

S.No. of proceedings	Date of Order or proceedings.	Order or other proceedings with signature of Judge or Magistrate and that of parties where necessary.
1	2	3
	17.05.2016	<p align="center"><u>BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u></p> <p align="center"><u>CAMP COURT ABBOTTABAD</u></p> <p align="center"><u>APPEAL NO. 1156/2014</u></p> <p align="center"><u>Mst. Kousar Sultana Versus Government of Khyber Pakhtunkhwa through Secretary E&amp;SE Department. Peshawar and 4 others.</u></p> <p align="center"><u>JUDGMENT</u></p> <p align="center"><u>MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:-</u></p> <p>Counsel for the appellant and Mr. Muhammad Siddique, Senior Government Pleader alongwith Mr. Muhammad Usman, Senior Clerk for official respondent and counsel for private respondent No. 5 present.</p> <p>2. Mst. Kousar Sultana PSHT hereinafter referred to as the appellant has impugned order dated 08.05.2014 vide which she was transferred from Government Girls Primary School Data No. 1 to Government Girls Primary School, Nelore District Mansehra and in her place private respondent No. 5 (Mst. Bashirun Nisa) was posted.</p> <p>3. Brief facts giving rise to the present appeal are that vide notification dated 21.03.2013 numerous Primary School Head Teachers (PSHTs) BPS-15 were adjusted against newly upgraded PSHT posts and appellant Mst. Kousar Sultana already serving at GGPS Data No. 1 was also granted upgradation against the same post. Vide impugned order dated 14.09.2013 appellant was transferred to GGPS Nelore while</p>

17.05.16

private respondent No. 5 was transferred to GGPS Data No. 1 where-against the appellant preferred departmental appeal which was not responded and hence the instant service appeal within the specified time.

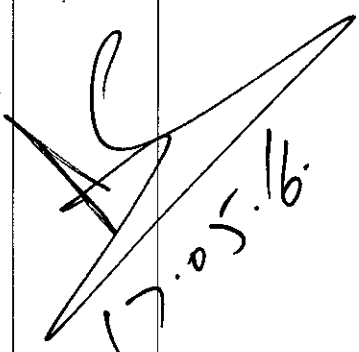
4. Learned counsel for the appellant argued that the appellant was senior to private respondent No. 5 and as per rationalization policy she was entitled to retain her post at GGPS Data No. 1 while private respondent No. 5 was illegally accommodated against the said post on the basis of political intervention.

5. Learned counsel for private respondent No. 5 argued that tenure of the appellant against the said post has already elapsed and that private respondent No. 5 was also resident of the same Union Council and as such the impugned order warrants no interference.

6. Learned Senior Government Pleader and Mr. Muhammad Usman, Senior Clerk representing the respondents argued that the appellant is senior to private respondent No. 5 and as per rationalization policy she was entitled to retain the post of PSHT at GGPS Data No. 1. We were further informed that adjustment order of the appellant has already been issued in her favour after interim order passed by this Tribunal.

7. We have heard arguments of learned counsel for the parties and perused the record.

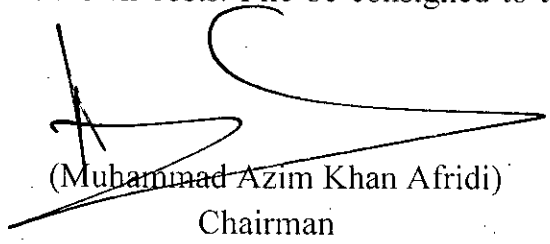
8. Since appellant Mst. Kousar Sultana is senior to private respondent No. 5 and as per rationalization policy entitled to retain the

  
17.05.16.

post of PSHT at GGPS Data No. 1 as such the impugned order dated 08.05.2014 is set aside and the order of appellant against the post of PSHT Data No. 1 is restored. The appeal is disposed of in the above terms. Parties are left to bear their own costs. File be consigned to the record room.



(Abdul Latif)  
Member



(Muhammad Azim Khan Afridi)  
Chairman

Camp Court A/Abad.

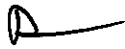
17.05.16

ANNOUNCED

17.05.2016

15.02.2016

Counsel for the appellant, Mr. Muhammad Usman, Senior Clerk alongwith Mr.Muhammad Saddique, Sr.G.P for official respondents No.1 to 4 and counsel for private respondent No.5 present. Written statement by private respondent No.5 and rejoinder by appellant submitted. Counsel for the appellant seeks adjournment as he has not prepared the case. To come up for final hearing before D.B on 15.03.2016 at Camp Court A/Abad. Status-quo be maintained.



Member



Chairman  
Camp Court A/Abad

15.03.2016

Counsel for the appellant, Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Saddique, Sr.G.P for official respondents No.1 to 4 and Mr.Aftab Shah. husband of private respondent No.5 present. Arguments could not be heard due to non-availability of D.B. To come up for final hearing before D.B on 17.5.2016 at Camp Court A/Abad. Status-quo be maintained.



Chairman  
Camp Court A/Abad

15.9.2015

Mr.Amjad Ali on behalf of the appellant and Mr. Muhammad Tahir Aurangzeb, G.P for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 22.10.2015 at Camp Court A/Abad. Status-quo be maintained.

  
Chairman  
Camp Court A/Abad

22.10.2015

Mr.Amjad Ali, husband of the appellant, Mr.Muhammad Fayaz, Supdt. alongwith Mr.Muhammad Tahir Aurangzeb, G.P for official respondents No.1 to 4 and Syed Aftab Shah, husband of private respondent No.5 present. Arguments could not be heard due to non-availability of D.B. To come up for rejoinder and final hearing before D.B on 17.12.2015 at Camp Court A/Abad. Status-quo be maintained.


  
Chairman  
Camp Court A/Abad.

17.12.2015

Counsel for the appellant, Mr. Muhammad Fayaz, Supdt. alongwith Mr. Muhammad Siddique, Sr.GP for official respondents and husband of private respondent No. 5 present. Due to non-availability of D.B, appeal to come up for rejoinder and final hearing before D.B on 15.2.2016 at Camp Court A/Abad. Status-quo be maintained.

  
Chairman  
Camp Court A/Abad


4 16.6.2015 Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Tahir Aurangzeb, G.P for respondents present In view of preceding order sheet dated 16.3.2015 the appeal is to be heard at Abbottabad. To come up for written reply on 23.7.2015 at camp court A/Abad. Status-quo be maintained.

  
Chairman  
Camp Court A/Abad

5 23.7.2015 Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Bilal, G.P for official respondents present. Adjustment order issued on the basis of Court order placed on record. To come up for written reply on 18.8.2015 <sup>at Abbottabad</sup> Status-quo be maintained.

  
Chairman  
Camp Court A/Abad

18.08.2015 Mr. Amjad Ali on behalf of the appellant and Mr. Muhammad Tahir Aurangzeb, GP for respondents present. Written reply not submitted. Requested for adjournment. Last opportunity granted. To come up for written reply/comment on 15.09.2015 S.B at camp court A/Abad. Status-quo be maintained.


  
Chairman  
Camp Court Abbottabad

Appeal No. 1156/2014  
Mst. Kamran Sultana

16.03.2015

Counsel for the appellant present. Learned counsel for the appellant argued that appellant while serving as PHST at GGPS DATA No.1 Mansehra was transferred to GGPS Niloor vice private respondent No.5 vide order dated 14.09.2013. Vide order dated 23.09.2013 the transfer order dated 14.09.2013 was cancelled by the respondent No.3 and private respondent No.5 was directed to join her original place of posting at GGPS Niloor. On acceptance of appeal of private respondent No.5 the transfer order dated 14.09.2013 was again restored vide order dated 08.05.2014. Feeling aggrieved the appellant filed departmental appeal on 19.05.2014 which was not responded within the statutory period and hence the present service appeal on 18.09.2014. Counsel for the appellant further argued that the impugned order is based on political influence used by private respondent No.5 which is evident from annexure-J page-40 whereby her application for posting has been recommended by Sardar Zahoor Ahmad, MPA PK-53 Mansehra. He stated that the impugned order is against the transfer posting policy of the Provincial Government.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 20.04.2015 before S.B. The appeal pertains to territorial limits of Hazara Division and as such to be heard at camp court Abbottabad. Notice of stay application be also issued to the respondents for the date fixed. Till then status-quo be maintained.

