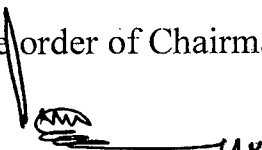


# FORM OF ORDER SHEET

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

Case No.- 1714/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	30/11/2022	<p>The appeal of Jehanzeba resubmitted today by Mr. Yasir Saleem Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>



The objections raised by the Honorable tribunal are removed.  
The removed objections are as following:

- 1-Objection No.1, 2, 3, 4 are removed, hence corrected.**
- 2-Objection No.5, that 16.09.2014, 07.05.2014, and 07.03.2014 are attached as annexure (D & E), while 17.09.2018 is incorrectly mentioned due to clerical mistake while its 12.09.2018 mentioned on the same annexure (H) given as remarks, and in the 06.09.2019 the remarks are also given on the same annexure (I).**
- 3-Objection No.6, departmental appeal is available on annexure (M).**

Hence Re-submitted today.

  
Afrasiab Khan Wazir  
Advocate High Court  
Peshawar

This is an appeal filed by Jehanzba today on 28/10/2022 for release of salaries against which she show her departmental appeal/ representation in the present appeal which was made on 11.08.2022 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority report as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Annexures of the appeal may be attested.
- 4- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 5- Copies of applications/letter dated 16.1.2014, 7.3.2014, 17.9.2018 & 6.9.2019 in respect of appellant mentioned in para-3, 4, 8 & 9 respectively are not attached with the appeal which may be placed on it.
- 6- Copy of departmental appeal dated 11.08.2022 in respect of appellant is not attached with the appeal which may be placed on it.

No. 3091 /ST,

Dt. 28/10/2022.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Yasir Saleem Adv. Peshawar.

- objection nos 1, 2 & 3 are removed.
- objection no 4 enquiry report is attached as Annex (C)
- objection no 5 deptt appeal is as Annex (H), while the list of the appellants Adjutant/ release of pay is attached as Annex (F), and the list of the appellant is after annex (D) & (E), page attested.
- objection no 11, 12, 13, Annex H better is replaced by better copy while Annex G is readable.
- objection no 7 are removed  
Hence re submitted & day.

Yasir Saleem Adv

Y

**IN THE COURT OF SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**  
**PESHAWAR**

Service Appeal No. 1764 /2022

**Jehanzeba**

.....**Appellant**

**VERSUS**

Government of Khyber Pakhtunkhwa & others

.....**Respondents**

**INDEX**

<b>S.No</b>	<b>Description of Documents</b>	<b>Annex</b>	<b>Pages</b>
1.	Service Appeal alongwith affidavit		
2.	Address of Parties		
3.	Copy of the Office Order dated 21.12.2013	<b>A</b>	
4.	Copies of the application dated 16.12.2013 and re-adjustment dated 07.03.2014	<b>B&amp;C</b>	
5.	Copies of the appeal dated 07.03.2014 and letter dated 07.03.2014	<b>D&amp;E</b>	
6.	Copy of the inquiry report dated 05.04.2014	<b>F</b>	
7.	Copies of the letter dated 07.06.2018	<b>G</b>	
8.	Copy of the appeal dated 12.09.2018	<b>H</b>	
9.	Copy of the appeal dated 06.01.2019	<b>I</b>	
10.	Copy of Office Order dated 30.01.2019	<b>J</b>	
11.	Copies of the letter dated 16.02.2019 & advertisement dated 21.12.2018	<b>K&amp;L</b>	
12.	Copy of appeal and office order dated 11.08.2022	<b>M &amp; N</b>	
13.	Copy of report of inquiry committee dated 08.09.2022	<b>O</b>	
14.	Wakalatnama		

Through:

*Yasir Saleem*  
Appellant

*Yasir Saleem*  
**YASIR SALEEM**  
Advocate High Court

&

*Afarsyab Wazir*  
**Afarsyab Wazir**  
Advocate High Court

**IN THE COURT OF SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**  
**PESHAWAR**

Service Appeal No. 1714 /2022

**Jehanzeba PTC Government Primary School Zeendai Kot North Waziristan  
District**

.....**Appellant**

**VERSUS**

1. **Government of Khyber Pakhtunkhwa**, through the Secretary Elementary & Secondary Education, Peshawar.
2. **Secretary Elementary & Secondary Education**, (FATA Secretariat Merged Areas) Warsak Road Peshawar.
3. **Director Elementary & Secondary Education**, (FATA Secretariat Merged Areas) Warsak Road Peshawar
4. **District Education Officer**, North Waziristan.

.....**Respondents**

**APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT AGAINST INACTION OF THE RESPONDENTS REGARDING THE RELEASE OF SALARIES OF THE APPELLANT DESPITE THE FACT THAT HE IS STILL ON THE ROLL OF THE DEPARTMENT AS PERFORMING HIS DUTIES AND HAS NOT RESPONDED THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF 90 DAYS.**

**Prayer-in-Appeal:**

**On acceptance of this Service Appeal, respondents may kindly be directed to release the salaries of the appellant from the date of stoppage and to adjust the appellant on his post.**

