendance Register of G.G.P.S. Toheed Abad attached.

Now after her adjustment in G.G.P.S. Salkhad her pay has been activated while recovery of sum '22600/- Rs (absent period) is being made which was recommended by inquiry officers etc. Enquiry Report attached.

It is brought into our mind while the Shereeh Bibi PHST Salkhad has adopted the same routine here - creating problems for teachers which has generally disturbed the school environment. Report attached

Attested

Muhammad Liaqat
Advocate

DFU
16/16

14/6/16

مس فیری گل ایڈوکیٹ ہائی کورٹ

محمد ایوب تنولی لائبریری بلازہ آفس نمبر 49، ڈسٹرکٹ کچھری، ایبٹ آباد

تاریخ: 17/12/2015

Muhammad Liaquat
Advocate

قانونی نوٹس



Annex-Q

نام: 1- سیکرٹری ایجوکیشن پشاور۔
2- ڈسٹرکٹ ایجوکیشن آفیسر (زناتہ) ایبٹ آباد

مکرمی جناب! اسلام علیکم!

بذریعہ نوٹس ہذا آپ کو مطلع کیا جاتا ہے کہ موکلہ شکیلہ بی بی زوجہ سہیل خان ٹیچر سہیل گریڈ پرائمری سکول ایبٹ آباد نے مجھے اپنا وکیل مقرر کر کے ہدایت فرمائی ہے کہ آپ کو ذیل قانونی نوٹس ارسال کروں۔

1- یہ کہ من موکلہ عرصہ 22 سال سے محنت ٹیچر اپنی خدمات احسن طریقے سے سرانجام دے رہی ہے۔

2- یہ کہ سال 2013 میں پروموشن ہوئی من موکلہ کو بذریعہ آرڈر نمبری BB/PST 2223-25 گورنمنٹ گریڈ پرائمری سکول مانگل میں ٹرانسفر کر دیا گیا جہاں پر موکلہ اپنی ڈیوٹی سرانجام دیتی رہی۔ دونوں آرڈروں کی کاپیاں لف ہیں۔

3- یہ کہ سال 2014 میں موکلہ کو مانگل سکول سے عزیز آباد سکول میں ٹرانسفر کیا گیا وہاں پر بھی موکلہ اپنی ڈیوٹی باقاعدگی سے سرانجام دیتی رہی اور تمام تر حاضری لگاتی رہی۔ رجسٹرڈ حاضری لف ہے۔

4- یہ کہ اس دوران بغیر کسی وجہ کے من موکلہ کی تنخواہ بھی بند کر دی تھی مگر موکلہ باقاعدگی سے اپنی ڈیوٹی سرانجام دیتی رہی۔

5- یہ کہ موکلہ کی بند تنخواہ کی کل رقم مبلغ 1,50,000/- روپے بنتی تھی جو کہ SDO صاحبہ نے موکلہ کو مل بنا کر دیا تو موکلہ نے اپنی تنخواہ وصول کر لی۔

6- یہ کہ یکم جنوری 2015 سے موکلہ پر ریکوری ڈال دی گئی کیوں؟۔ شکفتہ ٹیچر جو کچھ سکول میں گریڈ پر تعینات تھی پر موشن دی گئی اور بھٹیاں سکول میں تعینات کیا گیا۔ مگر وہ نہ گئی پھر اسے ویری سکول میں گریڈ 15 پر تعینات کر دیا گیا وہ بہت عرصہ بھٹیاں سکول میں غیر حاضر رہی۔ شکفتہ ٹیچر کی تنخواہ تو ایک دن کے لئے بھی بند نہ کی گئی۔ اسی طرح طاہرہ کوثر جو کہ کھوکھر سکول میں 15 گریڈ میں تھی ایک سال وہ کچھ سکول میں ہی ڈیوٹی سرانجام دیتی رہی اور پھر ویری اور پھر شیخ البانڈی میں اسکی تعیناتی کی گئی اس کی بھی غیر حاضری تھی مگر ایک دن کے لئے بھی اس کی تنخواہ بند نہ ہوئی۔