  
Member

Appellant Deposited  
Security & Process Fee


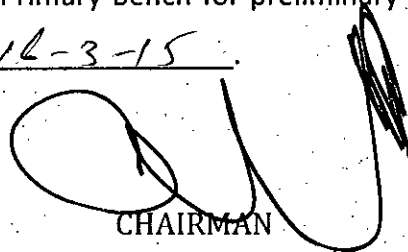


Form- A

FORM OF ORDER SHEET

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

Case No. 1156 /2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	18/09/2014	<p>The appeal of Mst. Kausar Sultana presented today by Sardar Muhammad Akmal Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	3-6-14	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>12-3-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>



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

Appeal No. 1156 of 2014

Mst. Kausar Sultana

.....PETITIONER

**V E R S U S**

1. Govt of KPK and others

..... RESPONDENTS

-----  
APPLICATION FOR FIXATION THE INSTANT APPEAL AT  
PRINCIPAL SEAT PESHAWAR FOR EARLY HEARING  
-----

*Respectfully Sheweth,*

1. That the Appellant instituted the instant Service Appeal alongwith CM on 10-09-2014 before this Honourable Court.
2. That the Appellant is resident of District Mansehra
3. That the Appellant challenged the impugned transfer order dated 08-05-2014 in the interest of Justice and fair play, the instant Appeal be fixed short date for early hearing.

It is, therefore, humbly prayed that on acceptance of instant Application, appeal of the Appellant may please be fixed for early hearing at Principal Seat Peshawar.

*B. T. 49*  
.....APPELLANT

Through:

*(Signature)*

(Sardar Muhammad Akmal)  
Advocate High Court, Abbottabad.

Dated: 11-9 /2014

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

Service Appeal No. 1156 /2014

Mst. Kousar Sultana PSHT

...APPELLANT

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber  
Pakhtunkhwa, Elementary and Secondary Education, Peshawar & others

...RESPONDENTS

**SERVICE APPEAL**

**INDEX**

S.No.	Description of Document	Annexure	Page No.
1.	Appeal alongwith affidavit and Certificate	--	1-10
2.	Addresses of the parties	--	11
3.	Application for suspension of order alongwith affidavit	--	12-13
4.	Copy of appointment order dated 08.04.1990	"A"	14
5.	Copies of all transfer orders	"B" to "F"	14-20
6.	Copy of the promotion notification and copy of charge report	"G" & "H"	21-38
7.	Copy of order dated 14.09.2013 and copy of application of respondent NO.5 for recommendation of transfer order	"I" & "J"	39-40
8.	Copy of the application and copy of the cancellation transfer order	"K" & "K-1"	41-42
9.	Copy of the attendance register of respondent No.5	"L"	43
10.	Copy of the transfer order respondent of No.5 in light of inquiry report	"L-1"	44
11.	Copy of direction order dated 14.12.2013	"M"	45
12.	Copy of the restored order dated 02.05.2014	"M-1"	46
13.	Copy of the departmental appeal/representation	"N"	47
14.	Vakalat Nama	--	48

*Sultana*  
...APPELLANT

Through:

Dated:- 8/9 /2014

*A*  
(SARDAR MUHAMMAD AKMAL)  
Advocate High Court, Abbottabad.

1

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

**Service Appeal No. 1156/2014**

Mst. Kousar Sultana PSHT D/o Gulzaman, resident of Data, District Mansehra, presently Government Girls Primary School No.1, Data, Tehsil and District Mansehra.

**VERSUS**

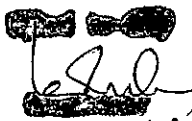
**APPELLANT**  
1186  
18-9-2014

- 1) Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education, Peshawar.
- 2) Director, Elementary and Secondary Education, Peshawar.
- 3) District Education Officer, Elementary and Secondary Education (Female), Mansehra.
- 4) Sub Divisional Officer, Elementary and Secondary Education (Female), Mansehra.
- 5) Mst. Bashirun Nisa, PSHT, Government Girls Primary School, Nelore, Tehsil and District Mansehra.

**...RESPONDENTS**

-----

**APPEAL U/S 4 OF THE N.W.F.P SERVICE TRIBUNAL ACT, 1974, AGAINST THE OFFICE ORDER NO.432-35 DATED 08.05.2014 ISSUED BY RESPONDENT NO.4 WHEREBY THE APPELLANT WAS TRANSFERRED FROM G.G.P.S DATA NO.1 MANSEHRA TO G.G.P.S NELORE MANSEHRA IN PLACE OF RESPONDENT NO.5 HENCE RESPONDENT NO.4 MALAFIDELY RESTORED THE TRANSFER ORDER NO.3460-64 DATED 23.09.2013 AFTER EIGHT MONTHS WHICH IS ILLEGAL, PREMATURE, AGAINST THE TRANSFER POLICY OF**

  
18/9/14

THE GOVERNMENT OF KHYBER PAKHTUNKHWA, IS  
THE RESULT OF POLITICAL INFLUENCE AND HIGH  
HANDEDNESS OF THE RESPONDENTS.

---

---

**PRAYER:-**

ON ACCEPTANCE OF THE INSTANT  
SERVICE APPEAL, RESPONDENT NO.4 MAY  
GRACIOUSLY BE DIRECTED TO WITHDRAW HIS ORDER  
NO.432-35 DATED 08.05.2014 AND APPELLANT MAY  
GRACIOUSLY BE ALLOWED TO PERFORM/CONTINUE  
HER DUTIES IN GOVERNMENT G.G.P.S DATA NO.1,  
MANSEHRA.

---

---

***Respectfully Sheweth,***

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

1. That, the appellant was appointed as Primary School Teacher in Education Department on 08.04.1990 as Primary School Teacher and has served the department for about 24 years of her service. ***(Copy of appointment order is annexed as Annexure "A")***
2. That, the appellant is performing her duties to the entire satisfaction of her superiors as well as the community where she is serving as a teacher. The appellant has

never given any chance of complaint to the local public as well as to the Department.

3. That, as the appellant out of her 24 years of her service, served about 18 years away from her home station and the detail of which is as under:-

Station	Period/Tenure	Distance from Home
1) G.G.P.S Ajmera Battagram	about 04 years	90 KM
2) G.G.P.S Phagora Battagram	about 02 years	85 KM
3) G.G.P.S Mera Madda Khail, Torghar	about 02 years	120 KM
4) G.G.P.S Purni	about 05 years	15 KM
5) G.G.P.S Rehar	about 03 years	10 KM
6) G.G.P.S Data No.2	about 02 years	02 KM

4. That, it is obvious from the above detailed position that appellant has served for about 18 years away from her home station at hilly remote and hard stations. ***(Copies of all transfer orders are annexed as Annexure "B" to "G" respectively)***

5. That, the appellant was promoted in BPS-15 order No.339-927 dated 21.03.2013 against the post which is already occupied in G.G.P.S Data No.1 and appellant was performing her duty at G.G.P.S Data No.1, Mansehra. ***(Copy of the said notification is annexed***

**as Annexure "H" and copy of charge report is attached as Annexure "H-1")**

6. That, respondent No.5 by using political influence and with the collusion of the respondent's Department has thrown the appellant at a distance of about 50 KM kilometers away in a school namely G.G.P.S Nilor, Mansehra which is situated at top of a hill vide order Endorsement No.339-927 dated 21.03.2013 whereas large number of P.S.H.T who were promoted in BPS-15 against the post already occupied in their schools in Mansehra city having political ground have not been disturbed and the appellant who has no such backing that is why not been allowed to complete her tenure at G.G.P.S Data No.1. **(Copy of order dated 14.09.2013 is annexed as Annexure "I" whereas copy of application of respondent NO.5 for recommendation of transfer order is annexed as Annexure "J")**
  
7. That, the appellant moved an application for cancellation of transfer order No.3460-64 dated 23.09.2013. Respondent No.4 cancelled the said order in light of the said application moved by the appellant. **(Copy of the application is annexed as Annexure "K" whereas copy of the transfer order is annexed as Annexure "K-1")**

8. That, respondent No.3 promoted the respondent No.5 from GGPS Pir Sohaba to GGPS Chora Behali in BPS-15 but respondent NO.5 did not bother to comply with order of respondent NO.3 meanwhile respondent No.4 visited the school of the respondent NO.5 but respondent NO.5 found absent from her duty in the said school. ***(Copy of the attendance register is attached as Annexure "L")***
  
9. That, after cancellation of the transfer order, respondent No.4 directed the respondent NO.5 to join your original place of posting i.e Government Girls Primary School Nelore, but respondent No.5 could not comply the said order and found absent from her duty at GGPS Nelore, Mansehra. ***(Copy of the order is annexed as Annexure "L-1")***
  
10. That, after 8 months, respondent No.4 malafidely restored the order No.3425-30 dated 08.05.2014. ***(Copy of the restored order is annexed as Annexure "M")***
  
11. That, husband of the appellant also served in Education Department as PSHT incase of transfer of appellant in GGPS Nelore Mansehra the education of their children would be disturbed.

