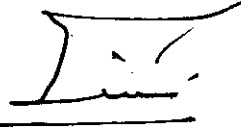


17<sup>th</sup> Nov, 2022

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

Counsel are on strike, therefore, the case is adjourned to  
15.12.2022 for arguments before the D.B at Camp Court Abbottabad.



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



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

22<sup>nd</sup> Sept 2022

Appellant alongwith his counsel present. Mr. Muhammad Jan, District Attorney for the respondents present.

This case was partly heard by the bench comprising of Rozina Rehman, learned Member Judicial and one of us (Fareeha Paul, learned Member (Executive)). Let this appeal be fixed before the said bench. To come up for arguments on 14.11.2022 before D.B at camp court Abbottabad.



(Fareeha Paul)  
Member (Executive)

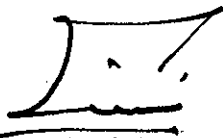


(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

14<sup>th</sup> Nov, 2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Shujja Ali, ADEO for the respondents present.

Clerk of learned counsel for the appellant seeks adjournment on the ground that learned counsel for the appellant is ill today. Adjourned. To come up for arguments on 17.11.2022 before the D.B at Camp Court Abbottabad.



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





(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

21<sup>st</sup> Sept 2022

Appellant alongwith his counsel present. Mr. Muhammad Jan, District Attorney for the respondents present.

This case was partly heard by the bench comprising of Rozina Rehman, learned Member Judicial and one of us (Fareeha Paul, learned Member (Executive)). The said bench will be sitting tomorrow. Let this appeal be fixed before the said bench. To come up for arguments on 22.09.2022 before D.B at camp court Abbottabad.

  
(Fareeha Paul)  
Member (Executive)

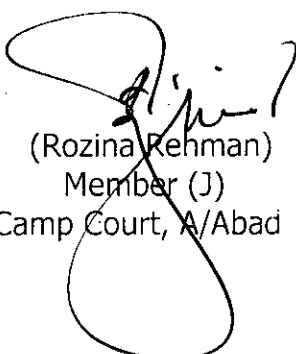
  
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

22.09.2022

Appellant alongwith counsel present.

Kabir Ullah Khattak, Additional Advocate General for respondents present.

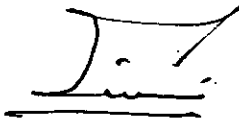
Case in hand was sent by the Hon'ble Chairman for disposal in accordance with law. Learned Member (Executive) waited for the arrival of appellant and her counsel till 10:00 AM but none appeared on behalf of appellant, therefore, she left for joining DB. This case is, therefore, respectively sent to the learned Chairman for further appropriate orders.

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

18<sup>th</sup> July 2022

Clerk of learned counsel for the appellant present.  
Mr. Noor Zaman, District Attorney alongwith Mr. Saqib  
Shahzad, Office Assistant for respondents present.

Clerk of learned counsel for the appellant seeks  
adjournment on the ground that learned counsel for the  
appellant is not available today. Last opportunity granted  
for arguments. 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.

Muhammad Jan, learned District Attorney alongwith  
Shuja Ali ADEO (Litigation) for respondents present.

Case was argued at certain length, however, personal  
appearance and travel history of appellant is essential for  
the just decision of case. Counsel is directed to make sure  
personal appearance of appellant and representative of  
respondents is directed to produce travel history of  
appellant. To come up for arguments before D.B on  
21.09.2022 at Camp Court, Abbottabad.



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




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

19.01.2022

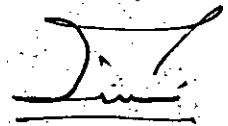
Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Clerk of learned counsel for the appellant again requested for adjournment on the ground that learned counsel for the appellant has not feeling well. Adjourned. To come up for arguments on 18.03.2022 before the D.B at Camp Court Abbottabad.

The instant appeal is pending for adjudication since the year 2018, therefore, appellant shall ensure the presence of her counsel on the next date.



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



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

18.03.2022

Due to retirement of the Hon'ble Chairman, the Tribunal is defunct, therefore, the case is adjourned for the same on 16.05.2022.



Reader

16.05.2022

None for the appellant present. Mr. Muhammad Riaz Khan, Assistant Advocate General for respondents present.

Previous date was adjourned through Reader note, therefore, notice for prosecution of appeal be issued to the appellant as well as her counsel. Adjourned. To come up for arguments before D.B on 18.07.2022 at camp court Abbottabad.



(Fareeha Paul)  
Member(F)



(Kaleem Arshad Khan)  
Chairman  
Camp Court Abbottabad

24.09.2021

Clerk of learned counsel for the appellant present. Mr. Riāz Ahmed Painsdakhel, Assistant Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy before the august Peshawar High Court, Abbottabad Bench. Adjourned. To come up for arguments before the D.B on 19.11.2021 at Camp Court Abbottabad.



(ATIQU-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)  
CAMP COURT ABBOTTABAD



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

19.11.2021

Counsel for appellant present.

Muhammad Rasheed learned Deputy District Attorney alongwith Sohail Ahmad Zeb Litigation Officer for respondents present.

The learned Member (Judicial), feeling not well, is unable to attend the proceedings. Therefore, case is adjourned. To come up on 19.01.2022 before D.B at Camp Court, Abbottabad.



Chairman  
Camp Court, A/Abad

20.02.2020


Due to COVID-19, the case is adjourned for the same on 18.02.2021.

  
READER

18.02.2021 Junior to counsel for appellant present.

Noor Zaman Khattak learned District Attorney for respondents present.

Former made a request for adjournment as senior counsel is busy before Hon'ble Peshawar High Court, Peshawar. Adjourned. To come up for arguments on 14.06.2021 before D.B at Camp Court, Abbottabad.



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



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

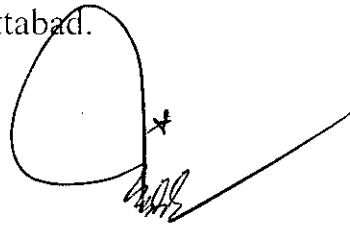
14.6.21 Due to COVID 19, case is adjourned  
to 24.9.21 for the same



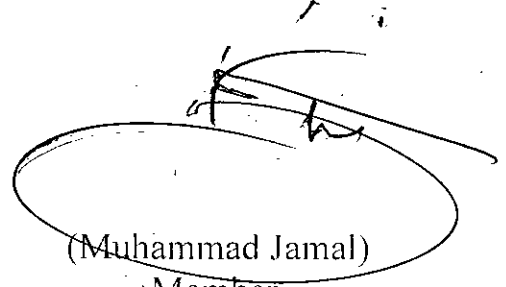
17.09.2020

Mr. Qazi S/o Mir Alam, Father of the appellant who is holding Special Power of Attorney has forth come. Mr. Muhammad Riaz Khan Páindakhel, Assistant Advocate General alongwith Mr. Sohail Ahmad Zeb, Litigation Officer and Mr. Shuja Ali, ADEO (Lit) for respondents present.

The learned Assistant Advocate General for the state and respondents invited attention of the Bench to the impugned order dated 15.06.2015 which has been passed with retrospective effect and since the issue of retrospectivity is pending consideration in the Larger Bench of this Services Tribunal, therefore, we deemed it appropriate to submit the instant appeal before the Hon'able Larger Bench for consideration till then the case is adjourned to 17.11.2020 for further proceedings and arguments before D.B at camp court Abbottabad.



(Mian Muhammad)  
Member(E)



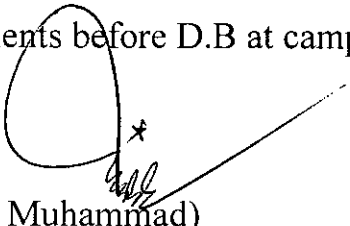
(Muhammad Jamal)  
Member  
Camp Court A/Abad

17.11.2020

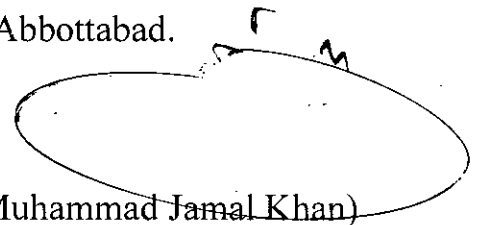
Counsel for the appellant is person. Mr. Usman Ghani, District Attorney alongwith Mr. Sohail Ahmad Zeb, Assistant Litigation for respondents is present.

Learned counsel for the appellant requests for adjournment on the ground that he has not prepared the brief.

Adjourned to 20.01.2021 on which date to come up for arguments before D.B at camp court Abbottabad.



(Mian Muhammad)  
Member(E)



(Muhammad Jamal Khan)  
Member(J)  
Camp Court Abbottabad



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

Reader

Due to summer vacation case to come up for the same on 1/7  
9 / 20 at camp court abbottabad.

  
Reader

17.09.2020

Mr. Qazi S/o Mir Alam, Father of the appellant is present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Mr. Sohail Ahmad Zeb, Litigation Officer and Mr. Shuja Ali, ADEO (Lit) for respondents present.

The learned Assistant Advocate General for the state and respondents invited attention of the Bench to the impugned order dated 15.06.2015 which has been passed with retrospective effect and since the issue of retrospectivity is pending consideration in the Larger Bench of this Services Tribunal, therefore, we deemed it appropriate to submit the instant appeal before the Hon'able Larger Bench for consideration till then the case is adjourned to 17.11.2020 for further proceedings and arguments before D.B at camp court Abbottabad.

(Mian Muhammad)

(Muhammad Jamal)

19.11.2019

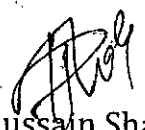
Counsel for the appellant present. Mr. Usman Ghani, District Attorney alongwith Mr. Shuja Ali, ADEO for respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 18.12.2019 before D.B at Camp Court, Abbottabad.


  
Member

  
Member  
Camp Court Abbottabad

18.12.2019

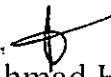
Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned to 17.02.2020 for rejoinder if any, and arguments before D.B at Camp Court Abbottabad.

  
(Hussain Shah)  
Member  
Camp Court Abbottabad

  
(M. Amin Khan Kundi)  
Member  
Camp Court Abbottabad

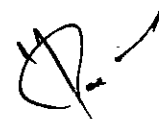
19.06.2019

Counsel for the appellant present. Mr. Muhammad Bilal, DDA for respondents present. Written reply on behalf of respondents not submitted. Notice be issued to the respondents for submission of written reply/comments. Case to come up for written reply/comments on 22.08.2019 before S.B at camp court Abbottabad.

  
(Ahmad Hassan)  
Member  
Camp Court A/Abad

22.08.2019

Clerk to "counsel for the appellant present. Mr. Muhammad Bilal learned DDA alongwith Shuja Ali ADO Litigation present and submitted written reply/comments. Adjourn. To come up for rejoinder if any, and arguments on 21.10.2019 before D.B at Camp Court Abbottabad.

  
Member  
Camp Court A/Abad

21.10.2019

Clerk to counsel for the appellant present. Mr. Usman Ghani, District Attorney alongwith Mr. Sohail Ahmad Zeb, Assistant Litigation and Mr. Suja Ali, SDEO for respondents present. Clerk to counsel for the appellant seeks adjournment due to general strike of the bar. Adjourn. To come up for arguments on 19.11.2019 before D.B at Camp Court, Abbottabad.

  
Member

  
Member  
Camp Court Abbottabad

19.04.2019

Counsel for the appellant present.

States that the impugned order dated 28.06.2018 was passed on the basis of previous proceedings and it was noted in the order that the termination order issued on 15.06.2015 was confirmed. In effect the said order against the appellant was set aside by this Tribunal on 21.11.2017 while deciding service appeal No. 1325/2015. Through the said decision the respondents were allowed to proceed afresh against the appellant only in accordance with the law and rules. On the other hand, the impugned order suggests that no proper proceedings were undertaken against the appellant in the second round thus the judgment of Tribunal was disregarded. In the said manner the impugned order issued against the appellant was without affording her an opportunity of defending her cause, it was maintained.

In view of the above the appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 20.06.2019 before S.B at camp court, Abbottabad.

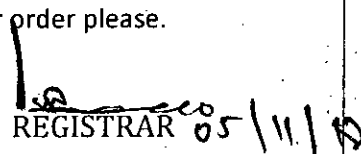
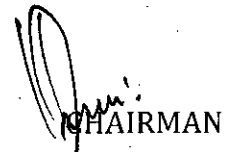

Appellant Deposited  
Security & Process Fee

  
Chairman  
Camp Court, A/Abad

Form- A  
FORM OF ORDER SHEET

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

Case No. 1364/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/11/2018	<p>The appeal of Mst. Saima Qaazi presented today by Mr. Qazi Ghulam Rauf 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 05/11/18</p>
2-	19/11/2018	<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>19.02.2018</u></p> <p style="text-align: right;"> CHAIRMAN</p>
19.02.2019		<p>None present on behalf of the appellant. Notice be issued to appellant and her counsel for attendance and preliminary hearing for 19.04.2019 before S.B at Camp Court Abbottabad.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member Camp Court Abbottabad</p>

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

Service Appeal No. 1364 /2018

Mst. Saima Qazi PST/F/Pry BPS-12 Govt. Girls Primary School, Loon Patian, Tehsil Abbottabad.