**Respectfully Sheweth:-**

1. That the appellant was initially appointed as PTC in the Respondent establishment vide office order dated 21.12.2013. ***(Copy of the Office Order dated 21.12.2013 is attached as Annexure A).***
2. That the Appellant, ever since her appointment as PTC teachers in 2013, had been performing her duties without any complaint, albeit the appellant had been denied her salaries. Later the nomenclature of PTC is changed to PST. Ever since appointment, the Appellant has agitated the matter of adjustment and release of her salaries.
3. The since the Appellant was not paid her salary, she was constrained to filed application dated 16.01.2014 to the then Director Education FATA for the redressal of her grievances. The application was processed and the Appellant was issued re-adjustment order vide notification dated 07.02.2014. ***(Copies of the application dated 16.01.2014 and re-adjustment dated 07.05.2014 are attached as Annexure B & C)***
4. That although the Appellant was readjusted, however her salary was not released, therefore the appellant filed appeal to Additional Accountant General, Peshawar on 07.03.2014 which was processed and vide letter dated 07.03.2014 the then Agency Accounts Officer was requested to entertain the claims of appellant. ***(Copies of the appeal dated 07.03.2014 and letter dated 07.03.2014 are attached as Annexure D & E)***
5. That an inquiry committee was also constituted in the matter on the instructions of the then Agency Education Officer North Waziristan vide his letter dated 04.02.2014. The inquiry committee conducted its inquiry and submitted its report on 05.04.2014 wherein it was recommended to release the salary of the Appellant. ***(Copy of the inquiry report dated 05.04.2014 is attached as Annexure F)***
6. That later when the law and order situation got worsen due to militancy, the appellant alongwith her family migrate being IDPs in June 2014 to Peshawar.

7. That the Appellant throughout agitated the matter of release of her salary with the respondents on the post. One of the appeals was processed and Agency Education Officer (NWA)/ District Education Officer were asked to resolve the issue. The Respondent No. 4 replied vide his letter dated 07.06.2018 admitted that neither the Appellant were terminated nor she has been paid her salary, further added that pay bill was submitted to the accounts officer in the year 2014 which was returned with the remarks that the bill would be passed after the post verification. **(Copy of the letter dated 07.06.2018 is attached as Annexure G)**
8. That later on another appeal dated 12.09.2018 was submitted to the Respondent No. 3 which was marked to the Respondent NO.4 to release the pay vide his remarks dated 17.09.2018 on the body of the said appeal. **(Copy of the appeal dated 12.09.2018 is attached as Annexure H)**
9. That the above cited appeal was followed by another appeal dated 06.01.2019 again to Respondent No. 3 which was again marked to the Respondent No. 4 with a query that why the salary has not been released to the Appellant vide his remarks dated 09.01.2019 on the body of the appeal. **(Copy of the appeal dated 06.01.2019 is attached as Annexure I)**
10. That while processing the appeal dated 09.01.2019, the Respondent No. 3 directed the respondent No. 4 vide office order dated 30.01.2019 to implement his directives already made by him in his remarks on the appeal dated 09.01.2019 of the Appellant. **(Copy of Office Order dated 30.01.2019 are attached as Annexure J)**
11. That the office order dated 30.01.2019 was replied by the Respondent No. 4 vide his letter dated 16.02.2019 wherein he admitted that Appellant was never terminated. Astonishingly he added that the many posts including the post of the Appellant has been advertised published in newspaper dated 21.12.2018. **(Copies of the letter dated 16.02.2019 & advertisement dated 21.12.2018 are attached as Annexure K & L)**

12. That still the appellant is pursuing the case and lastly filed his appeal to respondent No. 2 for redressal of his grievances vide his appeal dated 11.08.2022 which was forwarded to DEO North Waziristan with directions to resolve the issue under intimation to this office vide order dated ~~08.11.2022~~<sup>08.11.2022</sup>. (Copy of appeal and office order dated 11.08.2022 are attached as **annexure M & N**).
13. That in response the DEO referred the matter to already constituted inquiry committee to probe the matter in hand, where-after the inquiry committee submitted his report to the DEO on 08.09.2022. (Copy of report of inquiry committee dated 08.09.2022 is attached as **annexure O**).
14. That the acts and omissions of the respondents regarding stoppage of salaries of the appellant is illegal and unconstitutional inter alia on the following grounds.

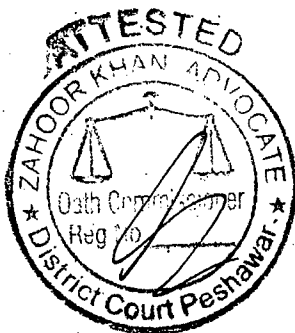
**GROUND:**

- A. **That** the appellant has not been treated in accordance with law, hence his rights secured and guaranteed under the law are badly violated.
- B. **That** withholding of salary amounts to punishment albeit without any charge sheet or show cause notice his salary has been stopped.
- C. **That** ever since appointment as PTC (PST) in 2014, the Appellant has been on the roll of the department and has not been terminated yet.
- D. **That** the appellant has been denied of her livelihood, which amounts to violation of Article-4 of the Constitution of Islamic republic of Pakistan, 1973, it is the fundamental right of the Appellant that she must be paid her salary for the services she are rendering for the respondents.
- E. **That** since her services has not been terminated, therefore she is on the strength of the department for all intents and purposes, thus being civil servant, she is entitled for salary of her post.