12. That, feeling aggrieved of the same, the appellant preferred departmental representation/appeal before respondent No.2 on 19.05.2014 but no result within the statutory period. Copy of the departmental appeal is annexed as **Annexure "N"**, thus the appellant has come to this Hon'ble Tribunal after expiry of the prescribed period of appeal/representation assailing the impugned order, inter-alia, on the following grounds:-

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

- a. That, the impugned order is premature, void, illegal, without lawful authority, against the policy of the Government, arbitrary, perverse and smack of favoritism, nepotism, result of illegal exercise of power and it has been issued under the political influence and has ignored the merits.
- b. That, the impugned order is malafide, discriminatory and against the public policy, hence liable to be set aside.
- c. That, the impugned order is against the tenure policy of the Government and is in violation of the principles of natural justice and law.



- d. That, the impugned order is wholly without jurisdiction and called for interference by the Hon'ble Tribunal.
- e. That, the impugned order has been passed premature and appellant has not been allowed to complete the tenure due to political pressure of respondent No.5.
- f. That, the respondent No.3 promoted 386 teachers in BPS-15 in District Mansehra against posts already occupied their schools after six months only appellant transferred from GGPS Data No.1 to Nelore Mansehra this act of the respondents is totally malafide, discriminatory and against natural justice and law.
- g. That, public representative have nothing to do with the internal affairs of the department the employee hence at the behest and instance of public representative, any order passed against the rights of an employee or official shall be nullity in the eyes of law and deserves to be set aside.
- h. That, appellant seeks leave of this Hon'ble Tribunal to agitate additional grounds at the time of hearing of this appeal.
- i. That, the instant appeal is well within time.

In the circumstances, it is, most humbly prayed that on acceptance of the instant service appeal, respondent No.4 may graciously be directed to cancel/withdraw his order No.432-35 dated 08.05.2014 and the appellant be graciously allowed to continue in her position at GGPS Data No.1, Mansehra in the best interest of justice. Any other relief deemed fit and proper in the circumstances of the case.

*Subhana*  
...APPELLANT

**Through:**

Dated:- 8/9 /2014

  
(SARDAR MUHAMMAD AKMAL)  
Advocate High Court, Abbottabad.

**VERIFICATION:-**

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

Dated:- 8/9 /2014

*Subhana*  
...APPELLANT

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

**Service Appeal No. /2014**

Mst. Kousar Sultana PSHT

...APPELLANT

**V E R S U S**

Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education, Peshawar & others

...RESPONDENTS

**SERVICE APPEAL**

**AFFIDAVIT**

I, Mst. Kousar Sultana PSHT D/o Gulzaman, resident of Data, District Mansehra, presently Government Girls Primary School No.1, Data, Tehsil and District Mansehra **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 that nothing has been concealed from this Hon'ble Tribunal.

**DEPONENT**

Dated:- 27/9 /2014

**IDENTIFIED BY:-**



*Kousar*  
...APPELLANT

*(Signature)*  
**(SARDAR MUHAMMAD AKMAL)**  
Advocate High Court,  
Abbottabad.

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

**Service Appeal No. /2014**

Mst. Kousar Sultana PSHT

...APPELLANT

**V E R S U S**

Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber  
 Pakhtunkhwa, Elementary and Secondary Education, Peshawar & others

...RESPONDENTS

**SERVICE APPEAL**

**CERTIFICATE**

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

*Sultana*  
 ...APPELLANT

**Through:**

Dated:- 879 /2014

  
 (SARDAR MUHAMMAD AKMAL)  
 Advocate High Court, Abbottabad.

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

**Service Appeal No. /2014**

Mst. Kousar Sultana PSHT

**...APPELLANT**

**V E R S U S**

Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education, Peshawar & others

**...RESPONDENTS**

**SERVICE APPEAL**

**ADDRESSES OF THE PARTIES**

***Respectfully Sheweth,***

The addresses of the parties are as under;

**APPELLANT:**

Mst. Kousar Sultana PSHT D/o Gulzaman, resident of Data, District Mansehra, presently Government Girls Primary School No.1, Data, Tehsil and District Mansehra.

**RESPONDENTS:**

- 1) Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education, Peshawar.
- 2) Director, Elementary and Secondary Education, Peshawar.
- 3) District Education Officer, Elementary and Secondary Education (Female), Mansehra.
- 4) Sub Divisional Officer, Elementary and Secondary Education (Female), Mansehra.
- 5) Mst. Bashirun Nisa, PSHT, Government Girls Primary School, Nelore, Tehsil and District Mansehra.

**...RESPONDENTS**

*Kousar Sultana*  
**...APPELLANT**

***Through:***

Dated:- 8/9/2014

  
**(SARDAR MUHAMMAD AKMAL)**  
 Advocate High Court, Abbottabad.

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

**Service Appeal No. /2014**

Mst. Kousar Sultana PSHT

...APPELLANT

**V E R S U S**

Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education, Peshawar & others

...RESPONDENTS

**SERVICE APPEAL**

-----

APPLICATION FOR SUSPENSION OF THE OPERATION OF IMPUGNED ORDER NO.432-35 DATED 08.05.2014 AND THE APPELLANT BE GRACIOUSLY ALLOWED TO CONTINUE IN HER POSITION AT GGPS DATA NO.1, TILL FINAL DECISION OF THE INSTANT SERVICE APPEAL.

-----

*Respectfully Sheweth,*

1. That the appeal is filed and the facts alongwith grounds may graciously be treated as integral part of this appeal.
2. That the appellant has prima-facie good case and balance of convenience also lies in her favour.
3. That the impugned order has been passed under the political pressure and the respondent has not used the independent mind.
4. That if the operation of the impugned order is not suspended, the appellant would suffer irreparable loss and respondents have no loss.

It is, therefore, humbly prayed that on acceptance of the foregoing application, the operation of impugned order No.432-35 dated 08.05.2014 may kindly be suspended, till final disposal of the titled service appeal.

...APPELLANT

Through:

Dated:- 8/9 /2014

  
(SARDAR MUHAMMAD AKMAL)  
Advocate High Court, Abbottabad.

**AFFIDAVIT:-**

I, Mst. Kousar Sultana PSHT D/o Gulzaman, resident of Data, District Mansehra, presently Government Girls Primary School No.1, Data, Tehsil and District Mansehra **appellant**, do hereby solemnly affirm and declare on Oath that the contents of instant **application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

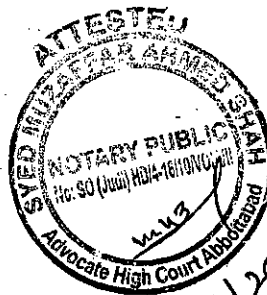
DEPONENT

Dated:- 8/9 /2014

*Kousar*  
...APPELLANT

**IDENTIFIED BY:-**

  
(SARDAR MUHAMMAD AKMAL)  
Advocate High Court,  
Abbottabad.



# Annexure A (14) (1)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

OFFICE ORDER NO.  
Dated Mansehra, the 8/4 /1990

A P P O I N T M E N T.