...APPELLANT

**VERSUS**

Govt. of Khyber Pakhtunkhwa, through Secretary, Education Govt. of Khyber Pakhtunkhwa Peshawar & others.

...RESPONDENTS

**SERVICE APPEAL**

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4.	Copy of passport	13	"C"
5.	Copy of certificate	14	"D"
6.	Copy of letter dated 07/07/2010	15	"E"
7.	Copy of letter dated 10/10/2012	16	"F"
8.	Copy of news add	17	"G"
9.	Copy of application	18	"H"
10.	Copy of show cause notice	19	"I"
11.	Copy of letter dated 23/06/2014	20	"J"
12.	Copy of letter dated 14/01/2015	21	"K"
13.	Copy of Notification dated 15/06/2015	22	"L"
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...APPELLANT

Through

Dated: \_\_\_\_\_/2018



(QAZI GHULAM RAUF)

Advocate Supreme Court of Pakistan,  
Abbottabad

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

Service Appeal No. 1364 /2018

Mst. Saima Qazi PST/F/Pry BPS-12 Govt. Girls Primary School, Loon Patian, Tehsil Abbottabad.

...APPELLANT

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1603

Dated 05/11/2018

VERSUS

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

....RESPONDENTS

Filed to-day

Registrar

05/11/18

**SERVICE APPEAL UNDER SECTION 4 OF  
SERVICE TRIBUNAL ACT, 1974, AGAINST  
OFFICE ORDER NO.5237-42/SAIMA QAZI  
DATED 28/06/2018 ISSUED BY RESPONDENT**



NO.4 THROUGH WHICH THE MAJOR PENALTY OF REMOVAL FROM SERVICE IMPOSED BY ORDER NO.8875-78 DATED 15/06/2015 WAS CONFIRMED.

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**PRAYER:** ON ACCEPTANCE OF THE INSTANT APPEAL, THE IMPUGNED ORDER DATED 28/06/2018 THROUGH WHICH THE APPELLANT HAS BEEN REMOVED FROM SERVICE, BE SET ASIDE AND THE APPELLANT MAY GRACIOUSLY BE REINSTATED IN SERVICE.

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Respectfully Sheweth:-

1. That appellant was appointed as PST at Govt. Girls Primary School, Loon Patian, Tehsil and District Abbottabad on 22/04/1999, where she performed her duties with due diligence, devotion and efficiency to the entire satisfaction of her seniors.
2. That husband of appellant is employee abroad (Abu Dhabi) who suffer from typhoid for which

the appellant was constrained to avail extra ordinary leave without pay to which she was entitled and which was granted w.e.f 10/08/2008 to 09/08/2010 by the competent authority.

3. That after the expiry of said leave, appellant reported for duty and performed her duty for some periods but under some compelling domestic circumstances and for unavoidable reasons she again applied for two years extra ordinary leave and after approval, availed the said leave without pay. The competent authority converted the said absence period namely 10/08/2010 to 30/03/2012 (538) days into extra ordinary leave without pay and she performed her duties w.e.f 31/03/2012 to 14/09/2012 continuously. The ~~petitioner~~ <sup>respondent</sup> No.2 vide letter No.1887 dated 14/01/2015, directed respondent No.4 to sanction the remaining period as leave without pay.

4. That notwithstanding the clear cut direction contained in letter No.1887 dated 14/01/2015, respondent No.4 dispensed with the need of a formed enquiry and issues the order of removal

from service vide letter No.8875-78 dated 15/06/2015.

5. That appellant preferred departmental appeal against the order of removal from service dated 15/06/2015, and after waiting for the statutory period of 90 days, she preferred appeal to the KPK Service Tribunal.

6. that this Honourable Court vide its elaborate judgment dated 21/11/2017 in service appeal No.1325/2015 came to the conclusion as under.

“As a consequence, the present appeal is accepted and the appellant is reinstated in service. The department is however at liberty to proceed afresh in accordance with law nad rules and in the light of the observations mentioned above”.

7. That after obtaining the copy of the judgment of this Honourable Court, appellant contacted the concerned office to implement the judgment, but appellant was told that matter has been referred to law department. On 10/01/2018 law department also recommended the reinstatement of appellant,

but she was kept in a state of suspension and ultimately she was verbally informed that department is going to initiate fresh inquiry.

8. That without reinstating the appellant into service practically, vide letter No.3421-24 dated 31/01/2018, which was intimated to appellant on 19/02/2018 fresh proceedings were initiated against the appellant, thus indirectly frustrated the order of this Honourable Court. She was simultaneously ordered through the same letter to appear before respondent No.4 for personal hearing.

9. That not withstanding the judgment and order of this Honourable Court the respondent No.4, without affording a reasonable opportunity to show cause and without conducting enquiry in accordance with the mandatory provisions of efficiency and discipline rules, passed the impugned order No.5237-42/Saima Qazi dated 28/06/2018, confirming the order No.8875/78 dated 15/06/2015, through which the appellant was removed from service.

10. That appellant preferred departmental appeal to respondent No.2 against the order dated 28/06/2018 through her counsel on 13/07/2018 personally in the office of respondent No.2.
  
11. That appellant waited for statutory period of 90 days for the decision/action on the departmental appeal but received no intimation or response whatsoever from respondent No.2, hence the present appeal is being submitted within the prescribed period of time, inter-alia on the following grounds;-

**GROUND:-**

- a) That the impugned order is entirely misconceived in points of facts and the law applicable thereto, hence void ab-initio and not bindings on the rights of appellant.
  
- b) That order No.8875-78 dated 15/06/2015 was declared as illegal and was set aside by

the Honourable KPK Service Tribunal vide its judgment dated 21/11/2017, hence the department was required to initiate fresh proceedings and conduct proper enquiry in accordance with the mandatory provisions of law as contained in efficiency and discipline rules.

c) That the procedure adopted by the respondent/department was violative of the fundamental principles of law and natural justice. The so called enquiry was conducted on papers only and that too, at the back of appellant and no opportunity whatsoever was afforded to appellant for hearing and practically confirmed the same order which was set aside by the this Honourable Court.

d) That the department committed grave illegality in confirming the earlier order of removal from service, which had been set aside by this Court. The department failed to appreciate and comprehend the order of this Honourable Court in its true perspective

and substance and then proceed in the light of observations made by the court.

- e) That even in the light of available record, the appellant had completed ten years service and was, as a matter of right, entitled to extra ordinary leave without pay. The major penalty in the wake of documentary evidence available on record was entirely illegal, unjust, uncalled for arbitrary and capricious. The appellant has been condemned un-heard and subjected to grave injustice. The order is on the face of it not sustainable in the eyes of law.
  
- f) That there is no other prompt, efficacious remedy, available to the appellant except the instant service appeal.
  
- g) That the instant appeal is filed well within time.

It is, therefore, humbly prayed that by accepting the appeal, the impugned order of removal from service be set aside and the appellant may be reinstated in service with all the back benefits.

*Qazi*

...APPELLANT

Through

Dated: 5. 11. /2018

*Qazi Ghulam Rauf*

(QAZI GHULAM RAUF)

Advocate Supreme Court of Pakistan,  
Abbottabad

**VERIFICATION:-**

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

*Qazi*

...APPELLANT

*Through Attorney.*



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

Service Appeal No. \_\_\_\_\_/2018

Mst. Saima Qazi PST/F/Pry BPS-12 Govt. Girls Primary School, Loon Patian, Tehsil Abbottabad.

**...APPELLANT**

**VERSUS**

Govt. of Khyber Pakhtunkhwa, through Secretary, Education Govt. of Khyber Pakhtunkhwa Peshawar & others.

**...RESPONDENTS**

**SERVICE APPEAL**

**AFFIDAVIT**

I, Mst. Saima Qazi PST/F/Pry BPS-12 Govt. Girls Primary School, Loon Patian, Tehsil Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

*Saima Qazi*  
**DEPONENT**

*Through Attorney*

(10)

ANNEXURE "A"

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) PRIMARY ABBOTTABAD.

NOTIFICATION

Consequent upon their selection by the Departmental Selection Committee the District Education Officer (F) Primary Abbottabad is pleased to appoint the following trained PTC candidates at the schools noted against their names in BPS.7 Rs.1480-81-2695 plus usual allowances as admissible under the rules with immediate effect subject to the terms and conditions noted at the end.

<u>S.No.</u>	<u>Name of Candidates P/Name and Address.</u>	<u>open/U/C wise Merit</u>	<u>Merit No.</u>	<u>School where posted</u>	<u>Remarks.</u>
1.	Robina Shaheen d/o Rehmat Din R/O Hav:City	Open	1	GGPS,Nagri Fayeen	V/Post
2.	Shamim Akhter d/o Mohabb Khan R/O Malikpura.	"	2	" Palkote	-do-
3.	Gul Jabeen d/o Alaf Din R/O Chamba.	"	3	" Hirlan	-do-
4.	Margbana Rehman d/o Mehboob ur Rehman R/O S.Bandi	"	4	" Bassian Barwala	-do-
5.	Nabils Taj d/o Ali Rehman R/O Pattel	"	5	" Shaheed Abad	-do-
6.	Robina d/o Gulistan R/O S.Bandi	"	6	" Akhreela(B.Gali	-do-
7.	Fozia Nooreen d/o Mehrab Gul R/O S.Bandi	"	7	" <del>do</del> Bagan	-do-
8.	Rifhat Bibi d/o Mohd Farooq R/O Terhana	"	8	" Jatal	-do-
9.	Janira Kousar d/o Mohd Younis R/O Mian De Seri	"	9	" Banota	-do-
10.	Fosheen Anjum d/o Musaffar Khan R/O Nawanshehr	"	10	" Kaghian	-do-
11.	Safida Yasmin d/o Khawaj Mohd Khan r/o Havelian	"	11	" Dhanna Norral	-do-
12.	Fakhra Bano d/o Qutbut Din r/o Upper Kehal	"	12	" Kakmer	-do-
13.	Najam Nissa d/o Ali Akbar R/O Rawalkote	"	13	" Nagaki No. 2	-do-
14.	Atiya Shaheen d/o Rehmat Khan R/O Hav:City	"	14	" Dhanna Noral	-do-
15.	Robina d/o Pir Khan R/O Nagri Bala	"	15	" Kablia Kutlia	-do-
16.	Atiqs Jadoon D/o Mohd Jamil R/O Narrien	"	16	" Dong Malach	-do-
17.	Rukhsana Mansoor d/o Manzoor Hussain R/o Havl:	"	17	" Langrial	-do-
18.	Shezie Rani d/o Rustom Khan R/O Mohar Kalan	"	18	" Utli Pand	-do-
19.	Acila Taj d/o Ali Rehman R/O Pattel	"	19	" Jogan Mar	-do-
20.	Saima Qazi d/o Qazi R/O Bandi Dboundan	"	20	" Sarhan	-do-
21.	Bibi Asma Sarwar d/o Mohd Sarwar r/o N.Shehr	"	21	" Phalwan	-do-
22.	Bushra Bibi d/o Mohamud Arif, r/o Dhodial	"	22	" Nalaki	-do-
23.	Sofia Bibi d/o Khalig Dad R/O Jhaffar	"	23	" Phalwan	-do-

(11)

TERMS & CONDITIONS:-

1. They will be governed by such rules and regulations as may be prescribed by the Govt: from time to time for the category of the Govt: servant to which they belong.
2. In case of resignation without notice one month pay will be forfeited in lieu thereof.
3. They should join the posts within 15 days of the issue of this Notification.
4. Charge reports Should be submitted to all concerned duly verified by the Nambar Dar/Chairman/Members of Khidmat Committee/Chairman PTAs of the School village.
5. Their Original Certificates/Degrees should be checked by the S.D.E.O.(F) Abbottabad at the time of the preparation of S/Books.
6. The appointees are required to produce Health & Age Certificates from M/Authority after taking over the charge.
7. No T.A/P.A is allowed.
8. An undertaking shall be obtained from Master & Degree holder PTC that they will serve in the Department for at least 5 years.
9. Those candidates who failed to take over the charge within 15 days their services will be terminated without assigning any notice.
10. The candidates appointed on the Basis of U/C will served in that U/C for 7 years.

22/11/99  
 DISTRICT EDUCATION OFFICER,  
 (FEMALE) PRIMARY ABBOTTABAD.

