


FORM OF ORDER SHEET

Court of _____

Case No.- 1719/2022

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 Mst. Suhaila Hakim presented today by Mr. Saif Ullah Mongol 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>

KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

CHECK LIST

Sahila Hakeem

Versus

Govt of KP and others

..... Appellant

..... Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>Saif ulah Advocate High Court</u>	√	
2.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	√	
3.	Whether appeal is within time?	√	
4.	Whether the enactment under which the appeal is filed mentioned?	√	
5.	Whether the enactment under which the appeal is filed is correct?	√	
6.	Whether affidavit is appended?	√	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	√	
8.	Whether appeal/annexures are properly paged?	√	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	√	
10.	Whether annexures are legible?	√	
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/clear?	√	
13.	Whether copy of appeal is delivered to AG/DAG?	√	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	√	
15.	Whether numbers of referred cases given are correct?	√	
16.	Whether appeal contains cutting/overwriting?	x	
17.	Whether list of books has been provided at the end of the appeal?	√	
18.	Whether case relate to this court?	√	
19.	Whether requisite number of spare copies attached?	√	
20.	Whether complete spare copy is filed in separate file cover?	√	
21.	Whether addresses of parties given are complete?	√	
22.	Whether index filed?	√	
23.	Whether index is correct?	√	
24.	Whether Security and Process Fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	√	
26.	Whether copies of comments/reply/rejoinder submitted? On _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:- _____

Signature:- _____

Dated:- _____

Saif Ullah Mangol
 Advocate High Court &
 Federal Shariat Court of Pakistan

WTC/PAI Composing Center, Peshawar High Court, Peshawar
 Pioneer of legal drafting & composing
 Cell No:- +923028818600/+921119149544/+921159737151
 Email- phtc.netcomposing@gmail.com

(A)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service appeal NO. 1779 /2022

Mst. Suhaila Hakeem

.....Appellant

VERSUS

Government of KPK & others

.....Respondents

INDEX

S#	Description of the Documents	Annex	Pages
1.	<i>Memo of Service appeal</i>	*	
2.	<i>Affidavit</i>	*	4
3.	<i>Addresses of the parties</i>	*	5
4.	<i>Copy of CNIC</i>	"A"	8
5.	<i>Copy of educational testimonials</i>	"B" & B-9	9 to 18
6.	<i>Copy of appointment letter and charge report.</i>	"C" & "D"	19 to 21
7.	<i>Copy of corrigendum/Transfer order</i>	"E"	22
8.	<i>Copy of application</i>	"F" & "G"	23, 24
9.	<i>Wakalat Nama</i>	*	25

Through Appellant

Saif Ullah Mongol
Advocate High Court &
Federal Shariat Court of Pakistan
Saif Ullah

Date: 28/11/2022

Saif Ullah Mongol
Advocate, Supreme Court

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service appeal No. 1719 /2022

Mst. Suhaila Hakim D/o Lal Hakim R/o Khevedad Khel, Tappa, Hassan Khel,
Mohallah Darwesh Bagh Sadda Tehsil Lower Kurram District Kurram.

.....APPELLANT

VERSUS

1. Government of KPK, through secretary elementary and secondary education Khyber Pakhtunkhwa Peshawar office at Civil Secretariat near MPA Hostel, Peshawar.
2. District education officer DEO (Female) District kurram and office at para chinari city upper kurram.
3. District education officer DEO (Male) District Kurram office at Para Chinari City Upper Kurram .
4. Deputy District education officer DDEO (Female) lower and central kurram office at sadda Colony lower Kurram.
5. Bibi Zakia D/o Muhammad Umer R/o Central Kurram Tehsil Sadda District Kurram.

.....Respondents

**APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974
AGAINST THE IMPUGNED TRANSFER ORDER /
NOTIFICATION DATED 30-06-2022, PASSED BY
RESPONDENT NO. 4.**

Respectfully Sheweth:

That appellant humbly submits under:

1. That the appellant is bonafide and peaceful citizen of Islamic republic of Pakistan and permanent resident of Caste khoiyadkhel Tappa Hassan Khel Muhallah Darwesh Bagh Post Office sadda Tehsil Sadda District Kurram. (Copy of CNIC is attached as annexure "A").
2. That the appellant belongs to an educated family and completed her master degree in the year 2014 with additional degree of bachelor of education (B'ED) (Copy of educational testimonials are attach as "B" to "B-9")
3. That the appellant appointed as primary School teacher (PST) (BPS-12) through order No. 1986-2002 /EDO dated 19-04-2022 by the respondent No.3, in response to that appointment letter the appellant took charge of the same after fulfilling all cadal formalities on 19-04-2022 (Copy of

appointment letter and charge report are attached as annexure "C"-
"D")