Attal
Muhammad Liaqat
Advocate

7- یہ کہ موکلہ پر جو ریکوری ڈالی گئی اس کی بابت کہا گیا کہ ریکوری کے پیسے گورنمنٹ کے خزانے میں جا رہے ہیں۔ موکلہ نے نہ تو کوئی غیر حاضری کی ہے اور جہاں پر بھی موکلہ کا ٹرانسفر ہوا ہے موکلہ نے ایمانداری، فرض شناسی سے اپنی ڈیوٹی سرانجام دی ہے۔ موکلہ ایک غریب اور بے کس ٹیچر ہے موکلہ کے ساتھ بہت بڑا ظلم ہو رہا ہے۔

8- یہ کہ عرصہ 1 سال سے موکلہ کو کم تنخواہ مل رہی ہے اور موکلہ کی حاضری کے باوجود موکلہ کی تنخواہ سے جو کٹوتی کر رہے ہیں وہ غلط ہو رہی ہے۔ موکلہ کی ریکوری فی الفور بند کی جائے اور موکلہ کو پوری تنخواہ اور بقایا جات دیئے جائیں۔

لہذا بذریعہ نوٹس ہذا آپ کو مطلع کیا جاتا ہے کہ آپ اندر 7 یوم بوصولی نوٹس ہذا من موکلہ کو دسمبر 2015 سے باضابطہ مجوزہ تنخواہ جاری کریں اور کسی قسم کی کوئی کٹوتی نہ کرتے ہوئے موکلہ کے تمام بقایا جات بھی موکلہ کو باقاعدگی سے دیئے جائیں۔ بصورت دیگر من موکلہ عدالت مجاز سے رجوع کرنے کی جسکی جملہ وجہ وخرچہ کی ذمہ داری آپ پر عائد ہوگی۔

لہذا نوٹس ہذا بذریعہ رجسٹرڈ AD آپ کو ارسال کیا جاتا ہے۔ جسکی CTC کاپی برائے مزید کارروائی میرے دفتر میں محفوظ ہے۔

والسلام

مس فری کلائیٹ وکیٹ
ہائی کورٹ، ایبٹ آباد۔

①

BEFORE THE PESHAWAR HIGH COURT,
BENCH ABBOTTABAD

77

Anna R

W.P No: 177 -A/2015

Shakila Bibi, presently GGPS Salhad, Abbottabad.

....PETITIONER

VERSUS

Attended
Muhammad Liaqat
Advocate

1. The Govt. of Khyber Pakhtunkhwa, through Secretary Education Peshawar.
2. DEO Female, Abbottabad,
3. Account Office Education Department, Abbottabad.

.... RESPONDENTS

Certified to be true (Copy)
Ex. Secy. High Court
Peshawar Bench
Abbottabad Bench
Authorized Under Sec 75, Act 1973
13/6/16

WRIT PETITION UNDER ARTICLE 199 OF COP
AGAINST THE ILLEGAL DEDUCTION OF
AMOUNT OF RS. 7000/- FROM THE SALARY OF
PETITIONER BY THE DEO (FEMALE) AND IS NOT
MAINTAINABLE UNDER THE LAW BEING
CONTRARY TO THE BASIC RIGHTS PROVIDED IN
CONSTITUTION AND NEEDS TO BE REVERSED.

No 1010
26/7/16

PRAYER:- ON ACCEPTANCE OF WRIT PETITION
THE RESPONDENT MAY BE DIRECTED TO

A
Registrar
High Court
Abbottabad

BEFORE THE PESHAWAR HIGH COURT,
ABBOTTABAD BENCH

(78)

Annex 'B'

CM No. 355 -A/2016
IN

WP No. _____ -A/2016

Shakila Bibi, presently GGPS Salhad, Abbottabad.