As ordered by the Honourable Chief Minister, NWFP, / Minister for the following appointments/adjustments of \_\_\_\_\_ is/are hereby ordered @ Rs. \_\_\_\_\_ in BPS-7 plus usual allowances as admissible to them under the Rules in the schools mentioned against following terms and conditions:-

S.No.	Name/Father's Name	School	Name of School where posted.	Remarks.
1.	<del>Gul Naz D/o Sain Mohammad marks 632 R/o Datta.</del>	<del>---</del>	<del>GGPS, Garki No. Said, newly created (Battagram).</del>	<del>post.</del>
2.	Nazneen D/o Sain Mohammad Gul. 639/ R/o Datta.	---do---	GGPS, ---do---	---do---
3.	Kesar Sultana D/o Gul Zaman marks 634 R/o Datta.	---do---	GGPS, Mera Dakhli Ajmera (B/Gram).	---do---
4.	Rafhat Shaheen D/o Faqir Khitab 630 R/o Baffa.	---do---	GGPS, Asharbagh (Battagram).	Agvdoant PTC post.

CONDIT IONS.

1. No. TA/DA or TG is allowed.
2. Charge Reports should be submitted to all concerned.
3. The appointments is/are purely on temporarily basis and subject to termination at any time without notice or any assigning reason.
4. He/She/They should produced his/her/their Age and Health certificates from the Medical Supd:concerned.
5. The head of institution is required to check all original Educational/Professional Certificate's before handing over charge to him/her.
6. In candidator/Candidate wishes/wish to resign from service he/she will have to give on monts period notice for forfeit one month pay in lieu of short notice.
7. The appointment can be cancelled/terminated on arrival of Tranded teachers.
8. The appointment order will be considered terminated if they failed to take over charge within 15 days of the issue of this order.

DISTRICT EDUCATION OFFICER,  
(FEMALE) MANSEHRA.

Endst:No. 5046-521

Copy for information to the:-

1. P.S to Secretary to the Hon:Chief Minister N.W.F.P.
2. P.s to Minister for
3. Headmistress GGHS/GGMS/GGPS
4. Candidate concerned.
- 5-6. S.D.E.O (F) Mansehr. /Battagram.

Attested

DISTRICT EDUCATION OFFICER,  
(FEMALE) MANSEHRA.



# Annexure B

15

OFFICE OF THE DISTRICT EDUCATION OFFICER (P. A. I.) MANECHRA.

OFFICE ORDER.

Dated Manechra the 9/7 /1990.

ADJUSTMENT.

Met: Koucar Sultana D/O Mr. Gul Zaman P.T.C. Assistant trained under appointment order at Govt: Girls Primary School Near Dabhi Ajmera (B/Gram).  
Vice this office order is issued under order No. 5046-52 dated 8.4.1990 by hereby adjusted at Govt: Girls Primary School Pechora (Battagram) w.e.f. 1.7.1990 vice Met: Raj-um-Laxo P.T.C. absent from duty.

Note:-


1. Charge reports should be submitted to all concerned.
2. Other service conditions will remain the same as laid down in her appointment order dated 8.4.1990.

DIST: EDUCATION OFFICER (P. A. I.) MANECHRA.

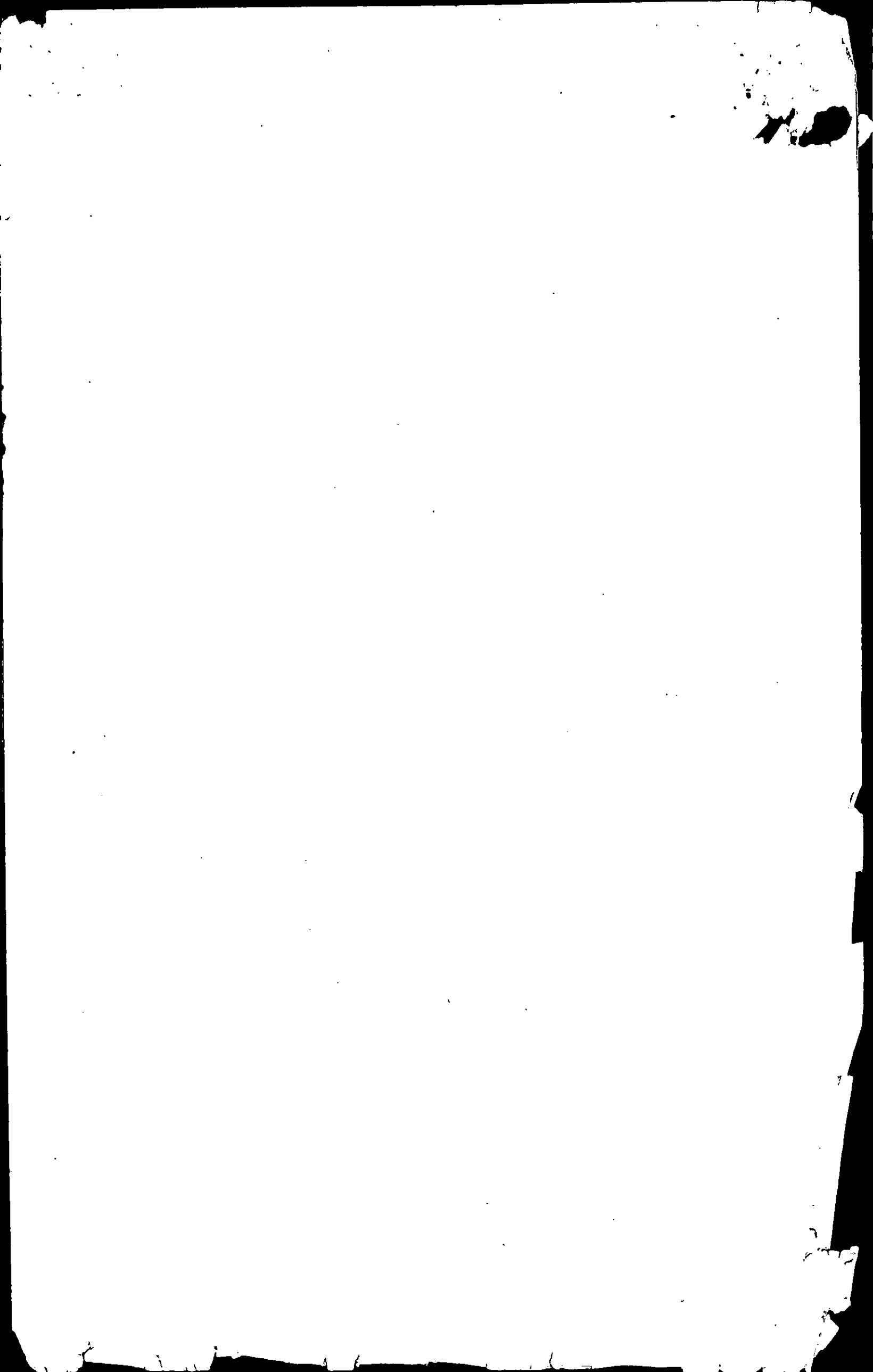
Order No. 6755/55  
Copy to the:-

1. S.D.O (F) Battagram with reference to her order No. 267 dated 24.6.90. The mistress concerned may be asked to explain her position with regard to her willful absence from the school and her reply along with comments be sent to this office for further necessary action.
2. The Headteacher (G.S) Pechora (3) Met: Koucar Sultana D/O Gul Zaman Village & P.O Datta (Manechra).
4. Office order file.

DIST: EDUCATION OFFICER (P. A. I.) MANECHRA.

*Attested*  


Akhtia  
Advocate  
MANECHRA



# Annexure B 16

OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER (FEMALE) MANSEHRA.

TRANSFER.

O.O. NO.

Dated Mansehra the 27/8/95

As desired by the Hon; Minister for Primary Education NWFP Peshawar and Mohd Tariq Khan FMA the following PTC teachers are hereby transferred (Under disciplinary action) on their own pay and grade in the interest of public service with immediate effect:-

S.No.	Name of teacher.	From.	To.	Remarks.
1.	Mousar Sultana PTC.	GCPS Mera Madda Khail.	GCPS Furni.	V.No.2
2.	Tayyba Naz PTC.	GCPS Furni.	" Mera Madda Khail.	V.No.1
3.	Mehraj PTC.	" Furni.	" Mera Madda Khail.	V.No.4
4.	Shagufta Naz PTC.	" Mera Madda Khail.	GCPS Furni.	V.No.3

- Note.
- Charge report should be submitted to all concerned.
  - No TA/DA is allowed.