4. That thereafter the appellant started her services from 19-04-2022 in government girl's primary school (GGPS) Pir qayam No.2 against the vacant post initially for one year on probation period.
5. That after two months and 11 days of service rendered by the appellant in the ibid school and astonishingly the appellant received a corrigendum letter No.3175-87/ EDO on 30-06-2022 issued by the respondent No.4, through which the appellant transferred to government girls primary Hassanzai, while the respondent No.5 has been transferred from GGPS Hassanzai to GGPS Pir Qayum No.2 (**Copy of corrigendum/Transfer order as attach as annexure "E"**)
6. That the appellant upon the illegal and unauthorized transfer order approached through an application to the respected office of respondent No.1 and 3 for cancellation of the impugned transfer order dated 30-06-2022, however all efforts of the appellant went in vain. (**Copy of application are attached as annexure "F & "G"**)
7. That seriously aggrieved with the inaction upon the application of the appellant, hushed and tight zip act of the respondents department, the appellant has no efficacious remedy except to approach this Hon'ble tribunal in service appeal amongst the following grounds.

GR OUNDS:

- A. That the appellant is natural born bona fide citizen of Islamic republic of Pakistan and fully and equally entitled to all basis and fundamental rights as supported and guaranted by the constitution of Islamic republic of Pakistan 1973, interpreted and discrimination along with unfettered exercise of discriminative powers by an authority or office is always been deplored and deprecated by the superior court.
- B. That the impugned transfer order issued by the respondent No.4 is illegal, without authority and against the principle of civil services laws and rules.
- C. That the appellant is permanent resident of union council pir qayyum and also applied for the appointed post at the time of filing online application.
It is very important to mention here that the appellant got marriage in the year 2018 in sadda and have 1 kid, now joining in subsequent transfer school create hurdles and there is apparent apprehension of murder, because in hassanzai there is conflict between sunni and shia and most importantly the transfer school is situate 15 km distance from appellant house and there is no transport facility provided by the government.
- D. That the initial posting made on the basis of merit list and appointment latter, the respondent No. 5. on serial no.2 of the merit list having 108, 28 score and on her sweet will and wish decided to join GGPS Hassanzai, while the appellant were on serial No.9 of the appointment letter.

3

- E. That the impugned transfer order/letter is issued on political approach, while the appellant is belong to a poor family and has no political approach. There is a lot of judgments of this honourable court as well the Apex court that transfer on political approach is illegal and violation of article 27 of the Islamic republic of Pakistan, 1973, which provide the safeguard against discrimination in services.
- F. That the appellant craves leave of this honourable court to submit additional documents as per need and to raise further points at the time of arguments.

It is, therefore, humbly prayed that on acceptance of this Service appeal the impugned transfer order No.3175-78 dated 30-06-2022 may kindly be declared illegal, unlawful, passed without authority and resultantly the appellant may kindly be ordered to remain and to continue her services on her initial appointed station i.e GGPS pir qayyum No.2.

Any other remedy which deems fit by this Honourable Court may also be granted in favour of appellant.

CERTIFICATE:

Certified on instructions of my client that appellant has not previously moved this Hon'ble court under section-4 of the Khyber Pakhtunkhwa service tribunal act, 1974 regarding the instant matter. Further stated that being service appeal on the score that since there is no adequate and alternate legal remedy is available or previously avail or approach lower forum, thus this case may be fixed before this honourable court.

ADVOCATE

Shila

appellant *

Saif Ullah Mangol
Advocate High Court &
Federal Shariat Court of Pakistan

Through

Saif Ullah Mangol
Advocate High Court &
Saif Ullah Mangol
Advocate, High Court

Date: 28/11/2022

(4)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service appeal NO. _____/2022

Mst. Suhaila Hakeem

.....appellant

V E R S U S

Government of KPK & others

.....Respondents

AFFIDAVIT

I, Suhaila hakim D/o La l Hakim R/o khevedad khel, tappa, hassankhel
Muhllah darveesh bagh sadda District Kurram, do hereby solemnly
affirm and declare that the contents of the Service appeal are true and
correct to the best of my knowledge and belief and nothing has been
concealed from this Hon'ble Court.

Suhaila

DEPONENT

21302-1942834-2

0302-8352106

Identified by

Saif Ullah Mongol
Advocate High Court

Saif Ullah Mongol
Advocate High Court &
Advocate District Court of Pakistan
Saif Ullah

Zarin Khan
ZARIN KHAN
Advocate High Court

28/11/22

5

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service appeal NO. _____/2022

Mst. Suhaila Hakeem

.....Appellant

V E R S U S

Government of KPK & others

.....Respondents

ADDRESSES OF PARTIES

appellant

Mst. Suhaila Hakeem D/o Lal Hakeem R/o Khevedad Khel, Tappa,
Hassan Khel, Mohallah Darwesh Bagh Sadda Tehsil Lower Kurram
District Kurram.