Dist: No. ~~99~~ 041-1307 / "ated Abbottabad the, 20 April /1999..

Copy forwarded for information to the:-

1. Director Primary Education NWFP, Peshawar.
2. Accountant General NWFP, Peshawar.
3. PA to Secretary to Govt: of NWFP, Education Deptt: Peshawar.
4. S.D.E.O (F) Primary Abbottabad.
5. H/T, Concerned.
6. Candidates Concerned.
7. District Account Office Abbottabad

DISTRICT EDUCATION OFFICER,  
 (FEMALE) PRIMARY ABBOTTABAD.

M. Rehman Naheca

Anneaux " B "

(12)

45

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECY:  
EDUCATION DEPARTMENT ABBOTTABAD.

EA-PAKISTAN LEAVE

In accordance with the provision through amendment rule-6 in sub rule (1) (B) of Govt: of NWFP, Local Govt: & Rural Department issued through Notification No. (LG-I) 3-196/E.M/05 dated 7-10-2005, Sanction is hereby accorded to the grant of Ex-Pakistan leave in respect of Mst. Seema Qazi, PTC Govt: Girls Primary School, Loon Pattian w.e.f. 10-08-2008 to 09-08-2010 (730 days) EOL without pay on private affairs under the provision of leave rules 1981 as admissible under the rules. //

Necessary entry to this effect should be made in her S/Book and leave accounts.

Note:- The teacher concerned is not entitled for the extension of leave more than two years after the expiry of sanctioned period.

EXECUTIVE DISTRICT OFFICER  
ELEMENTARY & SECY: EDU:DEPT:ABBOTTABAD

Order No. 16481-82 / F.No.7 Vol:IX dated 4-Abad: the 08/8/08.

Copy to the:-

1. Dy: District Officer (Female) Primary Abbottabad with ref: to her No. 5655 dated 1-8-2008 alongwith S/Book of the teacher concerned.
2. Teacher concerned.

DISTRICT OFFICER  
ELEMENTARY & SECY: EDU:DEPT:ABBOTTABAD

Annexure C

(13)

Annexure C



IMMIGRATION OF  
UNITED ARAB EMIRATES  
11 SEP 2010

ENTRY  
11 SEP 2010

الإمارات العربية المتحدة  
UNITED ARAB EMIRATES



Annexure D

پہلے سے موجود ہے

(9)

(14)

2010 کی تاریخ

تاریخ 1-20

30.09.2010

تا

10.08.2010

2011 کی تاریخ

دن 23

18.08.2011

تا

25.07.2011

10

07.09.2011

تا

27.08.2011

Head Teacher  
Govt. Girls Primary School  
Loon Patian Abbottabad

4223 061

Handwritten signature and date 11/10

V. K. F. V. ...  
Annexure E

P15 (1)

To

The Deputy District Education Officer, (Female)  
Abbottabad.

Subject Extension for one year Ex: Pakistan  
Earned Leave.

Respected Madam;

It is submitted that two years Ex-Pakistan Earned Leave had been Sanctioned in my favour by your good self vide endst: No 16481-811 F. No 7 vol: IX dt: 08-08-2008. The Leave in question are exhausting on 9-08-2010. But my private affairs are yet to be finished.

In view of above it is requested that afore mentioned ex-Pakistan E/leave (with out Pay) may please be extended for one more year i.e from 10-8-2010 To 09-08-2011 and Obligated.

Thanking you in anticipation.

Your Obediently

*Saima Qazi*  
Saima Qazi

PTC GGPS LOON PATTIAN

7/7/10

*D. X. / D. O.*  
*D. / A. S. / A.*  
21/7/10

*Abd (circle) Qalandar*  
24/7/10

D-NO-121  
21-7-10

*Amir*

Annexure <sup>ce</sup> F

(176)

~~(176)~~

OFFICE OF THE DEPUTY DISTRICT OFFICER FEMALE PRIMARY ABBOTTABAD.

No. 1235 / 1

Dated 10/10 /2012.

To  
Section Officer (E-III)  
Govt: of Khyber Pakhtunkhwa  
Finance Department  
Peshawar.

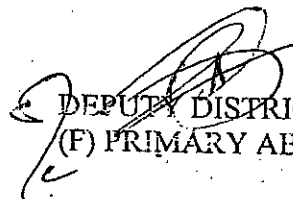
Subject: GUIDANCE.

Memo:

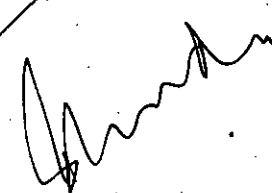
I am directed to refer to the subject noted above and to request that one Mst: Saima Qazi, PST appointed as PST on 21-04-1999. She applied for Ex-Pakistan Leave w.e.from 10-08-2008 to 09-08-2010 (730 days) which was approved and granted. (Her total length of service upto 10-08-2008 is 09 years 03 months and 19 days). After expiry of said leave she has failed to resume her duty on 10-08-2010. She has reported to the school on 31-03-2012 after lapse of 538 days without any information. The competent authority has already been converted her absence period i.e 10-08-2010 to 30-03-2012 (538 days) into EOL without pay. She performed her duty w.e.from 31-03-2012 to 14-09-2012 continuously.

Sir, she has applied for further leave for two years w.e.from 15-09-2012. Necessary guidance may be passed/communicated whether she is entitled of such leave or otherwise.

Your best advice in this regard will be highly appreciated please.

  
DEPUTY DISTRICT OFFICER  
(F) PRIMARY ABBOTTABAD.

*Dec*  
17/12

*Admission*  




آپ سہ ماہی کے لیے PST گورنمنٹ کے پرائمری سکولوں میں سرکاری سرنگھار کے لیے درخواستیں طلب ہیں۔ اس سے پہلے ہی آپ کو سہ ماہی کے لیے EOL (پندرہ دنوں کے باقی) گزار چکی ہیں ہم نے اس سے پہلے ہی آپ کو سہ ماہی کے لیے 24/9/2013 کو آپ کی غیر حاضری کا نوٹس بھیجا ہے پھر آخری نوٹس پندرہ روزوں کے لیے ارسال کیا گیا ہے۔ اس سے پہلے ہی 9/4/2014 کو شیڈول کر دیا ہے آپ کی 15/9/2012 سے غیر حاضری کے متعلق ہم نے سہ ماہی کے لیے کوٹا کے لیے 19/10/28/6/2014 کو ارسال کیا ہے۔ اس سے پہلے ہی 12/35/10/10/2012 کو ارسال کیا ہے۔ اس سے پہلے ہی 8502/11/12/2014 کے 'Guide Lines' حاصل کرنے کے لیے رابطہ کیا ہے مگر ابھی تک کوئی جواب نہیں ملا۔ آپ کو بذریعہ اخباری آئی ٹی نوٹس ارسال کیا گیا ہے کہ اشاعت کے 15 دن کے اندر اندر درخواستیں ارسال کرنا ہیں۔ اگر کوئی جواب نہیں دیا ہے تو اس کے خلاف قانونی کارروائی کی جائے گی جس میں آپ کی طرف سے اخراجات بھی کیا جاسکتے ہیں۔

Also available on [www.khyberpaktankhwa.gov.pk](http://www.khyberpaktankhwa.gov.pk) INF(127)7

**سیڈو پیچنگ ہسپتال سید و شریف سوات**

سیڈو پیچنگ ہسپتال میں جوئیئر ریمڈی کی ذمہ داری آسانیوں پر کرنے کے لیے درخواستیں طلب ہیں۔ تمام درخواستیں بذریعہ اخباری آئی ٹی نوٹس (BPS-17) کو بذریعہ اخباری آئی ٹی نوٹس ارسال کیا جاتا ہے کہ اسے درخواستیں بھیج کر آئی ٹی نوٹس 8/6/2015 کو ہٹا کر ارسال کریں۔ اس پر چیف ایگزیکٹو آفیسر سیڈو پیچنگ ہسپتال سوات کے دفتر میں 10/6/2015 تک 10 بجے تک کوئی TADA نہیں دیا جائیگا۔

1- جوئیئر ریمڈی کے لیے درخواستیں  
2- جوئیئر ریمڈی کے لیے درخواستیں

Criteria  
1- ریکارڈز اور BPS-17  
2- Periphery بروں والوں کو ترجیح دی جائیگی  
(Periphery بروں کرنے والے Periphery بروں سرٹیفکیٹ DGHS سے حاصل کر کے فراہم کریں)

**AYUR TEACHING HOSPITAL, AUBOTI TABADIT**

Sealed bids are invited from the well reputed firms/IT material registered with Govt. of KPK / Govt supply during the current financial year 2014-15:-

S.No.	Description	QTY	E/Money
1	Computer Server	2-No.	2 % of the
2	Computer PC / Printers etc	10-Nos.	do-

- The tender documents/specifications of the eqpt available and can be purchased from the Procure upto 09/06/2015 after deposit of Rs. 1500/- (Non Ref). The specs can also be downloaded from the
- The tender shall be single stage two envelopes b as Technical Bid and other as Financial Bid on the stage Technical Bid shall be opened and lat evaluated/qualified bidders shall be opened.
- Earnest money in shape of Call deposit from th be attached with the financial bid and also an aff CDR is included in the Financial Bid. Failing whic
- The bidders shall be finalized in accordance w Procurement Rules 2014.
- The following documents should be attached wif
  - Legal status along with proof of Registr Government
  - Proof of Registration with Income Tax / Sales Tax
  - Financial status of the firms including bank sta external auditor.
  - Organizational Profile of the company, past expa
  - Capabilities with respect to technical personal machinery and plants.
  - Proof of possessing appropriate managerial cap
- The tender shall be on FOR basis. The insta responsibility of the successful bidder at his risk ar
- The sealed bids shall be receive in the office of date upto 10/06/2015 up till 10:30 a.m and shall op in the presence of the bidders or their authorized a

*(Handwritten signatures)*

18

Annexure H

خدمت اشد میں جہا - EPO کے ریفرنس کے تحت کیے گئے تعلیم کے سلسلے میں

بوسا فٹ ڈسٹریکٹ ڈسٹرکٹ ایجوکیشن آفیسر صاحب (EPO) کے پاس  
صدا یعنی :-

گزشتہ برس بطور ریٹائرمنٹ کے سلسلے میں زیر التوا ہے کہ جس میں  
بجور PST دہیس و تدریس کے واسطے سرانجام دیا گیا ہے۔  
سائیکل میں صند جو لو جو بیوروں کے بنیاد پر ہی پیشگی کی وساطت  
میں پیشگی سے تصدیق شدہ Application (جو 5/5/12) میں (8/9/2012)

جمع کروائی گئی (Pay have not) جس کے نقل کف درخواست بنا ہے۔  
کیونکہ بتاریخ 12-3-1 کو سائیکل کو ایک فکٹا نوٹس ملا جس کے ذریعے  
سائیکل کو معلوم ہوا کہ سائیکل کی کاپی منظور نہیں ہوئی۔ اس طرح سائیکل  
بتاریخ 9/3/12 کو میں SHON CAUSE NOTICE جاری کیا۔ بتاریخ درخواست  
آف عہدہ رخصتی کر کے دیا۔ (اسید کف درخواست ہے) بتاریخ 2

2/2  
کیونکہ اس کے باوجود فورم 7 بتاریخ 2012 روزنامہ اخبار میں  
سائیکل کو دوبارہ نوٹس جاری کیا گیا اور 15 دن کے اندر حاضر ہو کر  
حکم دیا گیا۔

جو کہ ایک ملازم کے ساتھ اختلافی اور قانونی طور پر ناانصافی ہے۔  
صدا یعنی :- سائیکل کے ساتھ جہاں سے اسے بطور ریٹائرمنٹ کے لیے  
پہنچا گیا (یعنی Kind commend) کے ذریعے اس کے سائیکل کو تعلیم  
الہیہ 2012 میں حاصل کرنے اور تدریس کے سلسلے میں پیشگی کی کاپی

کی منظوری کے حکم صادر فرمادیں۔  
سائیکل کے لئے پیشگی دعاؤں سے ہے۔

Aliya Ghani

Saima Qazi

سائیکل کے ساتھ ساتھ کافی  
گورنمنٹ گزٹ میں اس کے لئے نوٹس  
کوئی کاپی یا تدریس کے  
کے لئے وضع نہیں کیا گیا۔

بتاریخ 30/3/2012

Annexure "eg."

19

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & SE) ABBOTTABAD.

SHOW CAUSE NOTICE.

