


15.06.2022

None for the petitioner present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Shuja Ali, ADEO Litigation for the respondents present.

Representative of the respondents department submitted documents containing the case of leave encashment that has been submitted to Finance Department for provision of funds, which according to them will be provided in the next financial year. Notice be issued <sup>to</sup> petitioner as well as her counsel for the date fixed. To come up for further proceedings on 15.08.2022 before S.B at Camp Court Abbottabad.

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

17<sup>th</sup> Oct. 2022

None present on behalf of the petitioner. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Notice be issued to petitioner and his counsel. To come up for further proceedings on 15.11.2022 before S.B.

  
(Kalim Arshad Khan)  
Chairman

18.01.2022

Brother of the petitioner present. Mr. Zahid Gul, ADEO (Litigation) and Mr. Hamza, Assistant Accountant alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present and produced leave encashment bill by stating that the amount of leave encashment shall be soon paid to the petitioner after availability of the budget. Adjourned. To come up for implementation report on 16.03.2022 before the S.B at Camp Court Abbottabad.



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

16.03.2022

Due to non-functional of the Tribunal, the case is adjourned to 19.05.2022 for the same.



Reader

19.05.2022

None for the petitioner present. Mr. Muhammad Asif Masood, DDA for respondents present.

Notices be issued to the petitioner as well as hercounsel. To come up for further proceedings before S.B on 15.06.2022 at camp court Abbottabad.



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

EP 59/2018

17.11.2021

Counsel for the petitioner and Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG alongwith Shujaa Ali, ADO for the respondents present.

The representative of the respondent No. 3 when questioned about the information regarding Service Book as required vide order dated 17.03.2021, he stated that the Service Book of the petitioner was misplaced and has not been found from office of respondent No. 5 where it was sent for passing of different payments. He has further stated that all dues payable to the petitioner have been drawn and paid to her except of leave encashment which is pending because of non-availability of Service Book. The respondent department is directed to reconstruct the Service Book by comparison of the entries with copy of the Service Book, if available in office or in possession of the petitioner without further delay and submit the case for leave encashment of the petitioner to the District Accounts Officer Abbottabad; who in turn shall not raise any objection to withhold the passing of bill of leave encashment on ground of the Service Book being reconstructed. To come up for implementation report on 18.01.2022 before the S.B.




Chairman  
Camp Court, A/Abad

17.03.2021

Brother of the petitioner on behalf of petitioner present. Mr. Asif Masood Ali Shah, learned DDA alongwith Mr. Shuja Ali ADO for respondents present.

Representative of respondent stated that implementation report has already been submitted as per orders. Remaining dues regarding Leave encashment which pertains to Service Book of the petitioner. Service Book was handed over to the petitioner in the Office of District Account Office Abbottabad personally and from there Service Book has been misplaced. Respondent No.4 is directed to attend the court and apprise the Tribunal in respect of Service Book and other Back benefits of the petitioner. To come up on 17/16 2021 before S.B at Camp Court, A/Abad.



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

17.06.2021

Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 30.09.2021.



Reader

30.09.2021

Nemo for the petitioner. Mr. Muhammad Adeel Butt, Addl. AG alongwith Zahid Gul, ADEO for the respondents present.

Notices be issued to petitioner/counsel for next date. To come up for further proceedings on 17.11.2021 before the S.B at Camp Court, Abbottabad.



Chairman  
Camp Court, A/Abad

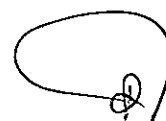
E.P. No. 59/2018  
Saeeda Bibi vs Govt

21.10.2020

Haq Nawaz real brother of petitioner on behalf of petitioner present.

Usman Ghani learned District Attorney for respondents present.

A miscellaneous application in respect of non-availability of Service Book of the petitioner had been submitted which has been pending since long. Notice of this application be served upon respondents and the respondents are directed to process the case of petitioner forthwith failing which necessary action in accordance with law will be initiated against all. Respondents are further directed to make sure presence of an officer of Grade-17 in order to apprise the Tribunal in respect of Service Book and other back benefits of the petitioner. To come up on 16.12.2020 before S.B at Camp Court, Abbottabad.



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

Due to COVID-19 case is  
ad Joured to 17.03.2021



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 / 21  
10 / 2020 at camp court abbottabad.

  
Reader

21.01.2020

Brother of the petitioner present. Mr. Muhammad Jan, DDA alongwith Mr. Shuja Ali, SDEO for respondents present.

Learned DDA presented a photocopy of letter dated 23.12.2019 addressed to District Comptroller of Accounts, Abbottabad for grant of pension to the petitioner alongwith pension/service certificate and both the documents have been placed on record. It is regretted that pension case of the petitioner is held up since her retirement on medical grounds on 10.04.2019. The DEO(F) Abbottabad is strictly directed to get her case approved from the quarters concerned within one week positively. The District Comptroller of Accounts, Abbottabad is also directed to issue PPO without further loss of time, failing which his salary would be attached. In the meanwhile salary of respondent no.3 and 4 already attached shall continue to be attached till payment is made to the petitioner. To come up for further proceedings on 17.02.2020 before S.B at Camp Court, Abbottabad.



Member  
Camp Court Abbottabad

21.11.2019

Mr. Haq Nawaz, brother of the petitioner on behalf of the petitioner present. Mr. Usman Ghani, District Attorney alongwith Mr. Shuja Ali, ADEO for respondents present. It is brought on record that judgment dated 20.11.2017 is yet to be implemented in letter and spirit by the respondents. Representative of the respondents conceded at the bar inordinate delay on their part in finalizing the case but assured that pending issues of the petitioner would be redressed positively by issuing a corrigendum well before the next date of hearing. In the meanwhile warrants of attachment of salary of respondent no. 3 and 4 be issued forthwith. In case the matter is not resolved within the given deadline, the law will take its course. Case to come up for further proceedings on 21.01.2020 before SB at camp court Abbottabad.




Member  
Camp Court Abbottabad



17.09.2019

Brother of the petitioner on behalf of the petitioner present. Mr. Muhammad Bilal Khan, Deputy District Attorney alongwith Mr. Shujja Ali, ADO (Litigation) for the respondents present and requested for adjournment on the ground that implementation report is in process. Adjourned to 20.11.2019 for implementation report before S.B at Camp Court Abbottabad.

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad

20.11.2019

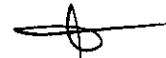
Brother of the petitioner on behalf of the petitioner present. Mr. Usman Ghani, District Attorney alongwith Mr. Zahid Gul, ADO for respondents present. Representative of the respondents seeks adjournment. Adjourn. To come up for further proceedings on 21.11.2019 before S.B at camp court Abbottabad.

  
Member  
Camp Court Abbottabad

17.06.2019

Brother of the petitioner on behalf of the petitioner and Mr. Muhammad Bilal, DDA alongwith Mr. Zahid Gul, ADO (Lit) for respondents present.

On the previous date of hearing last opportunity was granted to the respondents to produce implementation report. Today representative of the respondents informed that further time was needed to process case of the petitioner. This shows that the respondents have no regard for the directions of this Tribunal. They have developed a habit to un-necessarily prolong such cases so as to add to the miseries of the poor litigants. This Tribunal is left with no other option but to adopt coercive measures against the concerned. As a first step, warrants of attachment of salary of respondent no.3 be issued forthwith. In case compliance report is not submitted on the next date of hearing, further coercive measure in the shape of civil imprisonment would be taken against her. Case to come up for further proceedings on 09.07.2019 before S.B at camp court Abbottabad.



(Ahmad Hassan)  
Member  
Camp Court A/Abad

09.07.2019


Brother of the petitioner, on behalf of the petitioner present. Mr. Shujja Ali, ADO (Litigation) for the respondents present. Implementation report not submitted. Representative of the department requested for further adjournment. Last chance is granted. To come up for implementation report on 17.09.2019 before S.B at Camp Court Abbottabad.



(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad

20.02.2019


Clerk of counsel for the petitioner present. Mr. Muhammad Bilal Khan, Deputy District Attorney for the respondents present. Clerk of counsel for the petitioner requested for adjournment on the ground that learned counsel for the petitioner is not available today. Adjourned to 18.04.2018 for further proceedings before S.B at Camp Court Abbottabad.

  
(Muhammad Amin Khan Kundi)  
Member  
Camp Court Abbottabad

18.04.2019


Brother of the petitioner present. Mr. Muhammad Bilal, DDA for respondents present.

Last opportunity is granted to the respondents to submit implementation report as per order sheet dated 18.12.2018, failing which coercive measures would be adopted against them. Case to come up for further proceedings on ~~18.04~~ 18.06.2019 before S.B at camp court Abbottabad.

  
(Ahmad Hassan)  
Member  
Camp Court A/Abad

15.10.2018

Mr. Haq Nawaz, brother of the petitioner present. Mr. Shujaa Ali, ADO alongwith Mr. Usman Ghani, District Attorney for the respondents present. Written reply on behalf of the respondents submitted. The same is placed on record. Adjourned. To come up for arguments on implementation report on 17.12.2018 before S.B at camp court, Abbottabad.

  
Member  
Camp Court, A/Abad

18.12.2018

Counsel for the petitioner present. Mr. Shuja Ali, ADO alongwith Mr. Usman Ghani, District Attorney for respondents present.

Representative of the respondents produced a copy of the de-novo enquiry conducted as per directions contained in judgment of this Tribunal dated 20.11.2017, however, necessary orders are yet to be passed on the recommendations of the enquiry officer. Respondents are directed to produce implementation report based on the recommendations of the enquiry officer on or before the next date of hearing on 20.02.2019 before S.B at camp court A/Abad.

  
Member  
Camp court A/Abad


27.08.2018

Attorney for the Petitioner and Shujja Ali ADO for respondents present . Due to summer vacations, the case is adjourned .To come up for the same on 18.09.2018 at camp court Abbottabad.

  
Reader

18.09.2018

Mr. Haq Nawaz brother of petitioner alongwith counsel present. Mr. Usman Ghani learned District Attorney present. Implementation report not submitted. Learned District Attorney seeks time to furnish implementation report. Mr. Shuja Ali AD litigation representative of the respondents absent he be summoned to furnish implementation report for the next date. To come up for implementation report on 15.10.2018 before S.B at Camp Court A/Abad

  
Member  
Camp Court A/Abad

FORM OF ORDER SHEET

Execution Petition No. 59/2018

S.No.	Date of order Proceedings	Order or other proceedings with signature of Judge
1	2	3
1	01.03:2018	<p>The Execution Petition of Mst. Saeeda Bibi received to-day by post through Mr. Khaled Rabbani Advocate may be entered in the relevant Register and put up to the Court for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR 01/03/18</p>
2-	27-3-18	<p>This Execution Petition be put up before Touring S. Bench at A.Abad on <u>22-5-18</u>.</p> <p style="text-align: right;"><i>[Signature]</i> MEMBER</p>
22.05.2018		<p>Counsel for the appellant Mr. Khalid Rabbani, Advocate present and heard. Notices be given to the respondents. To come up for implementation report on 16.07.2018 before the S.B at camp court, Abbottabad.</p> <p style="text-align: center;"><i>[Signature]</i> Chairman Camp court, A/Abad</p>
16.07.2018		<p>Mr. Haq Nawaz, brother of the appellant present and submitted power of attorney and wakalatnama of Mr. Khalid Rabbani, Advocate, which are placed on file. Mr. Shujaa Ali, ADO (Litigation) on behalf of the respondents alongwith Mr. Usman Ghani, District Attorney present. The later requested for adjournment. Granted. To come up for implementation report on 27.08.2018 before the S.B at camp court, Abbottabad.</p> <p style="text-align: right;"><i>[Signature]</i> Chairman Camp Court, A/Abad</p>

بعدالت جناب چیئرمین صاحب سروس ٹریبونل پشاور پنج، ایبٹ آباد

درخواست اجرائے ڈگری

Execution Petition no. 59/2018

نمبر مقدمہ	اپیل نمبر 707/12 رجوعہ: 26/06/2012، تاریخ فیصلہ: 20/11/2017
نام فریقین	سعیدہ بی بی زوجہ محمد اکبر PTC گورنمنٹ گرلز پرائمری سکول موہری میرا (بوی)۔ --- ڈگری دارہ
	<b>بنام</b>
	1- سیکریٹری ایجوکیشن محکمہ تعلیم (E&SE) سول سیکریٹریٹ، پشاور۔
	2- ڈائریکٹر ایجوکیشن (E&SE) پشاور۔
	3- ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ (زنانہ مدارس)، ایبٹ آباد۔
	4- سب ڈویژنل ایجوکیشن آفیسر صاحبہ (زنانہ مدارس) ایبٹ آباد۔
	5- ڈسٹرکٹ اکاؤنٹ آفیسر صاحبہ ضلع ایبٹ آباد۔
	--- مدیونان
تاریخ ڈگری	20/11/2017
نتیجہ اپیل	اپیل سائلہ منظور ہوئی اور مدیونان کو حکم ہوا کہ اندر 90 یوم مکمل انکوائری کریں۔
نتیجہ سابق درخواست اجرائے ڈگری	قبل ازیں کوئی درخواست بابت اجراء نہیں دی گئی۔
نتیجہ تصفیہ فریقین	تصفیہ مابین فریقین نہ ہوا ہے۔
ڈگری	مدیونان کو حکم ہوا کہ اندر 90 یوم مناسب کارروائی کرتے ہوئے Proper Proceedings کریں۔
خرچہ	مذمہ فریقین رکھا گیا ہے۔
کس پر اجراء مطلوب ہے۔	اجراء عنوان جملہ مدیونان پر مطلوب ہے۔
اعانت عدالت	بذریعہ عدالت آنحضرت سائلہ کے بقایا جات بضمہ تنخواہ از ماہ یکم مارچ تا اگست 2017 کی ادائیگی کے علاوہ اگر کسی دیگر داد رسی کی سائلہ حقدارہ قرار دیا جاوے۔ بذریعہ درخواست اجراء استدعا کی جاتی ہے۔

جناب عالی! درخواست ذیل عرض ہے۔

1- یہ کہ مقدمہ عنوان بالا میں من اپیلانٹ کی اپیل منظور ہوئی ہے۔ نقل کاپی لف درخواست ہذا ہے۔

2- یہ کہ عدالت آنحضرت سپانڈنٹان کو اندرون مدت 90 دن کے تحت قانون اور مجوزہ طریقہ ہائے کار کے مطابق انکوائری کرنے اور مناسب کارروائی کرنے کا حکم صادر کیا ہے۔





BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
CAMP COURT ABBOTTABAD



*E.P. No 59/18*

Service Appeal No. 707/2012  
Date of Institution... 26.06.2012  
Date of decision... 20.11.2017

Mst. Saeeda Bibi W/o Mohammad Akseer PTC Teacher,  
Govt: Girls Primary Scholl, Mohri Mera U/C Boi, Tehsil and District Abbottabad.  
... (Appellant)

Versus

1. The Secretary to Government of Khyber Pakhtunkhwa Elementary and Secondary Education (E&SE), Civil Secretariat, Peshawar and 4 others.  
... (Respondents)

-----  
MR. ABDULLAH KHAN TANOLI,  
Advocate ... For appellant.  
MR. MUHAMMAD BILAL  
Deputy District Attorney ... 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

2. The appellant is aggrieved from an order dated 09.02.2012 whereby her wilful absence was treated as extraordinary leave. Against this order she filed departmental appeal to the DCO on 13.03.2012 which was not responded to and thereafter the present service appeal on 25.06.2011.

**ATTESTED**  
*[Signature]*  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Camp Court, Abbottabad

## ARGUMENTS

3. The learned counsel for the appellant argued that the impugned order was passed without any inquiry under the Khyber Pakhtunkhwa Government Servant (Efficiency and Disciplinary) Rules 2011. That no order could be passed without following the procedure laid down under the rules mentioned above.

4. On the other hand, the learned Deputy District Attorney, argued that the present appeal is time barred and secondly the departmental appeal was addressed to in incompetent authority. He further argued that the appellant herself admitted her absence by filing an affidavit.