RESPONDENTS

1. Government of KPK, through secretary elementary and secondary education Khyber pakhtunkhwa Peshawar office at Civil Secretariat near MPA Hostel, Peshawar.
2. District education officer DEO (Female) District kurram and office at para chinar city upper kurram.
3. District education officer DEO (Male) District Kurram office at Para Chinar City Uppar Kuram .
4. Deputy District education officer DDEO (Female) lower and central kurram office at sadda Colony lower Kurram.
5. Bibi Zakia D/o Muhammad Umer R/o Central Kurram Tehsil Sadda District Kurram.

Through Appellant

Saif Ullah Mongol
Advocate High Court &
Federal Shariat Court of Pakistan

Saif Ullah Mongol
Advocate, High Court

Date: 28/11/2022

6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Service appeal NO. _____/2022

Mst. Suhaila Hakeem

.....appellant

V E R S U S

Government of KPK & others

.....Respondents

**APPLICATION FOR SUSPENSION OF IMPUGNED
TRASFER ORDER PASSED BY THE RESPONDENT
NO 4.**

Respectfully Sheweth :

1. That the above noted service appeal is being filed before this Hon'ble Service Tribunal, in which no date of hearing has yet been fixed .
2. That the Appellant has got a good prima facie case in his favour, and is sanguine about its success.
3. That the balance of convenience also lies in favour of the Appellant.
4. That the facts and grounds of the service appeal may kindly be read as an integral part of this application

It is , therefore , respectfully prayed that on acceptance of this application , the impugned transfer order of the appellant.may kindly be suspended , till the final decision of the service appeal.

Through Appellant

Date: 29/11/2022

Saif Ullah Mongol
Advocate, High Court

7

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

CM No. _____/2022

IN
Service appeal NO. _____/2022

Mst. Suhaila Hakeem

.....appellant
V E R S U S

Government of KPK & others

.....Respondents

AFFIDAVIT

I, Suhaila hakim D/o La l Hakim R/o khevedad khel, tappa, hassankhel Muhllah darveesh bagh sadda District Kurram, do hereby solemnly affirm and declare that the contents of the Service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Suhaila

DEPONENT
21302-1942834-2
0302-8352106

Saif Ullah Mongol
Advocate High Court &
Federal District Court of Pakistan

Identified by

Saif Ullah Mongol
Advocate High Court

Zahid Raza
Zahid Raza
Advocate High Court
28/11/22

8

Annexure
A



حکومت پاکستان

قومی شناختی کارڈ

2-1942834-1302

نام: سیدہ نسیم

پیدائش: 02/09/2009

رہائشی پتہ: [Illegible]

تعلقہ: [Illegible]

09/01/1989

شناختی کارڈ

دستخط



شناختی کارڈ نمبر: 21302-1942834-2

نام: سیدہ نسیم

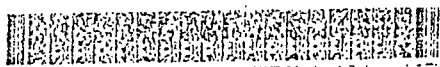
پیدائش: 02/09/2009

رہائشی پتہ: [Illegible]

تعلقہ: [Illegible]

01/07/2019

02/09/2009



M

Attest to be
True Copy

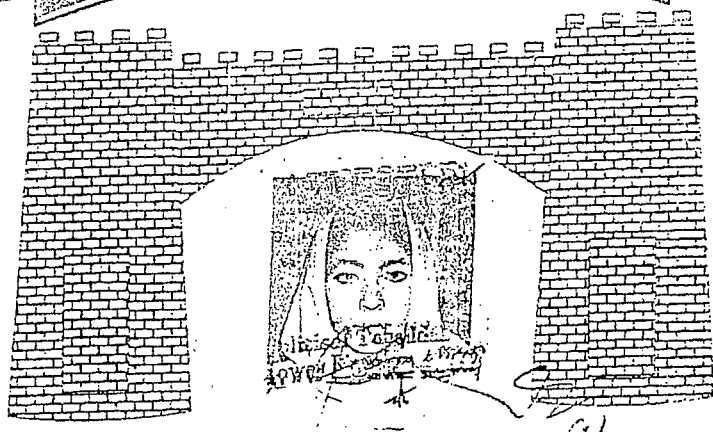
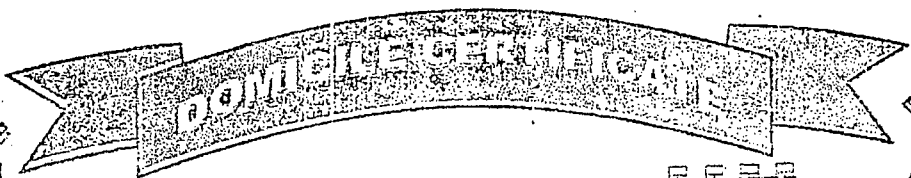
9