...PETITIONER

VERSUS

M. A. Qureshi
Muhammad Qureshi
Advocate

1. The Govt. of Khyber Pakhtunkhwa, through Secretary Education, Peshawar.
2. DEO (Female), Abbottabad, Peshawar.
3. Account Officer, Education Department, Abbottabad.

...RESPONDENTS

WRIT PETITION

APPLICATION FOR UNLAWFUL DEDUCTION OF PAY MAY KINDLY BE STOP FORTH.

Certified to be true Copy
Extraordinary Court
Peshawar
Abbottabad Bench
Authorized Under Seal
13/6/16

Respectfully Sheweth;-

1. That despite the fact that the petitioner about the said deduction of my pay respondent No. 3 has not stopped the deduction of my salary and has been deductioning of Rs. 70,000/- from my salary per month.

No 2368
20-5-16

FILED TODAY

A
Additional Registrar
Peshawar High Court
Abbottabad Bench

79

Att. of

Muhammad Liaqat
Advocate

- 2. That the respondent No. 2 has not so far issues directions for the payment of my salary.
- 3. That the original revision petition about the said case still pending before the Honourable Court.

Therefore, till the decision of the Honourable Court the respective salary may not be stop and necessary order to this effect may kindly be issued.

Certified to be True Copy
Examined by Court
Abbottabad Bench
13/6/16

Dated: 19/5/2016

Through

Shakila Bibi
...PETITIONER
Adv. Fari Gill
(FARI GILL)
Advocate High Court, Abbottabad

AFFIDAVIT:-

I, Shakila Bibi, presently GGPS Salhad, Abbottabad, do hereby declare on oath that the contents of foregoing writ petition are true and correct to the best of my knowledge and belief and nothing has been concealed intentionally from this Honourable Court.

Shakila Bibi
DEPONENT

13/04 - 276852 9-2

Identified by;

Adv. Fari Gill
(FARI GILL)
Advocate High Court, Abbottabad

2222/373
Certified to be true copy
at Abbottabad on 19/5/16
Shakila Bibi, Teacher GGPS
Salhad, Abbottabad

SECRET
19/5/16

FILED TODAY

Abbottabad Bench
2016

Annex 'T' 80

PESHAWAR HIGH COURT, ABBOTTABAD BENCH.

FORM OF ORDER SHEET

Court of.....

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

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge (s)
1	2
30.05.2016	<p><u>C.M.No. 355-A/2016 in W.P.No. 177-A/2016.</u></p> <p>Present: Ms. Fari Gill, Advocate, for the applicant. ***</p> <p>Notice of this application be given to the respondents for a short date. In the meanwhile, no adverse action shall be taken against the applicant with regard to deduction of his monthly salary.</p> <p><i>Self Judge</i> <i>Self Judge</i></p> <p><i>Agreed</i> <i>Muhammad Liaquat</i> Advocate</p>

Certified to be true copy

13/6/16
Peshawar High Court
Abbottabad Bench

گورنمنٹ ڈپارٹمنٹ کی خدمات میں بطور ایف اے

غور کیا گیا۔ اس بارے میں اسٹیٹس آرڈر (S.O) کے تحت
اس کی توثیق کی گئی ہے جو اس کے ساتھ ساتھ اس کے ساتھ ہے

Muhammad Liaquat
Advocate

مہتمم کے ذریعے

1. اس کے ساتھ ساتھ Promotion Policy کے تحت اس کے لئے 1264-67
کو 22/03/03 سے 09/05/03 کو اس کے لئے اس کے لئے اس کے لئے
2. اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
3. اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
4. اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
5. اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
6. اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
7. اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
8. اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
9. اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
10. اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے

اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے
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اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے اس کے لئے