SUB-DIVISIONAL EDUCATION OFFICER  
(FEMALE) MANSEHRA.

Enclst: No. 5410-17

Copy to:-

- The District Education officer (Female) Primary Mansehra.
5. The H/T all concerned.
6. The ASDEO (F) concerned.
7. The account branch local office.
8. O/O file.

SUB-DIVISIONAL EDUCATION OFFICER  
(FEMALE) MANSEHRA.

*Attested*

*[Signature]*  
M.A. LL.B Advocate  
DISTRICT COURT ABERGOTTABAD

Annexure <sup>(12)</sup>

177

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) MANSEHRA.  
TRANSFER/ADJUSTMENT.

As approved by the D.E.O. (F) Mansehra. The following P.TC/PT teachers are hereby transferred on their own pay and grade in the interest of public service with immediate effect:-

S.No.	Name of Teacher	From	To	Remarks
1.	Rizwana PTC.	GCPS Mukhala.	GCPS Daria.	V.No.2
2.	Seerat PTC.	" Darra.	" Mukhala.	V.No.1
3.	Abida Parveen PTC.	" Mera Amjid Ali.	" Ghazikot.	V.No.4
4.	Mukhtiar Begum PTC.	" Ghazi Kot.	" Mera Amjid Ali.	V.No.3
5.	Kousar Sultana PTC.	" Purni.	" Datta No.1.	V.No.6
6.	Syeda Mahmooda PTC.	" Datta No.1.	" Purni.	V.No.5
	/	/	/	
	/	/	/	
	/	/	/	

Note:- 1) Charge reports should be submitted to all concerned.  
2) SANS-4 transfer under report/complaint. ✓

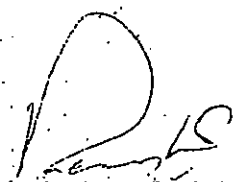
(Mrs. Parveen Akhtar)  
Sub Divisional Education  
Officer (Female) Mansehra.


2121-29  
(B)  
Endst: No. \_\_\_\_\_

Dated 31/8 1993

Copy forwarded for information to the:-

- 1) District Education Officer (F/P) Mansehra.
- 2) Head teacher concerned.
- 3) O/P Office Branch.

  
Sub Divisional Education  
Officer (Female) Mansehra.

Attested  
  
Advocate  
1217

# Annexure D (18)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (S&L) MANSEHRA.

RATIONALIZATION.

Consequent upon the rationalization ordered by the Department and duly approved by the District-Transfer/Adjustment Committee adjustments against the additional posts given under deployment process/newly created for the purpose/vacant posts, following teachers are hereby ordered in the interest of the public service with immediate effect:-

S.NO.	NAME OF TEACHER.	SURPLUSED FROM	ADJUSTED AT	REMARKS
1.	Yasmin Sadiq PTC	GPS, Shalia	Kohlian	A.V. Post
2.	Abida PTC	Balakote	Kawai	...do...
3.	Tahlat Yasmin PTC	Balakote	Narah ✓	...do...
4.	Bushra Ambreen PTC	Bilyani	G.H. Ullah ✓	...do...
5.	Tasleem Akhter PTC	Bajna	Ichrian ✓	...do...
6.	Bibi Ruqia PTC	Bissian	Sari Bandi ✓	...do...
7.	Khalida Parveen PTC	S.N.Khan	Hassa ✓	...do...
8.	Gulshan Zubida PTC	Talhatta	Chanool ✓	...do...
9.	Kosar Saigal PTC	Datta No.1	Rehar ✓	...do...

- NOTE:-
1. Charge report submitted to all concerned.
  2. No TA/DA is allowed to any one.

Sol

DISTRICT OFFICER (FEMALE)  
(S&L) MANSEHRA.  
/2004.

NO 2583-28 Dated Mansehra the 35/12

Copy forwarded to the:-

1. Executive District Officer (S&L) Mansehra.
2. District Officer (Female) S&L, Mansehra.
3. District Accounts Officer, Mansehra.
4. Account Branch local office.
5. HT concerned.
6. Transfer order file.

Attested

Attested by  
M. A. H. Advocate  
Manshra

DY: DISTRICT OFFICER (FEMALE)  
SCHOOL & LIT: MANSEHRA.

# Annexure E (19)

## OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY MANSEHRA.

ORD

Consequent upon the approval of Schools & Literacy Department NWFP, Peshawar Vide his No. SO(B&A)S&L/1-4/2007.DATED 06.09.2007,duly received thorough EDO S&L Mansehra Vide No.19072-73, dated 26.09.2007, the following PST(F)teachers are hereby ordered under the rationalization process in the school noted against each their name:-on their own pay & grade.

Sr.No.	Name of Teacher/School	Adjusted at under Rationalization	Remarks.
1	Shamshad Begum PTC, GGPS Battal	GGPS Charian Battal	Deployed W-Post
2	Basira PTC, GGPS Battal	GGPS Charian Battal	-do-
3	Fozia PTC, GGPS Battal	GGPS, Nogazi	-do-
4	Naheeda Begum PTC, GGPS Shangratta	GGPS, Chattar Plain	-do-
5	Samina Murtaza, PTC, GGPS Ogra	GGPS Moh: New Swati, Bherkund	-do-
✓ 6	Kousar Sultana, PTC, GGPS Rehar	GGPS Data No.2	-do-
7	Zahida Khatoon, PTC, GGPS Rehar	GGPS Neelor	-do-
8	Dilshad Andleeb, PTC, GGPS Bogarmang	GGPS Jabori	-do-
9	Naseem Bibi PTC, GGPS Dadar	GGPS Jabori,	-do-
10	Saeeda PTC, GGPS Zafarabad	GGPS Bai Bala	-do-
11	Gula Nisa PTC, GGPS Zafarabad	GGPS Charian Battal	-do-
12	Zainab Bibi PTC, GGPS Zafarabad	GGPS Chakia	-do-

Note: - 1.Charge report should e submitted to all concerned.  
2. No TA/DA is allowed.

Sd/  
EXECUTIVE DISTRICT OFFICER  
SCHOOLS & LITERACY MANSEHRA

No. 1491-94 /Rationalization File Dated Mansehra The 22/10/2007.  
Copy forwarded for information & necessary action to the:

7. Executive District Officer S&L Mansehra
8. District Officer (F) S & L Mansehra.
9. Head Teacher Concerned.
10. ADO (F) Concerned.
11. Account Branch.
12. District accounts Officer Mansehra.

*22/10/07*  
Dy: District Officer (Female)  
Schools & Literacy, Mansehra.

*Attested*

ABBOTTABAD  
N.A. P. ABBOTTABAD  
DISTRICT COURT ABBOTTABAD

# Annexure F

14  
20

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) MANSEHRA

## TRANSFER/ADJUSTMENT

The competent authority has been pleased to order the transfer/adjustment of the following PST (Female) on her their own pay and grade in the interest of public service with effect from the date of her/their taking over charge.

S.No.	Name & Designation	From	To	Remarks
1.	Koser Sultana	PST GGPS Datta No. 2	GGPS Datta No. 1	v.n.2
2.	Sher Bano	PST GGPS Datta No. 1	GGPS Datta No. 2	V.N.1

- Note: 1- Charge report should be submitted to all concerned.  
2- No TA/DA is allowed to any one.  
3. Their tenure remain intact.

EXECUTIVE DISTRICT OFFICER  
(E&S) EDUCATION MANSEHRA

Endst. No. 1365-69 Vol. III Dated 24/06/2009

Copy forwarded to :-

1. The District Accounts Officer Manshra.
2. The B & AO Local Office
3. The ADO Circle Concerned.
4. Head Teacher Concerned.
5. Teacher Concerned

*Sheetal*

*Sheetal*  
Muhammad Akmal  
DISTRICT COURT MANSEHRA

*R.1*  
DEPUTY DISTRICT OFFICER  
(FEMALE) (E&S) MANSEHRA

*24/6*

BPS (15) (F) Mansehra  
Annexure G (21)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

In pursuance of Government of Khyber Pakhtun Khawa Peshawar Notification No SO(B&A) /1-18/E&SE /2012 Dated 07/07/2012 and subsequently Notification issued by the District Education Officer (Female) Mansehra Endstt: No 1281-399 Dated 26/02/2013 Dated 26/02/2013.