NO. 1785 /AG

DATED PARACHINAR THE 19/7/62

OFFICE OF THE POLITICAL AGENT KURRAM AGENCY

Annexure
"B"



9/7

CERTIFIED THAT MR/MRS LELA HANUM
 SON/DAUGHTER OF MR LAL HANUM BELONGS TO A
 RECOGNIZED TRIBE OF Budhot SECTION Lower Kohat
 SUB SECTION ... AND HIS/HER FATHER IS /WAS A PERMANENT
 BONAFIDE RESIDENT OF VILLAGE ... KURRAM AGENCY
 HE/SHE IS AN ELIGIBLE CANDIDATE TO AVAIL HIMSELF/HERSELF OF THE SEAT RESERVED
 FOR TRIBAL AREAS KOHAT DIVISION KOHAT BACK AREA KURRAM AGENCY

[Signature]
 T.M. KURRAM TALIZAI
 Political Agent
 Lower Kohat

[Signature]
 ASSISTANT
 Political Agent

ATTACHED
 POLITICAL AGENT
 KURRAM AGENCY

OFFICE SEAL

10

S.No. KBGG 5265

Roll No. 52084

Annexure
"B1"

Board of Intermediate & Secondary Education
KOHAT



DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
Session 200 (Annual/Supplementary)
(GENERAL GROUP)

Name: Suhaila Haqeen

Father's Name: Lal Haqeen Roll No. 52084

SUBJECT	Marks Allotted						Marks Obtained				
	9 th			10 th			In Figures				In Words
	Theo	Pract	Total Marks	Theo	Pract	Total Marks	9 th	10 th	Total		
1. English	75	-	75	75	-	150					92
2. Urdu	75	-	75	75	-	150					104
3. Islamic Education	75	-	75	-	-	75					54
4. Pakistan Studies	-	-	-	75	-	75					41
5. Mathematics	75	-	75	75	-	150					95
6. General Science	75	-	75	75	-	150					104
7. E.H.E.	75	-	75	75	-	150					92
8. /s	75	-	75	75	-	150					106
Total	525	-	525	525	-	1050					658/3

Note: (1) Errors/Omissions are excepted. (2) "Re" means to reappear in the subject. (3) Failed to all means to reappear with the subject.

General Remarks: The Candidate has failed/passing and placed in Grade -

Six Hundred Eighty Eight

Date 15/6/01

506 Controller of Examinations
B.I.S.E. KOHAT

RECEIVED
B.I.S.E. KOHAT

S.No. KB

38826

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

Roll No. 52084

BOARD OF INTERMEDIATE & SECONDARY EDUCATION
KOHAT
(N.W.F.P. Pakistan)

Secondary School Certificate Examination
SESSION: 2005 - ANNUAL

THIS IS TO CERTIFY THAT Suhaila Hakeem
Son/Daughter of Lal Hakeem and a
student of Govt Girls High School Sadda Kurram Agency has passed
the *Secondary School Certificate Examination* of the Board of Intermediate and
Secondary Education, Kohat held in March, 2005 as a Regular
candidate. He/She obtained 688 Marks out of 1050 and has been placed in
Grade B Representing Very Good

The Candidate passed in the following subjects:

- | | | | |
|----------------|--------------------|--------------------|-----------------|
| 1. English | 2. Urdu | 3. Islamiyat | 4. Pak. Studies |
| 5. Mathematics | 6. General Science | 7. Islamic Studies | 8. EHE |

Date of birth according to admission form is 08-Jan-1989

Asstt. Secretary

Secretary

This Certificate is issued without alteration or erasure.

Annexure
"B2"

S No KB 49770

12

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

KOHAT

DETAILED MARKS CERTIFICATE
Higher Secondary School Certificate Examination



Annexure
"B3"

HUMANITIES (Part-II)
SESSION 2007 (ANNUAL) Roll No: 42307

Name SUHAILA HAKEEM Father's Name LAL HAKEEM
Institution/District: Govt Girls Degree College Sadda Kurram Agency

Subjects	Marks	Marks Obtained				Total	Marks in Words
		Part-I		Part-II			
		Theory	Pract	Theory	Pract		
English	200	41	--	25	--	66	Sixty-Six
Urdu	200	57	--	61	--	118	One Hundred Eighteen
Islamic Education	50	43	--	--	--	43	Forty-Three
Pakistan Studies	50	--	--	29	--	29	Twenty-Nine
Civics	200	65	--	75	--	140	One Hundred Forty Only
Outline Of Home Economics	200	59	16	39	15	129	One Hundred Twenty-Nine
Islamic Studies	200	65	--	76	--	141	One Hundred Forty-One
Total : 1100						656.8	Six Hundred Sixty-Six Only

Note: Errors / Omissions excepted.