- F. **That** from the reply/ letter dated 16.02.2019 of the respondent No. 4, it is quite clear that the Post against which the Appellant has been promoted is still in field meaning thereby the Appellant is still on the roll of the department, so it is in the interest of justice not to re-advertise the posts but to adjust on her respective post and also release her pay also.
- G. **That** since the issue relates to the monthly salaries and adjustment of the appellant in service, therefore the matter being recurring, hence no time limitation runs in the instant matter.
- H. **That** the appellant has been appointed by the competent authority, duly took over charge of her post and performed her duties thus valuable rights have been created in her favour the same cannot be undone or snatched away from them illegally.
- I. **That** the appellant seek the permission of this Honourable Court to rely on additional grounds at the hearing of this petition.

***It is, therefore prayed that the Service Appeal may please be allowed in favour of appellant as prayed for.***



Through:

Appellant

*[Signature]*  
**YASIR SALEEM**

Advocate High Court

&

*[Signature]*  
**Afarsyab Wazir**

Advocate High Court

**CERTIFICATE:**

It is certified that that appellant has not previously moved any service appeal regarding the instant matter.

*[Signature]*  
**ADVOCATE**

**AFFIDAVIT:**

It is do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon;able Tribunal.

*[Signature]*  
**DEPONENT**

**IN THE COURT OF SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**  
**PESHAWAR**

Service Appeal No. \_\_\_\_\_/2022

Jehanzeba

.....Appellant

**VERSUS**

Government of Khyber Pakhtunkhwa & others

.....Respondents

**ADDRESSES OF PARTIES**

**APPELLANT:**

Jehanzeba PTC Government Primary School Zeendai Kot North  
Waziristan District

**RESPONDENTS:**

1. **Government of Khyber Pakhtunkhwa**, through the  
Secretary Elementary & Secondary Education, Peshawar.
2. **Secretary Elementary & Secondary Education**, (FATA  
Secretariat Merged Areas) Warsak Road Peshawar.
3. **Director Elementary & Secondary Education**, (FATA  
Secretariat Merged Areas) Warsak Road Peshawar
4. **District Education Officer**, North Waziristan.

Through:

*Y*  
Appellant

*Y*  
**YASIR SALEEM**

Advocate High Court

&

*Af*  
**Afarsyab Wazir**

Advocate High Court

**AGENCY EDUCATION OFFICER NORTH WAZIRISTAN AGENCY**


**Appointment Order**


As per recommendation of Selection Committee and approval of the worthy Director Education FATA, The following male / female PTC is hereby appointed against the vacant post in BPS-09 plus usual allowances as admissible under the rules mentioned against each with immediate effect from their taking overcharge against the post noted against each in the best interest of public.

S#	Name	Place of Posting	Remarks
1	Ruqia PTC	GGPS Adam Khan Kot	AVP
2	Bushra Qadir PTC	GGPS, Akhtar Nawaz Kot	
3	Zaibun Nisa PTC	GGPS, Ghulam Sher Khan Kot.	
4	M. Shahid PTC	GPS, Awal Knan Kot.	
5	Ijaz-ur- Rehman PTC	GPS, Gul Rauf Kot.	
6	Asad Ullah PTC	Zar Gul Khan Kot.	
7	Imran Ullah PTC	GPS, Noor Khan Mada Khel.	
8	Taskin PTC	GGPS, Rehmat Ullah Kot.	
9	Amra Haider PTC	GGPS, Muhammad Amin Kot.	
10	Sawal Haider PTC	GGPS, Sher Dad Kot.	
11	Jabreela PTC	GGPS, Shahzad Gul Kot.	
12	Smina Naz PTC	GGPS, Muhammad Noor Din Kot.	
13	Abid Rehman PTC	GPS, Darpa Khel.	
14	Razia PTC	GGPS Zar Muhammad Kot.	
15	Noor Zahid PTC	GPS, Muhammad Aslam Kot.	
16	Abdul Qayum PTC	GPS, Inayat Khan Kot.	
17	Usma Rashid PST	GGPS Rasool Khan kot.	
18	Janzeba PST	GGPS Zindai kot.	

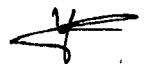
**Terms & Conditions**

1. Their appointments are made on contract / temporary basis and liable to be terminated any time and without any notice.
2. They should bring their medical certificate from Medical Supdt AHQ Hospital Miranshah. If they fail to assume their charges within 15 days, their orders will be treated as cancelled.
3. Their original CMCs should be produced to the accountant local office.
4. Their services will be terminated if they found absent for days continuously from the date of taking over

*Attested*  


  
 Agency Education Officer  
 North Waziristan Agency


Order No. 1035-911

**ATTESTER**  


Dated: 21/12/2013

Copy to the:-

1. Director Education FATA, Governor Secretariat, Peshawar.
2. Political Agent North Waziristan Agency Miranshah.
3. Agency Accounts Officer, NWA.
4. AAEO circle concerned.
5. Head Teacher concerned.
6. The Accountant Local Officer.
7. Candidates Concerned.