## CONCLUSION.

5. The delay of four days could not be taken to defeat the appeal of the appellant for the reason that the order was passed on 09.12.2012 and there is no proof of the fact that it was communicated to the appellant on the same day. It definitely takes few days to reach the aggrieved civil servant, therefore, this departmental appeal cannot be held to be time barred. Secondly the departmental appeal was submitted to the DCO. Under the Khyber Pakhtunkhwa Civil Servant (Appeal) Rules, 1986 the departmental appeal is to be made not to the appellate authority but in the office in which the appellant is serving. It is for the office to send the departmental appeal to the concerned authority if he himself is not the appellate authority (Rule-4). The DCO at the relevant time did figure in the hierarchy of the department. He should have referred the appeal to the appellate authority, if he himself was not the appellate authority. Admittedly, the department has not initiated the proceedings under the Khyber Pakhtunkhwa Government Servant (Efficiency and Disciplinary) Rules 2011. The proper procedure for the department was to have initiated the regular proceedings under the Rule-5 or under Rule-9 of the said rules. The competent authority could not decide the same on the basis of any affidavit by the appellant.

ATTESTED  
*[Signature]*  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Camp Court, Abbottabad

6. Resultantly, this appeal is accepted. The impugned order is set aside and the department is directed to initiate and conclude the proper proceedings within a period of 3 months from the date of receipt of this judgment. Parties are left to bear their own costs.

File be consigned to the record room.

sd -  
(Ahmad Hassan)  
Member

sd -  
(Niaz Muhammad Khan)  
Chairman  
Camp Court, A/Abad

ANNOUNCED  
20.11.2017

Certified to be true copy  
Suble  
Khyber Pakhtunkhwa  
Service Tribunal  
Camp Court, Abbottabad

Date of Presentation of Application 20-11-17  
Number of Words 1200  
Copying Fee 8-00  
Urgent -  
Total 8-00  
Name of Applicant \_\_\_\_\_  
Date of Completion of Copy 23-11-17  
Date of Delivery of Copy 23-11-17

37-6

August 2012

(13)

(2)

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

OFFICE ORDER.

Mst. Saeeda Bibi, PST Govt Girls Primary School Mohri Maira Abbottabad remained wilful absent from duty with effect from 01-02-2011 to 31-08-2011 without any application / prior permission.

Her absence was confirmed by the ADO circle as well as she has submitted an Affidavit, whereas she made confessional statement regarding her absence with the request that she will be careful in future.

Hence due to the length of her service absent period with effect from 01-02-2011 to 31-08-2011 be treated as extra ordinary leave (Leave without Pay) as approved by the competent authority.

sd  
EXECUTIVE DISTRICT OFFICER  
ELEMN: & SECY: EDU: A.ABAD.

Dated 29/02 /2012.

Endst: No. 1617-20 /PST (F/P)

Copy to the:-

- 1. District Coordination Officer Abbottabad.
- 2. Deputy District Officer E & SE (F/P) Abbottabad.
- 3. District Comptroller of Accounts Abbottabad.
- 4. Mst: Saeeda Bibi, PST GGPS Mohri Maira Abbottabad.

A. G. Loh  
DISTRICT OFFICER  
ELEMN: & SECY: EDU: A.ABAD.

29-2-2012

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

OFFICE ORDER.

Mst: Saeeda Bibi, PST Govt Girls Primary School Mohri Maira Abbottabad remained wilful absent from duty with effect from 01-02-2011 to 31-08-2011 without any application / prior permission.

Her absentee was confirmed by the ADO circle as well as she has submitted an Affidavit, whereas she made confessional statement regarding her absentee with the request that she will be careful in future.

Hence due to the length of her service absent period with effect from 01-02-2011 to 31-08-2011 be treated as extra ordinary leave (Leave without Pay) as approved by the competent authority.

sd  
EXECUTIVE DISTRICT OFFICER  
ELEMN: & SECY: EDU: A.ABAD.

Endst: No. 1617-20 /PST (F/P)

Dated 29/02 /2012.

Copy to the:-

1. District Coordination Officer Abbottabad.
2. Deputy District Officer E & SE (F/P) Abbottabad.
3. District Comptroller of Accounts Abbottabad.
4. Mst: Saeeda Bibi, PST GGPS Mohri Maira Abbottabad.

Mst Saeeda Bibi  
Owner

sd  
DISTRICT OFFICER  
ELEMN: & SECY: EDU: A.ABAD.

*Handwritten signature in Urdu script*

*Handwritten notes at the bottom of the page, including dates and names.*

8

**BEFORE THE SERVICES TRIBUNAL KHYBER  
PAKTOONKHWA PESHAWAR.**

Appeal No. 707 of 2012

Mst. Saeeda Bibi W/o Mohammad Akseer PTC Teacher, Government Girls  
Primary School, Mohri Mera U/C Boi, Tehsil and District Abbottabad.

APPELLANT

VERSUS

No. 704  
dated 26/6/12

1. The Secretary to Government of K.P.K Elementary and Secondary Education (E & SE), Civil Secretariat, Peshawar, Khyber Pakhtoonkhwa.
2. The District Co-odination Officer, District Abbottabad.
3. The Executive District Officer, Elementary and Secondary Education Abbottabad.
4. ✓ The District Officer, Elementary and Secondary Education (Female), Abbottabad.
5. The Deputy District Officer (Female), Primary Abbottabad.

...RESPONDENTS

-----  
SERVICE APPEAL AGAINST THE NON  
PAYMENT OF SALARY FOR 8 MONTHS SINCE  
01-02-2011 TO 31-08-2011.  
-----

[Signature]  
26/6/12

Respectfully Sheweth,

1. That the Appellant/~~Plaintiff~~ was appointed as PTC Teacher in the year 1999 in Government Girls

-2- 9-

Primary School, Mohri Mera Union Council Bōi,  
District Abbottabad.

2. That since the appointment till now Appellant is the only Teacher in the school and is performing her duties honestly and to the entire satisfaction of the supervisors.
3. That for the last 13 years no complaint was ever made by any inhabitant of the illaqa and similarly any Higher Authorities too and no complaint against the Appellant is available.
4. That on 09/02/2011 being seriously ill Appellant rushed to Abbottabad for medical check up and she also made arrangement of the School and an educated young lady of the village was deputed by the appellant to look after the students in her absence.
5. That on 09/02/2011 ADEO (Female) Abbottabad visited the School and at that time School was found close by the Officer so she made a complaint against Appellant to EDO (Female) Abbottabad and

when Appellant came to know about this, she visited the office of the DDO (Female) Abbottabad and submitted a medical Certificate and also explain her position of absence from the School.

***(Certificate is annexed as Annexure "A")***

6. That the salary of the appellant since 01/02/2011 to 31/08/2011 was not given to the appellant and for this appellant repeatedly requested the Higher Officer but no action was taken so for.

7. That ADEO (Female) Primary Inspection Abbottabad called the explanation about the absent from duty on 09/02/2011 and the appellant submitted the reply on 28/04/2011 and the Officer ADEO (Female) primary being satisfied from the explanation passed the order on 28/04/2011 for the release of the salary of the appellant but not action have been taken so for.

***(Photo copy is annexed as Annexure "B")***

8. That the appellant submitted a presentation to EDO Abbottabad for the release of the salary but the Petition was rejected and the impugned order was



پاسد ← passed on 09/02/2012 and a copy of the order was also issued to the appellant.

**(Copy of the order is annexed as Annexure "C")**

9. That appellant being highly aggrieved from the order of EDO Abbottabad of dated 09/02/2012, submitted an appeal to the DCO Abbottabad for setting aside the order of EDO No.1617-20 dated 09/02/2012. But till now no reply have so far been made by the learned DCO Abbottabad.

**(Copy of the Appeal is annexed as Annexure "D")**

10. That now there remains no other remedy except to approach this Honourable Tribunal for the following amongst other grounds:-

**G R O U N D S :-**

- a) That the Order of 09-02-2012 of respondent No.3 is against the facts, law and rules. Thus the Order is not maintainable in the eye of law.

b) That appellant is serving as a single Teacher in the Government Girls Primary School Mohri Mera for the last 13 years and not a single complaint was ever made against the Appellant.

c) <sup>2011</sup> That only on 09-02-2012 when the Appellant was seriously sick and went to the Doctor for treatment only at this occasion she was found absent although appellant submitted the Medical Certificate in support of her version which was found correct by the ADEO (Female) Primary Education Abbottabad and recommended for the release of the salary of the Appellant.

d) That the Appellant regularly remained in the above cited school and performed her duties honestly from 01-02-2011 to 31-08-2011 and was never charge sheeted or warned by the Higher Officer. So, treating the period from 01-02-2011 to 31-08-2011 as extraordinary leave without pay is against justice, law and rules and this observation of the Higher Authority is not sustainable and is against the principle of Audi Altrum Partum (No one should be condemned unheard).

- e) That the Appellant is a poor primary teacher and her 8 months salary is upheld without her fault.
- f) That the other factual and legal points if any will be raised with the permission of this Honourable Tribunal.

**PRAYER:-**

On acceptance of this appeal the impugned order No. 1617-20 dated 09-02-2012 may kindly be set aside and the Appellant may kindly be granted the salary of 8 months i.e. from 01-02-2011 to 31-08-2011.

*Saeeda*

Mst. Saeeda Bibi  
...APPELLANT

Through:

*Abdullah Khan Tanoli*

(ABDULLAH KHAN TANOLI)  
Advocate High Court, Abbottabad

Dated: 25/6 /2012

**VERIFICATION:-**

I, Saeeda Bibi W/o Mohammad Akseer PTC Teacher, Government Girls Primary School, Mohri Mera U/C Boi, Tehsil and District Abbottabad do hereby solemnly affirm and declare that the contents of the instant Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

*Saeeda*

Mst. Saeeda Bibi  
...APPELLANT

Dated: 25/6 /2012

-14-

BEFORE THE SERVICES TRIBUNAL KHYBER PAKTOONKHWA,  
PESHAWAR.

Appeal No. \_\_\_\_\_ of 2012

Mst. Saeeda Bibi W/o Mohammad Akseer PTC Teacher, Government Girls  
Primary School, Mohri Mera U/C Boi, Tehsil and District Abbottabad.

...APPELLANT

VERSUS

The Secretary to Government of K.P.K Elementary and Secondary Education (E  
& SE), Civil Secretariat, Peshawar, Khyber Pakhtoonkhwa & Others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, Mst. Saeeda Bibi W/o of Mohammad Akseer Appellant do hereby solemnly  
affirm and declare on Oath that the contents of instant Service Appeal are true  
and correct to the best of my knowledge and belief and nothing has been  
concealed from this Hon'ble Court.

Dated: -25/6 /2012



DEPONENT

*Saeeda*  
Mst. Saeeda Bibi  
...APPELLANT

25/6  
2012

IDENTIFIED BY:

*Abdullah Khan Tanoli*

(ABDULLAH KHAN TANOLI)  
Advocate High Court, Abbottabad.  
**ABDULLAH KHAN TANOLI**  
Advocate High Court  
Abbottabad

- 5 -

**BEFORE THE SERVICES TRIBUNAL KHYBER PAKTOONKHWA,  
PESHAWAR.**

Appeal No. \_\_\_\_\_ of 2012

Mst. Saeeda Bibi W/o Mohammad Akseer PTC Teacher, Government Girls  
Primary School, Mohri Mera U/C Boi, Tehsil and District Abbottabad.

...APPELLANT

**V E R S U S**

The Secretary to Government of K.P.K Elementary and Secondary Education (E  
& SE), Civil Secretariat, Peshawar, Khyber Pakhtoonkhwa & Others.

...RESPONDENTS

**SERVICE APPEAL  
CERTIFICATE**

*Certified that no such Appeal has earlier been filed before this  
Hon'ble Court.*

*Saeeda*  
Mst. Saeeda Bibi  
...APPELLANT

Through:

Dated: 25/6/2012

*Abdullah Khan Tanoli*  
(ABDULLAH KHAN TANOLI)  
Advocate High Court, Abbottabad.

- 16 - 

9

**BEFORE THE SERVICES TRIBUNAL KHYBER PAKTOONKHWA,  
PESHAWAR.**

Appeal No. \_\_\_\_\_ of 2012.

Mst. Saeeda Bibi W/o Mohammad Akseer PTC Teacher, Government Girls  
Primary School, Mohri Mera U/C Boi, Tehsil and District Abbottabad.

...APPELLANT

**VERSUS**

The Secretary to Government of K.P.K Elementary and Secondary Education (E  
& SE), Civil Secretariat, Peshawar, Khyber Pakhtoonkhwa & Others.

...RESPONDENTS

**SERVICE APPEAL**

**ADDRESSES OF THE PARTIES**

Respectfully Sheweth,

The addresses of the parties are as under;

**APPELLANT**

Mst. Saeeda Bibi W/o Mohammad Akseer PTC Teacher, Government Girls Primary  
School, Mohri Mera U/C Boi, Tehsil and District Abbottabad.

**RESPONDENTS**

1. The Secretary to Government of K.P.K Elementary and Secondary Education (E & SE),  
Civil Secretariat, Peshawar, Khyber Pakhtoonkhwa.
2. The District Co-odination Officer, District Abbottabad.
3. The Executive District Officer, Elementary and Secondary Education Abbottabad.
4. The District Officer, Elementary and Secondary Education (Female), Abbottabad.
5. The Deputy District Officer (Female), Primary Abbottabad.

  
Mst. Saeeda Bibi  
...APPELLANT

Through:

Dated: 25/6 /2012

  
**(ABDULLAH KHAN TANOLI)**  
Advocate High Court, Abbottabad.

**BEFORE THE SERVICES TRIBUNAL KHYBER  
PAKTOONKHWA PESHAWAR.**

Appeal No. \_\_\_\_\_ of 2012

Mst. Saeeda Bibi W/o Mohammad Akseer PTC Teacher, Government Girls  
Primary School, Mohri Mera U/C Boi, Tehsil and District Abbottabad.

...APPELLANT

**VERSUS**

The Secretary to Government of K.P.K Elementary and Secondary Education (E  
& SE), Civil Secretariat, Peshawar, Khyber Pakhtoonkhwa & Others.