Date : 10-08-2007

Computer Cell BISE, Kohat
(J.S.S.)

Checked by [Signature]

Remarks :

Controller of Examinations
BISE Kohat

[Signature]
BISE Kohat

13

Annexure
"B4"

S.No. KB 13714

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Roll No. 42307

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



**KOHAT
(N.W.F.P. Pakistan)
INTERMEDIATE EXAMINATION
HUMANITIES GROUP
Session 2007 (Annual)**

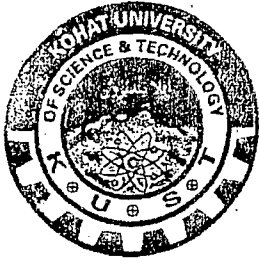
This is to Certify that Suhaila Hakeem
Son/Daughter of Lal Hakeem
and a student of Govt Girls Degree College Sadda Kurram Agency
Registered No 025-BK/GCSKA-2005 has passed the Intermediate Examination
of the Board of Intermediate & Secondary Education, Kohat held in May, 2007
as a Regular candidate. He/she obtained 666 marks out of 1100 and has
been placed in B Grade Representing Very Good

The Examination was taken as a whole / in parts.

[Signature]
Asstt. Secretary

[Signature]
Secretary

This certificate is issued without alteration or signature.



14

Serial No. 024016

Kohat University Annex
of Science & Technology, Kohat (Pakistan) **BS-9**

DETAILED MARKS CERTIFICATE

Bachelor of Arts (B.A) Part II Annual Examination, 2009

Name: Sohaila Hakeem
 Father's Name: Lal Hakeem

Roll No. 13352

Registration No. 2007-SKG-11

Certified that the candidate secured the following marks and is placed in **1st Division**

S U B J E C T S	Maximum Marks	M A R K S	
		In Figure	In Words
English Compulsory	75	32	Thirty Two
Islamic Studies	75	54	Fifty Four
Urdu	75	42	Forty Two
Pak Studies	40	29	Twenty Nine
Part-I Marks	285	185	One Hundred Eighty Five
Total	550	342	Three Hundred Forty Two

The examination was taken as a whole

To Pass 40% Marks in each Subject (Written & Practical Separately) & 45% Marks in Aggregate.

Result declared on **24-Oct-09**

Tabir

ATTACHED
ADMITTED

CONTROLLER OF EXAMINATIONS

Kohat University of Science and Technology
Kohat, Pakistan

Errors and omissions are subject to subsequent rectification.

Amjad Ali
86

Serial No. 007072

Roll No. 1332

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No.
2007-SKC-11

Kohat University

of Science & Technology, Kohat
(Pakistan)

Session 2007-2009

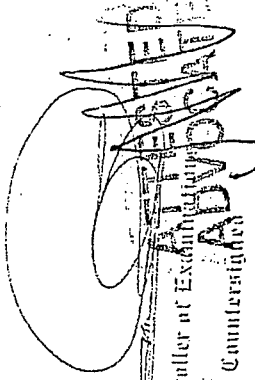
SIMAILA HAKEM DAUGHTER of LAL HAKEM
of GOVT GIRLS DEGREE COLLEGE SAODA

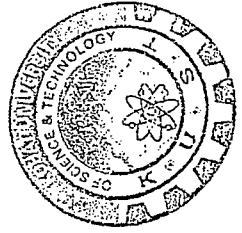
and a student
having passed the prescribed
examination held in JULY 20 02, is this day admitted by

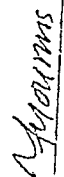
The Kohat University of Science & Technology, Kohat
to the Degree of
Bachelor of Arts
in the FIRST Division

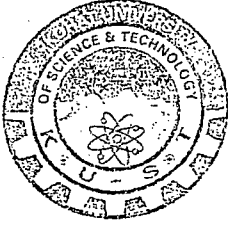
The Examination was taken as a whole / in parts

Result declared on OCTOBER 24, 2009


Controller of Examinations
Kohat University of Science & Technology
Kohat




Vice Chancellor



16

Serial No. 238217

Kohat University
of Science & Technology, Kohat (Pakistan)

« Annexure »
« B7 »

DETAILED MARKS CERTIFICATE

*Master of Arts (Urdu) Final Annual Examination,
2012*

Name: Schaila Hakeem

Roll No. 16909

Father's Name: Lal Hakeem

Registration No. 2007-SKG-11

Certified that the candidate secured the following marks and is placed in 2nd Division