  
 Agency Education Officer  
 North Waziristan Agency

(۵) جناب ڈائریکٹر، محکمہ تعلیم، گورنمنٹ روڈ، لیٹیاؤڈ  
مہنگانہ، درخواست برائے ڈی ایچ آر ایف۔

عناوین کے لیے گزارش کیا جاتا ہے کہ اگر کسی کو ایسے کوئی نوکری  
میں لیا جائے تو اس کے بارے میں *written order* دینے کے بعد اس کو نوکری میں  
لے جائیے۔ اس کے بعد اس کے بارے میں اس کے نام  
کو اپنے تحریریں اور نوکری کے بارے میں اگر کسی کو  
کئی ڈی ایچ آر ایف کے احوالات حاصل ہو کر اسکے نوکری  
کے بارے میں اس کے لیے۔ اگر کسی کو  
کے بارے میں اس کے لیے۔ اگر کسی کو  
کے بارے میں اس کے لیے۔ اگر کسی کو

dated 16/1/2014

سید محمد اسماعیل  
ڈی ایچ آر ایف  
گورنمنٹ روڈ، لیٹیاؤڈ

HEO NATA

Please resolve the  
Matter. If the teachers are  
terminated, give them termination  
order of nil. They do have  
right for salary. They have  
been kept under stress. If  
they were reported absent then  
there must be a written probk  
in them. J. A. M. 16-01-14  
D. E. P. A.

Attested  
By

Director Education  
PATA.

ATTESTED

Amk C

(4)

Office Of The Agency Education Officer North Waziristan Agency Miranshah

Re- Adjustment Order

According to the order of the worthy Director education FATA, Khyb Pakhtunkhwa, Peshawar order dated 16-1-2014. The following candidates are hereby adjusted / release of pay against the vacant of post of PTC mentioned against their name with immediate effect in the larger interest of justice.

Note: - Necessary entries should be made in their service books.

- |                        |                              |
|------------------------|------------------------------|
| 1. Ruqia PTC           | GGPS Adam Khan Kot           |
| 2. Bushra Qadir PTC    | GGPS, Akhtar Nawaz Kot       |
| 3. Zaibun Nisa PTC     | GGPS, Ghulam Sher Khan Kot.  |
| 4. M. Shahid PTC       | GPS, Awal Khan Kot.          |
| 5. Ijaz-ur- Rehman PTC | GPS, Gul Rauf Kot.           |
| 6. Asad Ullah PTC      | Zar Gul Khan Kot.            |
| 7. Imran Ullah PTC     | GPS, Noor Khan Mada Khel.    |
| 8. Taskin PTC          | GGPS, Rehmat Ullah Kot.      |
| 9. Amra Haider PTC     | GGPS, Muhammad Amin Kot.     |
| 10. Sawal Haider PTC   | GGPS, Sher Dad Kot.          |
| 11. Jabreela PTC       | GGPS, Shahzad Gul Kot.       |
| 12. Smina Naz PTC      | GGPS, Muhammad Noor Din Kot. |
| 13. Abid Rehman PTC    | GPS, Darpa Khel.             |
| 14. Razia PTC          | GGPS Zar Muhammad Kot.       |
| 15. Noor Zahid PTC     | GPS, Muhammad Aslam Kot.     |
| 16. Abdul Qayum PTC    | GPS, Inayat Khan Kot         |
| 17. Umera Rashid PST   | GGPS Rasool Khan Kot.        |
| 18. Jarzoba PST        | GGPS Zinda Kot               |

*[Signature]*  
Agency Education Officer  
North Waziristan Agency

Encl: No. 265-68 / R-Adj: PTC/MRN/AEO dated 7/5 /2014

Copy to the:-

1. Director Education FATA KPK, Peshawar w/r to his order dated 16-12-2013.
2. Agency Accounts Officer North Waziristan Agency.
3. AAEO Circle Concerned.
4. Accountant-Local office is directed to prepare their bills with immediate effect and onward submission in favour of the Teachers mentioned above accordingly.

*[Signature]*

*[Signature]*  
Agency Education Officer  
North Waziristan Agency

ATTESTED

*[Signature]*

Annex D  
(10)

The Addl. Acc. General  
AGPS Sub Office Pesh.

Suspect Appeal For Justice

R/Sir,

With great respect it is stated that our pays was stopped by the ER-AGPS agency without any cogent reason/written order. The AEO has released our pays but the account officer <sup>newly</sup> did not entertain our claims and uses delay tactics.

Therefore it is humbly prayed that necessary order may kindly be passed <sup>to appropriate</sup> to entertain our claims without any further delay cases which have already been got delay, for which we shall be greatful to you for this regards.

Thanks

Yours Sincerely

Dated. 6/3/04

- 1- Ruzia PTC and others
- Jahanzib
- Jehanzeb PTC and other
- M. Zabit
- M. Zabit Ishaq PTC and other
- USA
- 2- Ihsanullah T.T. & others

Pl look into the matter and process it

Attest

AAO / M. Zabit

7/3/04

ATETSTED

Annex E (11)

# Accountant General

Pakistan Revenues, Sub Office, Peshawar  
Ph # 091-9211278 Fax# 091-9211301

Legal Cell/General Corr/2013-14/113

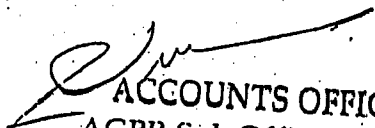
Dated: 07.03.2014

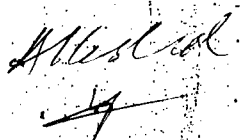
The Agency Accounts Officer  
North Waziristan Agency  
Miranshah

APPEAL FOR JUSTICE

I am directed to enclosed herewith a copy of appeal submitted by MS  
Rugia PSI and others and Jehanzeba PTC and others which is self-explanatory.

The additional Accountant General AGPR, sub Office Peshawar has  
recorded his directive on the face of the said appeal you are therefore requested  
to entertain the claims submitted by the applicants after completing all possible  
formalities.