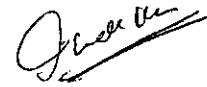
...RESPONDENTS

**SERVICE APPEAL**

**LIST OF BOOKS**

1. The Constitution of Islamic Republic of Pakistan, 1973
2. Other case<sup>h</sup>/related books will be cited at Bar.

Dated: 25/6 /2012



(ABDULLAH KHAN TANOLI)  
Advocate High Court, Abbottabad

- 18 -

QSYSPRT125716

NATIONAL BANK OF PAKISTAN

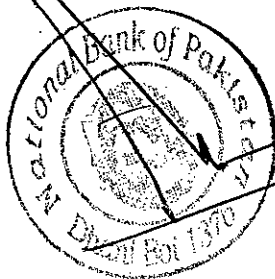
001

SAEEDA BIBI W/O MUHAMMAD AKSEER  
VILL MOHRI MERA PO BOI

PROFIT & LOSS SHARING ACCOUNT

ACCOUNT NO. : 002731-1  
BRANCH CODE/NAME: 1376-DHANI DISTT HAZARA  
REGION NAME : Abbottabad

D A T E	DESCRIPTION	INSTRUM#	DEBIT-AMOUNT	CREDIT-AMOUNT	BALANCE
2011-01-01	BAL B/F				70,988.80
2011-01-03	CHEQUE	636114	12000.00		58,988.80
2011-01-19	PFT/LOSS	83160000		837.00	59,825.80
2011-01-19	WITHTAX	83150000	83.70		59,742.10
2011-02-01	Salary	98930190		13190.00	72,932.10
2011-02-22	CHEQUE	636115	6000.00		66,932.10
2011-03-05	CHEQUE	636116	10000.00		56,932.10
2011-03-21	CHEQUE	636117	4000.00		52,932.10
2011-03-21	CHEQUE	636119	10000.00		42,932.10
2011-04-09	CHEQUE	636120	20000.00		22,932.10
2011-04-30	CHEQUE	636122	15000.00		7,932.10
2011-06-04	CHEQUE	636121	7000.00		932.10
	DR-SUM	84083.70	CR-SUM	85015.80	





- 19 -

QSYSPRT125716 (2) (2)

NATIONAL BANK OF PAKISTAN

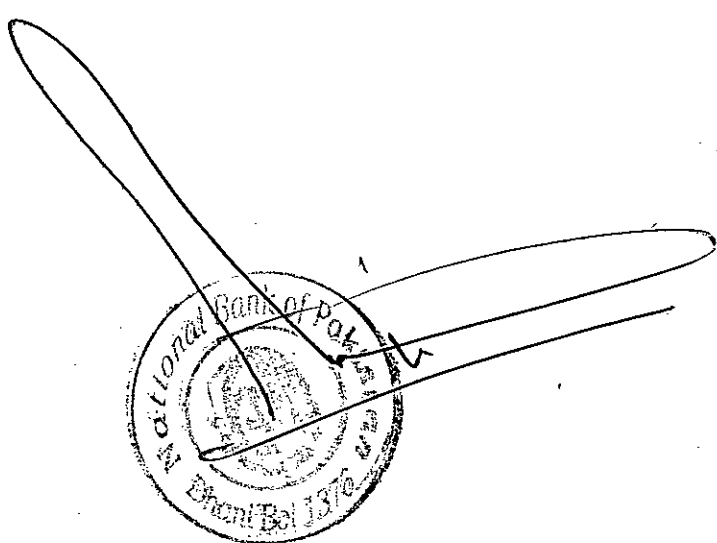
001

SAEEDA BIBI W/O MUHAMMAD AKSEER  
VILL MOHRI MERA PO BOI

PROFIT & LOSS SHARING ACCOUNT

ACCOUNT NO. : 002731-1  
BRANCH CODE/NAME: 1376-DHANI DISTT HAZARA  
REGION NAME : Abbottabad

D A T E	DESCRIPTION	INSTRUM#	DEBIT-AMOUNT	CREDIT-AMOUNT	BALANCE
					932.10
2011-07-01	BAL B/F				1,709.10
2011-07-21	PFT/LOSS	83270000		777.00	1,631.40
2011-07-21	WITHTAX	83260000	77.70		201,631.40
2011-09-06	CASH	99960043		200000.00	217,707.40
2011-10-01	Salary	98980183		16076.00	233,783.40
2011-11-01	Salary	98910185		16076.00	203,783.40
2011-11-11	CHEQUE	636123	30000.00		203,723.40
2011-11-11	WITHTAX	99960015	60.00		3,723.40
2011-11-22	TRANSFER	636124	200000.00		19,799.40
2011-12-01	Salary	98950176		16076.00	9,799.40
2011-12-21	CHEQUE	636125	10000.00		26,195.40
2011-12-30	Salary	98930178		16396.00	
	DR-SUM	240137.70			
			CR-SUM	266333.10	



عنوان - درخواست میں نقل بورڈ

عتاب عالیہ

گزارش ہے کہ میں نے کئی دفعہ اور مصیبتوں کا مریض میں  
عمر تقریباً 10 سال سے مریض ہے۔ کافی علاج معالجہ کروایا  
لیکن دن بدن اہمیت بگڑ رہی ہے اور اب اسے  
اپنے مریضوں کی انجام دہی سے عام ہے۔  
لہذا میں نقل ریفارڈ ہمارے ٹیوٹ درخواست پنا

لہذا اس کے ساتھ میں نقل بورڈ اس کے احکامات  
کا درمیان حاکم ہوا کرتے ہیں۔

Saeed  
الموسم 23/02/18

سعد 2000 اول محلہ گورنمنٹ گرلز ہائی اسکول

موسم و مصراہ (پوٹی) ایب آباد

ADD  
23/2/18  
Harward

complaint  
authenticity

Assistant Prof.  
**Dr. Jawad Hussain**  
 Consultant Neurophysician  
 M.B.B.S (Gold Medalist) (Best Graduate)  
 F.C.P.S (neurology)  
 Ayub Medical College &  
 Ayub Teaching Hospital  
 Abbottabad.



اسٹنٹ پروفیسر  
**ڈاکٹر جواد حسین**  
 کنسلٹنٹ نیوروفزیشن  
 ایم بی بی ایس (گولڈ میڈلسٹ) (بیسٹ گریجویٹ)  
 ایف سی پی ایس (نیورولوجی)  
 ماہر امراض فائج، سر درد، مکرر ذرہ مرگی، ہٹھ، عرق النساء، حرام مغز  
 نیورولوجی، ایوب ٹیچنگ ہسپتال ایبٹ آباد

Patient's Name: Saeed Saad Date: 6 Feb 18

Jawad

Cap Zentis 6g  
 20

26

Cap Amylin 2g

26

Cap Mestap 2g

20

Cap Sangobars

20

Cap Regain 2g

0.14

115/90

CBV  
 FTS -  
 urea/E

Assistant Prof.  
**DR. Jawad Hussain**  
 MBBS (Gold Medalist)  
 FCP S (Neurology)



# ALLIED CLINICAL LABORATORY

-22-

## RENAL PROFILE LABORATORY REPORT

Name: Saeeda      Referred By: Dr. Jawad Hussain  
Age: 38      Sample Source: Inside  
Gender: Female      Date: 20.12.2017

Test Name	Result	Reference Range
-----------	--------	-----------------

Renal Profile		
Creatinine	0.9 mg/dL	Male: 0.6 - 1.1 mg/dL Female: 0.5 - 0.9

Test Name	Result	Reference Range
-----------	--------	-----------------

LIVER FUNCTION TESTS		
ALT (SGPT)	20 U/L	Male: <41 U/L Female: <31 U/L Children 10 - 18 yrs: <30

This lab report has been prepared by using latest and automatic equipment available today, however no legal responsibility or financial liability is accepted for any error/omission. This report is not valid for court of law.



Adjacent Sarazy CNG Station, Mirpur Mansehra Road, Abbottabad  
Tel: 0992-382256

ALLIED CLINICAL LABORATORY ABBOTTABAD.

First Name: SAEBDA BIBI      Last Name:      Gender: Female      Age: 38 Years  
 Sample ID: 20      Patient Type: Inpatient      Patient ID:      Mod: WB-CEC+DIFF  
 Cpl: DR. JAWAD HUSSAIN      Time of Analysis: 06-02-2018 19:12'

Parameter	Result	Unit	Ref. Ranges	
1 WBC	7.79	10 <sup>9</sup> /L	4.00 - 10.00	WBC Message
2 Neut#	4.14	10 <sup>9</sup> /L	2.00 - 7.00	
3 Lym#	2.81	10 <sup>9</sup> /L	0.80 - 4.00	
4 Mon#	0.79	10 <sup>9</sup> /L	0.12 - 1.20	
5 Eos#	0.05	10 <sup>9</sup> /L	0.02 - 0.50	
6 Bas#	0.00	10 <sup>9</sup> /L	0.00 - 0.10	
7 Neut%	53.1	%	50.0 - 70.0	
8 Lym%	36.1	%	20.0 - 40.0	
9 Mon%	10.1	%	3.0 - 12.0	
10 Eos%	0.7	%	0.5 - 5.0	
11 Bas%	0.0	%	0.0 - 1.0	
12 RBC	4.37	10 <sup>12</sup> /L	3.50 - 5.00	RBC Message
13 HGB	L 9.5	g/dL	11.0 - 15.0	
14 HCT	L 31.3	%	37.0 - 47.0	
15 MCV	L 71.6	fL	80.0 - 100.0	
16 MCH	L 22.6	pg	27.0 - 34.0	
17 MCHC	L 31.6	g/dL	32.0 - 36.0	
18 RDW-CV	15.8	%	11.0 - 16.0	PLT Message
19 RDW-SD	40.6	fL	35.0 - 56.0	
20 PLT	266	10 <sup>9</sup> /L	100 - 500	
21 MPV	9.5	fL	6.5 - 12.0	
22 PDW	15.4	%	9.0 - 17.0	
23 PLT	H 0.284	%	0.108 - 0.282	

Operator:      Administrator:      Validated by:      Time of Printing: 06-02-2018 19:13  
 Delivery time:      Comments: [This report only applies to the corresponding sample analyzed]

NOT VALID FOR COURT



# ALLIED CLINICAL LABORATORY

Adjacent Sarazy CNG Station, Mirpur Mansehra Road, Abbottabad  
 Tel: 0992-382256

-24-



# ALLIED CLINICAL LABORATORY

## LIVER FUNCTION TESTS LABORATORY REPORT

Name: Sarwat N      Referred By: Dr Jawad Hussain  
 Age: 38      Sample Source: Inside  
 Gender: Female

Test Name	Result	Reference Range
-----------	--------	-----------------

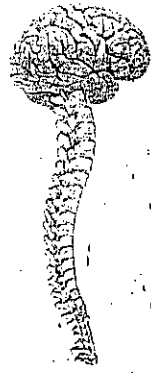
LIVER FUNCTION TESTS		
BILIRUBIN	0.8 mg/dL	UPTO 1.0mg/dL
ALKALINE PHOSPHATASE	245 U/l	Adult <258 U/l Children 1 - 12 yrs <727 Children (Female) 13 - 17 y <448 Children (Male) 13- 17 yrs <935
ALT(SGPT)	16 U/L	Male <41 U/L Female <31 Children 10 - 18 yrs <30

This lab report is prepared using automatic equipment available today, however no legal responsibility or financial liability is accepted for any error. This report is not valid for court of law.

Adjacent Sarazy CNG Station, Mirpur Mansehra Road, Abbottabad  
 Tel: 0992-382256

-26-

Assistant Prof.  
**Dr. Jawad Hussain**  
Consultant Neurophysician  
M.B.B.S(Gold Medalist) (Best Graduate)  
F.C.P.S (neurology)  
Ayub Medical College &  
Ayub Teaching Hospital  
Abbottabad.



اسٹنٹ پروفیسر  
**ڈاکٹر جواد حسین**  
کنسلٹنٹ نیوروفزیشن  
ایم بی بی ایس (گولڈ میڈلسٹ) (بیسٹ گریجویٹ)  
ایف سی پی ایس (نیورولوجی)  
ماہر امراض فاج، سردرد، گرد، مرگی، ہنٹھ، عرق النساء، حرام مغز  
نیورولوجی، ایوب ٹیچنگ ہسپتال ایبٹ آباد

Patient's Name: Saeed Bayy Date: 2 Dec 17 10

7/1/17

Cap Zenam 600

ob6 — 90 ①

Cap Nuvic 500

ob ① — 100 ①

Tas Amigla 250

ob3 — 1/2 — 100 ①

Tas Xone 0.50

ob2 — 100 ①

Tas Monop 200

ob ① — 100 ①

Physiology

Assistant Prof.  
**DR. Jawad Hussain**  
MRBS (Gold Medalist)  
F.C.P.S (Neurology)

فون: 0316-9872589

الائیڈ سپیشلسٹ ہاسپتال نمبر ایئر فورس آفس میر پور ایبٹ آباد

Assistant Prof.  
**Dr. Jawad Hussain**  
Consultant Neurophysician  
M.B.B.S (Gold Medalist) (Best Graduate)  
F.C.P.S (neurology)  
Ayub Medical College &  
Ayub Teaching Hospital  
Abbottabad.



اسٹنٹ پروفیسر  
**ڈاکٹر جواد حسین**  
کنسلٹنٹ نیوروفزیشن  
ایم بی بی ایس (گولڈ میڈلسٹ) (بیسٹ گریجویٹ)  
ایف سی پی ایس (نیورولوجی)  
ماہر امراض فالج، سردرد، کمر درد، مرگی، ہنٹھ، عرق النساء، حرام مغز  
نیورولوجی، ایوب ٹیچنگ ہسپتال ایبٹ آباد

Patient's Name: Saeed سعد Date: 2 Dec 17 10

Cap Zenon 600

ob 6 — 30 ①

Cap Nuvia 500

ob ① — 1+1+1

Tos Angla 250

ob 3 — 1 — 1/2 — 1

Tos Xone 0.50

ob 2 — ①

Tos Monop 200

ob ① — ①

7/2/17

Physician

Physician

Assistant Prof.  
**DR. Jawad Hussain**  
MBBS (Gold Medalist)  
F.C.P.S (Neurology)

فون: 0316-9872589

الائیڈ سپیشلسٹ ہاسٹل نیو ایر فورس آفس میر پور ایبٹ آباد



Physiotherapist

**Dr. Rashid Ahmed**

Consultant Physiotherapist

Physiotherapy Specialization (KSA)

MS, (Neuro-Musculoskeletal Rehabilitation) **PHYSIOTHERAPY**  
Department (Doctor of Physiotherapy) KMU **Rehabilitation**



فزیوتھراپسٹ

**ڈاکٹر رشید احمد**

کنسلٹنٹ فزیوتھراپسٹ

ماہر امراض: ہڈی، جوڑ، ہاتھ، عرق النساء، سپورٹس انجریز  
معدور افراد، فالج، کمردرد اور اعصابی کمزوریاں

Pt. Name Saeeda Bilal Age 35 Sex Female Date 23-10-2017

Clinical Notes

Rx

Pin spinal  
on lower spine

- Back Extension
- SLR -ve
- Foot Locked
- FABER -ve
- Slump -ve

Degenerative Disc  
(mild)

L5-S1  
Compression

Medical Back Pain

- Pain on Motion
- Pain on Jumper
- Ring
- Indirect Ball
- Core stability
- Foot on ground
- Spinal Slipping
- HFE

*[Signature]*

Assistant Prof.  
**Dr. Jawad Hussain**  
 Consultant Neurophysician  
 M.B.B.S (Gold Medalist) (Best Graduate)  
 F.C.P.S (neurology)  
 Ayub Medical College &  
 Ayub Teaching Hospital  
 Abbottabad.



اسٹنٹ پروفیسر  
**ڈاکٹر جواد حسین**  
 کنسلٹنٹ نیورو فزیشن  
 ایم بی بی ایس (گولڈ میڈلسٹ) (بیسٹ گریجویٹ)  
 ایف سی پی ایس (نیورولوجی)  
 ماہر امراض فاع، سر درد، کمزوری، ہنٹھ، عرق النساء، حرام مغز  
 نیورولوجی، ایوب ٹیچنگ ہسپتال ایبٹ آباد

Patient's Name: Sacada 38yr Date: 22 August 17 8

aches/pains  
 30 days ago  
 Syr.  
 LBA  
 Neck  
 legs  
 2  
 12/20  
 SR-ve  
 Spurling-ve  
 Reflex-intact  
 Multiple  
 tender points  
 Cervical  
 lumbar  
 elbow  
 knee

Physiotherapy  
Passive A  
Exercising

- Cap Zenbar 30ms  
 0.14 —————  
 ob 3 —————  
 Rised 20mg  
 - Cap Prency 75ms  
 ob 2 —————  
 Cap are alpha 0.5ms  
 ob 2 —————  
 - Tot Nervadex 0.5ms  
 ob 2 —————  
 - Tot Folic Acid 5mg  
 ob 3 —————  
 - Symp m Atillium  
 0.10 —————

Assistant Prof.  
**DR. Jawad Hussain**  
 M.B.B.S (Gold Medalist)  
 F.C.P.S (Neurology)

فون: 0316-9872589

الائیڈ سپیشلسٹ ہاسپتال نزد ایئر فورس آفس میر پور ایبٹ آباد



# ALLIED CLINICAL LABORATORY

25-

## Urine RE LABORATORY REPORT

Name: [Name] Referred By: Dr Jawad Hussain  
 Age: [Age] Sample Source: Inside  
 Gender: Female

### Test Name Result Reference Range

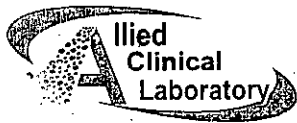
Physical Examination		
Quantity	20 ml	
Colour	Yellow	
pH	6.0	(Ref Range 4.52 - 7.0)
Specific Gravity	1.015	(Ref Range 1.010 - 1.030)

Chemical Examination	
Albumin	Nil
Sugar	Nil
Blood	Nil
Urobilinogen	Nil
Nitrites	Nil
Ketones	Nil
Bilirubin	Nil

Microscopic Examination	
RBCs	Nil /HPF
Pus Cells	0-5 /HPF
Epithelial Cells	Nil /HPF
TRIPLE PHOSPHATE	Nil
OTHERS	Nil

This lab report has been prepared by using semi-automatic and automatic equipment available today, however no legal responsibility or financial liability is accepted for any error/omission. This report is not valid for court of law.