S U B J E C T S	Maximum Marks	M A R K S O B T A I N E D	
		In Figure	In Words
Poetry "Nazam" (VI)	100	54	Fifty Four
Qasida MASNavi & Marsia (VII)	100	40	Forty
Iqbaliyat (VIII)	100	40	Forty
Criticism (IX)	100	48	Forty Eight
Essay / Mass Communication (X)	100	44	Forty Four
Viva	100	44	Forty Four
Previous Marks:	500	227	Two Hundred Twenty Seven
Total	1100	497	Four Hundred Ninety Seven

The examination was taken as a whole

Result declared on 11-Jan-13

Tahir

CONTROLLER OF EXAMINATIONS
Kohat University of Science and Technology
Kohat, Pakistan.

Errors and omissions are subject to subsequent rectification.

ATTORNEY
ADVOCATE

Serial No. 003364
Roll No. 16909

Answer
" B B "

گورنمنٹ یونیورسٹی
of Science & Technology, Kohat
(Pakistan)

گورنمنٹ یونیورسٹی

Session Annual, 2012

SUMAIYA HANSEN

DAUGHTER OF M. HANSEN

and a student

NONPAM AGENCY

having passed the prescribed

examination held in

SEPTEMBER 2012

is this day admitted by

The Kohat University of Science & Technology, Kohat

to the degree of

Bachelor of Arts

in the stream Division

The Subject of examination being

The Examination was taken as a whole / in parts

Controller of Examinations

Counter signed

Vice-Chancellor

M. Samra



Result declared on: JANUARY 19, 2013

ATTN: ADM
ADMISSION

Handwritten signature and stamp of the Controller of Examinations.

Registration No. 2007-SKG-11

Serial No. 0927938

18

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
TRANSCRIPT

Serial No 723642

Name

SOHAILA HAKEEM

Father's Name LAL HAKEEM

Address

MUHAMMAD JAVID STATIONARY BANGASH MARKET
SADDA

Tehsil

SADDA LOWER KURRAM

District

KORRAM AGENCY

has successfully completed

BACHELOR OF EDUCATION (B.ED)

Roll No.

AJ60045

Registration No.

11AKM00015

Final Semester

SPR-2015



Annexure
"B9"

The detail of passed courses is as under

Semester	Course Code	Title of Courses	Marks	
			Maximum	Obtained
AUT- 11	0513	SCHOOL ORGANIZATION	100	65
SPR- 11	0514	EVALUATION, GUIDANCE & RESEARCH	100	63
SPR- 11	0516	EDUCATIONAL PSYCHOLOGY	100	64
AUT- 11	0651	ENGLISH (COMPULSORY)	100	54
SPR- 12	0512	PERSPECTIVE OF EDUCATION	100	55
SPR- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	69
SPR- 12	0655	WORKSHOP	100	61
SPR- 15	0517	TEACHING OF PAKISTAN STUDIES	100	57
AUT- 11	0654	ISLAMIAT AND ITS TEACHING	100	59

Total Credits

6

Total Marks/Obtained

900 / 547

Result Declared on January 14, 2016

Percentage/Grade

61 / B

Date of Issue

December 13 2021

Signature of Controller of Examinations

Controller of Examinations

Disclaimer:

This result card/transcript is issued provisionally, errors and omissions excepted, as printed only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

Annexure
"C"

19



OFFICE OF THE DISTRICT EDUCATION OFFICER
ROHANKHATA PARACHINAH
District Education Officer
Rohankhata Parachinah

APPOINTMENT

Consequent upon the recommendation of the Departmental Selection Committee, the appointment of the following candidates to hereby ordered on the vacant PET posts mentioned against their names in DRS-12 (15320-960-42120) plus usual allowances as admissible under the rules purely on adhoc/contract basis as per existing policy of the Provincial Government with effect from the date of their taking over charge:-

S.N	Name	Father's Name	Score	Name of School	Remarks
1	Umme Rubab	Najib Hussain	103.07	GGPS Niyamin	A.V.Post
2	Bibi Zaki	Muhammad Umar	108.28	GGPS Hasanzaib	A.V.Post
3	Sugra	Israr Hussain	107.73	GGPS Tangal	A.V.Post
4	Natasha Israr	Israr Hussain	100.95	GGPS Ibrakimtal	A.V.Post
5	Nasroo Bibi	Noor Hussain	100.79	GGPS Sra Ghurga	A.V.Post
6	Nabeela Hassan	Mir Zaman	99.56	GGPS Sangwana	A.V.Post
7	Samreena	Mir Alam Khan	98.80	GGPS Shukatdars	A.V.Post
8	Zahid Khan	Muhammad Khan	93.97	GGPS Musadliq Abad	A.V.Post
9	Suhaila Hakeem	Lal Hakeem	93.72	GGPS Pir Qayum No.2	A.V.Post