  
ACCOUNTS OFFICER  
AGPR Sub Office Peshawar



~~ATEISTED~~  
y

Office Date-1/TM letter

Ann R (19) (15)

Office of the Agency Education Officer North Waziristan Agency

From

The Enquiry Committee

To

The Agency Education Officer  
North Waziristan Agency

Subject: Enquiry

Memo:

Kindly refer to your order dated 4/2/2014 on the subject noted above and to state that we the undersigned checked the record and determined that the contain mentioned in the appeal filed by Ruqia and Others to the Director Education FATA on date 11/1 /2014 is based on fact and found that neither they were terminated nor released their pays upto now. They are deserve for the same as requested in the appeal please.

1- Mr Umar Niaz Khan Supdt

Chairman

2- Taj Muhammad AAEO

Member

3- Sadiq Ali AAEO

Member

Agreed and Physically Checked

Attested

*[Handwritten signature]*  
A. E. O. N.W. 5/9/14

ATTESTED

*[Handwritten signature]*



Amir G (13) (15)

OFFICE OF THE DISTRICT EDUCATION OFFICER NORTH WAZIRISTAN  
TRIBAL DISTRICT

Dated 7/6/2018

No. 23/3 /Appoint/ DEO/NWTD

To

The Director Education  
Newly Merged Districts Khyber  
Pakhtunkhwa, Warsak Road Peshawar

Subject: APPEAL FOR ADJUSTMENT / RELEASE OF PAY

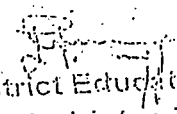
Memo: Kindly refer to your remarks on the body of an appeal to resolve the issue in respect of Fahim Junior Clerk on the subject cited above and to state that Ex. DEO has been issued order on 24-01-2014 in the light of notification dated 24-01-2013 (copy attached).

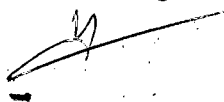
It is further stated that Ex. DEO has issued order in respect of Ruqia PTC and others after enquiry (copy attached).

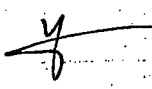
Pay bill of the above officials have been submitted to the accounts office NWD Miranshah and returned with the remarks that bills will entertain / passed after post verification (copy attached).

It is further added that neither they were terminated nor release their pays up till now. They are performing their duties regularly to the entire satisfaction of their superior up till. But presently there are no vacant posts of PTC / Junior Clerk to adjust them for release of pay as they need vacancies. As and when the posts are available / exist in the office of undersigned, they will be adjusted for the release of pay accordingly to avoid more litigation, please.

Report is submitted for further necessary action, please.

  
District Education Officer,  
North Waziristan Tribal District

11/7/18  
3956  
11-7-18  
Attested  


ATTESTED  


The Honourable Director Edu.  
PATA Walsall road Pesh.

AMU  
H  
14  
(17)

Subject: Appeal for release of pays in r/o  
Ruzia ptc and others & Fahimullah J/c and other

Plur, with great respect it is stated that  
the Ex-DE PATA has been stopped on pays without  
any written order verbally.

In this connection your good office has been issued  
clear directions to BHO North for release of pays  
but no action has been taken on this direction

Neither we were terminated nor release our  
pays up till now. If we were terminated than  
kindly give us termination order if we were not  
terminated than release our pays without any further  
delay like case, which have already been delayed  
if you issued direction one way or another way, we shall  
pray for your good health and long leave.

Dated 12/3/018.

NEO (AMU) Shams  
As mentioned  
Discontinued  
Release the pay  
Director Education  
PATA Walsall road Pesh.

Yours obediently,  
Ruzia ptc. AMU or  
others & Fahimullah J/c  
and others.

ATTESTED  
y

Annex I (15)

*(Signature)*

The Honourable Director Education.

FATA Warsak road Pesh.

Subject: Appeal for release of salaries in v/o Ruzia and Fahimullah S/c

R/Sir, with great respect it is stated that the Ex Director Edu FATA has been stopped our pays without any written order verbally.

In this connection your good office has been issued a clear directions to AEO NWA for release of pays but no action has been taken on your three directions but using a delay tactics.

It is worthly mentioned that neither we were terminated nor released our pays still now.

Therefore it is brought into your kind notice that if we were terminated then issue direction to give us termination orders for court of law, if we were not terminated then issue direction to AEO NWD for releasing our pays which have already been delayed.

Hence it is once again requested in your kind honor that a necessary order may kindly be passed to AEO NWD to release our pays one way or another way to release the issue once for all please.

Dated 5/1/09

Yours obediently  
Ruzia and others  
Fahimullah S/c.

*(Signature)*

ATTESTE

*(Signature)*

List of appellants are attached.

<u>Bushra</u>	Bushra Qader.	- 2
<u>Zaibunisa</u>	Zaibun nisa	- 3
<u>M. Shahid</u>	Mohd Shahid	- 4
<u>Ijaz Reh</u>	Ijaz-ur-Rehman.	- 5
<u>Asadullah</u>	Asadullah.	- 6
<u>Imran</u>	Imranullah	- 7
<u>Tasim</u>	Tasim	- 8
<u>Sawal</u>	Sawal Haider.	- 9
<u>Jebroela</u>	Jebroela	- 10
<u>Samia</u>	Samina Naz	- 11
<u>Abid</u>	Abid-Lehman	- 12
<u>Razia</u>	Razia	- 13
<u>Noor Zahid</u>	Noor Zahid.	- 14
<u>A. Rayan</u>	Abdul Rayan	- 15
<u>Umra</u>	Umra Rashid.	- 16
<u>Jahanzeb</u>	Jahan zeba	- 17

Attested



Attested



Amir K. (17)

OFFICE OF THE DISTRICT EDUCATION OFFICER NORTH WAZIRISTAN TRIBAL DISTRICT AT MIRANSHAH.	
No <u>10611</u>	/DEO/NWTD. Dated: <u>16</u> /02/2019



(17)

TO:

The Director Education  
Newly Merged District KPK Peshawar.