The following Primary School Head Teacher B-15 are adjusted against newly upgraded Primary School Head Teacher Post with immediate effect.

S#	S.L.No	Name of Teacher	Name of School	Adjusted To	Remarks
<b>The Teachers already occupied the Post in same Schools</b>					
1	1	BIBI KHUSHNOODA	GGPS Purni	GGPS Purni	Post Already Occupied
2	11	SADIQA ALMAS	GGPS DHODIAL NO.1	GGPS DHODIAL NO.1	Post Already Occupied
3	15	BIBI AMINA	GGPS BAFFA KALAN	GGPS BAFFA KALAN	Post Already Occupied
4	20	BIBI NASREEN	GGPS GANDIAN NO.1	GGPS GANDIAN NO.1	Post Already Occupied
5	25	NASIRA BAGUM	GGPS JABRI MEDAN	GGPS JABRI MEDAN	Post Already Occupied
6	32	TANVEER AKHTAR	GGPS MAIRA JIA	GGPS MAIRA JIA	Post Already Occupied
7	39	YASMEEN BEGUM	GGPS Panjool	GGPS Panjool	Post Already Occupied
8	44	AZRA JHAHEEN	GGPS LABER KOT	GGPS LABER KOT	Post Already Occupied
9	49	NAHEEDA BAGUM	GGPS KHAIL	GGPS KHAIL	Post Already Occupied
10	58	RIFFAT ARA	GGPS GULI BAGH	GGPS GULI BAGH	Post Already Occupied
11	62	S. JEEHA BEGUM	GGPS Gandian no.2	GGPS Gandian No.2	Post Already Occupied
12	64	SHAKILA AYUB	GGPS NOKOT	GGPS NOKOT	Post Already Occupied
13	65	SAFIA shaheen	GGPS HILL KOT	GGPS HILL KOT	Post Already Occupied
14	67	SAEEDA BEGUM	GGPS HAMSHIRIAN	GGPS HAMSHIRIAN	Post Already Occupied
15	68	HAMEEDA BAGUM	GGPS AZIZ ABAD	GGPS AZIZ ABAD	Post Already Occupied
16	72	FEHMIDA AYUB	GGPS TARHA PAYEEN	GGPS TARHA PAYEEN	Post Already Occupied
17	76	ULFAT AARA	GGPS Makria	GGPS Makria	Post Already Occupied
18	77	FARHAT AFZEL	GGPS OGRA	GGPS OGRA	Post Already Occupied
19	79	YASMEEN	GGPS MONDHAR	GGPS MONDHAR	Post Already Occupied
20	81	SAJID QAZI	GGPS THAKAR MERA	GGPS THAKAR MERA	Post Already Occupied
21	84	PARVEEN TABASAM	GGPS DARA	GGPS DARA	Post Already Occupied
22	87	BIZI RASHIDA	GGPS BHERKUND NO.1	GGPS BHER KUND 1	Post Already Occupied
23	90	BUSHRA RABANI	GGPS JABA	GGPS JABA	Post Already Occupied
24	91	NUSRAT SAHEHEEN	GGPS Balang	GGPS Balang	Post Already Occupied
25	95	Musrat Begum	GGPS KAWAI	GGPS KAWAI	Post Already Occupied
26	96	Haseena Khatoon	GGPS SHALI JAREED	GGPS SHALI JAREED	Post Already Occupied
27	98	ABIDA PARVEEN	GGPS TARHA PAYEEN	GGPS Hafiz Bandi	Adjucent U/C due nap
28	101	SHAHGUL	GGPS BAGA	GGPS BAGA	Post Already Occupied
29	103	BALQEES BEGUM	GGPS KANGER MERA	GGPS KANGER MERA	Post Already Occupied
30	114	PERVEEN AKHTAR	GGPS MERA B.ABAD	GGPS MERA B.ABAD	Post Already Occupied
31	119	SAFIA SULTANA	GGPS SARNI	GGPS SARNI	Post Already Occupied
32	120	NAHEED AKHTAR	GGPS S.MAZULLAH	GGPS S.MAZULLAH	Post Already Occupied
33	121	RAZIA SULTANA	GGPS BANDA PIRAN	GGPS BANDA PIRAN	Post Already Occupied
34	122	SHAHIDA PARVEEN	GGPS PEER SAHABA	GGPS PEER SAHABA	Post Already Occupied
35	124	S. JEEENA RAFEEQ	GGPS SHINKIARI NO.2	GGPS SHINKIARI NO.2	Post Already Occupied
36	125	NIGHAT NASREEN	GGPS MUNGAN	GGPS MUNGAN	Post Already Occupied
37	126	NAHEED TABASAM	GGPS SHINKIARI NO.1	GGPS SHINKIARI NO.1	Post Already Occupied
38	129	GUL NASRIN	GGPS BAFFA KHURD	GGPS BAFFA KHURD	Post Already Occupied
39	134	FARZANA GUL	GGPS MANSEHRA NO2	GGPS MANSEHRA	Post Already Occupied

Attested  
A

10/02/2013  
SDEO (F)  
Mansehra.



(22) 18, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85

40	137	SAIRA JABEEN	GGPS DHODIAL NO.2	GGPS DHODIAL NO.2	
41	138	FARHAT NASEEN	GGPS Lohar Banda Msr	GGPS Loha - Banda Msr	Post Already Occupied
42	139	BILQEES BEGUM	GGPS BASALA	GGPS BASALA	Post Already Occupied
43	144	ASIA BIBI	GGPS LASO ZIMANDARI	GGPS LASC ZIMANDARI	Post Already Occupied
44	145	MEHMOONA FAROOQ	GGPS DAIBGRAN	GGPS DAIBGRAN	Post Already Occupied
45	146	SABELHA KHANAM	GGPS NANOHA DHAKAN	GGPS N/ DHAKAN	Post Already Occupied
46	147	BIBI ROBINA	GGPS TALHARI	GGPS TALHARI	Post Already Occupied
47	155	Bushra begum	GGPS BATKARAR	GGPS BATKARAR	Post Already Occupied
48	162	SAEEDA BANO	GGPS EID GAH	GGPS EID GAH	Post Already Occupied
49	171	MAJDA TABASAM	GGPS DHODIAL NO.3	GGPS DHODIAL NO.3	Post Already Occupied
50	172	TAZAIM AKHTAR	GGPS JABBORI	GGPS JABBORI	Post Already Occupied
51	175	TABASUM RAHNA	GGPS LASSAN THAKRAL	GGPS L/THAKRAL	Post Already Occupied
52	177	ANEESA TAHIRA	GGPS CHINAR KOT	GGPS CHINAR KOT	Post Already Occupied
53	180	KALSOOM JAN	GGPS GANDA	GGPS GANDA	Post Already Occupied
54	187	Naghit Bibi	GGPS BUTTAN JAREED	GGPS BUTTA Y JAREED	Post Already Occupied
55	188	NOOR JAHAN	GGPS MANGLOOR	GGPS MANGLOOR	Post Already Occupied
56	189	S'AZIA BIBI	GGPS NONAHA KHURD	Tali Sydan	Post Already Occupied
57	196	feroza begum	GGPS BALAKOT	GGPS BALAKOT	Post Already Occupied
58	198	KHAFER UL NISA	GGPS Bedadi	GGPS Bedadi	Post Already Occupied
59	201	FARZANA SHAHEEN	GGPS MANSEHRA NO1	GGPS MANSEHRA NO1	Post Already Occupied
60	210	Bibi SHAHIDA	GGPS MORBAFFA KALAN	GGPS MORBAFFA KALAN	Post Already Occupied
61	213	khafida parveen	GGPS S..N.KHAN	GGPS S..N.KHAN	Post Already Occupied
62	225	Tehmina Gul	GGPS Mansehra No.3	GGPS Mansehra No.3	Post Already Occupied
63	237	GULNAZ PARVEEN	GGPS KATHA DOBANDI	GGPS KATHA DOBANDI	Post Already Occupied
64	241	ASIA BEGUM	GGPS GARA KAWAI	GGPS GARA KAWAI	Post Already Occupied
65	248	SHAGUFTA GUL	GGPS PORI	GGPS PORI	Post Already Occupied
66	251	BIBI MEHMOONA	GGPS GHAZIKOT	GGPS GHAZIKOT	Post Already Occupied
67	257	BILQUIS	GGPS BAI BALA BATTAL	GGPS BAI BALA BATTAL	Post Already Occupied
68	264	G. ZALA NAHEED	GGPS MARI M.SHAH	GGPS MARI M.S SHAH	Post Already Occupied
69	266	TAHIRA JABEEN	GGPS SIKANDARA	GGPS SIKANDARA	Post Already Occupied
70	268	SAMINA BEGUM	GGPS BATTANGI HASSA	GGPS BATTANGI HASSA	Post Already Occupied
71	269	Ghazala Yasmin	GGPS Oghi	GGPS Oghi	Post Already Occupied
72	271	BI BI NELOFIR	GGPS PAKONA	GGPS PAKONA	Post Already Occupied
73	276	ASIA NIAZI	GGPS Seri Massand	GGPS Seri Massand	Post Already Occupied
74	277	NAZISH BEGUM	GGPS No. 4 Mansehra.	GGPS No. 4 Mansehra.	Post Already Occupied
75	278	SAJDA RA ANA	GGPS GIRWAL	GGPS GIRWAL	Post Already Occupied
76	279	BIBI GHAZALA	GGPS HATHI MERA	GGPS HATHI MERA	Post Already Occupied
77	(283)	G. BIBI	GGPS KOTLI PAYEEN	GGPS KOTLI PAYEEN	Post Already Occupied
78	284	Bibi Shaheen	GGPS BHANGIAN	GGPS BHANGIAN	Post Already Occupied
79	286	G. NAR	GGPS KHAKI	GGPS KHAKI	Post Already Occupied
80	289	SHAZIA BANO	GGPS PANO DHERI NO.1	GGPS PANO DHERI NO.1	Post Already Occupied
81	307	NAGHAT NASEEMA	GGPS ICHRIAN	GGPS ICHRIAN	Post Already Occupied
82	310	NIGHAT YASMEEN	GGPS LACHI MUNG	GGPS LACHI MUNIS	Post Already Occupied
83	313	RUKHSANDA BEGUM	GGPS DUMKACHA	GGPS DUMKACHA	Post Already Occupied
84	315	NASEEM AKHTER	GGPS DAB NO1	GGPS DAB NO1	Post Already Occupied
85	317	Rashda Parveen	GGPS NARRAH	GGPS NARRAH	Post Already Occupied