I Mr. Muhammad Riaz Swati, Executive District Officer (E & SE) Abbottabad as competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) rule, 2011 do hereby served you Mst. Saima Razi Government Girls Primary School Loran Pateria Abbottabad follows:-

- You have been absent from duty with effect from 10-8-2010 to date till date as per report of the Assistant District Officer (F/P) Abbottabad dated 06/2/012
- There is no need of holding a formal enquiry in this case.
- In exercise of the power conferred by the Khyber Pakhtunkhwa, Govt: Servants (Efficiency & Discipline) rules, 2011 the competent Authority is hereby pleased to dispense with the conduct of a formal enquiry and serve you with the instant show cause notice with the direction to submit your defence in writing within 15 (fifteen) days of the receipt of this notice as to why the major penalty of rule-4(b) of the said rules should not be imposed upon you and also intimate whether you desire to be heard in person.
- In case you failed to submit your reply within the stipulated period, it will be presumed that you have no defence to offer and ex-parte decision will be taken against you.

No 214 Dated 23/2/2012

COMPETENT AUTHORITY

Mst. Saima Razi D/O Razi  
Vill: P.O Bandi Dhundlan  
Teh: Dist: A. Abad.

[Signature]

Annexure

cc J 73

20

1

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

No. 1910 / EOL/Saima  
Dated 20/6 /2014.

To  
The Director,  
Elementary & secondary Education  
Khyber Pakhtunkhwa Peshawar.

Subject: **GUIDANCE.**

Memo:

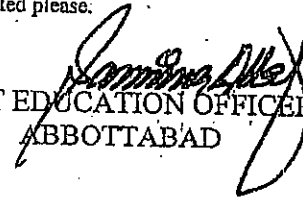
I have the honour to request your good self that one Mst: Saima Qazi, PST appointed as PST on 21-04-1999. She applied for Ex-Pakistan Leave w.e. from 10-08-2008 to 09-08-2010 (730 days) which was approved and granted. (Her total length of service upto 10-08-2008 is 09 years 03 months and 19 days). After expiry of said leave she has failed to resume her duty on 10-08-2010. She has reported to the school on 31-03-2012 after lapse of 538 days without any information. The competent authority (EDO E & SE) has converted her absence period i.e 10-08-2010 to 30-03-2012 (538 days) into EOL without pay on her repeated request. She performed her duty w.e. from 31-03-2012 to 14-09-2012 continuously.

Sir, she has applied for further leave for two years w.e from 15-09-2012 but she has already been availed over and above the prescribed limit/Entitlement. In this regards this office has been got published her absence in the Daily News Paper AKHBAR on 9/4/2014.

It is also bright into your kind Notice that she has Rendered about 0 years 2 months and eight days service, according to the Govt Rules/Regulation she is entitled for only two years EOL (Without Pay) and has availed 1268+624=1992 days leave without pay during the entire period.

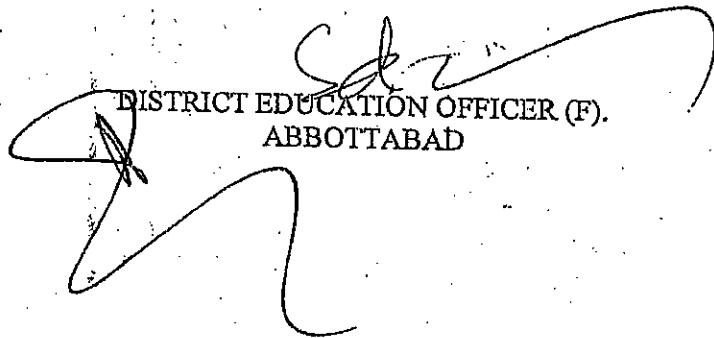
In this regards your necessary guidance is required to enable the undersigned to dispose off the said issue.

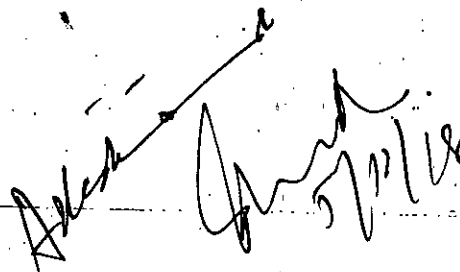
Your best advice in this regard will be highly appreciated please.

  
DISTRICT EDUCATION OFFICER (F).  
ABBOTTABAD

Endst of even No & Date

Copy to the SDEO(Female) Abbottabad for information.

  
DISTRICT EDUCATION OFFICER (F).  
ABBOTTABAD

  
5/11/14

Annexure " K "

22

**Directorate of Elementary & Secondary Education Khyber  
Pakhtunkhwa, Peshawar**

No. 1887 /A/Abad.

Dated: 12/1 /2015

To.

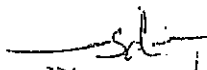
The District Education Officer,  
(Female) Abbottabad.

Subject: **GUIDELINES.**

Memo:

Your attention is invited to the office letter No: 8502, dated 04/12/2014 on the subject cited above. The concerned teacher i.e. Saima Qazi (PST) GGPS Loon Pattian has availed 1863 days. However, she has total leave approximately 09 year services. The official replied the show cause notice within stipulated period and resumed her duties.

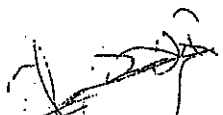
So you are directed to sanction her remaining period leave without pay and direct her to continue her duty.

  
Director,  
E & SE, KPK,  
Peshawar

Endst: No: \_\_\_\_\_/

Copy forwarded to the:-

1. SDEO, (Female) Abbottabad.

  
By: Director,  
E. & SE, KPK,  
Peshawar

Annexure "L"

29

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

NOTIFICATION

Where as you Mst. Saima Qazi EX-PST GGPS Loon Pattain Circle Qalanderabad was proceeded for having committed the following acts which constituted in efficiency and Mis- Conducted under Rules (3) sub Rules(a),(b) and (c) of the Khyber Pakhtunkhwa Govt; servants efficiency and discipline Rules 2011.

Where as you have keeping your selves absent from duty w.e.f. 01-09-2012. — (2)

Where as you have availed 1268-days EOL (With Out pay) on the following detail.

w.e.f. 10-08-2008 to 09-08-2010= 730-days.

w.e.f.10-08-2010 to 30-03-2012=538-days (730+538=1268-days).

And your service is 09-years 03 Months and 18-days(below 10 years) so you are entitled to avail only two years (730-days) EOL and you have availed 538-days as excess for which you were not entitled.

You remained absent from duty w.e.f.01-09-2012 as reported by the ADO Circle Qalanderabad.

For your long absence dispute this office approached the high ups of the Department thrice. According to the letter No. 1887 dated 14-01-2015, neither you appear before the undersigned nor you joined the school /duty. (3)

After your Dis-appearance has been published by this office in the Daily Aaj dated 25-05-2015 but you also failed to appear before the undersigned within 15-days of publication of notice to intimate the cause of absence falling which an.Ex-Party decision would be taken against you under the relevant Rules. (4)

No therefore on exercise of power conferred by the Khyber Pakhtunkhwa Govt; servant (Efficiency & Discipline) Rules 2011, the competent authority District Education Officer (Female) Abbottabad is please to impost major penalty of removal from service of Mst. Saima Qazi PST GGPS Loon Pattian (Circle Qalanderabad)from the date of absence.

Endst.No. 8875-78 PST (F/P)

District Education Officer  
(Female)Abbottabad.  
Dated Abbottabad the 15-6- /2015.

Copy to:-

- 1- The Director Elementary & Secondary Education Khyber Pakhtubkhwa Peshawar.
- 2- The Sub Divisional Education Officer (Female) Abbottabad.
- 3- The District Accounts Officer Abbottabad.
- 4- Mst. Saima Qazi PST GGPS Loon Pattain Abbottabad.
- 5- ADEO Circle Qalanderabad.

*Saima Qazi*  
District Education Officer  
(Female)Abbottabad

بخدمت افسر ڈپٹی انسپیکٹر (زبانہ) مدارس ضلع ایسٹ آباد

عنوان: ایسٹ لنگھڑا نظر ثانی ڈائری نمبر 6256

مناظرہ: شری سٹیٹ بک بورڈ کے مورخہ 26/7/15 کے تحت جاری کردہ حکم تعلیم تاریخ 15/8/15 ملاحظہ کیجئے جو چارجز لنگھڑا کے لئے کی گئی ہیں۔ Removal from service سے اہلیات جاری کی گئی ہیں۔ ان کے جوابات کی دفعہ سائیکلنگ ٹیسٹوں کے لئے لکھی گئی ہیں اور ان افسروں سے ان جوابات کو تسلیم بھی کیا ہے جو کہ حکم تعلیم کے مندرجہ ذیل امور ہیں اور جو کہ ثبوت درج ذیل ہیں۔

1) یہ آگے سے 1268 days BOA (with out pay) کے متعلق پوچھا ہے۔ اس پر ثبوت

DE GUIDANCE لکھ ہے جو 1910ء میں کے تحت تاریخ 28/6/2014 کو ڈائری نمبر

ایڈیشنل ایف ڈی کپکس پشاور کو بھیجا گیا ہے۔ جس میں تاریخ 11/11/14 کے تحت Absence Period

(30/3/2012 to 10/8/2014) کو BOA سے تبدیل کرنے میں convert کر دیا ہے۔ (ڈپٹی ایف ڈی کے درخواست پڑھا)

2) یہ آگے سے 850 سرکل فلڈز آباد (F.M) کے رپورٹ تاریخ 9/12/14 کو لکھی گئی ہیں۔

کہ اس تاریخ کو میں ڈپٹی ایف ڈی کے غیر حاضری کی جگہ دن بھر ملازمین کے پیرا ایف ڈی کے آخری لائن کے مطابق ڈپٹی ایف ڈی (ایف ڈی) کے ساتھ ساتھ

She performed her duty w.o.p 31/3/2012 to 14/7/2012 continuously

3) Letter No 1887 جاری کردہ 14/7/2015 کو DE GUIDANCE لکھی گئی ہے۔

جو کہ ڈپٹی ایف ڈی کے ساتھ ساتھ جاری ہوا۔ (کفایت) میں کے مطابق

ان کے دفتر کو یاد دہانی کی گئی ہے کہ ان کے سرورس کو Continue کرنے

کے حکم صادر فرمادیں۔ جو کہ آگے کے دفتر کو فوری طور پر پورا کرنا

بار بار آفیس سے رابطہ کیا گیا۔ لیکن یہ دفعہ سے نہیں کیا گیا۔ اس لئے یہ

جلد حل ہوگا۔ لیکن سائیکلنگ ٹیسٹوں کے لئے بھی تقاریر نامہ لکھی گئی ہیں جن کے

Handwritten signature on the left margin.

فکر تعلیم سے امکانات کے لیے مختلف وزنی کوششیں  
ضابطہ عالیہ!

سائل نمبر 1 جو وقتاً چارج لگایا گیا ہے، 25/15 روز نامہ آج سے پونہ ماہ سے  
اس کے لیے پندرہ روزہ سائل نمبر 1 اور 2 کے جواب دیا تھا۔ جس کا کافی  
لف درخواست ہے (3)

مناہٹ عالیہ: سائل 1 سے منسلک ہے اور اسے اپیل کرتے ہوئے سائل کے خلاف

پتھر پتھر فیصلہ درج نمبر 2 کی بنیاد پر والیس لیا جا

امدادی ایئر لائنز کے جاری کردہ ہالٹہ 2015 کے  
مقررہ سائل کے سروس کو continue کرنے کی اطلاعات جاری کی گئی  
سائل 2 کے لیے ہم دعا کر رہے ہیں۔ Thanks.

بصورت دیگر سائل کو صرف حقوق کے لیے عدالت عالیہ سے  
درخواست کرنے کے لیے کوئی سائل لگائی اور قانونی حق ہے  
جماعت 1973 civil servant rule.

x

کالے چارے اٹھائے!

1) ڈیپارٹمنٹ آف ایئر لائنز (PST) کے لیے درخواست

2) ڈیپارٹمنٹ آف ایئر لائنز (PST) کے لیے درخواست

3) ڈیپارٹمنٹ آف ایئر لائنز (PST) کے لیے درخواست

4) ڈیپارٹمنٹ آف ایئر لائنز (PST) کے لیے درخواست

5) ڈیپارٹمنٹ آف ایئر لائنز (PST) کے لیے درخواست

مناہٹ عالیہ: سائل 1 اور 2 کے لیے عدالت عالیہ سے  
درخواست کرنے کے لیے کوئی سائل لگائی اور قانونی حق ہے  
جماعت 1973 civil servant rule.