Adjacent Sarazy CNG Station, Mirpur Mansehra Road, Abbottabad  
 Tel: 0992-382256



# ALLIED CLINICAL LABORATORY

## Urine RELEASER REPORT

Name: Siddiqi Referred By: Dr Jawad Hussain  
 Age: 30 Sample Source: Inside  
 Gender: Female

Test Name	Result	Reference Range
-----------	--------	-----------------

### Physical Examination

Quantity	20 ml	
Colour	Yellow	
pH	6.0	(Ref Range 4.52 - 8.0)
Specific Gravity	1.015	(Ref Range 1.01 - 1.035)

### Chemical Examination

Albumin	Nil
Sugar	Nil
Blood	Nil
Urobilinogen	Nil
Nitrites	Nil
Ketones	Nil
Bilirubin	Nil

### Microscopic Examination

RBCs	Nil	/HPF
Pus Cells	0-5	/HPF
Epithelial Cells	Nil	/HPF
TRIPLE PHOSPHATE	Nil	
OTHERS	Nil	

This lab report has been prepared by our skilled and automatic equipment available today, however no legal responsibility or financial liability is accepted for any error or omission. This report is not valid for court of law.

Adjacent Sarazy CNG Station, Mirpur Mansehra Road, Abbottabad  
 Tel: 0992-382256

Assistant Prof.  
**Dr. Jawad Hussain**  
Consultant Neurophysician  
M.B.B.S(Gold Medalist) (Best Graduate)  
F.C.P.S (neurology)  
Ayub Medical College &  
Ayub Teaching Hospital  
Abbottabad.



اسٹنٹ پروفیسر  
**ڈاکٹر جواد حسین**

کنسلٹنٹ نیوروفزیشن

ایم بی بی ایس (گولڈ میڈلسٹ) (بیسٹ گریجویٹ)

ایف سی پی ایس (نیورولوجی)

ماہر امراض فالج، سر درد، کردرد، ہرگی، ہشہ، عرق النساء، حرام مغز

نیورولوجی، ایوب ٹیچنگ ہسپتال ایبٹ آباد

Patient's Name: Saeed 35yr Date: 23/5/17 /G

Handwritten signature/initials.

Cap Zebra 30s

① ۱۰۰

0.14 -

Cap Zebra 60s

① ۱۰۰

- Cap Nuvica 25s

① ۱۰۱

- Tab Amyla 25s

① ۱۱ 1/2

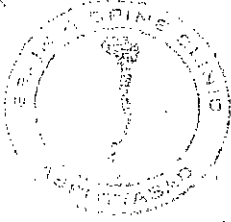
0.23 - ① ۱۰۰

- Tab Colaris 50s

① ۱۰۱

Physiotherapy

Assistant Prof.  
**DR. Jawad Hussain**  
MBBS (Gold Medalist)  
FCPS (Neurology)



# DR. AHSAN AURANGZEB

(M.B.B.S) (M.S) (FELLOWSHIP NEUROSURGERY JAPAN)  
ASSISTANT PROFESSOR NEUROSURGERY  
AYUB TEACHING HOSPITAL COMPLEX  
ABBOTTABAD.

Saeeda Bibi (F)

03/01/15

Actv/

L/SP

P/S

1. Tab. Loxavine ER 100

3 = 1, 1

2. Tab. Ecotec 100

1 + 1

3. Tab. Cardiolite 25

3 = 1, 1

4. Gp. Bepso 20

2 = 2, 1 + 1

(2)

Handwritten signature/initials

Handwritten signature/initials

برین اینڈ سپائن کلینک اینٹ آباد

الحیدر پلازہ بالمقابل آئی نور ہسپتال

ایوب میڈیکل کمپلیکس منڈیان، مانسہرہ روڈ، اینٹ آباد

فون نمبر: 0300-9118513 / 0992-384939

2921



# DR. AHSAN AURANGZEB

(M.B.B.S) (M-S) (FELLOWSHIP NEUROSURGERY JAPAN)  
ASSISTANT PROFESSOR NEUROSURGERY  
AYUB TEACHING HOSPITAL COMPLEX  
ABBOTTABAD.

Saeeda Bibi (F)

03/01/15

Adv/

L/SP

P/S

1. Tab. Laxamine ER 100

3 = 1, 1

2. Tab. Ecbtec 100

1 + 1

3. Tab. CardioLife 25

3 = 1, 1

4. Cap. Bepora 20

2 = 2, 1 + 1

(2)

1/1

1/1

برین اینڈ سپائن کلینک ایبٹ آباد

الحیدر پلازہ بالمقابل آئی نور ہسپتال

ایوب میڈیکل کمپلیکس منڈیاں، مانسہرہ روڈ، ایبٹ آباد

فون نمبر: 0300-9118513 / 0992-384939

2921



ABBOTTABAD BLOOD BANK, TRANSFUSION SERVICES  
&  
CLINICAL LABORATORY



Dr. Muhammad Idris  
MBBS, FCPS Medicine  
FCPS Clinical Haematology

Saifullah Khan  
Microbiologist  
B.Sc (Hon) M. Phil

Patient no:  
**6506/15**  
Lab no:  
**66**

Name : **Saeeda Bibi**  
Age/Gender: **36 / F**      Sample Source: **Inside**  
Referred By: **Dr. Ahsan Aurangzeb**  
Contact No :

Receipt Date:  
**28-Mar-2015 4:11 pm**  
Issue Date:  
**28-Mar-2015 5:23 pm**

Test	Result
------	--------

**BRUCELLA**

Brucella Abortus  
Brucella Melitensis

**NEGATIVE**  
**NEGATIVE**

Vitamin D Total (Vidas)

**26.0 ng/ml**

Status 25-(OH) Vitamin D  
Deficient < 20 ng/ml  
Insufficient 20 – 29 ng/ml  
Sufficient 30 – 100 ng/ml  
Potential toxicity > 100 ng/ml

NOTE: This lab report has been prepared by using latest and automatic equipment available today, however, no legal responsibility or financial liability is accepted for any error/omission. This report is not valid for court of law.

Note: Not valid for court

Al-Haider Plaza, Opp: INOR Cancer Hospital Gate, Abbottabad.  
Tel: 0992-384432, Fax: 0992-384510 Mob: 0346-9543464  
E-mail: abbatslabs@yahoo.com, khan\_41@hotmail.com





ABBOTTABAD BLOOD BANK, TRANSFUSION SERVICES  
&  
CLINICAL LABORATORY



Dr. Muhammad Idris  
MBBS, FCPS Medicine  
FCPS Clinical Haematology

Saifullah Khan  
Microbiologist  
B.Sc (Hon), M. Phil

Patient no:  
**6506/15**

---

Lab no:  
**66**

Name : **Saeeda Bibi**

Age/Gender: **36 / F**      Sample Source: **Inside**

Referred By: **Dr. Ahsan Aurangzeb**

Contact No :

Receipt Date:  
**28-Mar-2015 4:11 pm**

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Issue Date:  
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E-mail: abbatslabs@yahoo.com, khan\_41@hotmail.com



# DR. AHSAN AURANGZEB

(M.B.B.S) (M-S) (FELLOWSHIP NEUROSURGERY JAPAN)  
ASSOCIATE PROFESSOR NEUROSURGERY  
AYUB TEACHING HOSPITAL COMPLEX  
ABBOTTABAD.

Saeeda Bibi (CF)

28/03/15

Adv/

1. Tab. Mex-D

1 + 1

2. Tab. Laxazine ER 100

3 = 1, 1

3. Tab. Forcam B

1 + 1

4. Cap. ~~Paracetamol~~ <sup>Risole 20</sup>

3 = 1, 1

• 4/6P

• P/S

N/L ✓

180/80

②  
3/4

↓

برین اینڈ سپائن کلینک ایبٹ آباد

الحیدر پلازہ بالمقابل آئی نور ہسپتال

ایوب میڈیکل کمپلیکس منڈیان، مائسہرہ روڈ، ایبٹ آباد

فون نمبر: 0300-9118513 / 0992-384939

2806

650



# DR. AHSAN AURANGZEB

(M.B.B.S) (M-S) (FELLOWSHIP NEUROSURGERY JAPAN)  
ASSOCIATE PROFESSOR NEUROSURGERY  
AYUB TEACHING HOSPITAL COMPLEX  
ABBOTTABAD.

28/03/15

Saeeda Bibi (F)

Adv/

1. Tab. Max-D

1 + 1

2. Tab. Laxaline ER 100

3 = 1, 1

3. Tab. Lorcom 8

1 + 1

4. Cap. ~~Paracetamol~~ <sup>Risole 20</sup>

3 = 1, 1

• 4/6p

• P/S

N/L ✓

130/80



Handwritten signature or mark.

برین اینڈ سپائن کلینک ایبٹ آباد

الحیدر پلازہ بالمقابل آئی نور ہسپتال

ایوب میڈیکل کمپلیکس منڈیان، مانسہرہ روڈ، ایبٹ آباد

فون نمبر: 0300-9118513 / 0992-384939

2806

600

Dr. Raja mohammad Ijaz

M.B.B.S, F.C.P.S

General and Orthopaedic Surgeon

Sheikh Khalifa Bin Zayd Hospital

AK CMH, muzaffarabad

Associate Professor Surgery AJK Medical College

سر جن ڈاکٹر راجہ محمد اعجاز خان

ایم۔ بی۔ بی۔ ایس، ایف۔ سی۔ پی۔ ایس

کنسلٹنٹ سرجن

شیخ خلیفہ بن زید ہسپتال ای ایم ایچ مظفر آباد

ایسوسی ایٹ پروفیسر سرجری اے جے کے میڈیکل کالج مظفر آباد



Name: Vijay Age      sex      Date 7-11-2016

Clinical Record

MRI L5/S1  
disc at spine

Backache

Handwritten signature or mark.

ڈاکٹر راجہ محمد اعجاز  
ایم۔ بی۔ بی۔ ایس، ایف۔ سی۔ پی۔ ایس  
کنسلٹنٹ سرجن شیخ خلیفہ بن زید ہسپتال ای ایم ایچ  
ایسوسی ایٹ پروفیسر سرجری  
اے جے کے میڈیکل کالج مظفر آباد



L4,5/S1  
compression

سید علی عزیز  
زبردست دماغ  
بہ گائے سار  
کڑکا سہا  
موتی

Handwritten signature or mark.

Handwritten signature or mark.

ڈاکٹر راجہ محمد اعجاز

ایم۔ بی۔ بی۔ ایس، ایف۔ سی۔ پی۔ ایس  
کنسلٹنٹ سرجن شیخ خلیفہ بن زید ہسپتال ای ایم ایچ  
ایسوسی ایٹ پروفیسر سرجری

Tds Xaar Sep

- 1-1

Tds Tanoflox

دیکھئے

Tab Quinofel 250&500mg-Levofloxacin, Tab Orpaxol (Paracetamol 325mg & Opioid Citrate 50mg)

مظفر آباد اسپیشلسٹ کلینک قاضی پلازہ، سی ایم ایچ روڈ مظفر آباد

301-5696980  
301-5180201  
300-9795746

موبائل:

Dr. Raja mohammad Ijaz

M.B.B.S, F.C.P.S

General and Orthopaedic Surgeon

Sheikh Khalifa Bin Zayd Hospital

AK CMH, muzaffarabad

Associate Professor Surgery AJK Medical College

سر جنرل ڈاکٹر راجہ محمد اعجاز خان

ایم۔ بی۔ بی۔ ایس، ایف۔ سی۔ پی۔ ایس

کنسلٹنٹ سرجن

شیخ خلیفہ بن زید ہسپتال اسی ایم ایچ مظفر آباد

ایسوسی ایٹ پروفیسر سرجری اے جے ایم سی کے میڈیکل کالج مظفر آباد



P's Name: محمد علی Age 57 sex M Date 7-11-2016

Clinical Record

MRI L5/S1  
L5/S1 Disc Herniation

A Backache

Handwritten signature/initials.

ڈاکٹر راجہ محمد اعجاز  
ایم۔ بی۔ بی۔ ایس، ایف۔ سی۔ پی۔ ایس  
کنسلٹنٹ سرجن شیخ خلیفہ بن زید ہسپتال اسی ایم ایچ  
ایسوسی ایٹ پروفیسر سرجری  
اے جے ایم سی کے میڈیکل کالج مظفر آباد



L5/S1  
compression

سید محمد علی  
زیدت دوسرے  
لے گاؤں  
کے لے گاؤں  
کے لے گاؤں

Handwritten signature/initials.

ڈاکٹر راجہ محمد اعجاز

ایم۔ بی۔ بی۔ ایس، ایف۔ سی۔ پی۔ ایس  
کنسلٹنٹ سرجن شیخ خلیفہ بن زید ہسپتال اسی ایم ایچ  
ایسوسی ایٹ پروفیسر سرجری

Tab Xaar Sip

Tab Tongiflex

Tab Quinorel 250&500mg-Levofloxacin, Tab Orpadol (Paracetamol 325mg & Orphenadrine Citrate 50mg)

301-5636980

301-5180201

300-9795746

مظفر آباد اسپیشلسٹ کلینک قاضی پلازہ، سی ایم ایچ روڈ مظفر آباد

# وکالت نامہ

کورٹ فیس

بعدالت سروس پرنٹنگ ہاؤس - سٹیٹ بینک آف پاکستان

عنوان: صدر عدلیہ پتہ جنتونہ (مکتبہ تعلیم)

منجانب: صدر - محکمہ

نو عیت مقدمہ:

## باعث تحریر آنکے

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ آں مقام

خاتمہ ربانی رٹنر و سیکریٹری پرنٹنگ ہاؤس سٹیٹ بینک آف پاکستان

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا محامی 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 داخہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا بعد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر محامی مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد تجارت ناشر بیحدہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المرقوم: 28/02/2018

Attuned by Anupam

بمقام: صدر عدلیہ

الـ

Signature

Saeed

کورٹ فیس قیمتی

# وکالت نامہ

بعدالت شیخ حسین سعید سید سروسٹریٹ لٹریچر کورٹ ایبٹ آباد

عنوان: سروسٹریٹ لٹریچر بنام صوفی (محمد علی صاحب)

منجانب: ڈپٹی سروسٹریٹ لٹریچر

نوعیت مقدمہ: درخواست اصرار و سروسٹریٹ لٹریچر

باعث تحریر آنکہ

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

ایبٹ آباد سروسٹریٹ لٹریچر اور صوفی محمد علی صاحب کے درمیان

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 ثالث و فیصلہ برحلف و دینے اقبال و دعویٰ اور بصورت دیگر ڈگری کرانے اجراء

وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور

کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار

بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول

ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔

نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف

پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف

مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصیغہ مفلسی کے دائرہ کرنے اور اس کی

پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

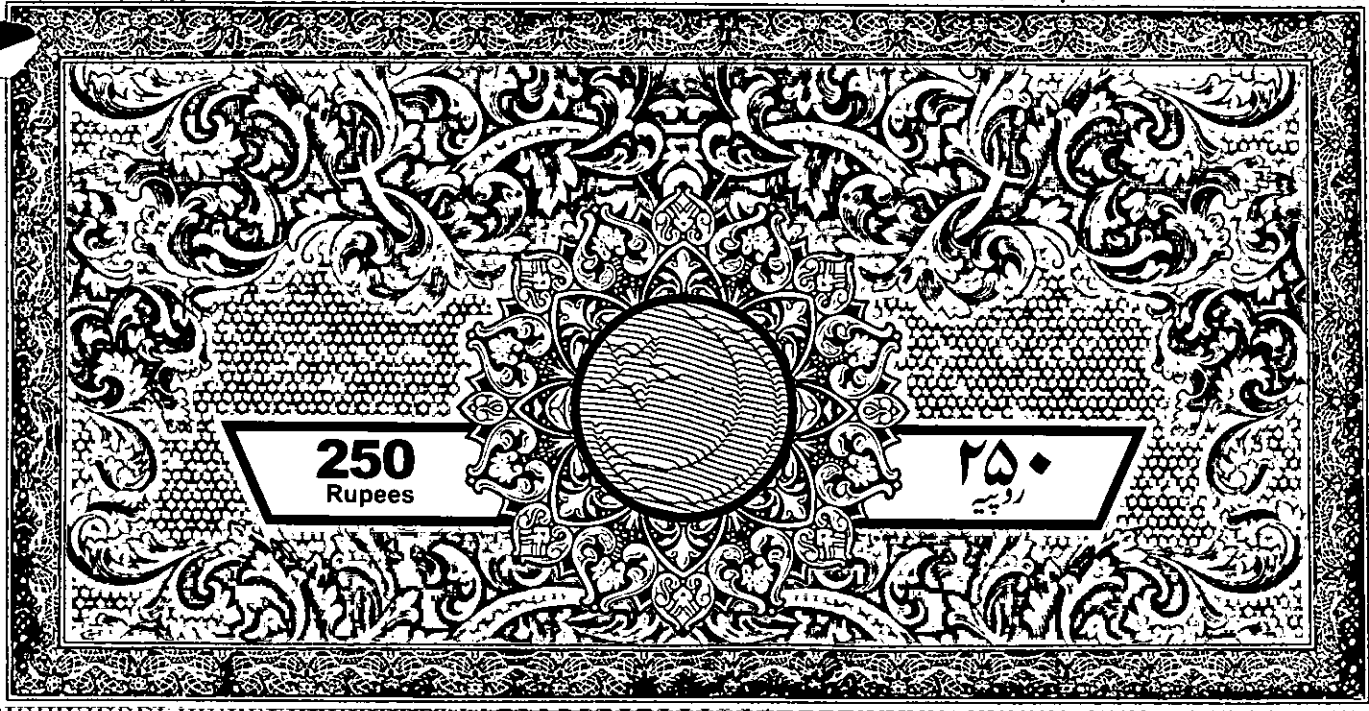
لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

16-7-18 المرقوم:

بمقام: ایبٹ آباد

Accepted

سروسٹریٹ لٹریچر ایبٹ آباد



250 Rupees

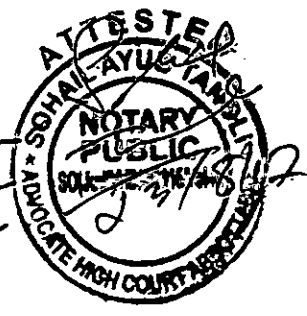
۲۵۰ روپیہ

لبدالت جناب سرورس پیروی فتح پور کا پتہ

سعدہ بی بی ... نام ... ایجوکیشن ڈیپارٹمنٹ کراچی

Place in file 16-7-2012

فتاویٰ فاضل پیروی فتح پور 207/11/2012



منہ سعدہ بی بی زوجہ محمد اسلم  
آپ کا رقم ویدیا میں قبضہ اسٹیٹ آباد اٹاری میں  
دکوی عدالت باہر میں عدلیہ میں جو زید کو  
عدالت آنکھ ہے جو عورت ذات پر نشانی امالت  
فاضل عدالت پیر پیرویاد جوابدہی قدم سے حضور  
میں بدینا وچ اپنی جانب سے برادر فقہی حق نواز وہ  
در بیان آنا رقم ویدیا میں قبضہ اسٹیٹ آباد  
کو فتاویٰ فاضل پیرویاد کے اختیارات دیے ہیں  
وہ فاضل عدالت پیر پیرویاد جوابدہی کرے دکوی  
جواب دکوی عدلیہ دکوی تدبیری دکوی جواب الکراب  
درخواست جواب درخواست بیان زبانی بیان طلب  
لقدینہ کرے رقم داخل دید آمد کرے عدالت کھن

ATTESTED  
SOHAIL AYUB KHAN  
NOTARY PUBLIC  
ADVOCATE HIGH COURT  
Date: 16-7-2012  
LST - 251  
Notary Seal: Nizamuddin Ahmed Tanoli, Registered No. 156/2006, Sector 1st, F-7/1, Islamabad



Handwritten notes and numbers: 150 + 50 = 552

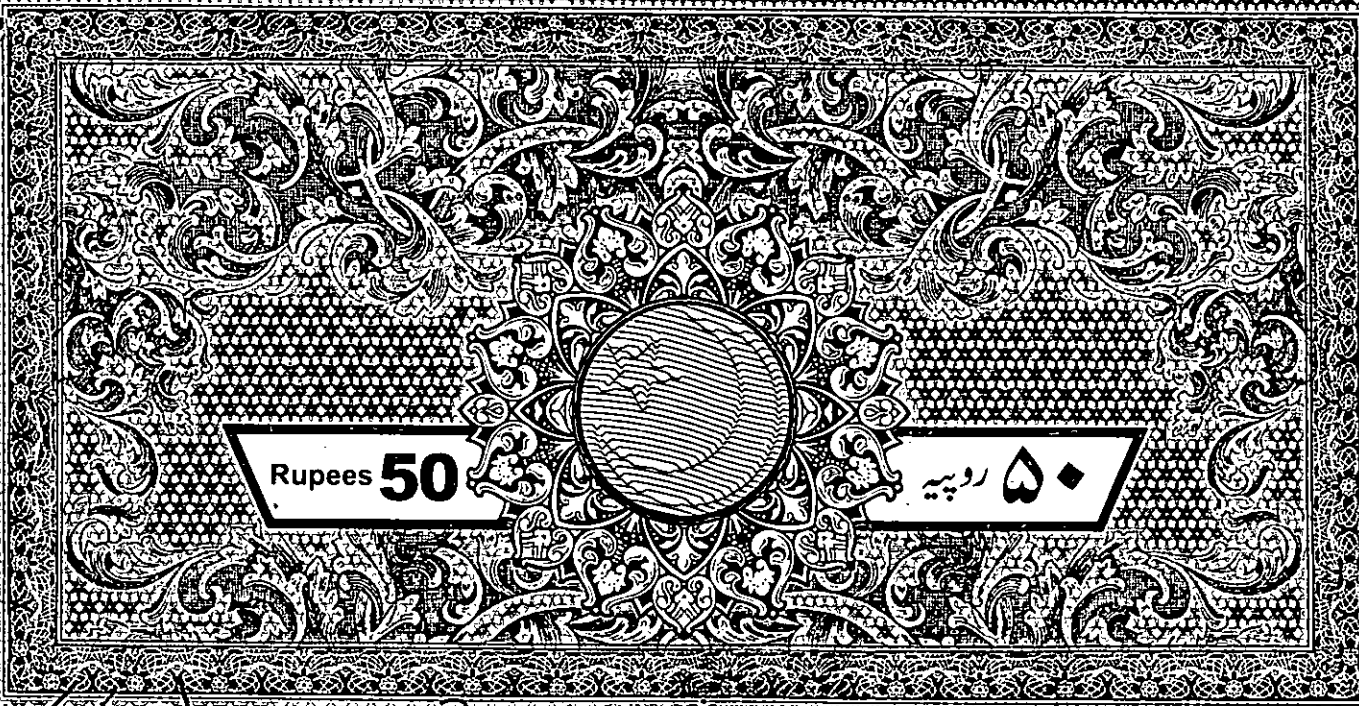
Handwritten text: 13101-0807125-0

Handwritten signature and text: No. 1, 13101-0807125-0

DUHAMAD OFFICE  
Stamp vendor  
Kutubhery Abbottabad

ISSUED STAMPS TO  
STAMP VENDORS  
ABBOTTABAD  
TREASURY OFFICE ABBOTTABAD

23-8-2010



Rupees 50

۵۰ روپیہ

کوئٹہ فورٹ ہائلم ہسٹریکل ڈیپارٹمنٹ  
 کیل یا ایڈیسی کا فور و سڈل رٹ . دستبرداری رٹ  
 بیل بندانی نظر ثانی رٹ . اجراء ڈری کرائے اور  
 جم فلم احکام حورہ از عدالت ابتدائی تا عدالت  
 عالیہ یا سیکرٹری عدالت عالیہ سیریم کورٹ آف پاکستان  
 کی تعینات رٹ . الفص جم اختیارات جو جم حاصل  
 سبیا مختار فاص مذکورہ کو حاصل ہونے لگی ہیں  
 کاروائی زبانی یا لکیری سے قبول ہونے والی  
 روبرو گواہان سے لکیری سے  
 23/12/17



ATTESTED  
 SOHAIL AYUB TANOLI  
 NOTARY PUBLIC  
 ADVOCATE HIGH COURT ABOTTA  
 23/12/17  
 Date  
 23/12/17

الو - 0 - 13101-0907125

حاجہ سعیدہ بی بی مذکورہ

Sandy

Handwritten notes and signatures in the bottom left corner, including a date 13/12/17 and a signature.

Handwritten notes and signatures in the bottom right corner, including a date 13/12/17 and a signature.

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 1899/ST

Dated 22 / 9 / 2018


To

The District Education Officer Female,  
Abbottabad.

SUBJECT: -- **ORDER IN EXECUTION PETITION NO. 59/2018, MST. SAEEDA BIBI**

I am directed to forward herewith a certified copy of order dated 15.10.2018 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

# سید محمد علی صاحب مدنی سرسبز ٹریبونل ایسٹ ورائٹ ڈیپارٹمنٹ

سید محمد علی صاحب مدنی  
بنام  
اجرائے ڈگری

جواب درخواست اجرائے ڈگری نمبر 3، 4

صاحب عالی! جواب تیل عرض ہے۔

عذرات پھیری

1. یہ کہ درخواست گزار کو کوئی نئے درخواست حاصل ہے۔
2. یہ کہ مقدمہ نمبر 307/1975 میں درخواست گزار نے مقدمہ سے کچھ نئے نئے تعلق لے لیے درخواست گزار سے درخواست گزار سے عیناً عیناً وہ آرگنٹس لیس ہو گیا ہے تو بیان طلبی کے اس بیان طلبی نے دی اور عدالت میں اجرائے ڈگری درخواست گزار نے اس دوران انکواری سے وہ آرگنٹس لیس لیا تھا۔
3. یہ کہ درخواست گزار صرف باتوں سے عدالت آئی ہے۔
4. یہ کہ درخواست گزار نے ہی Relief کا تیار ہے۔

عذرات واقعی

1. فوہ 1 اجرائے ڈگری درست ہے اور قانونی ہے۔
2. یہ کہ فوہ 2 درست ہے مقدمہ نمبر 307/1975 میں درخواست گزار نے صرف انکواری 90 دن سے طلبی کا حکم تیار کیا ہے۔
3. یہ کہ عدالت نے حکم لے انکواری کے لیے Application



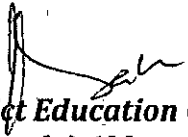


**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD**

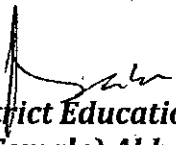
**NOTIFICATION:**

In the light of decision of Honorable Khyber Pakhtunkhwa Service Tribunal Camp Court Abbottabad Service Appeal No: 707/2012 in r/o Mst. Saeeda Bibi (PST) GGPS Mohri Maria (Circle Boi) Abbottabad, Mr. Shafqat, Principal GHS Harno is hereby appointed as Inquiry Officer to probe in to the matter and submit report with facts/findings recommendations within 07 days positively for further action.

Endst No: 7196-7202 dated: 9/10/2018  
Copy to:

  
District Education Officer  
(Female) Abbottabad

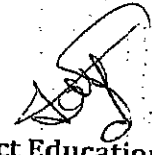
1. Examiner, Khyber Pakhtunkhwa Service Tribunal Camp Court Abbottabad.
2. PA to Director, Elementary and Secondary Education, KPK, Peshawar.
3. DEO (M) Abbottabad with the request that Mr. Shafqat, Principal GHS Harno may be directed to inquire the above mentioned Enquiry.
4. Enquiry Officer, Principal, GHS Harno.
5. SDEO (F) Abbottabad, she is directed to provide all relevant documents/record of above case to inquiry officer.
6. Office File.

  
District Education Officer  
(Female) Abbottabad

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

**NOTIFICATION**


In the light of decision of Honorable Khyber Pakhtunkhawa Service Tribunal camp Court Abbottabad Service Appeal No: 707/2012 in r/o MST: Saeeda Bibi PST GGPS Mohri Miara (Circle Boj) Abbottabad, Principal GGHS Sheikhul Bandi is hereby appointed as Inquiry officer to probe the matter and submit report with facts /finding recommendation within 7 (seven) days positively for further action

  
District Education Officer  
Female Abbottabad

Endst No: 3451-BM EB-1 Inquiry/PST/\_\_\_\_\_ Dated 06/02/2018

Copy to;

1. Examiner Khyber Pakhtun Khawa Service Tribunal Camp Court Abbottabad
2. PA TO DIRECTOR OF ELEMENTARY & SECONDARY EDUCATION KPK Peshawar
3. Principal GGHS Sheikhul Bandi
4. SDEO (F) Abbottabad, she is directed to provide all relevant documents / record of above case to Inquiry officer

  
District Education Officer  
Female Abbottabad

6/2/2018

خدمت نقاب DEO (زمانہ) قلعہ ایبٹ آباد  
عنوان - درخواست میں نقل ہو رہی

جناب عالی  
گزارش ہے کہ سائیکل دزد اور سپروں کا سرخس ایک  
عصر تقریباً ۱۰ سال سے ملتا ہے۔ کافی عرصہ معالجہ کر دیا  
لیکن دن بدن اہمیت بگڑ رہی ہے اور اب اس  
اچھے نرائض کی انجام دہی سے عاجز ہے۔  
چند عیدوں میں ریفارڈ بار ٹیوٹ درخواست بنا  
گئی ہے۔

لہذا اس کے ساتھ معیدوں میں نقل ہو کر اس کا احکامات  
۱۲ دروغیات حاصل کرنا ضروری ہے۔  
Saeed  
الموسم 23/02/18

سعود ۵۵ اول محلہ گورنٹ گرلز ہائی اسکول  
موسم ۲۳/۰۲/۱۸

ADD  
23/02/18  
Kamran  
complaint  
authentic  
[Signature]



# بسم اللہ الرحمن الرحیم

حکومت وین

سیدہ بی بی

بھابھ

اجرائے ڈگری

جواب درخواست اجرائے ڈگری مہاتما جی 3، 4

صبا عالی  
جواب دیل میں ہے

عذرات پھیری

1. یہ کہ درخواست گزار کو کوئی نئے درخواست حاصل ہے
2. یہ کہ مہلہ فرہ ٹریبونل جج 11/2/2017 کو درخواست گزار نے مہلہ سے کچھ لکھے ہیں اور لکھے درخواست گزار نے جس درخواست گزار سے یہاں یہ کہہ آر انوار سے نہیں ہو گیا ہے تو بیان طلبی ر فراسی بیان طلبی نہ دی اندہ حال میں اور انے ڈگری درخواست گزار نے اس دوران انوار سے مہلہ کو روک دیا تھا
3. یہ کہ درخواست گزار ہاتھ پاؤں سے ہوائی آئی ہے
4. یہ کہ درخواست گزار نے بھی فریڈل کا ہمارے ہے

عذرات واعمالی

1. فوٹو 1 اور انے ڈگری رسائی کے بعد کافی ہے
2. یہ کہ فوٹو 2 درست مہلہ فرہ 11/2/2017 کو جس درخواست گزار نے طلبی انوار سے 90 دن سے طلبی کا طلبی ہمارے کیا ہے
3. یہ کہ ہوائی سے طلبی کے انوار سے لکھے

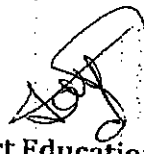
Notification



**OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE ABBOTTAEAD**

**NOTIFICATION**

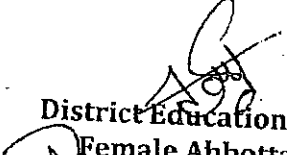
In the light of decision of Honorable Khyber Pakhtunkhawa Service Tribunal camp Court Abbottabad Service Appeal No: 707/2012 in r/o MST: Saeeda Bibi PST GGPS Mohri Miara (Circle Boi) Abbottabad, Principal GGHS Sheikhul Bandi is hereby appointed as Inquiry officer to probe the matter and submit report with facts /finding recommendation within 7 (seven) days positively for further action

  
District Education Officer  
Female Abbottabad

Endst No: 3451-BM EB-1 Inquiry/PST/\_\_\_\_\_ Dated 06/02/2018

Copy to;

1. Examiner Khyber Pakhtun Khawa Service Tribunal Camp Court Abbottabad
2. PA TO DIRECTOR OF ELEMENTARY & SECONDARY EDUCATION KPK Peshawar
3. Principal GGHS Sheikhul Bandi
4. SDEO (F) Abbottabad , she is directed to provide all relevant documents / record of above case to Inquiry officer

  
District Education Officer  
Female Abbottabad

6/2/2018



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

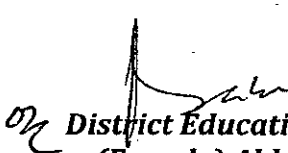
**NOTIFICATION:**

In the light of decision of Honorable Khyber Pakhtunkhwa Service Tribunal Camp Court Abbottabad Service Appeal No: 707/2012 in r/o Mst. Saeeda Bibi (PST) GGPS Mohri Maria (Circle Boi) Abbottabad, Mr. Shafqat, Principal GHS Harno is hereby appointed as Inquiry Officer to probe in to the matter and submit report with facts/findings recommendations within 07 days positively for further action.