شہادت نامہ کی توثیق کے لئے۔ نوٹیفکیشن Cont Petition

Order No. 5076/2016 کے لئے

7) Departmental سے اس کے دوران میں

Honorable Service Appral
Internal کو بار کے نوٹیفکیشن Service Appral کے لئے

8) Service Appral کے دوران میں اس کے لئے GAPS

Adjust کر کے اس کے لئے اس کے لئے
Order کے لئے Service Appral کے لئے

9) اس کے لئے Deduct کر کے اس کے لئے

کارروائی کے لئے اس کے لئے

اس کے لئے Deduct کر کے اس کے لئے

اس کے لئے اس کے لئے اس کے لئے
اس کے لئے اس کے لئے اس کے لئے
اس کے لئے اس کے لئے اس کے لئے

2/1
2018

اس کے لئے اس کے لئے اس کے لئے

Subbi

خدمت جناب DEO (F) ایسٹ آباد 82

Amex 7

مہون درخواست بعد از دیکھ جانے حکم بابت بندش تنخواہ

سائلہ و حکم بابت وصولی (Recovery) تنخواہ سائلہ ذیل
RTI ایکٹ خیرہ کھٹون خواہ

Muhammed Liaqat
Advocate

جناب عالیہ

گزارشیں سائلہ کے علم میں آ رہی ہیں کہ سائلہ کے خلاف
احکامات بالا ہوئے ہیں جنکی اطلاع نہ سائلہ کو دی گئی بعد ازیں
ان احکامات کی تفصیل و سروس سائلہ کو ضابطہ کی گئی جبکہ
ذیل دفعہ 29-A جنرل کارز ایکٹ کوئی بھی حکم احکامات مخالفانہ
اگر سائلہ کو بھیجے گئے تو اسکی تفصیل کے ساتھ ساتھ اسکی سروس
بھی متعلقہ ایسکار کو کی جانی چاہیے

نہ اسے میری درخواست سائلہ کی منظور فرمائے ہو سائلہ کو
فی الفور مطلوبہ نقول فراہم کی جائے
عین گزارشیں سائلہ

العارفہ

سائلہ شکیلہ بی بی گورنمنٹ گریڈ اسکول سائلہ

Headmistress
G. G. P. S. Sahar
Abbottabad



Handwritten signature and date 25/5/18

کتابت فی حق DEO میری جیل میں داخلہ کی درخواست

درویشی کی درخواست Right to Information 2013

یہ درخواست کے تحت حق کیس کی
رہے گا کیس کی درخواست میں
میں -

Arrested

Muhammad Liaqat
Advocate

[Handwritten signatures]

جنا - عالی ترین عدالت میں -

اپنے اپنے حق کی *Police* *Promotion*



کلم نمبر 67-1268 صدر 03/2013 میں
نوسید آباد پولیسی لہ اداں نوسید آباد سے ہونے
کلم 25-2013 صدر 14/05/2013
پولیسی

2۔ کہہ سکتے ہیں کہ لہ اداں سے ہونے

کلم 99-1296 صدر 07/10/2013 دوبارہ
نوسید آباد سے ہونے

3۔ کہہ سکتے ہیں کہ لہ اداں سے ہونے
کو نظر انداز کر کے سائل کو غیر حاضر شمار کر کے

مذکورہ *Person* کی درخواست کی ریکوری کا حکم جاری کیا جا
یا حال سائل کو موصول نہ ہوا بلکہ سائل کی ہمارے

سے کوئی بھی نہیں جانی رہی جسکی بھی تفصیل یاد ہو دست
بار دی جانے کرنے کے سائل کو نہ دی گئی جو حکم کا نقل

علقہ غیر قانونی ہے لہذا جس سے درجہ سائل کی

کلم کوئی ایسٹ نوسید آباد سے ہونے تفصیل سائل کو
RTI عیاں کیا جاوے

15/01/2019

[Signature]

سائل کی درخواست میں خان حال شیخ *CCPS*

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

No. 289

Dated Abbottabad, the 17/01/2015.

The Sub Divl: Education Officer (Female)
A b b o t t a b a d .