Subject: APPEAL FOR ADJUSTMENT/RELEASE OF PAY.

Memo:

Reference your letter No:1665 dated 30/01/2019 the undersigned was directed to release the salaries and adjust the applicants if there is no termination order and cogent reason in this connection the Ex.District Education Officer submitted a detail report along with enquiry report vide letter No:4347 dated 7/06/2018.

This office searched a lot, but we found no termination order on the record of this office. Moreover, this office has advertised the posts of all categories for filling up through ETEA. Hence this office is unable to release/adjust the applicants as they need vacancies.

Report is submitted for your perusal and further necessary action please.

*Adhikar*  
y

*[Signature]*  
DISTRICT EDUCATION OFFICER  
North Waziristan Miranshah.



**DIRECTORATE OF EDUCATION**  
**NEWLY MERGED TRIBAL DISTRICTS**  
 WARSAK ROAD PESHAWAR, PAKISTAN  
 PHONE. 091-9210166 FAX 091-9210216  
 No. 1666 /Date Pesh: the 30/11 /2019

To

✓ The District Education Officer,  
 North Waziristan District.

*Amir J*  
 (16) (16) (16)

Subject: APPEAL FOR ADJUSTMENT/RELEASE OF PAY.

Memo:

I am directed to refer to this office letter No. 300 dated 7/1/2019 on subject noted above and to enclose herewith an application in respect of Mr. Fahimullah Junior Clerk and Mst: Rujia PST and others of North Waziristan District and to ask you to implement the directions on the body of the previous applications dated 09.01.2019.

I am further directed to ask you to follow the directions put up by Director Education Erstwhile FATA on the body of enclosed application under intimation to this office positively please.

Encl: A.A.

*Mirza*  
 Deputy Director (F/A)

Endst: No. \_\_\_\_\_/-  
 Copy to the :-

Dated Pesh: the \_\_\_\_\_/2019. 29/11/19

1. District Accounts Officer NWD for necessary action.
2. PA to Director Education NMTD,

Deputy Director (F/A).

*Attested*  
 ✓

*Attested*  
 ✓

# ورڈ اسٹیبلیشن

پندرہ روزوں سے مجوزہ فارم پر مورخہ 10 جنوری 2019ء سے 30 جنوری 2019ء تک درخواستیں طلب ہیں۔ درخواست نامہ اساتذہ کی پبلسیشن ایجوکیشنل ایڈوائزمنٹ (E.TEA) کے ویب سائٹ (www.etea.edu.pk) پر دستیاب ہے۔ متوزعہ تاریخ کرڑنے کے بعد مورخہ 30 جنوری 2019ء کو اپنا فارم دیکھنا ہوگا۔ اساتذہ کے ویب سائٹ پر موجود طریقہ کار اور اہلیات کے مطابق آن لائن درخواستیں لگانے کی تاریخ 30 جنوری 2019ء تک ہے۔

Sl. No.	Group	Category	Details
3519	1	سی (CT)	(i) کسی بھی تسلیم شدہ جامع تعلیمی ادارے سے تیار کروائی گئی ہوگی۔ (ii) سیکنڈ اور تیسری کے بعد 9 ماہ کی لازمی ٹریننگ ہوگی اور وہ FITE/GCET سے حاصل کرئی ہوگی۔
3520	2	ای ایم (DM)	(i) کسی بھی تسلیم شدہ جامع تعلیمی ادارے سے تیار کروائی گئی ہوگی۔ (ii) سیکنڈ اور تیسری کے بعد 9 ماہ کی لازمی ٹریننگ ہوگی اور وہ FITE/GCET سے حاصل کرئی ہوگی۔
3521	3	ای ای ایم (BPS-15)	(i) کسی بھی تسلیم شدہ جامع تعلیمی ادارے سے تیار کروائی گئی ہوگی۔ (ii) سیکنڈ اور تیسری کے بعد 9 ماہ کی لازمی ٹریننگ ہوگی اور وہ FITE/GCET سے حاصل کرئی ہوگی۔
3522	4	ٹی ٹی (BPS-15)	(i) کسی بھی تسلیم شدہ جامع تعلیمی ادارے سے تیار کروائی گئی ہوگی۔ (ii) سیکنڈ اور تیسری کے بعد 9 ماہ کی لازمی ٹریننگ ہوگی اور وہ FITE/GCET سے حاصل کرئی ہوگی۔
3523	5	ای ٹی (BPS-15)	(i) کسی بھی تسلیم شدہ جامع تعلیمی ادارے سے تیار کروائی گئی ہوگی۔ (ii) سیکنڈ اور تیسری کے بعد 9 ماہ کی لازمی ٹریننگ ہوگی اور وہ FITE/GCET سے حاصل کرئی ہوگی۔
3524	6	پرائمری سکول ٹیچر (PST)	(i) کسی بھی تسلیم شدہ جامع تعلیمی ادارے سے تیار کروائی گئی ہوگی۔ (ii) سیکنڈ اور تیسری کے بعد 9 ماہ کی لازمی ٹریننگ ہوگی اور وہ FITE/GCET سے حاصل کرئی ہوگی۔
3525	7	بہن (BPS-11)	(i) کسی بھی تسلیم شدہ جامع تعلیمی ادارے سے تیار کروائی گئی ہوگی۔ (ii) سیکنڈ اور تیسری کے بعد 9 ماہ کی لازمی ٹریننگ ہوگی اور وہ FITE/GCET سے حاصل کرئی ہوگی۔
3526	8	آئی ٹی بی ایچ (BPS-07)	(i) کسی بھی تسلیم شدہ جامع تعلیمی ادارے سے تیار کروائی گئی ہوگی۔ (ii) سیکنڈ اور تیسری کے بعد 9 ماہ کی لازمی ٹریننگ ہوگی اور وہ FITE/GCET سے حاصل کرئی ہوگی۔