Endst No: 7196-7202 dated: 9/10 /2018  
Copy to:

  
District Education Officer  
(Female) Abbottabad

1. Examiner, Khyber Pakhtunkhwa Service Tribunal Camp Court Abbottabad.
2. PA to Director, Elementary and Secondary Education, KPK, Peshawar.
3. DEO (M) Abbottabad with the request that Mr. Shafqat, Principal GHS Harno may be directed to inquire the above mentioned Enquiry.
4. Enquiry Officer, Principal, GHS Harno.
5. SDEO (F) Abbottabad, she is directed to provide all relevant documents/record of above case to inquiry officer.
6. Office File.

  
District Education Officer  
(Female) Abbottabad

مذمت نقاب DEO (زبان) قہلج ایب ڈیڈ  
عنوان - درخواست میں عمل پورے

جناب عالی  
گزارش ہے کہ سائیکل ڈرو اور سپروں کا مرعزہ میں  
موجود تقریباً ۱۰ سال سے ملتا ہے۔ کافی عرصہ سے معاملہ کھڑا  
کیوں دن بدن اہمیت بگڑ رہی ہے اور اس وقت  
اسے مزاحمت کی انجام دہی سے عاجز ہے۔  
لہذا عدالت میں رجسٹرڈ بار شہوت درخواست پنا  
کوفی ہے۔

لہذا اس کے ساتھ عدالت میں رجسٹرڈ اس کے اسقاط  
کا درخواست چاہتے ہوئے پیش کر رہے ہیں۔  
Saeed 11  
المعلوم 23/02/18

سعود ۵۵ اول خولہ گورنمنٹ گرلز ہائی اسکول  
موجودہ مسراہ (پوٹی) ایب ڈیڈ

ADD  
23/2/18  
Xanwar  
complaint  
authenticity

**District Abbottabad Pay Bill of Permanent Establishment of the Sub Divisional Education Officer(Female)Abbottabad For the Month of JUNE-2021**

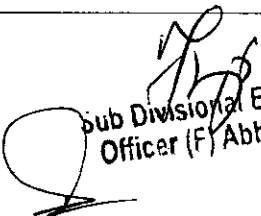
Admitted Rs,		Head of service Chargeable		Budget 2021-22	Voucher No.....
Objected Rs,		09 Education Affair & Services		Total Budget	List of Payment for.....
DDO CODE :AD-6128		091 Education Affair & Services		Expdr this Bill	Rs.
				Expdr: Pre: Bill	
				TOTAL EXP	
		0911 Primary Education Affair & Services			Rs.
		Leave Encashment AO-4114		Balance Budget	Rs.
Auditor		Senior Accountant			
Name of Section and of incumbent	Pay and acting allowance claimed (Seprately) for Government Servant Present Duty	Leave Salary AO-4114			NET Payable Amount
1.Name:-	SAEEDA BIBI	Formula	(28050*238*12/365)		
2.Designation:-	SPST		219482		219482
3.Name of School:-	MOHRI MAIRA				
4.Personal No:-	6390				
CNIC No:-	13101-0907125-0				
Bank Name:-	NBP 1376 Dhani(Boi) branch			Sanction of Retirement/Leave Encashment Vide DEO (F) Abbottabad No. 10044-45 Dated 03.12.2019	
A/C No:-	2731-1				

The total of each section should be entered in red ink.

In case of recoveries made under orders issued from Accounts Officer, the No. and date of the Comptroller letter should be quoted in the bill. The Government of Pakistan exercise no supervision are the management of the Hindu Family Annuity Fund, Bengal Christies family Fenslon fund and the General Family Pension Fund nd are in no way responsible for their solvency.

To be on tired by drawing Officer and checked in audit Office:

K.P.K Accountant General No.8.

  
 Sub Divisional Education  
 Officer (F) Abbottabad



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

SANCTION FOR RETIREMENT OF MEDICAL GROUND.

Consequent upon the decision of standing Medical Board Medical Superintendent Service, Hospital, Abbottabad, received vide letter No.2132, dated.12-04-2019 & Verification letter No. 3064 dated.27-05-.2019 Mst: Saccda Bibi SPST Govt: Girls Primary School Mohri Maira (Boi) Abbottabad is completely and permanently in-capacitated for further service w.e.f. 10-04-2019 & as approved by competent authority. She is hereby allowed to retire from service with effect from 10-04-2019 (AN) on Medical Grounds,

Moreover she is also allowed to (238 days) leave encashment in lieu of L.P.R. as due and admissible to her under the rules.

- Note: - 1. Necessary entry to this effect should be made in her service book.  
2. Recovery of overpayment if any should be made from her pension/gratuity etc.

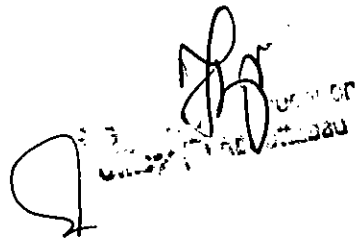
Sd-  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD.

Endst: NO. 10044-45 /EB-I/R/Cases Vol: 02-019 Dated A.Abad the. 3/12/19.

Copy to the:

1. The S.D.E.O. (F) Primary Abbottabad with reference to her No. 1879 dated 23-11-19 a/w service book.
2. The District Accounts Officer Abbottabad.

Dy: DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD.





**Detail of pay bill of permanent establishment of the S.D.E.O (FEMALE) ABBOTTABAD for the month of 06/2019**


District Abbottabad

Admitted Rs, Objected Rs, <b>P.NO. 6390</b>	Head of Service chargeable 09 Edu:Affair & Ser 092 Secy:Edu & Ser	Pay Rupees ( ) .....	Voucher No.....of List of payment for..... .....200
<b>BANK ACCOUNT NO. 2731-1</b> Bank Name: N.B.P DANI BOI BR: ATD <b>BRANCH CODE. 231376</b>		PRIMARY Secy: Education AD6128 o/o SDEO (F) ATD	
Auditor		Auditor G.O	
Senior Accountant			

Name of section & of incumbent	Name of Post	Senior Accountant								Auditor G.O					Total Deduct	Net Amount Payable			
		A01151 Pay	A01202 H.R.A	A01217 M.A	A0120 conv	A0120X AD-2010	121-T AD-2013	A0122-C AD-2015	A0 AD-2016	G.TOTAL	G.P.F	B.Fund	R.B	EEF					
MST: SAEEDA BIBI EX:PST GGPS.MOHRI MAIRA																			
ARR:wef. 01/02/2011 to 31/08/2011		48330	7413	7000															
		48330	7413	7000	0	0	0	0	0	0	62743	0	0	0	0	0	0	0	62743

The total of each section should be entered in red ink

"In case of recoveries made under orders issued from an Account Office the number & date of the Accountant General's letter should be quoted in the bill. The Govt. of Pakistan exercise no supervistant over the management of the Hindu family Annuity fund. Bengal Christian Family pension fund & General family pension fund & in no way responsible for their solvency (to be entered by Drawing & Disbursing Officer & checked in Audit office). (N.W.F.P Acctt:Genl: No.8

  
**Sub Divisional Education Officer (F) Abbottabad**

DDO CODE AD-6128

## ARR.PAY OF MST : SAEEDA BIBI PST GGPS.MOHRI MAIRA ARR.WEF.01/02/2011 TO 31/08/2011 BPS.12

Name of sec & of incumbe	Name of Post	A01151 Pay	A01202 H.R.A	A01217 M.A		A0120X AD-2010		121-T AD-2013	A0122-C AD-2015	A0 AD-2016			G.TOTAL	G.P.F	B.Fund	R.B	E E F	Total Deduct	Net Amount Payable
1/2/2011	30/06/2011 05-MONTHS	29050	5295	5000	0	0		0	0	0			39345					0	39345
1/7/2011	31/08/2011 02-MONTHS	19280	2118	2000	0	0		0	0	0			23398					0	23398
<b>TOTAL</b>		<b>48330</b>	<b>7413</b>	<b>7000</b>	<b>0</b>	<b>0</b>		<b>0</b>	<b>0</b>	<b>0</b>			<b>62743</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>62743</b>

Sub Divisional Education  
Officer (F) Abbottabad

ARR:PAY OF MST : SAEEDA BIBI PST GGPS.MOHRI MAIRA ARR:WEF.01/02/2011 TO 31/08/2011 BPS.12

Name of sec & of incumbe	Name of Post	A01151 Pay	A01202 H.R.A	A01217 M.A		A0120X AD-2010		121-T AD-2013	A0122-C AD-2015	A0 AD-2016			G.TOTAL	G.P.F	B.Fund	R.B	E E F	Total Deduct	Net Amount Payable
1/2/2011	30/06/2011 05-MONTHS	29050	5295	5000	0	0		0	0	0			39345					0	39345
1/7/2011	31/08/2011 02-MONTHS	19280	2118	2000	0	0		0	0	0			23398					0	23398
TOTAL		48330	7413	7000	0	0		0	0	0			62743	0	0	0	0	0	62743

Sub Divisional Education Officer (F) Abbottabad

Sub Divisional Education Officer (F) Abbottabad

Detail of pay bill of permanent establishment of the S.D.E.O (FEMALE) ABBOTTABAD for the month of 06/2019

District Abbottabad

Admitted Rs.	Head of Service chargeable	Pay Rupees ( )	Voucher No. .... of
Objected Rs. <b>P.NO. 6390</b>	09 Edu:Affair & Ser		List of payment for .....
	092 Secy:Edu & Ser		.....200
<b>BANK ACCOUNT NO. 2731-1</b>			
Bank Name: N.B.P DANI BOI BR: ATD		PRIMARY Secy: Education	
BRANCH CODE. 231376		AD6128 o/o SDEO (F) ATD	

Auditor		Senior Accountant				Auditor G.O									Total	Net Amount
Name of section & of incumbent	Name of Post	A01151 Pay	A01202 H.R.A	A01217 M.A	A01200 conv/AD-2010	121-T AD-2013	A0122-C AD-2015	A0 AD-2016			G.TOTAL	G.P.F	B.Fund	R.B	Product	Payable
MST: SAEEDA BIBI EX:PST GGPS.MOHRU MAIRA		48330	7413	7000							62743					
Sub Divisional Education Abbottabad ARR.wef. 01/02/2011 to 31/08/2011																
		48330	7413	7000	0	0	0	0	0	0	62743					62743

S 74 / 04/10

*Returned with the official was on 2 to 31/8/11 (212) days. The said entry of pay is not entitled to be entered on service book without pay. The said entry of pay is not entitled to be entered on service book without pay. The said entry of pay is not entitled to be entered on service book without pay.*

The total of each section should be entered in red ink

"In case of recoveries made under orders issued from an Account Office the number & date of the Accountant General's letter should be quoted in the bill. The Government of Pakistan exercise no supervisory control over the management of the Hindu Family Annuity fund, Bengal Christian Family Pension Fund & General Family Pension Fund & in no way responsible for their solvency (to be entered by Drawing & Disbursing Officer & checked in Audit office). (N.W.F.P Acctt:Genl: No.8

Sub Divisional Education Officer (F) Abbottabad

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 2064-65ST

Dated 26 / 11 / 2019


To

1. The District Education Officer, Female,  
Government of Khyber Pakhtunkhwa,  
Abbottabad.
2. Sub Divisional Education Officer (Female),  
Government of Khyber Pakhtunkhwa,  
Abbottabad.

SUBJECT: - ORDER IN E.P NO. 59/2018, MST. SAEEDA BIBI.

I am directed to forward herewith certified copy of order dated 21.11.2019 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR,  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 267-69/ST

Dated 28 / 01 / 2020

To

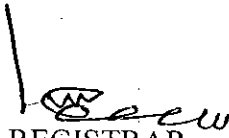
1. The District Accounts Officer,  
Government of Khyber Pakhtunkhwa,  
Abbottabad.
2. The District Education Officer, Female,  
Government of Khyber Pakhtunkhwa,  
Abbottabad.
3. Sub Divisional Education Officer (Female),  
Government of Khyber Pakhtunkhwa,  
Abbottabad.

SUBJECT: -

**ORDER OF ATTACHMENT OF SALARY OF RESPONDENT NO. 3 & 4 IN E.P NO. 59/2018, MST. SAEEDA BIBI.**

I am directed to forward herewith certified copy of order dated 21.01.2020 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 266 /ST

Dated 28 / 01 / 2020

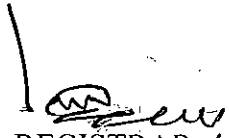
To

The District Comptroller of Accounts,  
Government of Khyber Pakhtunkhwa,  
Abbottabad.

SUBJECT: - ORDER IN E.P NO. 59/2018, MST. SAEEDA BIBI.

I am directed to forward herewith certified copy of order dated 21.01.2020 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

- 6 -

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



No: 9878  
Date: 26/11 /2019  
0992-342533  
Deofemale\_abbottabad@yahoo.com

**NOTIFICATION:**

Whereas Mst. Saeeda Bibi, PST, GGPS Mohri Maira Abbottabad period of wilful absence w.e.f 01-02-2011 to 31-08-2011 was converted into EOL (without pay) vide office order No. 1617-20/PST(F/P) dated 19-02-2012.

Whereas Mst. Saeeda Bibi has filed Service Appeal No. 707/2012 in the Honourable Service Tribunal, which was decided on 20-11-2017.

Whereas District Education Officer (Female) Abbottabad constituted De-Novo Inquiry in accordance with direction of Honourable Service Tribunal Camp Court Abbottabad. Inquiry officer conduct inquiry and submit his report. As per Inquiry Report recommendation concerned teacher declared eligible for salary for that period except 09-02-2011 and 24-02-2011 two days (un authorised absence).

Whereas the office order No. 1617-20 dated 19/02/2012 is hereby withdraw in the light of Honourable Service Tribunal Judgement dated 20/11/2017.

Therefore, wilful absence of period Mst. Saeeda Bibi w.e.f 01-02-2011 to 31-08-2011 (212 days)(EOL) without pay is hereby converted into full pay except 09-02-2011 and 24-02-2011 (two days) un-authorised absence.

*[Signature]*  
District Education Officer  
(Female) Abbottabad  
ADED (Lit)

*[Signature]*  
District Education Officer  
(Female) Abbottabad

Endst: No \_\_\_\_\_ Dated \_\_\_\_\_ /2019.

**Copy forwarded to:-**

1. Registrar Service Tribunal Peshawar.
2. District Account Officer Abbottabad.
3. Sub Divisional Education Officer (female), Abbottabad.
4. Office File.

*[Signature]*  
District Education Officer  
(Female) Abbottabad



**SANCTION FOR RETIREMENT OF MEDICAL GROUND.**

- 2 -

Consequent upon the decision of standing Medical Board Medical Superintendent Service, Hospital, Abbottabad, received vide latter No.2132, dated.12-04-2019 & Verification letter No. 3064 dated.27-05-.2019 Mst: Saeeda Bibi SPST Govt: Girls Primary School Mohri Maira (Boi) Abbottabad is completely and permanently in-capacitated for further service w .e .f. 10-04-2019 & as approved by competent authority. She is hereby allowed to retire from service with effect from 10-04-2019 (AN) on Medical Grounds,

Moreover she is also allowed to (238 days) leave encashment in lieu of L.P.R. as due and admissible to him under the rules.