Subject: - DRAWAL OF SALARY

Annex 'W' (84)

Memo;

In the lights of the reply in detail, regarding the Drawal of the Salary in respect of Mst: Shakeela Bibi PSHT, GGPS, Toheed Abad (Circ: Nathia Gali), the Salary Dealing Assistant @ the SDEO (Female) Abbottabad is hereby warned to be careful in future and take great care.

Further more, pay for the under transfer period from II/2013 to I0/2014 amounting to Rs. 387444/- should be recovered from the Pay of Mst: Shakeela Bibi PSHT in easy instalments at the rate of Rs. 5000/- PM under intimation to this office. Her Pay is also stopped till further order.

etc
DISTRICT EDUCATION OFFICER (F)
A b b o t t a b a d .

All set
MAG
Muhammad Liaqat
Advocate

Received
30-04-19

PREPARATION, ILLUSTRATION, FORMS, THE

وکالت نامہ

کورٹ فیس

85

بعدالت جناب سر جسٹری جنرل کراچی کورٹ آف ایپل

عنوان: سید شکیلہ بی بی۔ پیام گورنمنٹ کراچی

منجانب: ایڈووکیٹ / سید شکیلہ

نوعیت مقدمہ: سر جسٹری جنرل

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے اس سے پیروی و جواب دہی کل کارروائی متعلقہ آس مقام

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت ناش بصیغہ مفلسی کے دائرہ کرنے اور اس کے پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

Attested.

Accepted.

بمقام:

المقوم: 02/05/2019

Attested
ACC

2

سید شکیلہ بی بی
پیام گورنمنٹ کراچی
ایڈووکیٹ

BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR CAMP COURT ABBOTTABD.

APPEAL NO 2228-A/2020

MST SHAKEELA BIBI..... APPELLANT

VS

GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH SECRETARY
EDUCATION DEPARTMENT PESHAWAR & OTHERS.....RESPONDENTS

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2.	Annexure	"A" & "B"	5 To 7
3	Annexure	"B" & "D"	8 To 9

Respondents

Dated _____

Through Representative

①

**BEFORE THE HONRABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR CAMP COURT ABBOTTABD.**

APPEAL NO 2228-A/2020

MST SHAKEELA BIBI..... APPELLANT

VS

**GOVERNMENT OF KHYBER PAKHTUNKHWA THROUGH
SECRETARY EDUCATION DEPARTMENT PESHAWAR &
OTHERS.....Respondents**

Para wise comments on behalf of the respondents No 1 to 4.

Respectfully Sheweth:

Para wise comments on behalf of the respondents No 1 to 4 are as under.

PRELIMINARY OBJECTION

1. That the appellant has no locus standi/cause of action to file instant appeal.
2. That the appellant is stopped to agitate the instant matter before this Honorable Tribunal.
3. That the appellant has not approached this Honorable Tribunal with clean hands.
4. That the appellant has filed instant appeal with malafide intention for wrongful gain and suppressing the original facts, from this Honorable Tribunal, hence the appeal is liable to be dismissed.
5. That the appeal is hopelessly time barred.
6. That the appellant is treated as per rules and law and policy. Therefore appellant is not entitled for any relief and hence appeal is liable to be dismissed without further proceeding.
7. That the instant appeal is not maintainable in its present form.
8. That appellant was found irregular/absent in her respective duties.
9. That the instant appeal is against the law/service rules hence not maintainable in the eye of law and liable to be dismissed.
10. That the appellant has filed the present appeal just to pressurize the respondents.
11. That the act of the respondent with in law and rules the order No 289 dated 17-01-2015 issued