TERMS & CONDITIONS

1. Charge report should be submitted to all concerned in duplicate.
2. Their appointment is purely made on temporary basis initially for one year.
3. They should not be handed over charge, if they do not fulfill the recruitment age criteria.
4. Their appointment is subject to the condition that the Educational & Professional certificates/documents must be verified from the concerned Issuing Authorities. If they found producing bogus/fake certificates/documents, their services will be terminated and reported to the Law Enforcement Agencies for further action.
5. Their services will be terminated at any time, in case their performance found unsatisfactory during his probation period.
6. In case they want to resign their post, they will have to give one month prior notice or forfeit one month pay in lieu thereof.
7. Their salaries will not be drawn until or unless their academic/professional certificates/degrees are got verified from concerned Issuing Authorities.
8. They should join their posts within 15 days of the issuance of this notification, in case of failure, their appointment will automatically be considered as cancelled.
9. They are directed to provide their medical certificates from the Medical Superintendent concerned before taking over charge.
10. They will be governed by such rules and regulations as may be issued from time to time by the Government.

M. Khan

ATTESTED
ADVOCATE

Contd Page.....2

80


11. In case of any discrepancy in documents, oversight or clerical mistake, the Competent Authority has the right to withdraw appointment order.
12. If any candidate appointed with fake documents/low score erroneously, his appointment will be withdrawn.

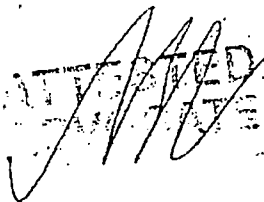
(Sultan Muhammad)
District Education Officer
District Kurram

No. 1986-2002 /Edu Dated 19/4 /2022

Copy forwarded to the:

1. Director Elementary & Secondary Education K.P Peshawar.
2. Deputy Commissioner District Kurram.
3. District Accounts Officer Kurram.
4. District Monitoring Officer (EMA) Kurram.
5. Dy:DEO (Female) Lower/Central Kurram.
6. Head Teachers concerned.
7. Accountant Local Office at Sadda.
8. Candidates concerned.
9. Office file.


District Education Officer
District Kurram



91

CHARGE REPORT

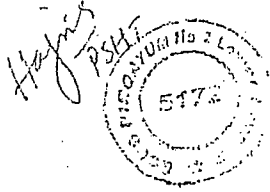
Annexure
'D'

I. Miss Sohaila Hakeem D/O La. Hakeem in compliance with the District Education Officer Kurram Endst No 1986-7002 Dated 19/04/2022 took over charge as PST post at GHIS/GMS/GPS Pir Qayum today on 19/04/2022 forenoon/afternoon.

Took Over

Miss. SOHAILA HAKEEM

HM/Head Teacher



Copy forwarded to:-

- 1:- District Education Officer Kurram at Parachinar.
- 2:- Deputy District Education Lower & Central Kurram .
- 3:- SDEO/ADEO concerned
- 4:- Candidate Concerned.
- 5:- Office file.

Attested to be
True Copy

99

Annexure
RE



OFFICE OF THE DEPUTY DISTRICT EDUCATION OFFICER,
(FEMALE) LOWER & CENTRAL KURRAM, SADDA.
No _____ /Edu Dated _____ 2022
E-Mail: deputydcofemalesadda@gmail.com

CORRIGENDUM

Consequent upon the direction of Director Education Elementary & Secondary
Education KPK Peshawar partial modification in this office Endst No 1986-2002 dated 19/04/22.

SN.	NAME OF THE OFFICIAL	FATHER	FROM	TO
1	Bibi Zakia	Muhammad Umar	GGPS Hassanzal	GGPS Pirqayum No.2
2	Suhla Hakim	Lal Hakim	GGPS Pirqayum No.2	GGPS Hassanzal

Note: Charge report should be submitted to all concern.

Dy: District Education Officer,
(F) Lower & Central Kurram, Sadda.

Endst No 3175-78 /Edu Dated- 30 / 06 2022.

Copy forwarded to the:

Director Education Elementary & Secondary Education KPK Peshawar.

District Education Officer Lower and Central Kurram.

ASDEO Lower Kurram.

Teacher concern.

ATTACHED

Dy. District Education Officer,
(F) Lower & Central Kurram, Sadda.

To,

(23)

Annexure
"F"

The District Education Officer
(Female) Parachinar upper Kurram D.K.

Subject: APPLICATION FOR CANCELLATION OF IMPUGNED TRANSFER
ORDER DATED: 30-06-2022.

Respectfully Sir/ Madam,

That the applicant humbly submits as under.