- Note: - 1. Necessary entry to this effect should be made in her service book.  
2. Recovery of overpayment if any should be made from her pension/gratuity etc.

Sd-  
**DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD.**

Endst: NO. 10044-45 /EB-I/R/Cases Vol: 02-019 Dated A.Abad the. 3/12/19.

Copy to the:

1. The S.D.E.O. (F) Primary Abbottabad with reference to her No. 1879 dated 23-11-19 a/w service book.
2. The District Accounts Officer Abbottabad.

  
Dy: **DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD.**





ARR:PAY OF MST : SAEEDA BIBI PST :GGP'S.MOHRI MAIRA ARR:WEF.01/02/2011 TO 31/08/2011 BPS.12

Name of sec & of incumb	Name of Post	A01151 Pay	A01202 H.R.A	A01217 M.A		A0120X AD-2010		121-T AD-2013	A0122-C AD-2015	A0 AD-2016			G.TOTAL	G.P.F	B.Fund	R.B	E E F	Total Deduct	Net Amount Payable
1/2/2011	30/06/2011 05-MONTHS	29050	5295	5000	0	0		0	0	0			39345					0	39345
1/7/2011	31/08/2011 02-MONTHS	19280	2118	2000	0	0		0	0	0			23398					0	23398
TOTAL		48330	7413	7000	0	0		0	0	0			62743	0	0	0	0	0	62743

Sub Divisional Education  
Officer (F) Abbottabad

FORM OF LEAVE ACCOUNT

Leave Account of Miss /Mr Saeeda Bibi  
 Date of Commencement of Service Rvs FS 1981 24-4-1999  
 Date of attaining the age of superannuation 10-4-2019

Government /Department served under	Period of Duty			Leave earned on full pay for each calendar month	Brought Forward	Leave at credit (column 21+6)	LEAVE TAKEN ( From Column 8 to 11				Balance /returned from leave	ATTESTATION
							PERIOD		Leave on full pay/Half pay without /medical	Leave on full pay on medical certificate		
							From	To				
1	2	3	4	5	6	7	8	9	10	11	12	13
	24-4-99	8-2-11	11-9-14	141 days.		9-2-11	31-8-11	(204 days E/L			141 days.	
								w/o pay				
	1-9-11	10-4-19	7-7-9	= 91 + 141 =		232 days.					232 days.	
	Entries Revised											
	24-4-99	10-4-19	19-11-16	240-	<del>240-</del>	240	2-days	9-2-11 & 24-2-11	Un-authorized absence		238-days.	

Sub Divisional Education Office  
 (Female) Abbottabad

5

## Pension Calculation in respect of SAEEDA BIBI (BPS-14)

Retired from Government of Khyber Pakhtunkhwa on Retiring Pension  
Opted for 35% commutation

Date of Retirement :	Year - Month - Day 2019 - 04 - 10
Date of Birth :	1976 - 04 - 06
Age at Retirement :	43 y, 4 d

Date of Retirement :	2019 - 04 - 10
Date of Appointment :	1999 - 04 - 24
Length Service :	19 y, 11 m, 16 d

Qualifying Service :	20 years
Basic Pay :	28,050.00

Total Emoluments :	28,050.00
Gross Pension :	13,090.00
35% Commuted Portion :	4,581.50
Net Pension :	8,508.50
Commutation Rate :	269.6556
<b>Commutation Amount :</b>	<b>1,235,427.13</b>
Date of Restoration :	10-04-2041

Net Pension :		8,508.50
15% increase of 2010	0.00	8,508.50
15% increase of 2011	1,276.27	9,784.77
20% increase of 2012	0.00	9,784.77
15% increase of 2013	0.00	9,784.77
10% increase of 2014	0.00	9,784.77
10% increase of 2015	978.48	10,763.25
10% increase of 2016	1,076.33	11,839.58
10% increase of 2017	1,183.96	13,023.54
10% increase of 2018	1,302.35	14,325.89
10% increase of 2019	1,432.59	15,758.48
25% Medical Allowance of 2010	2,127.13	
25% increase on Medical Allowance	531.78	
<b>Net Pension Payable Rs.</b>		<b>18,417.39</b>

2019 - 04 - 10  
1976 - 04 - 06  
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43 - - 04

1235427.13  
1157495.  
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77932

2019 04 10  
1976 - 04 - 06  
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43 - - 4

15

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



No: 9878  
Date: 26/11 /2019  
0992-342533  
Deofemale\_abbottabad@yahoo.com

### NOTIFICATION:

Whereas Mst. Saeeda Bibi, PST, GGPS Mohri Maira Abbottabad period of wilful absence w.e.f 01-02-2011 to 31-08-2011 was converted into EOL (without pay) vide office order No. 1617-20/PST(F/P) dated 19-02-2012.

Whereas Mst. Saeeda Bibi has filed Service Appeal No. 707/2012 in the Honourable Service Tribunal, which was decided on 20-11-2017.

Whereas District Education Officer (Female) Abbottabad constituted De-Novo, Inquiry in accordance with direction of Honourable Service Tribunal Camp Court Abbottabad. Inquiry officer conduct inquiry and submit his report. As per Inquiry Report recommendation concerned teacher declared eligible for salary for that period except 09-02-2011 and 24-02-2011 two days (un authorised absence).

Whereas the office order No. 1617-20 dated 19/02/2012 is hereby withdraw in the light of Honourable Service Tribunal Judgement dated 20/11/2017.

Therefore, wilful absence of period Mst. Saeeda Bibi w.e.f 01-02-2011 to 31-08-2011 (212 days)(EOL) without pay is hereby converted into full pay except 09-02-2011 and 24-02-2011 (two days) un-authorized absence.

*S. M. Khan*  
District Education Officer  
Female Abbottabad  
ADEO(LT)

*S. M. Khan*  
District Education Officer  
(Female) Abbottabad

Endst: No \_\_\_\_\_ Dated \_\_\_\_\_/2019.

### Copy forwarded to:-

1. Registrar Service Tribunal Peshawar.
2. District Account Officer Abbottabad.
3. Sub Divisional Education Officer (female), Abbottabad.
4. Office File.

*S. M. Khan*  
District Education Officer  
(Female) Abbottabad

**OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE ABOttABAD.**

No. 10571 /AB-P.File P.Case

Dated A.Abad the 23/12 /2019

To :-

The District Accounts Officer,  
Abbottabad.

Subject:- **PENSION CASE IN RESPECT OF MRS.SAEEDA BIBI EX-PSST GOVT: GIRLS  
PRIMARY SCHOOL MOHRI MAIRA BOI ABOttABAD.**

Memo:

Enclosed please find herewith Pension Case in respect of the above name official who retired on **10.04.2019** (AN) and sanction of retirement/Encashment on **Medical Ground** has already been issued by the Estt: Branch of this Office vide Endst: No **10044-45** dated **03.12.2019** for further process under the rules please.

S.NO.	DETAIL OF DOCUMENTS	REMARKS.
1	Service book.	Original
2	Pension papers/Photo graphs.	Original
3	CNIC in respect of Mr.Saeeda Bibi Ex-SPST	Copy
4	LPC issued by SDEO(F) Abbottabad	Original
5	Pay Print 03.2019	Original
6	Clearance Certificate/ Accuracy certificate/Pay Stopge Certificate	Original
7	Bank clearance certificate	Original
8	No demand certificate, Declaration & Under taking, Specimen Signature, Fingers & Thumb impression	Original
9	Clearance Certificate, Option of 35 % Commutation & Non Involvement Certificate	Original
10	Service Roll	Original
11	List of family members	Original
12	Retirement/encashment order	Original
13	Pension service certificate	Original
14	Undertaking	Original
15	Ist Appointment Order	Original
16	Indemnity Bound Stamp Paper	Original
17	Option for Direct Credit of Pension.	Original
18	Verification of Invalidation Certificate	Copy

Endst: No. 10572

Copy to the:-

Sub Divisional Education Officer Female Havelian with reference to her No.1192 dated 17.12.2019 for information.

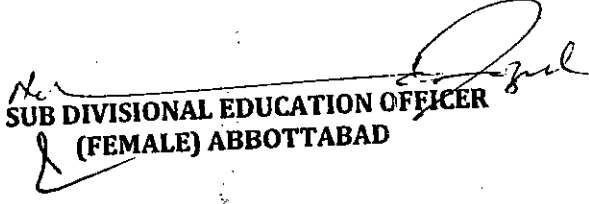
*[Signature]*  
District Education Officer  
Female Abbottabad.

*[Signature]*  
District Education Officer  
Female Abbottabad



**PENSION SERVICE CERTIFICATE.**

1. Certified that no Departmental/Anticorruption/Judicial case is pending against **MRS.SAEEDA BIBI SPST GGPS MOHRI MAIRA (ABBOTTABAD)**
2. Certified that **MRS.SAEEDA BIBI SPST GGPS MOHRI MAIRA (ABBOTTABAD)** he has rendered the entire service under the Govt: of KPK against pension able post.
3. Certified that **MRS.SAEEDA BIBI SPST GGPS MOHRI MAIRA (ABBOTTABAD)** has not remained on deputation or in Foreign Service within Pakistan/Abroad in the entire period of services.
4. Certified that there is not break/deficiency in the entire service of **MRS SAEEDA BIBI SPST GGPS MOHRI MAIRA (BBOTTABAD)**
5. Certified that the pension / commutation money has been calculated and found correct of **MRS.SAEEDA BIBI SPST GGPS MOHRI MAIRA (ABBOTTABAD)**
6. Certified that the amount of pension and commutation in respect of **MRS.SAEEDA BIBI SPST GGPS MOHRI MAIRA (ABBOTTABAD)** has been checked/re-checked by the experts in Accounts and found correct.
7. Certified that **MRS SAEEDA BIBI SPST GGPS MOHRI MAIRA (ABBOTTABAD)** has not involved in any kind of Departmental/ Anti corruption/ Judicial/Police case.


  
SUB DIVISIONAL EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

### Inquiry Report

Caption of the inquiry	<b><u>"Execution Petition No. 59/18 out of Service appeal No. 707/2012 in r/o Mst. Saeeda Bibi (PST) GGPS, Mohri Maira (Circle Boi) Abbottabad.</u></b>
Inquiry Officer	SHAFQAT KHAN, Principal (BPS-19), Government Higher Secondary School, Harno Azizabad, Abbottabad.
Period	11 <sup>th</sup> , 12 <sup>th</sup> and 13 <sup>th</sup> October, 2018.
Reference/TOR's	The inquiry was initiated vide District Education Officer (Female) Abbottabad, No. 7196-7202 Dated 09/10/2018.
Procedure/Proceedings	Inquiry officer visited the District Education Office (F) Abbottabad on 11 <sup>th</sup> , 12 <sup>th</sup> and 13 <sup>th</sup> of October, 2018.
Brief History & Findings	<p>District Education Officer (Female) vide her office No. 7196-7202 dated 09/10/18 directed the inquiry officer to probe into the matter and submit the report.</p> <p><b>I. D.E.O. (F) Abbottabad Office Documents</b></p> <p>The district education office (female) Abbottabad, through its concerned officials, provided documents/letters related to the case; a brief summary of which is as follows:</p> <ol style="list-style-type: none"> <li>1) Mst. Saeeda Bibi (PST) of Government Girls Primary School Mohri Maira (Circle Boi) Abbottabad was caught absent by the ADO (F) (Pry) on 09/02/2011 and 25/5/2011. Her pay was stopped/made inactive from the month of March 2011 (Annex-I).</li> <li>2) Upon her appeal, and submission of affidavit, her pay was activated in the month of September 2011; later vide EDO's No. 1617-20 dated 9/2/2012 the period between 01/2/2011 to 31/8/2011 was declared as wilful absence on part the accused teacher and that period was converted into extra ordinary leave (EOL) (without pay) (Annex-II).</li> <li>3) Mst. Saeeda Bibi on 26/6/2012 filed a petition in the Khyber Pakhtunkhwa Service Tribunal Camp Court, Abbottabad under Appeal No. 707/12 dated 26/6/2012.</li> <li>4) Honourable court in its Judgement, pronounced on 20/11/2017, set aside the EDO's Office Order No. 1617-20 dated 9/2/2011 with the direction to the department to initiate and conclude the proper proceedings within a period of three (3) months from the date of receipt of the judgement (Anex-III).</li> </ol>

	5) Meanwhile, Mst. Saeeda Bibi on 23/2/2018 applied for retirement on the basis of medical board (Annex-IV).
Conclusions	<p>Action against Mst. Saeeda Bibi was initiated and taken by the EDO E&amp;SE Abbottabad under the Khyber Pakhtunkhwa Government Servants (Efficiency &amp; Discipline) Rules 2011.</p> <p>In the light of those rules and going through the above facts and statements following conclusions have been drawn:</p> <p>a) No proper inquiry was conducted neither rule 5 or 9 of the E&amp;D rules 2011 were adopted properly.</p> <p>b) There was no conclusive evidence of absence from duty of the accused teacher for such a long time i.e. from 1/2/2011 to 31/8/2011.</p> <p>c) Despite the clear directions for initiation and conclusion of proper proceedings in the Judgement of the Honourable Court on 20/11/2017 no proceeding was initiated within three months of the announcement of the judgement.</p>
Recommendations	<p>On the bases of the above findings and conclusion the following recommendations are hereby suggested:</p> <ol style="list-style-type: none"> <li>1. Penalty imposed on the teacher should be reconsidered on the humanitarian basis keeping in view her health conditions.</li> <li>2. Two days absent pay should be deducted by applying the proper procedure.</li> <li>3. Pay of the teacher for the period of 1/2/2011 to 31/8/2011 should be honoured through system of receipt of source from the DDO concerned.</li> <li>4. Her application for medical board should be sent to the quarter concern for proper and speedy action.</li> <li>5. The inquiry was conducted in the best interest of public.</li> </ol>

No. 858Dated: 13 / 10 / 2018.

  
 Inquiry Officer,  
 SHAFQAT KHAN,  
 Principal (BPS-19),  
 Govt; Higher Secondary School,  
 Harno, Abbottabad.

خدمت جناب EDO صاحبہ محکمہ تعلیم ضلع ایبٹ آباد

جناب عالی!