FACTUAL OBJECTION

1. Para No 1 is correct pertains to record hence no comments.
2. Para No 2 of appeal is correct to the extent that appellant was promoted from BPS-14 to BPS-15 as per promotion Policy and adjusted at GGPS Toheed Abad. She took over charge and starts to perform her respective duties.
3. Para No 3 of the appeal is correct to the extent that the appellant was promoted and adjusted at GGPS Toheed Abad. The Teacher named Aneeza f Government Girls Primary School Mangal, who was the in the promotion merit list on the merit, whom give the stamp and denied her promotion but latter on when the appellant was adjusted there she filed appeal for her promotion and adjustment at the same school GGPS Manhagal as per promotion Policy. The appeal of the Mst Aneeza bibi was entertained and promoted at same school as per Policy GGPS Mangal. The adjustment order of the appellant was withdrawn and directed her to attend her original school of posting GGPS Toheed Abad. **(Photocopy of affidavit and order of Aneeza are annexed as Annexure "A" & "B".)**
4. Para No 4 is correct that the Mst Aneeza bibi was promoted and adjusted at same school as per Promotion Policy.
5. Para No 5 is correct. That firstly Mst Aneeza Bibi submitted affidavit regarding her promotion, but latter on she filed appeal and requested to promote her and adjust same school as per Policy. Which was accepted and promoted the Mst Aneeza as adjusted at GGPS Mangal.
6. Para No 6 of the appeal is correct. Appellant filed civil suit which was dismissed on jurisdiction grounds.
7. In reply to Para No 7 is that, Appellant filed service appeal and was adjusted at GGPS Selhad Abbottabad during the service appeal.
8. Para No 8 of the appeal it is submitted that during the Service appeal appellant submitted the affidavit and was adjusted at GGPS Selhad Abbottabad. **(Photocopy of affidavit and order of appellant are annexed as Annexure "C" & "D".)**
9. Para No 9 of the appeal is correct to the extent that the civil suit of the appellant was dismissed on jurisdiction grounds.
10. Reply of Para 10 of the appeal is that the transfer order of the appellant was canceled but the appellant did not attend Government Girls Primary School, Toheed Abad, concern ADEO reported that appellant was absent from her duties, due to which the deduction of salary received on the basis of the report of the concerned ADEO was implemented.
11. Para No 11 of the appeal is correct. Appellant is not aggrieved. Appellant treated as per rules and law.
12. Para No 12 of the appeal is incorrect the departmental appeal of the appellant is badly time barred and liable to be dismissed.

GROUNDS

- a. Para of the ground "a" is incorrect, hence denied. Appellant has been treated as per rules.
- b. Para of the ground "b" is incorrect. Appellant was remain^{not} willfully absent from her duties, attendance registered which appellant is bogus..
- c. Para of the ground "c" is incorrect. Reply has already been given in above factual objection in detail.
- d. Para of the ground "d" is incorrect, hence denied. The appellant has treated as per rules.
- e. Para of the ground "e" is incorrect. Strongly denied.
- f. Para of the ground "f" incorrect all the proceeding has been done by the authority as per rules and law.
- g. Para of the ground "g" is subject to prove her absent period by concern ADEO.
- h. Para of the ground "h" is incorrect, hence denied. Reply has already been given in above Paras. The order of the respondent No 3 is accordance with rules and law. Appellant leveling baseless allegation to save her skin.

It is therefore humbly prayed that in the light of foregoing comments the appeal may graciously be dismissed with cost throughout.

Sub Divisional Education Officer
(Female) Abbottabad.

[Signature]
(Respondent No 4)

[Signature]
Director (E & SE)

Director Khyber Pakhtunkhwa
Elementary & Secondary Education
Peshawar.

(Respondent No 2)

[Signature]

District Education Officer
(Female) Abbottabad.

[Signature]
(Respondent No 3)

[Signature]
Secretary Education (E & SE)

Khyber Pakhtunkhwa
Peshawar.