R

80	319	RIFFAT SHAHEEN	GGPS MOHALLAH N/SAWATI	GGPS MOH: N SAWATI	Post Already Occupied
87	323	YASMIN SADIQ	GGPS CHARIA	GGPS CHARIA	Post Already Occupied
88	335	CHAND BIBI	GGPS SAFAIDA	GGPS SAFAIDA	Post Already Occupied
89	342	IFFAT IQEAL	GPS TALIAN DE KASI	GPS TALIAN DE KASI	Post Already Occupied
90	346	FARIDA BANO	GGPS JALOO	GGPS JALOO	Post Already Occupied
91	347	Safeena Begum	GGPS GARLAT PAYEEN	GGPS GARLAT PAYEEN	Post Already Occupied
92	348	FATMAT SULTANA	GGPS NOGAZI	GGPS NOGAZI	Post Already Occupied
93	350	Nighat Shaheen	GGPS Khabal Bala	GGPS Khat al Bala	Post Already Occupied
94	351	HAFIZA BIBI	GGPS CHARIAN	GGPS CHARIAN	Post Already Occupied
95	356	ZAKIA JABIN	GGPS KHAWAJGAN	GGPS KHAWAJGAN	Post Already Occupied
96	364	Rukhsma Bibi	GGPS PATLANG	GGPS PATLANG	Post Already Occupied
97	365	FARKHND A BEGUM	GGPS PORE	GGPS PORE	Post Already Occupied
98	375	Bibi Hamida	GGPS Lohar Banda Koli	GGPS Lohar Banda Koli	Post Already Occupied
99	386	IMTIAZ BEGUM	GGPS CHANJA	GGPS CHANJA	Post Already Occupied
100	388	GUL NASREEN	GGPS KUND DEEDIL	GGPS KUND DEEDIL	Post Already Occupied
101	391	NUZHAT JABIN	GGPS MANAWAL	GGPS MANAWAL	Post Already Occupied
102	395	YASMEEN BEGUM	GGPS KOT BHALLAH	GGPS KOT BHALLAH	Post Already Occupied
103	400	NIGHAT JABEEN	GGPS BRRAT	GGPS BRRAT	Post Already Occupied
104	402	FATMA TALHAT	GGPS JABBRI	GGPS JABBRI	Post Already Occupied
105	404	ZARIDA PARVEEN	GGPS KANOCH	GGPS KANOCH	Post Already Occupied
106	409	BIBI GULSHAN	GGPS KULHARY GARBI	GGPS KULHARY GARBI	Post Already Occupied
107	411	SHAHANA BIBI	GGPS PHAGLA	GGPS PHAGLA	Post Already Occupied
108	413	DILSHAD ANDLIB	GGPS BOHGER MONG	GGPS BOHGER MONG	Post Already Occupied
109	414	SAIMA SHABNUM	GGPS TANGRI PAYEEN	GGPS TANGRI PAYEEN	Post Already Occupied
110	415	RAANA BEGUM	GGPS TANDA	GGPS TANDA	Post Already Occupied
111	416	BIBI RAZWANA	GGPS SERI NARAL	GGPS SERI NARAL	Post Already Occupied
112	418	SHAMANA NAZ	GGPS MOHAYIAN KHORI	GGPS MOHAYIAN KHORI	Post Already Occupied
113	419	Nazia Gul	GGPS HARI NAKKA	GGPS HARI NAKKA	Post Already Occupied
114	423	SHAHREEN AKHTAR	GGPS CHITTA BAT (S)	GGPS CHITTA BAT (S)	Post Already Occupied
115	427	SHAGUFTA FAROOQ	GGPS BHERKUND NO.2	GGPS BHERKUND NO.2	Post Already Occupied
116	434	SHAHIDA PERVEEN	GGPS HARI MERA	GGPS HARI MERA	Post Already Occupied
117	439	Sabzik Sultana	GGPS Bimbal	GGPS Bimbal	Post Already Occupied
118	441	SYEDA NAZIMA	GGPS CHARAN GADDA	GGPS CHARAN GADDA	Post Already Occupied
119	442	Saeeda Bibi	GGPS Upper K.Ban	GGPS Upper K.Ban	Post Already Occupied
120	447	ABIDA PARWEEN	GGPS MAIRA AMJED ALI	GGPS MAIRA AMJED ALI	Post Already Occupied
121	451	ZAKIA	GGPS CHANDNI	GGPS CHANDNI	Post Already Occupied
122	452	AZIDA BIBI	GGPS MARI SHAH WALI	GGPS MARI SHAH WALI	Post Already Occupied
123	458	SAYEDA SAMINA	GGPS MURAD ABAD	GGPS MURAD ABAD	Post Already Occupied
124	463	NASRINA NAZ	GGPS BAT DHARIAN	GGPS BAT DHARIAN	Post Already Occupied
125	464	BIBI AMINA	GGPS P ATTERSISHA	GGPS P ATTERSISHA	Post Already Occupied
126	465	Samia Bibi	GGPS KASHTRA	GGPS KASHTRA	Post Already Occupied
127	466	Gul Nasreen	GGPS JAREED BELA	GGPS JAREED BELA	Post Already Occupied
128	467	NASREEN AKHTAR	GGPS KARMANG BALA	GGPS KARMANG BALA	Post Already Occupied
129	468	GHAZALA TABBASAM	GGPS JABBA KANI	GGPS JABBA KANI	Post Already Occupied
130	469	NASRA FIRDOOS	GGPS DOODAH KOT	GGPS DOODAH KOT	Post Already Occupied
131	475	Asma Aslam	GGPS PALHATI	GGPS Palhati	Post Already Occupied