1: 1999ء میں سعیدہ بی بی کی عملہ تعلیم میں بطور

پرائمری ٹیچر، موہری میرا میں آرڈر ہوا۔

2: سنگل ٹیچر ہونے کی وجہ سے بقول اول معلمہ سعیدہ

بی بی، جب ضروری کام کے سلسلے میں جائے تو انکی

جگہ کسی ذمہ دار کو چھوڑ کر جاتی ہیں۔

3: 9/2/11 کو جب میں زائید (A.D.O) نے ورث کیا

تو سکول کو بند پایا یہ سکول وقت سے پہلے بند تھا فری

بوائے سکول کا ہی معائنہ کیا گیا وہ گولا تھا۔

سابقہ E.D.O صاحب کو مکمل رپورٹ دی گئی انھوں

نے اول معلمہ کی تنخواہ بند کر دی۔ اور معائنہ

EDO صاحبہ کی بیانات پر کیا گیا۔

4: ٹیچر سعیدہ کو جب پتہ چلا تو انھوں نے دفتر میں

اس وقت اپنا میڈیکل سرٹیفکیٹ پیش کیا جو کہ

پہلے بھیجا جا چکا ہے تھا۔

5: اپریل 2011 سے پینل سے تنخواہ پیس وصول ہوئی۔

6: مقامی تنظیم سنگم کے وفد نے DCO صاحب نے EDO صاحب

6. EDO صاحب کے پاس مکمل رپورٹ گواہوں کے دستخط اور عینی شواہد کی گزارشات سامنے تھیں اسی وجہ سے تنخواہ بحال نہیں کی گئی۔

7. بیان حلفی صرف پینچر سے ضمانت کے طور پر لیا گیا ہے آئندہ وہ ریگولر رہیں گی۔ جب پینچر نے زبانی اقرار کیا کہ ان سے یہ غلطی ہو چکی ہے اسی وجہ سے ان سے حلف نامہ پر وہی تحریر لکھوائی گئی۔

نوٹ ( فوٹو کاپی حلف نامہ Attach ہے - )

8. جولائی 2011 میں موسم گرما کی ٹیسٹوں کی وجہ سے محلہ کی کاروائی مکمل نہیں ہو سکی جلی وجہ سے تنخواہ بحال نہیں ہوئی۔ لیکن محلہ پر یہ بات واقع کر دی گئی تھی کہ باقاعدہ کاروائی سکول کھلے ہوں گے تو انکی تنخواہ بحال کی جاوے گی۔

9. 25/5/11 کو سکول کا دوبارہ جب معائنہ ہوا تھا اس وقت بھی یہی بتایا گیا کہ پینچر ڈاکٹر کے پاس گئی ہیں۔ معائنہ رپورٹ اسی جواب نامہ کے ساتھ attach ہے۔ اسی رپورٹ کی روشنی میں یہ بات بھی واقع ہوئی کہ محلہ سعودیہ بی بی مستقل سکول سے غیر حاضر رہیں ہیں اس کا اعتراف ہی انہوں نے کیا۔

:10

محکمہ نے سابقہ انٹروائریز کو بلائے طاق رکھتے ہوئے  
محلہ کو اپنی موقع دیا کہ اب وہ ڈپٹی ریگولر  
کریں درالکھائی۔ شیواہ جاری کی جائے۔  
اب وہ اپنی شیواہ وصول کر رہی ہیں۔

Tehseent

21/11/11

رپورٹ معیہ کی بی تعلیم عوامی سہرا سکول سرکل کوئی

9/02/01 کو سکول بند کا اجازت معائنہ کیا گیا معائنہ کے دوران سکول بند پایا گیا۔ سکول میں معیہ کی بی کی جگہ ساعدہ کی بی سکول میں جاتی تھیں جبکہ اس دن ساہی کی جگہ وہاں کوئی بوجھل لڑکی نے سکول کھولنا تقابلاً موقع پر وہ بھی موجود نہیں تھی حکم طور پر سکول بند پایا گیا۔ رپورٹ کے دوران NCHD کی MC منع بھی میرا ہمراہ لئی۔ سکول کاوزٹ EDO صاحب کو حکم سے کیا گیا۔ EDO صاحب کو رپورٹ پیش کی گئی تو انہوں نے معیہ کی بی کی شناخت inactive کر کے حکم جاری کیا۔ جس پر معیہ کی بی کی شناخت inactive کی گئی۔ لہذا اس سرکل نے بھی سکول کاوزٹ کیا اور اس کے دوران سکول میں معیہ کی بی کاواٹر لئی اور اس کے ساتھ NCHD کی ایک رپورٹ بھی سکول کھول دیا گیا۔ جب معیہ کی بی کی شناخت بند کی گئی تو اس نے مختلف لوگوں سے رابطے کیے اور ناظم اور سپاؤسڈ لوگوں کو اس میں شامل کیا کہ اس کی شناخت بحال کی جائے۔ جبکہ EDO صاحب نے اس لوگوں کو بتایا کہ سکول کاوزٹ کیا جائے گا اور پھر حاضر ہوگی تو اس کی شناخت بحال کی جائے گی۔

2 :

صہ معلمہ کو اس میں ملکہ پائی گئی تو اس نے اسے  
 غیر حاضر کی کو شکم کیا اور میں صلفی ماکو کر دی کہ  
 وہ سکول سے مسلسل غیر حاضر تھی اس لئے اسے  
 کو باہر نہیں کرے گی۔ اس 123 کی سنو او  
 حال کی گئی دلیل بنایا نہیں بنایا کیونکہ یہ  
 سکول سے غیر حاضر کا ہے۔

370  
 19/10/19  
 Na  
 Asstt. Distt. Officer  
 (F) Pw Abbottabad



معائنہ رپورٹ :  
گورنمنٹ گرنز پرائمری سکول صہری میرا

سکول معذا کا معائنہ مورخہ 25/5/2011 کو کیا گیا۔

اول معلمہ بی بی سعیدہ سکول میں نہیں تھیں۔ ایک

ٹیسٹر NCHD کی طرف سے حاضر تھی۔ میں سعیدہ کے بیانی

حق نواز بھی سکول میں میں سعیدہ کی مدد کر رہے تھے اور

Computer اور دیگر activities میں بچوں کی مدد کر رہے

تھے۔ چونکہ دار عبدالقیوم بھی ڈیوٹی پر تھے۔

میں سعیدہ کے بارے میں پوچھنے پر بتایا گیا کہ وہ ڈائٹری

کے پاس معائنہ کے لیے گئی ہیں۔

بچوں کا تدریسی معائنہ ہوا۔ تدریس پر مزید توجہ

کی ضرورت ہے۔ سکول کی بلڈنگ ابھی مکمل نہیں ہے جسکی

وجہ سے وہ بی بی سعیدہ کے گھر پر ہے۔

*Tehseen Kousar*

Assistant Dy: Distt: Officer

(F) Primary Abbottabad

Boi circle .

~~Annex-9~~

13

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

OFFICE ORDER.

Mst. Saeeda Bibi, PST Govt Girls Primary School Mohri Maira Abbottabad remained wilful absent from duty with effect from 01-02-2011 to 31-08-2011 without any application / prior permission.

Her absentee was confirmed by the ADO circle as well as she has submitted an Affidavit, whereas she made confessional statement regarding her absentee with the request that she will be careful in future.

Hence due to the length of her service absent period with effect from 01-02-2011 to: 31-08-2011 be treated as extra ordinary leave (Leave without Pay) as approved by the competent authority.

sd  
EXECUTIVE DISTRICT OFFICER  
ELEMN: & SECY: EDU: A.ABAD.

Endst: No. 1617-22 /PST (F/P)

Dated 29/02 /2012.

Copy to the:-

- 1. District Coordination Officer Abbottabad.
- 2. Deputy District Officer E & SE (F/P) Abbottabad.
- 3. District Comptroller of Accounts Abbottabad.
- 4. Mst: Saeeda Bibi, PST GGPS Mohri Maira Abbottabad.

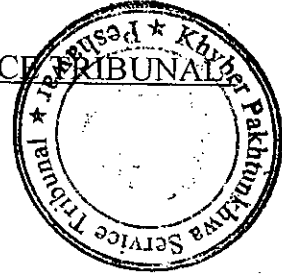
Attested  
Owner

sd  
DISTRICT OFFICER  
ELEMN: & SECY: EDU: A.ABAD.

*Handwritten signature/initials*

10-02-2012 Recd  
1617-22 (139) / PST (F/P) Mst. Saeeda Bibi Govt Girls Primary School Mohri Maira Abbottabad  
100/2012/2012

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
CAMP COURT ABBOTTABAD



Service Appeal No. 707/2012

Date of Institution... 26.06.2012

Date of decision... 20.11.2017

Mst. Saeeda Bibi W/o Mohammad Akseer PTC Teacher,  
Govt: Girls Primary Scholl, Mohri Mera U/C Boi, Tehsil and District Abbottabad.  
... (Appellant)

Versus

1. The Secretary to Government of Khyber Pakhtunkhwa Elementary and Secondary Education (E&SE), Civil Secretariat, Peshawar and 4 others.  
... (Respondents)

MR. ABDULLAH KHAN TANOLI,  
Advocate

... For appellant.

MR. MUHAMMAD BILAL  
Deputy District Attorney

... For respondents.

MR. NIAZ MUHAMMAD KHAN,  
MR. AHMAD HASSAN,

... CHAIRMAN  
... MEMBER

JUDGMENT

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

FACTS

2. The appellant is aggrieved from an order dated 09.02.2012 whereby her wilful absence was treated as extraordinary leave. Against this order she filed departmental appeal to the DCO on 13.03.2012 which was not responded to and thereafter the present service appeal on 25.06.2011.

ATTESTED

*Saeeda*  
CHAIRMAN  
Khyber Pakhtunkhwa  
Service Tribunal  
Camp Court, Abbottabad

2012

2)

ARGUMENTS

3. The learned counsel for the appellant argued that the impugned order was passed without any inquiry under the Khyber Pakhtunkhwa Government Servant (Efficiency and Disciplinary) Rules 2011. That no order could be passed without following the procedure laid down under the rules mentioned above.

4. On the other hand, the learned Deputy District Attorney, argued that the present appeal is time barred and secondly the departmental appeal was addressed to in incompetent authority. He further argued that the appellant herself admitted her absence by filing an affidavit.

CONCLUSION.

5. The delay of four days could not be taken to defeat the appeal of the appellant for the reason that the order was passed on 09.12.2012 and there is no proof of the fact that it was communicated to the appellant on the same day. It definitely takes few days to reach the aggrieved civil servant, therefore, this departmental appeal cannot be held to be time barred. Secondly the departmental appeal was submitted to the DCO. Under the Khyber Pakhtunkhwa Civil Servant (Appeal) Rules, 1986 the departmental appeal is to be made not to the appellate authority but in the office in which the appellant is serving. It is for the office to send the departmental appeal to the concerned authority if he himself is not the appellate authority (Rule-4). The DCO at the relevant time did figure in the hierarchy of the department. He should have referred the appeal to the appellate authority, if he himself was not the appellate authority. Admittedly, the department has not initiated the proceedings under the Khyber Pakhtunkhwa Government Servant (Efficiency and Disciplinary) Rules 2011. The proper procedure for the department was to have initiated the regular proceedings under the Rule-5 or under Rule-9 of the said rules. The competent authority could not decide the same on the basis of any affidavit by the appellant.

E-S-D R  
2011  
(5) - 8 - (9)

ATTESTED  
*[Signature]*  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Camp Court, Abbottabad

6. Resultantly, this appeal is accepted. The impugned order is set aside and the department is directed to initiate and conclude the proper proceedings within a period of 3 months from the date of receipt of this judgment. Parties are left to bear their own costs.

File be consigned to the record room.

sd-  
(Ahmad Hassan)  
Member

sd-  
(Niaz Muhammad Khan)  
Chairman  
Camp Court, A/Abad

ANNOUNCED  
20.11.2017

Certified to be true copy  
Suble  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Camp Court, Abbottabad

Date of Presentation of Application 20-11-17  
Number of Words 1200  
Copying Fee 8-00  
Urgent -  
Total 8-00  
Name of Applicant \_\_\_\_\_  
Date of Completion of Copy 23-11-17  
Date of Delivery of Copy 23-11-17

خدمت عتاب DEO (زبان) ضلع ایبٹ آباد  
عنوان - درخواست میں تامل بورڈ

عتاب والا

گزارش ہے کہ سائل مذکور درد اور مہیروں کے سر میں عتاب  
عبرہ تقریباً ۱۰ سال سے مبتلا ہے۔ کافی عرصہ معالجہ کروایا  
لیکن دن بدن اہمیت بگڑ رہی ہے اور اب سائل  
اپنے درالضی کی انجام دہی سے عاجز ہے۔  
ذند میں تامل ریکارڈ بار ثبوت درخواست پنا  
لے ہے۔

لہذا اس کے ساتھ میں تامل بورڈ کے احکامات  
سہا در مضامین حائضہ نواز شہزادہ  
Saeed 11  
المعلوم 23/02/18

سعد ۵۵ اول محلہ گورنمنٹ گرلز ہائی اسکول  
نور پور ضلع ایبٹ آباد

ADD  
23/2/18

Forwarded  
23/2/18

complaint  
authenticity

**"B"**

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

No.

C.P. No. 59/18 503

Appeal No. .... of 20 .....

Mrs. Saade Bitor

Appellant/Petitioner

The Secy. Edu. K.P.S.

Versus

Mrs. K.P.S.

Respondent

Respondent No. ....

Notice to: —

Distt. Education officer, (F)  
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 16/7/18 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..... 6/12

Day of..... June ..... 20 18

(at Camp Court A. A. Head)

*[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.**

No.

*E.P. No. 59/18* *TB*

Appeal No. .... of 20 ..

*Mst. Saeeda Bibi* Appellant/Petitioner

Versus

*The Secy Edn. & Pa. Pesh.* Respondent

Respondent No. ....

Notice to:

*- Distt. Accounts officer, A. Akad*

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 *15/7/2018* 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 *6/7/18* .....

Day of *June* ..... 20 *18*

*(at Camp Cour A. Akad)*

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.

*E.P. NO. 59/18* *713*

Appeal No. .... of 20 ..

*Mst. Saeda Bibi* ..... Appellant/Petitioner

Versus

*The Secy. Edu: KPKE* ..... Respondent

Respondent No. ....

Notice to:

*The Secy. to Govt. of KPKE Edu.  
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 16/7/2018 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 4/6 .....

Day of June ..... 20 18

*at Camp Court (A. Head)*

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

*E.P. No - 59/18*

No.

Appeal No. .... of 20 ..

*Ms. Saeeda Bibi*

Appellant/Petitioner

*The Secy. Edu. Dept.*

Versus

Respondent

Respondent No. ....

*Director Education K.P.K.*

Notice to: —

*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~~ *informed* 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.....20.....

*at Camp Ceer & A. Alad*

*Recd 25/1/19*

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.

Appeal No. E.P. 59/18 of 20 TB

Saeed Bibi ..... Appellant/Petitioner  
Versus

Director Edu: KP Pk Pk ..... Respondent  
Respondent No. 6

Notice to: —

Distt: Comptroller Officer, Account  
Mulla Akbar

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 16/12/2018 at 8.00 A.M. If you wish to urge anything against the appellan/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.

order sent copy  
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 5/12.....

Day of Nov ..... 20 20

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.

*FB*

*E.P. No. 59/18*

No.

Appeal No. .... of 20

*Saeeda Bibi*

Appellant/Petitioner

*Director Edu. K.P.K. Pesh.*

Versus

Respondent

Respondent No. ....

*Director, Education Govt. of K.P.K. Peshawar.*

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.....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.

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

*5/16*

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

*Nov. 20*

Day of.....20

*at Camp Court A. Almad*

*[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.

*E. P. No. 59/18. TB*

No.

Appeal No..... of 20

*Saeeda Bibi.*

Appellant/Petitioner

Versus

*Director Education K.P.P. Pesh.*

Respondent

Respondent No.....

*2*

Notice to: —

*DIST: Education Officer (F) Distt. 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.....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 is 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 purposes of this appeal/petition.

*Order Sheet Copy*

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

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

Given under my hand and the seal of this Court, at Peshawar this.....*5th*.....

Day of.....*Nov*.....20 *20*

*at Camp Court Abbottabad*

*[Signature]*

Registrar,  
Khyber Pakhtunkhwa Service Tribunal  
Peshawar.

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

**"B"**

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

No.

*E.P. No. 59/18 TB*

Appeal No..... of 20

*Saeeda Bibi*.....Appellant/Petitioner

Versus

*Director Edu. KP Pesh*.....Respondent

Respondent No.....*3*

Notice to: —

*Sub Division Education Officer (F)  
Tehsil Abot Tahad*

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.....*14.12.2018*.....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.

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*Order Sheet Copy*  
~~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.....*5.12*.....

Day of.....*14.12.2018*.....202*0*

*at Camp Court A. Head*

*[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.

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

No. 574 /ST

Dated 25 / 03 / 2021


To

The District Comptroller Officer Accounts,  
Government of Khyber Pakhtunkhwa,  
Abbotabad.

SUBJECT: - **ORDER IN EXECUTION PETITION NO. 59/2018 MST. SAEEDA BIBI.**

I am directed to forward herewith a certified copy of order dated 17.03.2021 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

  
REGISTRAR  
KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL  
PESHAWAR.

"A"

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

No.

E-P NO 59/18

TBA/A

APPEAL No. 707 of 2012

Mst Saeeda Bibi

Appellant/Petitioner

Versus

Secy. Edu. Deptt Pesh

RESPONDENT(S)

Notice to Appellant/Petitioner

Mst Saeeda Bibi w/o  
Mohd Akbar Govt Girls Primary  
School Mahri Mera (Boi) A/Abad

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 17-11-2014 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/Abad

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.