Saima Qazi

dated 28-07-2015

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2 Annexure "A"

~~26~~  
25

چارج لپورٹ

صیانتہ صانیعہ قاضی دفتر قاضی نائب معلمہ گو رطنت گورنمنٹ اسکول

سکول لون پٹیاں میں مورخہ 3/3/12 کو ماضی کر دی گئی

نائب معلمہ صانیعہ قاضی

اول معلمہ

Saima Qazi

Head Teacher  
Govt. Girls Primary School  
Leon Patian Abbottabad

Alisa

5/2

26

27

Annexure Co 27

حاضری رڈ پورٹ

میں معلمہ صاحبہ قاضی نے گورنمنٹ ہیرا مہرا اسکول کون پیش کیا ہے

بنداز دو پیمبر چارج لے لیا ہے

چارج دہترہ . چارج کنندہ

Saima Qazi

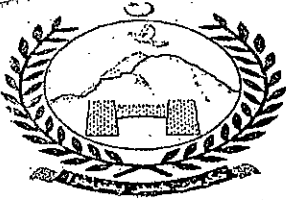
Nabila bibi

14/4/2014

2021  
حاضری میں

Alia

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



No. 4297 / Annex

Dated: 15 / 2018

0992-342533, 0992-342314

Deofemale\_abbottabad@gmail.com

(27)

To

**Mst. Saima Qazi (Ex-PST)**  
GGPS Loon Pattian  
Abbottabad.

Subject: **SHOWCAUSE NOTICE**

Enclosed please find herewith the Showcause Notice of the above mentioned official on account of allegations explained in the attached notice. Your reply should reach in the office of the undersigned within 07 days positively. Duplicate copy of the showcause notice may be returned to this office after signature as taken of receipt.

**District Education Officer**  
**(Female) Abbottabad**  
District Education Officer  
(Female) Abbottabad



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

28

**SHOW CAUSE NOTICE:**

I Miss. Faiza Shafi, District Education Officer (F) Abbottabad as competent authority under Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline rule 2011), do hereby serve upon show cause Notice/ Explanation to Miss. Saima Qazi (Ex-PST) GGPS Loon Pattian, Abbottabad for your non-serious attitude towards duty.

**ALLEGATIONS:**

You have been absent from duty w.e.f 15-09-2012 to the date of termination from the services, i.e 15-06-2015. Before this absent period you already availed 1268 days leave of which 538 days are in excess. Through enquiry report, conducted by Mst. Hina Fatima principal GGHS Nawansher (BPS-19) all the charges upon you are proved.

Therefore, in exercise of powers conferred upon me Government Servant (Efficiency & Discipline) rules 2011, I being competent authority served upon you with the instant show cause notice with the direction to submit reply within 07 days of the receipt of this notice as to why the following penalties as defined in rule-4(b)-iii should not be imposed upon you and also intimate whether you desire to be heard in person.

- i. Removal from Service.

In case you failed to submit your reply within the stipulated period it will be presumed that you have no defence to offer and ex-part decision will be taken against you under the rules ibid.

Mst. Saima Qazi (Ex-PST)  
GGPS Loon Pattian  
Abbottabad

COMPETENT AUTHORITY  
District Education Officer,  
(Female) Abbottabad

خدمت اقدس میں شریک ہو کر ایف ڈی اے (زناتہ) ضلع سوات میں

Reply of show cause notice

جناب عالیہ: - مندرجہ منبابت سے ادب سے اس کی خدمت میں درج ذیل گزارشات پیش کرتی ہوں۔

1) یہ کہ سائلہ سے جس Absent میری طرف سے سب سے زیادہ (16-5-18) کی بنا پر ہے۔ اس پر جواب سائلہ کی طرف سے دیا گیا ہے کہ وہ روالہ میں ہے۔

2) یہ کہ سائلہ نے جبکہ with out شکوہ پیش کیا ہے اس کے لئے رولہ میں ہے اور اسے

تو ڈسٹرکٹ آفیسر سے دفتر سے رہنمی اجازت دی گئی اور اسے Guidance letter سے مطلع کیا گیا ہے۔ جس کا کاپی لفٹ درخواست میں ہے۔

3) یہ کہ سائلہ کا بھیجے گئے بار میں عیب ڈسٹرکٹ آفیسر کے (اس سے جواب دہ) کے دفتر کو تیار کرنے کا ریکارڈ 14/11/15 وصول ہوا۔ تو اس وقت سے بھی سائلہ کو اس میں کبھی بھیجے گئے منفریہ آئی ہے۔ جس میں واضح اہکانات ہیں۔ کہ سائلہ کی طرف سے کہ continue ہے۔ (کاپی لفٹ درخواست میں ہے)

4) یہ کہ GUIDANCE letter وصول ہونے سے باوجود مجھے اطلاع میں رکھا گیا کہ 14/11/15 کو جاری کیا گیا ہے بعد تیار ہونے 15-6-2015 کو آئیڈیٹنگ Notificatin کے ذریعے

Removal of service کی بنا پر اسے ADO سب کے لئے اس پر رپورٹ بھیجی گئی ہے جو کہ Absent جبکہ اسے تاریخ کو ڈسٹرکٹ آفیسر صاحبہ سے حاضر کیا گیا ہے۔

5) یہ کہ درج بالا نوٹس کو عدالت کی طرف سے سائلہ کو Service Tribunal (11-11-2017) کے ذریعے

Law Department (Re-instated) کے لئے علم (dt/0-01-2018) صادر ہوا ہے۔

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ضابطہ عالیہ کے تحت Service Tribunal نے تیار کی 2017ء کو

محال کرنے کے حکم صادر فرمایا۔ اس وقت سے

ایک ہفتہ کے لئے کو سروس کے دن کیلئے ہر شہانہ کی اجازت

17 - بجھا آف بلایا گیا۔ کبھی Show cause کیا گیا۔

جس سے سروس کے دن زیادہ ہر شہانہ کی - اور اس سے

اجازت کیلئے سروس کے دن کو اس کے ہمدردانہ طور پر

سروس کو (Re-Instate) کیا گیا۔

سروس کے لئے بہت سے درخواستیں کی گئی ہیں اور اس کے

مشورہ و عنون رکھے ہیں۔

کی صورت میں سروس کے فیصلہ کے مطابق

چھ ماہ کے لئے سے اور سروس کے قانونی اور اخلاقی

حق استعمال کے لئے دوبارہ Service Tribunal سے

سے شروع کرنے کی تاہم انصاف حاصل کرنا

Thanks.

الف

سروس کے لئے قانونی

سابق حکم

49PS کوں پٹیاں

تعداد 1000 سے زیادہ

dated 21-05-2018.

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خدمت صواب DEO صاحبہ گورنمنٹ گلرز درالہ سن

ایسٹ آباد

جناب عالی

گزارش ہے کہ سائلہ حکیمہ تعلیم میں P.T.C پوسٹ پر نام لکھی تھی  
 Ex Pakistan لیوینے کے دوران سائلہ کو یوحہ غیر حاضری Remove from service  
 سر دیا گیا ہے جس کے خلاف سائلہ نے سروس ٹریبونل میں اپیل دائر  
 کی جو کہ کے سائلہ کی اپیل اس پر ایت پر کے دوبارہ انکوٹری کی جائے  
 کورٹ کے آرڈر پر تقریباً 7 ماہ گزار چکی ہیں۔ سائلہ کے خلاف جو انکوٹری  
 عمل میں لائی گئی ہے وہ سائلہ کو <sup>Act</sup> Right to information کے تحت سائلہ  
 کو انکوٹری کی کاپی حسب ضابطہ مطابقتاً دی جائے  
 سائلہ تاخیر آئیے دیے دیے گئے ہیں

عین نو ریش ہوئی

(لا ایل)

سائلہ Ex P.T.C پٹی گورنمنٹ گلرز درالہ سن

لوہیاں

صاحبہ عالیہ  
Saima Dazi

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EX-PAKISTAN LEAVE

(32)

In accordance with the provision through amendment rule-6 in sub rule (1) (B) of Govt: of NWFP, Local Govt: & Rural Department issued through Notification No.(LG-I) 3-196/E.M/05 dated 7-10-2005, Sanction is hereby accorded to the grant of Ex-Pakistan leave in respect of Mst.Saima Qazi, PTC Govt:Girls Primary School, Loon Pattian w.e.f. 10-08-2008 to 09-08-2010 (730 days) EOL without pay on private affairs under the provision of leave rules 1981 as admissible under the rules.

Necessary entry to this effect should be made in her S/Book and leave accounts.

Note:- The teacher concerned is not entitled for the extension of leave more than two years after the expiry of sanctioned period.

*scf*  
EXECUTIVE DISTRICT OFFICER  
ELEMENTARY & SECY: EDU:DEPTT:ABBOTTABAD

Endst:No. 16481-82 / F.No.7 Vol:IX dated 4.Absd the, 08/8 /08.

Copy to the:-

1. Dy: District Officer (Female) Primary Abbottabad with ref: to her No.565E dated 1-8-2008 alongwith S/Book of the teacher concerned.
2. Teacher concerned.

*[Signature]*  
DISTRICT OFFICER  
ELEMENTARY & SECY:EDU:DEPTT:ABBOTTABAD

*[Signature]*  
*[Signature]*



حضرت جناب اعلیٰ تعلیم و تربیت سیکریٹری، حکومت پنجاب  
33

گزارش ہے کہ میں ٹیچر کے طور پر سول گورنمنٹ گریجویٹ اسکول  
سکول لونڈیاں میں تدریس فریق سہ ماہی میں رہی ہوں۔

میں نے Without Pay چھٹی گزارنے کے بعد 10.8.2011 کو سکول

میں حاضر ہوئی اور پھر 10.2.2011 کو دوبارہ چھٹی لی۔ پھر میں نے

24.7.2011 سے 7.9.2011 تک حاضر ہوئی۔ حاضر ہو کر یہ دو راتیں

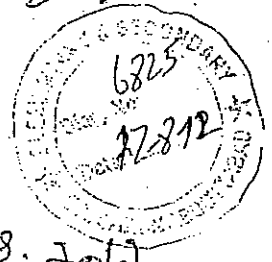
میں نے سکول میں آ کر تدریس کیا مگر یہ ٹیچر کے طور پر نہیں ہے

تک میں آ کر تدریس کر رہی ہوں۔ اس کے بعد سال بننا ہے۔

اپنے گزارش ہے کہ میں نے حاضر ہو کر اس کا اندراج سکول میں کیا ہے

کہ میں نے چھٹی کی درخواست پر غور کیا ہے۔

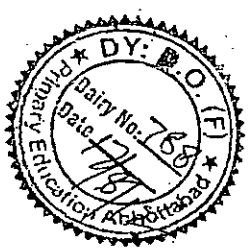
تا کہ آپ کے پاس دیا گیا ہو گا۔



16.8.2012

سائید صاحبہ قاضی

گورنمنٹ گریجویٹ اسکول لونڈیاں، Saimu Oazi



M. Jaffer  
for M. Jaffer  
17/8/12

جادی سکول

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## ENQUIRY REPORT

**Name Of Enquiry Officer:** HINA FATIMA PRINCIPAL GGCMS NAWANSHER ABBOTTABAD.

**Appointed By :** District Education Officer (Female) Abbottabad

**GROUNDS FOR PROCEEDINGS: -**

Guilty of habitually absence of MST Saima Qazi, from duty without prior approval of Leave.

**Procedure/Methodology:-**

1. Analysis of all the documents regarding this case attached as annexures from 1 to 31.
2. Personal hearing of MST Saima Qazi.
3. Information's through questionnaire from different personals

**Case History:-**

Name of teacher: **SAIMA QAZI**

Post: PST

Place of Posting: Ex-PST GGPS Loon Pattian, Circle Qalandarabad

Date of 1<sup>st</sup> Appointment: 21-04-1999

**Total Length of service:-**

- i. 21-04-1999 to 07-12-2003 (1690 days)
- ii. 03-03-2004 to 09-08-2008 (1619 days)
- iii. 01-04-2012 to 14-09-2012 (177 days)

**Leave Period:-**

- i. 08-12-2003 to 02-03-2004 (85 days)
- ii. 10-08-2008 to 09-08-2010 (730 days)
- iii. 10-08-2010 to 30-03-2012 (538 days)

**Absence Period:-**

- i. 15-09-2012 to the date of termination from the services, i.e, 15-06-2015

*Hina Fatima*

*Abdul Wahid*

## FACTS AND FINDINGS

For the absence period of MST Saima Qazi GGPS Loon Pattian Circle Qalandarabad, office of the District Education Officer (F) initiated proceedings as per Government rules and regulations and all the codal formalities were observed. The teacher failed to produce any evidence for her presence in the school during this period. Finally she prayed to the office that this period may be converted into leave without pay. As she has total length of service 09 years, 06 months and 06 days and before this absence period she already availed 1268 days leave of which 538 days is already in excess. So she is no more in title for any further leave. Hence the department has imposed major penalty of removal from service of MST Saima Qazi PST GGPS Loon Pattian Circle Qalandarabad. The effecty, appealed in the honorable service tribunal KPK which provided MST Saima Qazi Relief by accepting her appeal that she is reinstated and department has liberty for fresh proceeding.

Consider upon the judgment of honorable tribunal MST Saima Qazi is reinstated by District Education officer (Female) Abbottabad and fresh proceeding is being launched as decided by the honorable court.