18  
Anx 2  
18

Sl. No.	Qualification	Group
1	B.Ed	مستقل
2	M.Phil/P.H.D	مستقل
3	B.A/B.Sc	مستقل
4	B.A/B.Sc	مستقل
5	B.Ed	مستقل
6	M.Phil/P.H.D	مستقل

Sl. No.	Qualification	Group
1	B.Ed	مستقل
2	M.Phil/P.H.D	مستقل
3	B.A/B.Sc	مستقل
4	B.A/B.Sc	مستقل
5	B.Ed	مستقل
6	M.Phil/P.H.D	مستقل

- 1) تمام امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 2) تمام امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 3) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 4) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 5) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 6) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 7) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 8) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 9) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 10) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 11) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 12) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 13) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 14) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 15) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 16) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 17) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔
- 18) سندھ اور آزاد کشمیر کے امیدواروں کے ذریعہ طلبہ اور تدریس کے وقت 40 نمبروں کی تقسیم پورن سے کیا جائے گی۔

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Attest  
ATEE/STP

The Honourable Secy Edu Distt.  
ICP Peshawar.

Subject: Appeal for release of pay stopped  
without any logical reason/illegal

R/W, with great respect it is brought into your  
kind notice that our pays were stopped without  
any logical reason/illegal. we have already lodged  
appeal to Director Edu merged Distt. The DE(M) Distt  
was kind enough and issued order vide No 1666  
dt 30/1/2019 and No 2149-51 dt 7/2/19 (Copy attached)  
The District Edu officer conducted enquiry in this  
regard (Copy attached). After enquiry Bills were prepared  
and submitted to the Distt. Accounts officer, bill returned  
due to some observation, then the same was removed  
and resubmitted to the DAO office. (Copy attached)  
The Ex DAO stopped the process and we filed appeal  
to AG ICP. The AG ICP was kind enough and issued  
direction to process the claim. (Copy attached)

When a new DEO was posted and stopped all the  
lengthy correspondence without any legal reason.  
Therefore it is humbly requested in your gracious  
honour that a necessary order may kindly be  
passed to DEO North for release the salaries  
without stopped by the Ex DEO, for which we are struggl  
ing - for the last year

Dated 11/8/2020

Copy to the

- (1) The worthy AG ICP Peshawar.
- (2) The DE(M) Distt ICP
- (3) Distt - Accounts Officer North

Yours obediently  
Rajinder Singh TT & others  
Rajinder Singh and others

Attested  
[Signature]

SO (PE)

[Signature]  
11/8

Please ask  
Report - from DEO  
Concerned.

ATETSTED



List of appellants are attached.

- Bushra ————— Bushra Bader. - 2
- Zabunsa ————— Zabun nisa - 3
- M. Shahid ————— Mohd Shahid - 4
- Ijaz Reh ————— Ijaz-ur-Rehman. - 5
- Asadullah ————— Asadullah. - 6
- Imran ————— Imranullah - 7
- Tasim ————— Tasim - 8
- Sawal ————— Sawal Haider. - 9
- Jebreel ————— Jebreel - 10
- Samia ————— Samina Naz - 11
- Abid ————— Abid-Lehman - 12
- Razia ————— Razia - - 13
- Nor Zahid ————— Nor Zahid. - 14
- A. Rayan ————— Abdul Rayan - 15
- Uma ————— Uma Rashid. - 16
- Jahanzeb ————— Jahan zeba - 17

Attested

✓

Attested

✓

Attested

✓

Amr N (20)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block "A" Opposite M PA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223587

No. SO(PE)/E&SED/5-1/ Gen Misc/2022  
Dated Peshawar the August 11<sup>th</sup>, 2022

To ✓  
The District Education Officer (Male)  
District North Waziristan.

Subject: - APPEAL FOR RELEASE OF PAYS IN R/O NASIRUDDINTT RUOIA  
PSTAND OTHERS

I am directed to refer to the subject noted above and to enclose herewith a copy of self-explanatory application submitted by Mr. Nasiruddin TT and others along with its enclosure, for further necessary action.

2 You are therefore, directed to resolved the issued under intimation to this office.

Encl.As above.

(MUHAMMAD ISHAQ)  
SECTION OFFICER (PE)

Copy forwarded to the S to Secretary, E&SE Department Khyber Pakhtunkhwa.