(Respondent No 1)

*Please ref
DA*

*verified subject to correction
and if not appropriate
and appropriate*

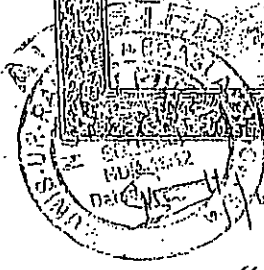
*Applicant's name
not mentioned
in the appeal*

4

AFFIDAVIT

Stated on oath that the contents of instant para wise comments are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

Respondent No 3



یک وقفہ اسٹامپ مافی = 30 روپے " بیان مافی "

عزیزہ بی بی دختر محمد زین زویہ جاوید امین کھنجر
 اور صاحبہ گلزار بی بی شکیلہ و صاحبہ ایشیا بی بی جمال P.T.C پٹی روڈ گلزار امین
 سکول مافیل کی بیویوں کے ساتھ بی بیوں کے من و مقررہ سے جس میں بی بی مافی
 مافی خیرہ 27/4/2013 دی گئی جس کو مقررہ وٹس کے کہ بی بی مافی 7.7
 رقم پر کر کے دے رکھی ہیں کہ "من و مقررہ کو جس کو بی بی مافی مافی
 لیا ہے اور جہاں آرڈر ہو گیا ہے من و مقررہ اس آرڈر
 اور Information کے تحت G.G.P. سکول مافیل
 میں سے اپنی بیوی کے لئے رقم لیا گیا ہے
 لکھنؤ امین مافی سندھ اور بی بی مافی
 مافی خیرہ 27/4/2013 من و مقررہ والی ہے

01-06-2013

عزیزہ بی بی شکیلہ P.T.C پٹی روڈ گلزار امین

Name: MUHAMMAD NAZIR
 Registration # 769 Dated: 20-05-2011
 Address: 10/10/10, Faisalabad
 Signature: [Signature]

Annex B

39 40

Annex

Muhammad Liaq
Advocate

Annex F

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) ABBOTTABAD.

ADJUSTMENT.

As approved by the competent authority the following PSHT female, are hereby adjusted in the schools noted against their names in their own Pay & Grade in the interest of public service with immediate effect.

<u>S.No.</u>	<u>Name of Teacher / School</u>	<u>School where adjusted</u>	<u>Remarks.</u>
1.	Aneesza Bibi, PSHT GGPS Mangal ATD	GGPS Mangal	Post already occupied.
2.	Shakila Bibi, PSHT GGPS Mangal	GGPS Toheed Abad	Ag: V. Post

District Education Officer
(FEMALE) ABBOTTABAD.

Endstt: No. 1296-99 /Adj: /PSHT

Dated 07/10/2013.

Copy to the:

1. District Education Officer (F) Abbottabad.
2. ADQs Circle.
3. Head Teacher concerned Schools.
4. Official Concerned.

Sub Divisional Education
Officer (F) ABBOTTABAD.

Muhammad Sarwar
Advocate High Court
Abbottabad

(7)

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (F) A.ABAD.

No. 542/1

Dated 28/06/2013.

To

(38-A)

Annex E

The District Education Officer
(Female) Abbottabad.

Subject:


WITH DRAWL OF REFUSAL/ ADJUSTMENT.