1. That the applicant is bona fide resident of Sadda Lower Kurram District Kurram
2. That the applicant is appointed as PST teacher in the GGPS Pir Qayum No.2 Lower Kurram since 19-04-2022. (appointment letter is attached)
3. That the applicant took charge on dated: 19-04-2022 in GGPS Pir Qayum No.2 Lower Kurram but later on through corrigendum order dated: 30-06-2022 the applicant is transferred from GGPS Pir Qayum No.2 to GGPS Hassanzai. (copy of the charge sheet and order are attached)
4. That the impugned transfer order has been issued recently while the applicant is serving probation period.
5. That the applicant belongs to a poor family and a married woman having a baby aged only 14 to 15 months and the GGPS Hassanzai is far away so it will affect the life of my baby and I will not be able to care of my baby.
6. That the order of transfer is against the law and the policy of education.

It is therefore humbly requested to you the order Dated: 30-06-2022 may kindly be cancelled for the welfare of the society as well as for the family of the applicant.

Dated: 04/08/22

APPLICANT
Suhaila Hakim

Applicant

Suhaila Hakim

Suhaila

(24)

Annexure
"G"

To,

The Deputy District Education Officer
(Female) Lower and Central Kurram Sadda

Subject: APPLICATION FOR CANCELLATION OF IMPUGNED TRANSFER ORDER DATED: 30-06-2022.

Respectfully Sir/ Madam.

That the applicant humbly submits as under.

1. That the applicant is bona fide resident of Sadda Lower Kurram Distract Kurram
2. That the applicant is appointed as PST teacher in the GGPS pir Qayum No.2 Lower Kurram since 19-04-2022. (appointment letter is attached)
3. That the applicant took charge on dated: 19-04-2022 in GGPS Pir Qayum No.2 Lower Kurram but later on through corrigendum order dated: 30-06-2022 the applicant is transferred from GGPS Pir Qayum No.2 to GGPS Hassanzai. (copy of the charge sheet and order are attached)
4. That the impugned transfer order has been issued recently while the applicant is serving probation period.
5. That the applicant belongs to a poor family and a married woman having a baby aged only 14 to 15 months and the GGPS Hassanzai is for away so it will affect the life of my baby and I will not be able to care of my baby.
6. That the order of transfer is against the law and the policy of education.

It is therefore humbly requested to you the order Dated: 30-06-2022 may kindly be cancelled for the welfare of the society as well as for the family of the applicant.

Dated: 04/08/2022

Applicant

Sahila Hakim

95

WAKALAT NAMA

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

Mst. Suhaila Hakem

VERSUS

Government of KPK
and others

Accused/ Petitioner/ Appellant/ Plaintiff.

Respondent/Defendant/ Complainant

KNOW ALL to whom these presents shall come that I the undersigned appoint: **Saif Ullah**

Mongol, Advocate High Court, Peshawar bearing KP Bar Council No. **15-6081** (herein after called the advocate) to be the Advocate for the Appellant in the above mentioned case, to do all the following acts, deeds and things or any of them that is to say:

- 1) To act and plead in the above mentioned case in this court or any other Court in which the same may be tried or heard in the first instance or in appeal or review or execution or in any other stage of its progress until its final decision.
- 2) To sign, verify and present pleadings, appeals, cross-objections, petitions for execution, review, revision, withdrawal, compromise or other petition or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of said case in all its stages.
- 3) To withdraw or compromise in the said case or submit to arbitration any difference or dispute that shall arise touching or in any manner relating to the said case.
- 4) To receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said case.
- 5) To engage any other Legal practitioner authorizing him to exercise the power and authorities hereby conferred on the Advocate whenever he may think fit to do so.

AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the promises.

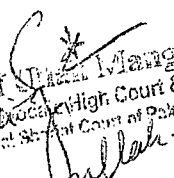
AND I hereby agree not to hold the Advocate or its substitute responsible for the result of the said case and in consequence of his absence from the court when the said case is called up for hearing

AND I hereby that in the event of the whole or any part of the fee agreed by me to be paid to the Advocate remaining unpaid, He shall be entitled to withdraw from the prosecution of the said case until the same is paid.

IN WITNESS WHEREOF I hereunto set my hand to these presents the contents of which have been explained to and understood by me, this 28 day of Nov 2022

Accepted By

Saif Ullah Mongol
Advocate High Court &
Federal Shariat Court of Pakistan



Saif Ullah Mongol,

Advocate High Court, Peshawar.


Cell No:- 0344-1040226

BC-15-6081

CNIC: 15202-3777187-5

Office: A-8, First Floor Nasir Mansion,

(Chinar Building) Shuba Bazar Peshawar


Signature/ thumb impression
of party / parties.

Suhaila hakim I/o Lal hakim

CNIC: 21302-1942834-2