### Conclusion:-

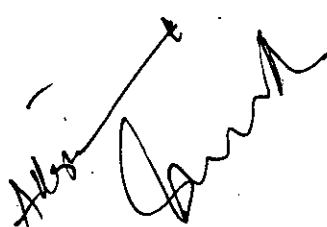
MST Saima Qazi was provided every opportunity to provide any evidence in her defense which she failed to do so. All the documents which are in support of this case were reanalyzed. different officers were also interviewed personally to seek into the matter.

All the charges against MST Saima Qazi are based on facts.

### Recommendations:-

Department may continue with the same major penalty i.e, removal from service which is imposed on MST Saima Qazi.

  
PRINCIPAL  
GGCMS NAWANSHEHR  
ABBOTTABAD



35

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.**

**CONFIRMATION OF TERMINATION ORDER ISSUED VIDE NOTIFICATION  
NO.8875-78 DATED. 15.06.2015.**

To implement the judgment order dated 21.11.2017 of the Honorable KPK Service Tribunal, Comp Abbottabad under Appeal No. 1325/2015, this office Has Issued the Re-Instatement order of Mst. Saima Qazi D/o Qazi Ex-PST, GGPS Loon-patian (Qalandarabad) vide Notification No.3421-24 dated 31.01.2018 with the condition to observe codal formalities.

For the compilation of legal process, this office has conducted the Inquiry by the Principal GGHSS Nawashehr (Abbottabad) vide office No. 3429-32 dated 02.02.2018, More over she has been issued the show cause notice vide this office No. 4297 dated 16.05.2018 for personal hearing also, However the Competent authority was not satisfied and there seems no justification for her long absence from the duty with effect from 15.09.2012.

According to the recommendation of the inquiry officer "Department may continue with the same major penalty i-e removal form service which is imposed on Mst saima Qazi "

Under the said situation/circumstances, it is hereby decided that the termination order issued by this office vide No. 8875-78 dated 15.06.2015 is based on facts. So the same is hereby confirmed.

Hence, Mst. Saima Qazi Ex-PST, GGPS Loon Patian is hereby terminated from the service w.e.f the date already been mentioned in the Notification No. 8875-78 dated 15.06.2015 issued by this office due to long absence from the school/duty.

Endst.No 5237-42 /Saima Qazi file.

*S/*  
District Education Officer  
(Female) Abbottabad.

Dated 28/6 /2018.

Copy to:-

1. The Registrar, KPK Service Tribunal Peshawar.
2. The District Accounts Officer Abbottabad.
3. The SDEO (Female) Abbottabad.
4. The ASDEO (Female) Circle qalandarabad.
5. Mst.Saima Qazi D/o Qazi Village & Post Office Bandi Dhundan, Abbott bad.

*S/*  
District Education Officer  
(Female) Abbottabad.

*A/*  
*S/*

خدمت و قدر میں برتری کے لیے SERVICE TRIBUNAL فیڈریشن کو نخواستہ (پتلا)

جنا صاحبی:-

سائلہ کی رجسٹرڈ نمبر 1325/2015 جو کہ تاریخ 19-11-2015 کے زیر التوا

رجسٹرڈ ہے۔ اور بعد میں تاریخ 21-11-2017 کو (Camp court)

میں ایک آرڈر کے ساتھ Reinstatement کے بارے میں حکم صادر فرمایا۔

اور بعد میں سائلہ نے اپنے متعلقہ افسر سے رجوع کیا تو کہا گیا کہ آج

Law Department کو بھی دیا گیا ہے۔

اس کے بعد 10-01-18 کو Department نے بھی حکم دیا کہ سائلہ کو

REINSTATE کیا جائے۔ لیکن حکم تعلیم نے اپنی روایت پر قرار رکھتے

ہوئے۔ یہ سائلہ سے سائلہ کو آفس بلایا۔ اور زبانی سائلہ کو

کہا گیا کہ آج کو ہی عدالت چلے گا۔ لیکن بعد میں

کو بتایا گیا کہ آج کے صدف اب ریٹائرنگ حکم نامہ (ٹولواٹری ہو رہی)

ہے۔ اور آج قرار تاریخ 28<sup>06</sup>/<sub>2018</sub> کو Honorable-S. Tribunal

کو، Department کے فیصلہ کے پروانہ کے بغیر سائلہ کو دوبارہ

Terminate کر دیا گیا۔ جو کہ سائلہ نے تو ظلم اور نا انصافی ہے۔

اور حکم تعلیم نے تو سب سے عدالت چلے۔ جس سے سائلہ کو منہایت ہی

تکلیف اور ذہنی پریشانی ہے اور اس سے اس کی زندگی پر حکم تعلیم

کے صدف کا رویہ کی وجہ سے اور S. Tribunal کے فیصلہ کے خلاف

نواز مسیحیح

Saima

5995  
03/9/18

Ali



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
CAMP COURT ABBOTTABAD

Service Appeal No. 1325/2015

Date of Institution... 19.11.2015

Date of decision... 21.11.2017 *TF*

Mst. Saima Qazi, PST/F/Primary BPS-12 Government Girls Primary School,  
Loonpatiyān, Abbottābād. ... (Appellant)

Versus

1. The Director E&SE, Khyber Pakhtunkhwa, Peshawar and 5 others.  
... (Respondents)

SYED IFTIKHAR AHMAD SHAH, ... For appellant.  
Advocate

MR. KABEERULLAH KHATTAK, ... For respondents.  
Addl. Advocate General

MR. NIAZ MUHAMMAD KHAN, ... CHAIRMAN  
MR. AHMAD HASSAN, ... MEMBER

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: - Arguments of the learned  
counsel for the parties heard and record perused.

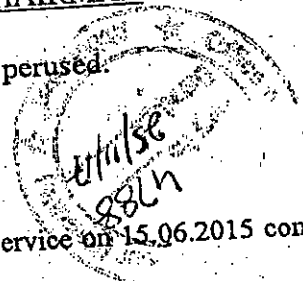
FACTS

2. The appellant was removed from service on 15.06.2015 communicated to her on  
26.07.2015 (according to the appellant). Against which she filed departmental appeal on  
28.07.2015 which was not responded to and thereafter, she filed the present service  
appeal on 19.11.2015. The charge against the appellant was her wilful absence from duty.

ARGUMENTS

The learned counsel for the appellant argued that in the impugned  
order dated 15.06.2015 three periods have been mentioned: That all these

**ATTESTED**  
Khyber Pakhtunkhwa  
Service Tribunal  
Camp Court, Abbottabad



*ADD (C) ...  
...  
25/11*

*Handwritten signature*

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
CAMP COURT ABBOTTABAD



Service Appeal No. 1325/2015

Date of Institution... 19.11.2015

Date of decision... 21.11.2017

Mst. Saima Qazi, PST/F/Primary BPS-12 Government Girls Primary School,  
Loonpatiyān, Abbottābād. ... (Appellant)

Versus

1. The Director E&SE, Khyber Pakhtunkhwa, Peshawar and 5 others.  
.... (Respondents)

SYED IFTIKHAR AHMAD SHAH,  
Advocate ... For appellant.

MR. KABEERULLAH KHATTAK,  
Addl. Advocate General ... For respondents.

MR. NIAZ MUHAMMAD KHAN, ... CHAIRMAN  
MR. AHMAD HASSAN, ... MEMBER

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: - Arguments of the learned  
counsel for the parties heard and record perused.

FACTS

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CHIEF MEMBER  
Khyber Pakhtunkhwa  
Service Tribunal  
Camp Court, Abbottabad

*Alisi*  
*Shah*

three periods have been covered by a letter of Directorate of Education dated 14.01.2015 wherein the competent authority was issued guidelines regarding sanction of leave to the appellant. It was also mentioned in the said letter that the appellant had resumed her duty. That in view of letter dated 14.01.2015 the whole proceedings dashed to ground.

4. On the other hand, the learned Addl. Advocate General argued that the appellant was removed from service for her absence for the period commencing from 15.09.2012 till date of the impugned order. That the guidelines dated 14.01.2015 were subject to availability of leave. That no leave was available therefore, the mentioned period was not converted to extraordinary leave. He further argued that the competent authority has rightly removed the appellant from service. The learned AAG next added that the departmental appeal is time barred, therefore, the present appeal is also time barred.

#### CONCLUSION.

5. Regarding limitation, if the period is reckoned from 26.7.2015, the date of communication as alleged by the appellant, then the appeal is within time and if the period is reckoned from the date of impugned order, then the departmental appeal is time barred. But since the appellant in his departmental appeal had alleged that the impugned order was communicated to her on 26.07.2015 then the burden shifted to the respondents to prove the communication earlier to that date but the department has not annexed any dispatch/diary etc. discharging their burden. Therefore, it is presumed the communication as alleged by the appellant,

**ATTESTED**

ADMINISTRATOR  
Hyderabad  
Service Tribunal  
20 Court, Abbottabad

*[Handwritten signature]*



and the departmental appeal is within time and for that matter the present service appeal is also within time.

6. As argued by the learned Addl. Advocate General that the impugned order was based on the absence of the appellant for the period commencing from 15.09.2012 and in this regard he referred to a show cause notice dated 23.2.2012. If we go through this show cause notice of 23.2.2012 it pertains to the period from 10.08.2010 to 06.02.2012 but this period is converted by conversion of her absence to extraordinary leave as is clear from the letter of the DEO dated 28.06.2014 addressed to the Director Elementary & Secondary Education which means that this show cause notice has got no relevancy to the period commencing from 15.09.2012. For the later period an advertisement was published in the daily newspaper which clearly disclosed that the appellant was absent from 15.09.2012. This notice was published under Rule 9 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011. According to Rule 9 the period of 15 days was to be given to the appellant for resuming the duty. In pursuance thereof the appellant appeared in the office and resumed her duty on 01.06.2015 by submitting an application. When the appellant appeared in pursuance of the said advertisement it was legal requirement that the proceedings against the appellant under Rule 9 mentioned above should have been dropped but the authority passed the impugned order of removal of service of the appellant. If the authority was to proceed against the appellant for misconduct due to her absence for the said period, the proper course was to have issued charge sheet and statement of allegations and then the formal enquiry. But the authority did not adopt the said course. This Tribunal does not comment on the letter dated 14.1.2015 because this is a guideline and the DEO was guided to convert remaining period of the appellant as leave without pay. It was not a conversion order because the conversion could be ordered by the

ATTESTED  
JES  
DIRECTOR  
Khyber Pakhtunkhwa  
Government Tribunal  
Lahore

*[Handwritten signature]*

(41)

DEO and not by the Director. Leaving this aspect aside, the very order of removal from service is against Rule 9 mentioned above.

7. As a consequence, the present appeal is accepted and the appellant is reinstated in service. The department is however, at liberty to proceed afresh in accordance with law and rules and in the light of the observations mentioned above. Parties are left to bear their own costs. File be consigned to the record room.

Announced  
21-11-17

Sd/- Niaz Muhammad Khan  
Chairman Camp Court  
Abbottabad -

Sd/- Ahmad Hassan.  
Member

Certified to be true copy

*[Signature]*  
JUDGE  
Khyber Pakhtunkhwa  
Service Tribunal  
Camp Court Abbottabad

Date of Presentation of Application	21-11-17
Number of Wards	1600
Copying Fee	14-00
Urgent	-
Total	14-00
Date of Issuance	22-11-17
Date of Receipt	22-11-17

*[Signature]*  
Ahmed

49/21

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

RE-INSTATEMENT

Consequent upon the Judgement order announced on 21-11-2017 of the honourable Court, Khyber Pakhtunkhwa Service Tribunal Camp Court Abbottabad under Appeal No.1325/2015 and as decided in the Meeting held in the Law Department on IC-I-2018;

Mst: Sayena Wazi Ex-PST GGRS Ioon Pattian (Balochistan) is hereby Re-Instated in the service for the purpose of affording her an opportunity for the personal hearing, to obey the order of the Court/Tribunal, on the usual terms & conditions of the Government Service Rules issued from time to time.

NOTE

1. No RA/DA/TG is allowed.
2. She is directed to attend the office of the undersigned for personal hearing within seven days after the issuance of Notification.

*[Handwritten Signature]*

District Education Officer (F)  
A b b o t t a b a d.

Endst No. 3421-24 / Dated A/Abad, the 31/1/2018

Copy to:-

1. The Registrar, KPK Service Tribunal, Peshawar.
2. The D.O, Abbottabad.
3. The SDEO (F) Abbottabad.
4. ASDEO (Female) Balochistan.

*[Handwritten Signature]*  
District Education Officer (F)  
A b b o t t a b a d.