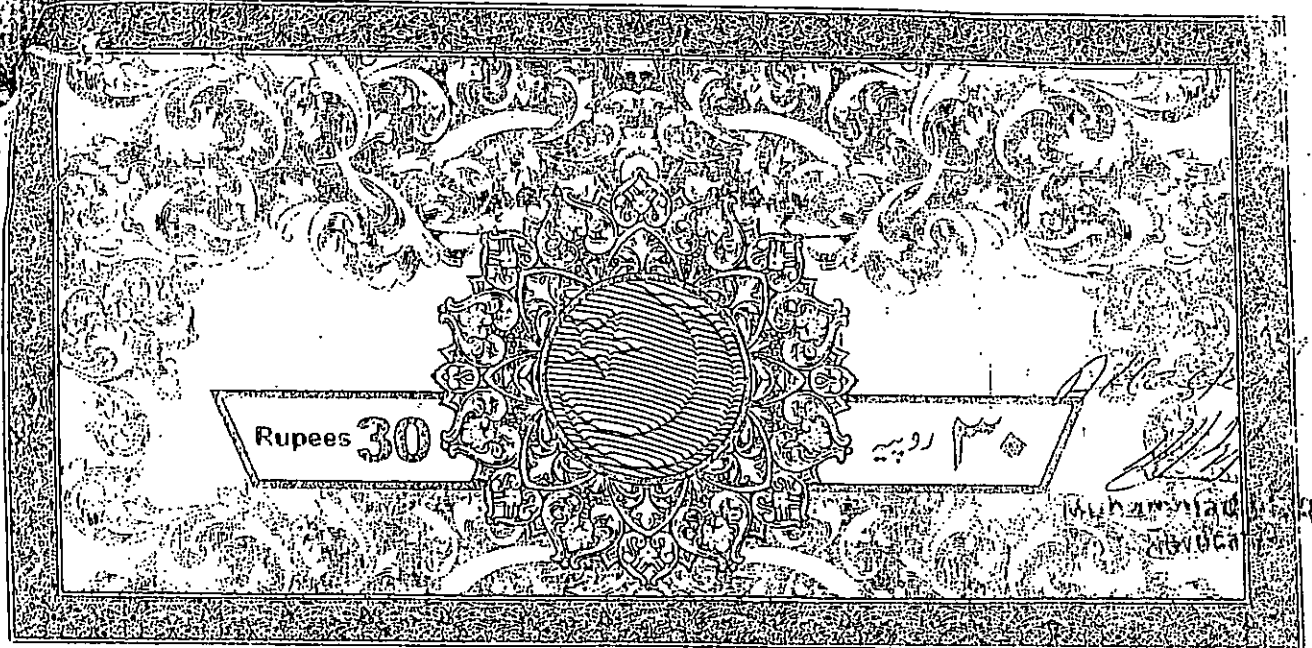
Attest
MGS
Muhammad Liaqat
Advocate

Memo:

Enclosed please find herewith an application and affidavit in original from Mst: Aneeza Bibi, PSHT GGPS Mangal which is self explanatory that she may be retained in same school in BPS-15 against PSHT and her previous refusal for up gradation to BPS-15 may be treated as null and void.

Submitted for further necessary action please.


SUB DIVISIONAL EDUCATION
OFFICER (F) ABBOTTABAD



یک قطعہ اسٹامپ عالتی / 30 روپیہ

بیان حلفی :

منکہ سماء شکیلہ بی بی زوجہ محمد ہیل خان سکن محلہ
تافھی ڈھوڑ پال ڈاکخانہ کواں شہر۔ حلفاً بیانی یہ کہ
من مقبرہ کو اپنی لیونین کو نرسٹل میں کہیں بھی ٹرانسفر کیا جاوے۔
تو من مقبرہ عدالت سے اپنا ٹرانسفر کا کیس واپس
کے گی۔ امراتب بالادرس۔ عیال۔ کوئی دوسر

تحقی کو
محمد زبیر بیان حلفی

المکرم نوم 07/05
2015

الک 2-2768529-13101
سمااء شکیلہ بی بی زوجہ محمد

ATTESTED
Muhammad Rehman

Signature

(9)

Annex D

~~58~~

~~ABRER~~

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

ADJUSTMENT

As ordered by the Honourable Service Tribunal, Khyber Pakhtunkhawa, Peshawar under Appeal No. 989/2014, Mst: Shakeela Bibi PSHT (Agrieved) is hereby adjusted against vacant post of PSHT, GGPS, Salhad, Abbottabad on her own Pay & BPS/Grade in the best interest of Public Service with effect from the date of Taking over charge:-

Saminat Ali

District Education Officer (Female) Abbottabad.

Endst No. 1334-36 Dated Abbottabad, the 13/8/2015.

Copy to:-

1. The Honourable Registrar, Khyber Pakhtunkhawa Service Tribunal, Peshawar.
2. The BAO, Abbottabad.
3. The SDEO (Female) Abbottabad.

[Signature]
District Education Officer (Female) Abbottabad.

Affected

[Signature]

Muhammad Liaqat
Advocate