SECTION OFFICER (PE)

11/8/22

Attested  
y

ATTESTED  
y

*The Ex Commitee Member,  
provide the already prepared  
recommendation for award  
submission to the District Education  
Officer and submit to the  
that is reported by the  
DRO for  
8/8/22*

To

The District Education Officer,

North Waziristan District.

**Subject: PHYSICAL VERIFICATION FOR IMPLEMENTATION OF DIRECTOR EDUCATION MERGED DISTRICT**

Kindly refer your office No30410-12 dated 23-07-2022 on the subject noted that and to state in pursuance of director Education FATA order No. 1666-68 dated 30-01-2019 on the subject noted above. We the following committee members thoroughly checked and verified the teachers whose salaries were stopped without any cogent reason and they are performing their duties regularly to the entire satisfaction of their superiors and they are regular employees of this department. In view of the above facts we the enquiry committee members recommended for releasing the outstanding salaries of the following teachers.

Report is submitted for further necessary action being low paid Government servants.

- |   |  |
|---|--|
| 1. Ruqia PST GGPS Adam Khan Kot             | 11. Jabrila PST GGPS Sharzad Gul Kot         |
| 2. Bushra Qadar PST GGPS Akhtar Nawaz Kot   | 12. Samia Naz PST GGPS Muhammad Noor Din Kot |
| 3. Zaiba Nisa PST GGPS Ghulam Shar Khan Kot | 13. Noor Zahid PST GPS Muhammad Aslam Kot    |
| 4. Muhammad Shahid PST GPS Awal Khan Kot    | 14. Abdul Qayum PST GPS Inayat Khan Kot      |
| 5. Ijaz Ur Rehman PST GPS Gul Rauf Khan Kot | 15. Umra Rashid PST GGPS Rasool Khan Kot     |
| 6. Asad Ullah PST GPS Zar Gul Kot           | 16. Razia PST GGPS Zainad Kot                |
| 7. Inran Ullah PST GPS Muhammad Aslam Kot   | 17. Abid Rahman PST GPS Darpa Khei           |
| 8. Taskin PST GGPS Rahmabn Ullah Kot        | 18. Janzaba PST GGPS Zainda Kot              |
| 9. Amra haidar PST GGPS Muhammad Amin Kot   |  |
| 10. Sawal Haldar PST GGPS Sher Dad Kot      |  |

**Enquiry Committee Members:**

1. Sami ullah V/Principal GHSS Idak:
2. Habib Ullah H/Master GHS Tall Village:
3. Mr. Shanabaz Khan S/Clerk DEO Office:
4. Mr. Arbab Khan J/Clerk DEO Office:

*[Handwritten signatures and initials for the Enquiry Committee Members]*

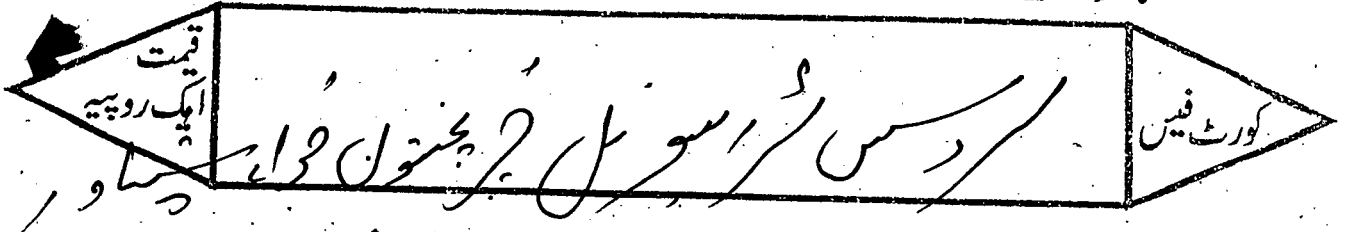
*Attested*

The above physical verification report is correct and has been reviewed by the enquiry officers and submitted for further action please.

7/9 Forwarded to DEO for further action  
*[Handwritten signatures and dates]*

*[Handwritten notes and signatures on the left side]*

بعدالت



قیمت  
ایک روپیہ

کوریٹ فیس

مورخہ  
مقدمہ  
دعویٰ  
جرم

۲۰۲۲ء منجانب  
بنام ایگسٹیشن ڈیپارٹمنٹ

صیانتیہ ایس کی

## باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی  
محلہ ان مقام سٹیٹو کے لئے افراسیٹک وزیر لا سکر سلیم  
مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا  
نیز وکیل صاحب کو راضی نامہ و مقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرانے اجراء اور وصولی چک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی  
تصدیق زر اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ  
یا اپیل کی برآمدگی اور منسوخی دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور  
بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی  
کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا  
اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا اور دوران مقدمہ  
میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق وکیل صاحب موصوف  
ہوں گے۔ نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر  
ہوگا تھانہ باہر ہو تو وکیل صاحب پابند ہوں گے کہ پیروی مقدمہ مذکور کریں۔ لہذا وکالت نامہ  
لکھ دیا کہ سیندر ہے۔

صیانتیہ

لکھ دیا کہ سیندر ہے۔

۲۰۲۲ء

ماہ

الرقوم

العبد گواہ شد العبد

Pranab Chandra Advani

Yasir Saleem  
Advocate

cell. No. 0312-9888752