19-2-218

*[Handwritten Signature]*

Ms (9431)

43

To,

13/2

The Director Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar

Subject: **DEPARTMENTAL APPEAL AGAINST OFFICE ORDER  
NO.5237-42/SAINA QAZI DATED 28/06/2018 ISSUED BY  
DISTRICT EDUCATION OFFICER (FEMALE)  
ABBOTTABAD.**

Sir,

With due respect, it is submitted that the office order mentioned above through which I have been terminated from service on the basis of order No.8875-78 dated 15/06/2015 is absolutely illegal, unjust, against facts, without lawful authority and liable to be cancelled due to the following reasons:-

- a. That the order is in violation of the judgment of Honourable Khyber Pakhtunkhwa Service Tribunal. The learned court had declare the earlier notification of termination of service of appellant as illegal, hence the service of appellant can not be terminated on the strength of that notification dated 15/06/2015.
- b. That confirmation of earlier notification dated 15/06/2015, which was set aside and declared illegal by the KPK Service Tribunal, amounts to contempt of court hence without lawful authority.
- c. That in de-novo proceedings, the department was required to initiate fresh proceedings. The so-called enquiry was conducted at the back of appellant and in violation of the mandatory provisions of Efficiency & Disciplinary Rules. The appellant was neither charge nor

a reasonable opportunity to show cause was afforded to appellant. The procedure adopted by the enquiry officer was entirely misconceived and not sustainable and amounts to unheard condemnation as no written record of so-called enquiry was maintained.

- d. That the application of appellant of 16/08/2012, which was allowed by the District Education Officer, Abbottabad, was misplaced by the staff, which was sufficient to prove that charge of willful absence was factually incorrect and she was allowed to proceed on leave, and was also legally entitled to leave. Copy of attached.

In the above mentioned circumstances, it is respectfully prayed that by accepting the appeal, the order of DEO Abbottabad mentioned above may be cancelled and appellant be reinstated into service.

Yours truly,

*Saima Qazi*

Mst. Saima Qazi,  
PS/F/Primary BPS-12,  
Govt. Girls Primary School, Loon Patian,  
Abbottabad

Dated: 13/7/2018

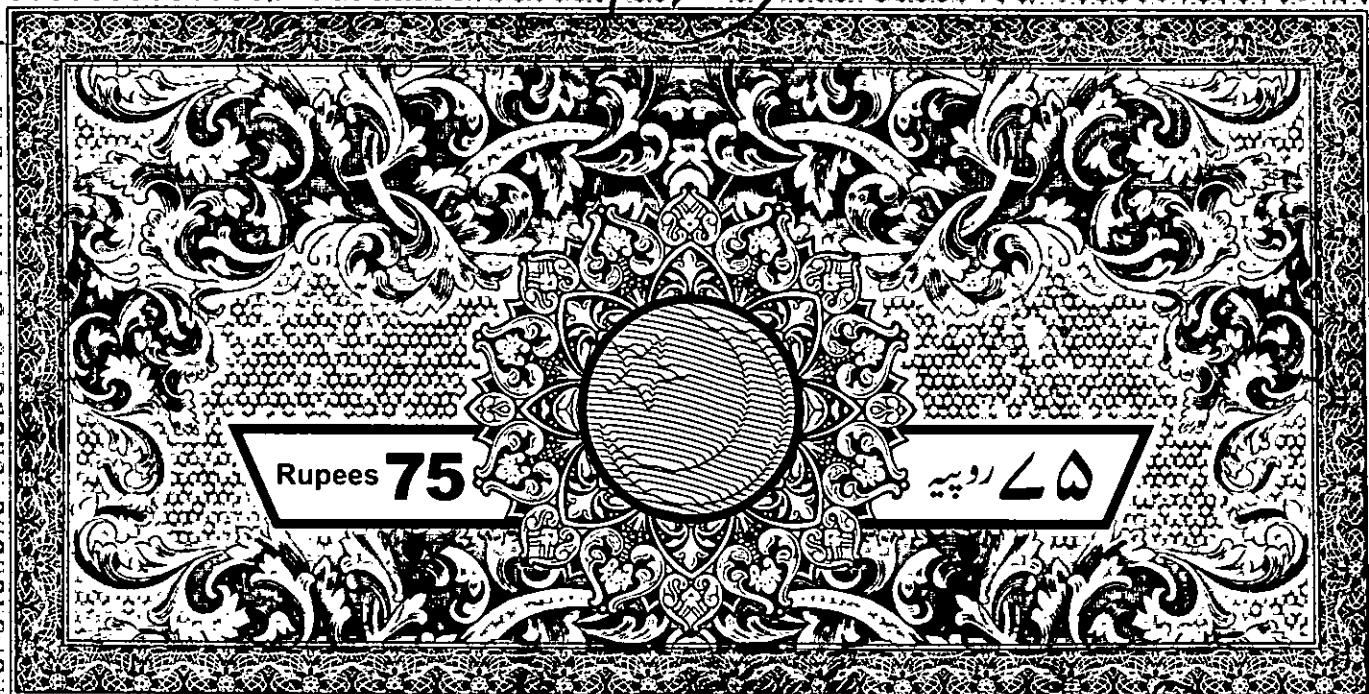
Through;-

*Qazi Ghulam Rauf*

(QAZI GHULAM RAUF)  
Advocate Supreme Court of Pakistan,  
Abbottabad

13/7/18

*Alison*  
*Qazi*



چار قطعہ شرافت والی ہے 75 + 30 = 105 روپیہ

”منیار نام خاص“

مندرجہ ذیل صاحبہ قاضی زوم عبدالستار سندھ چوراگاہوں  
کاٹول عیسیٰ وضع ایسٹ آف پورٹرا حویلی شرافت گارڈ مین

0-5491978-13101-5691978-03 17 آئی بیو - اقراری ہوئی ہے  
2018

منظورہ پیمبر ورنٹ گریڈ پرائمری سکول یونین شہاب ایسٹ آف

میت تعینات تھی جہاں منظورہ نے مورخہ 10/08/08  
کوئیال ایسٹ آف روضت با حوالہ مورخہ 20/08/2010  
اور سیدہ زوبیرہ رضت کا 05/08/2010  
منظورہ کو غیر قانونی

مورخہ 15/08/2015 8875-78 06 15/08/2015

راجو پٹن آفسیر (زنہ) ایسٹ آف نے ملازمت سے

Terminate کر دیا، منظورہ نے آرڈر مذکورہ کو

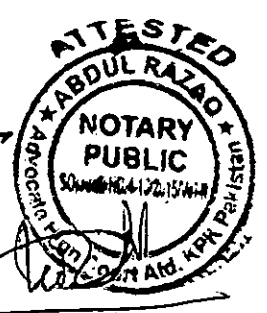
عدالت سروس ٹریبونل صیبرختو خواہ نشیاوار میں جلیغ

کر دیا جو عدالت مذکورہ نے حکم مذکورہ بالا

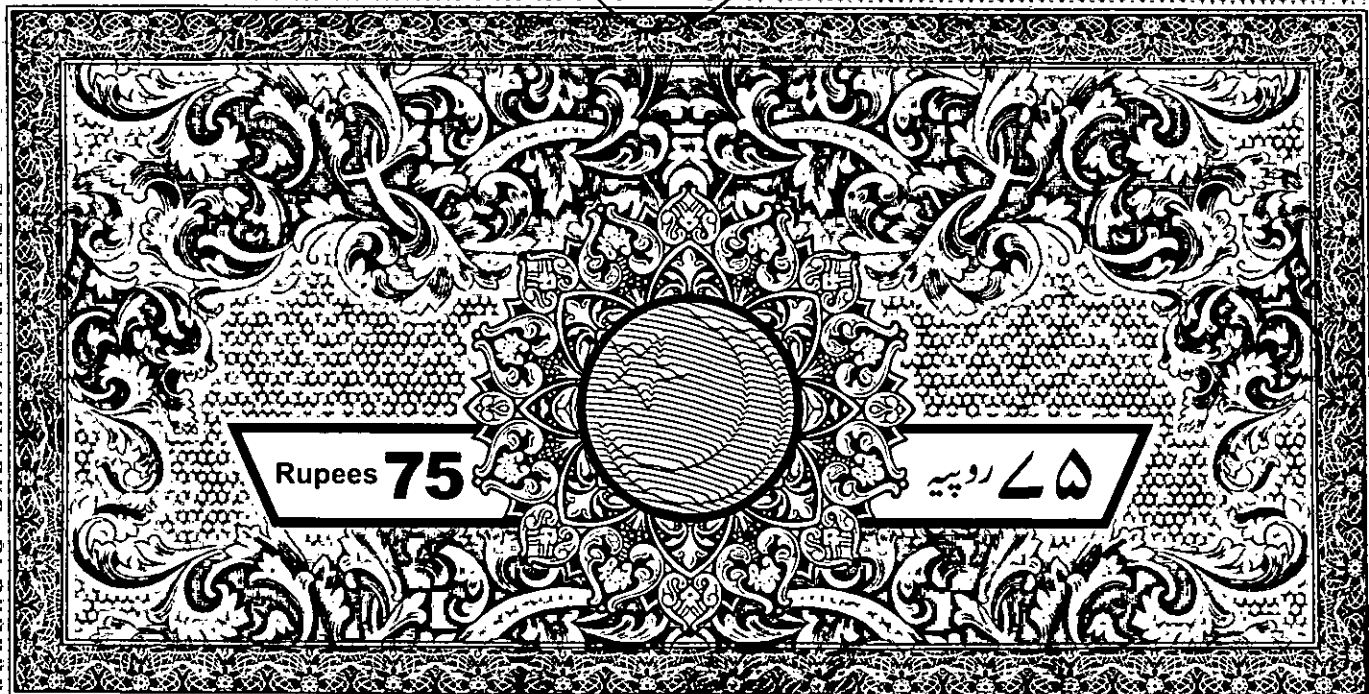
کو legal قرار دیا ہے صدرت عدالت میں کرنے

حکم ذرا پیمبر منظورہ کو صدرت عدالت میں عدالت میں لیا گیا۔

ABBAR MANSAM MUGHAL  
Regd. No: 140/DT: 22-8-1985 PHC  
Notary of Local Judiciary, District 2nd Grade  
Place: P.O. S: ABO MABRO  
My License Expire on: 31.8.2018  
Serial #: 899 Date: 09.08.2018



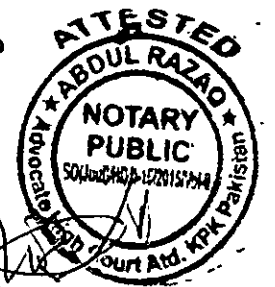
09/08/2018



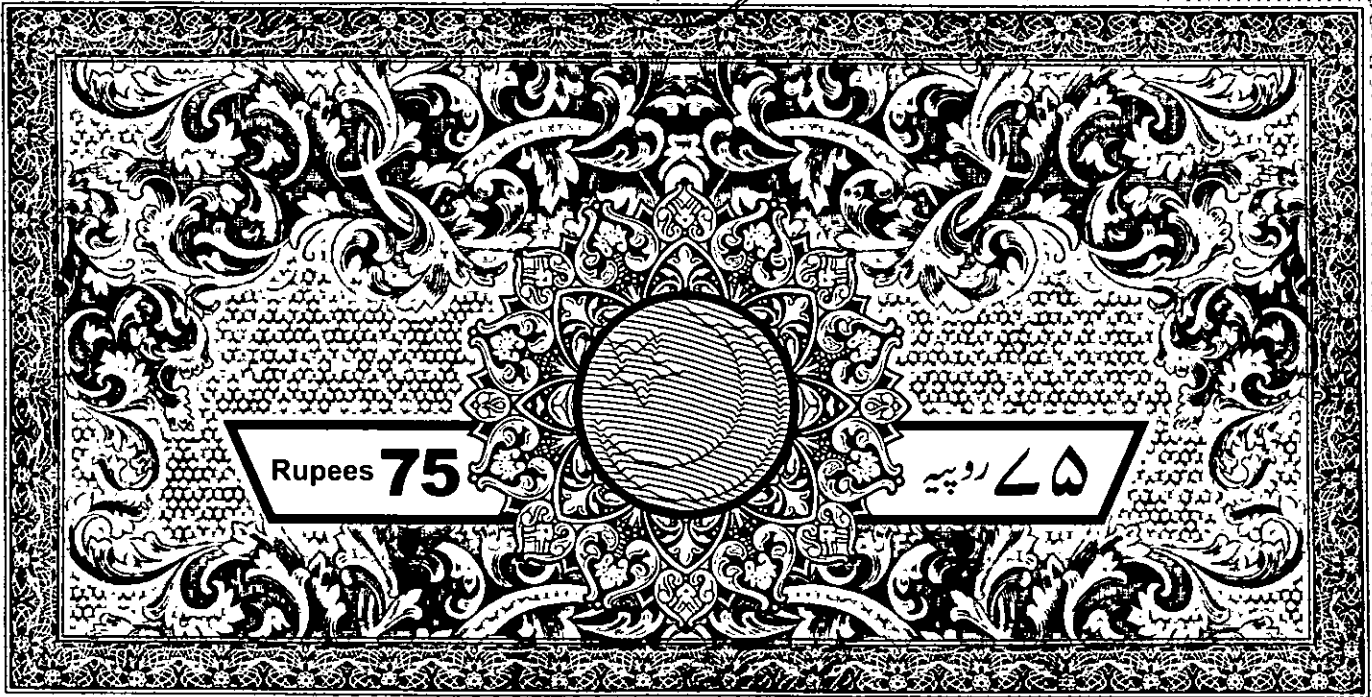
(2)

اب منظرہ دو بارہ سروس ٹریبونل KPK شماره میں داخل کیے گئے  
 قانونی چارہ کنرٹیکلی خواہاں ہوں مگر جوہرہ میں نشین  
 عدالت خواتین ہونے کے اصل میں اسل اپیشن  
 دائر کرنا اور پیروی و موافقت کرنا سے  
 حاضر و معذور ہوں اسلئے اعمال مقامی ہوش و  
 حواس فقیر بہر صبر و استراہ وغیرہ بہر ضابطہ و ارضیت فرم  
 این جانب سے والد ام صغیر مسیحی قاضی و لاہ صبر عالم  
 کسٹم بانڈوں ڈھونڈنا اور - عیش و مصلح اسلئے تیار  
 حاصل ہونے تک تلافی کارڈ وغیرہ - 307 5699-13101 غیر یہ  
 27<sup>10</sup>/<sub>2009</sub> کو اختیار سے مندر و نامزد کر کے اختیار  
 تفویض و منتقل کرتی ہوں کہ وہ پیروی جانب سے بہ صدف  
 و سہولتیں ایجوکیشن آفیسر (زنانہ) اسلئے آلا وغیرہ اسلئے یا پیشین  
 عدالت سروس ٹریبونل صغیر خواہ شماره میں داخل کر کے اور

SHABIR MUHAMMAD MUGHAL  
 Regd. # 140 - Dt: 22-8-1985, PHC  
 Nature of Lic: Common V. Civil and Grade  
 Place of Bus: S-SHABIR ABAD  
 My License Expires on: 31.8.2018  
 Serial # 1829 Date: 29.08.2018



2018/08/29

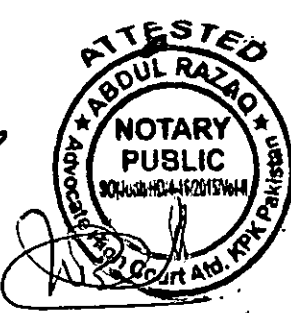


(3)

حسب عواہد پر خود پیروی و عواہد پر ہی نہ تفریق یا اپنی  
 نہ تفریق یا اپنی عواہد پر ہی نہ تفریق یا اپنی عواہد پر ہی نہ تفریق یا اپنی  
 بیان عواہد پر ہی نہ تفریق یا اپنی عواہد پر ہی نہ تفریق یا اپنی  
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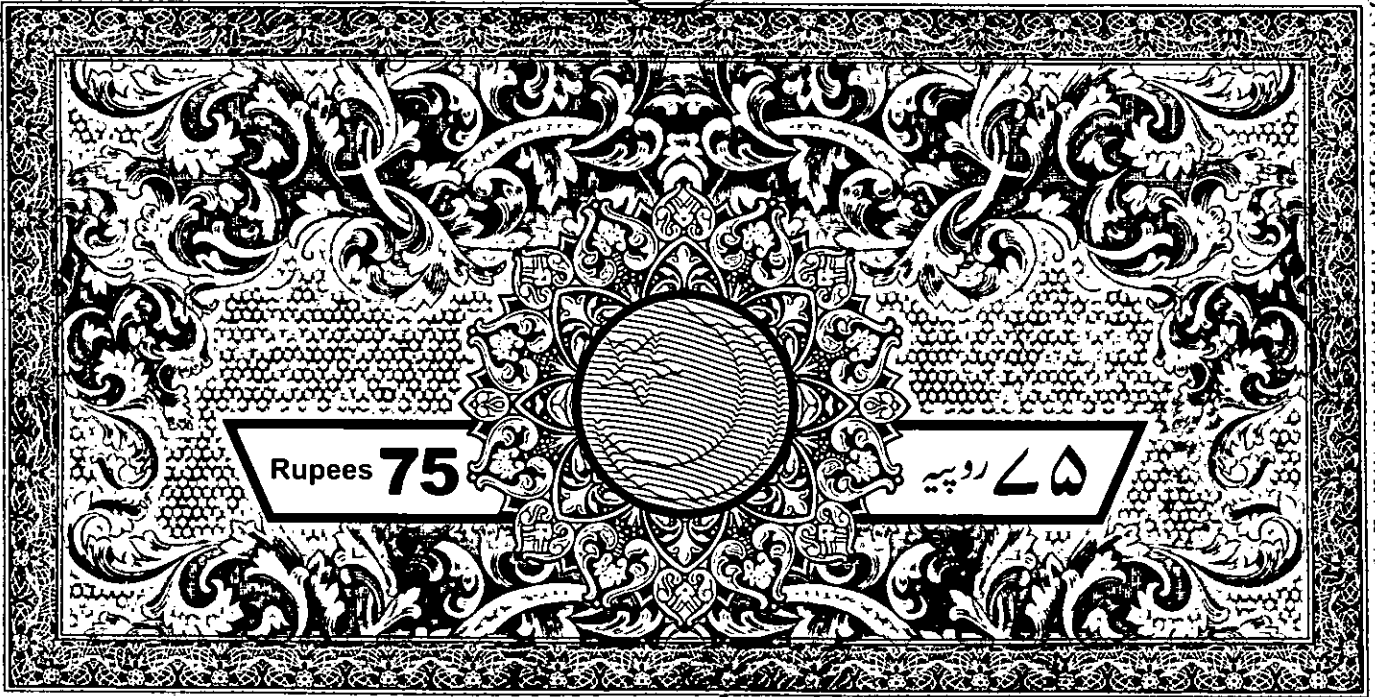
SHABIR HUSSAIN MUGHAL  
 Roll No: 140- Dt: 22-8-1985 PHC  
 Nature of Lic: Penmanship Writing Art Grade  
 Pk No: 81914-99-86807 LAHAD  
 My Licence Expire on: 31.8.2018  
 Serial No: 1399 Date: 29.08.2018

تاکیداً اس عہد نامے کے تحت پاکستان پیروی و عواہد پر ہی نہ تفریق یا اپنی  
 حسب عواہد پر خود پیروی و عواہد پر ہی نہ تفریق یا اپنی  
 عواہد پر ہی نہ تفریق یا اپنی عواہد پر ہی نہ تفریق یا اپنی  
 عواہد پر ہی نہ تفریق یا اپنی عواہد پر ہی نہ تفریق یا اپنی  
 عواہد پر ہی نہ تفریق یا اپنی عواہد پر ہی نہ تفریق یا اپنی  
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 عواہد پر ہی نہ تفریق یا اپنی عواہد پر ہی نہ تفریق یا اپنی



09/08/2018





(4)

الحضرت مختیار خاص ام موہوت کو فیصلہ منظورہ کاروائی پر مستعمل کرنے کے لئے اختیار خاص حاصل ہوئے ہیں۔ عکس و پیرا دستہ مختیار خاص ام مذکورہ فیصلے منظور و قبول ہو گا۔ لہذا مختیار خاص پیدار اور برادری کے نام سے شہیدانہ عزائم سے تادم بوقت ضرورت کام آئے۔

Simi Qazi  
 09/08/2018

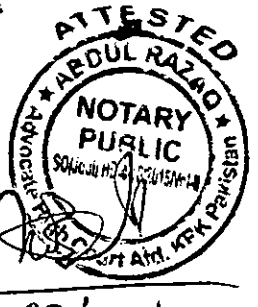
مختیار خاص اختیار دینے کے لئے

CNIC # 13101-5491978-0

SHABIR MUSAIN KHAN  
 Regd. # 100/2005 P/005  
 Nature of License: Under 2nd Grade  
 Place of Issue: BOTTABAGH  
 My Licence expires on: 31.8.2018  
 Serial # 4899 Date: 09.08.2018

Ahsin Ali  
 احسن علی ولد قافی اہلسہ  
 کاروائی و صورتوں سے اس کے لئے  
 13101-7440861 →

محمد یونس  
 محمد یونس ولد محمد یونس  
 کاروائی و صورتوں سے اس کے لئے  
 13101-0898107-5



09/08/2018

کورٹ فیس

## وکالت نامہ

بعدالت سرمدیہ سید محمد عزیز خاں۔ شمارہ

عنوان: صاحبہ ماسخی پیام حاجت مہدی کے لئے

منجانب: رہنمائی

نوعیت مقدمہ:

## باعث تحریر آنکھ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

ماسخی سندھم رزف امروہٹ۔ سید محمد کوٹ۔ رہنمائی

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر فائٹ و فیصلہ بر طرف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دخل کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مفکر 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 پر داختم مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو فرچہ و ہر جانہ 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 مفکر مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراء استجارت ناشر، بیخہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المقوم:

بمقام:

Saima Begi through attorney

Saima

"A"

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

No.

113

APPEAL No. 1364 of 20 18.

Mst. Saima Gazi

Appellant/Petitioner

Versus

Through Secy Education Pesh:

RESPONDENT(S)

✓  
Notice to Appellant/Petitioner

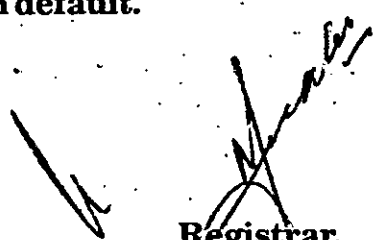
Mst. Saima Gazi PST,  
F/ Prg BPS-12 Jant.

Girls Primary School Loon Patian  
Tehsil Abbottabad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17-11-2018 at 8:00 AM

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

at Camp Court A-Head

  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"A"**

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

No.

APPEAL No. 1354 of 20 18

TB

Mst. Saima Qazi

Appellant/Petitioner

Versus

Through Secy. Edu. Dept. Pesh.

RESPONDENT(S)

Notice to Counsel Appellant/Petitioner

Qazi Ghulam Rauf  
Advocate Supreme Court  
of Pakistan at Abbottabad

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

10-4-2019 5:00 PM

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

at Camp Court A. Ahmad

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**“B”**

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

No.

Appeal No..... of 20

1364

TB

Appellant/Petitioner

Mst: Saïma Bazi

Respondent

through Secy. Edu: KPK

Respondent No.....

4

Notice to:

- District Education Officer (F) A. Abad

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

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

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

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

Day of..... June 29

at Camp Court A. Abad

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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

**"B"**

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

TB

No.

Appeal No. 1364 of 20 18

Mst. Sauma Gozi

Appellant/Petitioner

Versus

Through Secy. Edu. K.P.K. Pesh.

Respondent

Respondent No. 5

Notice to: —

Executive Distt. officer E.E. & Soc.  
Education Abbottabad

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 28/6/19 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

28/6

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

Day of June 20 19

at Camp Court A. Road

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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

**"B"**

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

No.

TIB

Appeal No. 1364 of 2018

MST: Saima Qazi Appellant/Petitioner

Through Secy. Edu. K.P.K. Pesh. Versus Respondent

Respondent No. 3

Notice to:

Deputy Director, Ele. & Sec. Education  
Govt. of K.P.K. Peshawar.

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

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

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

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

Day of June 2019

at Camp Court A. Abad

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

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

**"B"**

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

T13

No.

Appeal No.....1364..... of 20 198

.....M.S. Saad Gazi..... Appellant/Petitioner

Versus

.....Through Secy. Edu. & Sci. Pesh. Respondent

Respondent No.....2.....

Notice to: - Director, Edu. & Sci. Education Dept. of  
12 Pk Peshawar

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on.....22.....8.....2019.....at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this.....28/6.....

Day of.....June.....20 19

at Camp Court A. Akbar  
*[Signature]*  
Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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



**"B"**

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.**

JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

713

No.

1364

18

Appeal No. .... of 20 ..

Mst. Saima Qazi

Appellant/Petitioner

Through Secy. Edu.

Versus

Govt.

Respondent

Govt. of K.P.K. through Secy. Education  
Peshawar

Respondent No. ....

Notice to: —

WHEREAS an appeal/petition under the provision of the North-West Frontier Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 22<sup>nd</sup> June at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. .... dated ..... 28/6

Given under my hand and the seal of this Court, at Peshawar this .....  
Day of ..... 20 ..

at Camp Court A. Alod

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

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

*Handwritten initials*