*R*  
SDEO (F)  
Manshra

243

132	477	Tahira Bibi	GGPS BELA SUCHA	GGPS BELA SUCHA	Post Already Occupied
133	478	SHAGUFTA ANJIM	GGPS SEHRA GALI	GGPS SEHRA GALI	Post Already Occupied
134	481	BIBI NABEELA	GGPS KAGOOOTH GALI	GGPS KAGOOOTH GALI	Post Already Occupied
135	488	ASIA BIBI	GGPS SAJAWAL SHARIF	GGPS SI SHARIF	Post Already Occupied
136	500	BIBI NAFEESA	GGPS BATTAL PAIN	GGPS Battal Pain	Post Already Occupied
137	502	BUSHRS AMBREEN	GGPS BARAR KOT	GGPS BARAR KOT	Post Already Occupied
138	504	SAEEDA BEGUM	GGPS JULGRAN	GGPS JULGRAN	Post Already Occupied
139	506	ZABIDA KHTOON	GGPS BAJNA	GGPS Bajna	Post Already Occupied
140	507	BIBI GULSHAN	GGPS MERA BABRAL	GGPS MERA BABRAL	Post Already Occupied
141	509	CHAND BIBI	GGPS Sum	GGPS Sum	Post Already Occupied
142	511	ANIQA BANO	GGPS DAB NO.2	GGPS DAB NO.2	Post Already Occupied
143	512	Fakhar Bibi	GGPS Malookra Oghi	GGPS Malookra Oghi	Post Already Occupied
144	514	MUMTAZ FATIMA	GGPS ELAHI MANG	GGPS ELAHI MANG	Post Already Occupied
145	516	GULNAZ AZIZ	GGPS Inyatabad	GGPS Inyalabad	Post Already Occupied
146	517	FARHAT BIBI	GGPS MERA KALAN	GGPS MERA KALAN	Post Already Occupied
147	518	TEHMINA KOUSAR	GGPS DHANGRI	GGPS DHANGRI	Post Already Occupied
148	520	Hussan Nisa	GGPS MALYAR BANDA	GGPS MALYAR BANDA	Post Already Occupied
149	523	DIL SHAD BEGUM	GGPS SERI SUBIDAR	GGPS SERI SUBIDAR	Post Already Occupied
150	524	KOUSER PARVEEN	GGPS KHAN PUR	GGPS KHAN PUR	Post Already Occupied
151	528	JAMEELA AKHTAR	GGPS Davel	GGPS Davel	Post Already Occupied
152	534	Sfina nawaz	GGPS HASSARI	GGPS HASSARI	Post Already Occupied
153	537	Jameela khtoon	GGPS GARLAT BALA	GGPS GARLAT BALA	Post Already Occupied
154	538	NAHIDA BEGUM	GGPS CHATTAR PLAIN	GGPS CHATTAR PLAIN	Post Already Occupied
155	539	KOSIR SULTANA	GGPS DATTA NO.1	GGPS DATTA NO.1	Post Already Occupied
156	544	FARHAT SHAHEEN	GGPS N.S. M.GUL	GGPS N.S. M.GUL	Post Already Occupied
157	546	YASMIN KOSAR	GGPS MURAD PUR	GGPS MURAD PUR	Post Already Occupied
158	550	FOZIA NAHEED	GGPS KHARAR MAIRA	GGPS KHARAR MAIRA	Post Already Occupied
159	556	ROBINA BAGUM	GGPS BHORAJ	GGPS BHORAJ	Post Already Occupied
160	558	Fazina Shaheen	GGPS Maloga	GGPS Maloga	Post Already Occupied
161	563	Kadja BIBI	GGPS DOGAH	GGPS DOGAH	Post Already Occupied
162	568	NASREEN KOSAR	GGPS MALIK PUR	GGPS MALIK PUR	Post Already Occupied
163	569	BIBI KALSOOM	GGPS DANDA KHOLIAN	GGPS DANDA KHOLIAN	Post Already Occupied
164	570	SHAHEENA	GGPS JANDAR BANDA	GGPS JANDAR BANDA	Post Already Occupied
165	573	SHEHNAZ BEGUM	GGPS PHULRA	GGPS PHULFA	Post Already Occupied
166	576	BIBIATIA	GGPS SHANAI BALA	GGPS SHANAI BALA	Post Already Occupied
167	579	BIBI FATIMA	GGPS AGLA GRAN	GGPS AGLA GRAN	Post Already Occupied
168	586	RANI	GGPS SOKAL	GGPS SOKAL	Post Already Occupied
169	590	SHEEBA NAZ	GGPS BEHALI	GGPS BEHALI	Post Already Occupied
170	591	GHAZALA NOREEN	GGPS CHAKIA	GGPS CHAKIA	Post Already Occupied
171	593	SHAGUFTA BEGUM	GGPS TARHA BALA	GGPS TARHA BALA	Post Already Occupied
172	594	RAZIA BIBI	GGPS SOSAL GOWN	GGPS SOSAL GOWN	Post Already Occupied
173	597	FARAH NAZ	GGPS SUCHAN KHURD	GGPS SUCHAN KHURD	Post Already Occupied
174	599	ASMA SULTAN	GGPS KAYAN METHAL	GGPS KAYAN METHAL	Post Already Occupied
175	600	KHALDA BIBI	GGPS BUZBELA	GGPS BUZBELA	Post Already Occupied
176	601	ZAHIDA KHATOON	GGPS NELOOR	GGPS NELOOR	Post Already Occupied
177	603	RIFFAT NIAZ	GGPS SABIR SHAH	GGPS SABIR SHAH	Post Already Occupied
178	608	ZAHIDA BIBI	GGPS DARBAND	GGPS DARBAND	Post Already Occupied
179	609	BIBI SAJIDA	GGPS MUND GRAN	GGPS MUND GRAN	Post Already Occupied
180	610	SAJIDA BIBI	GGPS SUM (PHULRA)	GGPS SUM (PHULRA)	Post Already Occupied
181	612	RIFHAT JABEEN	GGPS BAI BOHAL	GGPS BAI BOHAL	Post Already Occupied
182	613	ABIDA HANAN	GGPS HALLAN	GGPS HALLAN	Post Already Occupied

25

183	617	SAFIA BIBI	GGPS LASSAN NAWAB	GGPS LASSAN NAWAB	Post Already Occupied
184	620	HAJIRA BIBI	GGPS FAZAL ABAD	GGPS FAZAL ABAD	Post Already Occupied
185	631	GUL NAZ ANWAR	GGPS Sadiq Abad	GGPS Sadiq Abad	Post Already Occupied
186	633	SAJIDA HANANA	GGPS LIAS	GGPS LIAS	Post Already Occupied
187	636	ZAHIDA BIBI	GGPS BISSIAN	GGPS BISSIAN	Post Already Occupied
188	641	SADQAT BABI	GGPS G.H.Ullah	GGPS G.H.Ullah	Post Already Occupied
189	644	Gul Nargis	GGPS Arbora	GGPS Arbora	Post Already Occupied
190	648	SAYYIDNAZ ZAIA	GGPS BATTANG	GGPS BATTANG	Post Already Occupied
191	652	Nuzhat Shaheen	GGPS JARED	GGPS JARED	Post Already Occupied
192	653	RIZWANA KANWAL	GGPS AFZAL ABAD	GGPS AFZAL ABAD	Post Already Occupied
193	655	ABIDA BIBI	GGPS REHAR 1/1/75	GGPS REHAR	Post Already Occupied
194	658	Bibi Ambreen	GGPS SANDU SANGAR	GGPS Sandu Sangar	Post Already Occupied
195	659	GUL BHAR begum	GGPS PATSARI	GGPS PATSARI	Post Already Occupied
196	663	MARIYAM	GGPS NARA DOGA	GGPS NARA DOGA	Post Already Occupied
197	664	BIBI SAEEDA	GGPS HARYALA	GGPS HARYALA	Post Already Occupied
198	675	Sughra Bibi	GGPS Malukera Oghi	GGPS Malukera Oghi	Post Already Occupied
199	678	SHAHISTA BANO	GGPS CHITA BATTI	GGPS CHITA BATTI	Post Already Occupied
200	679	Hussan Jan	GGPS BATTAL NARAN	GGPS BATTAL NARAN	Post Already Occupied
201	682	SHAMIM AKHTAR	GGPS MASWAL	GGPS MASWAL	Post Already Occupied
202	687	Sameena Tabbasam	GGPS Nakiya Jareed	GGPS Nakiya Jareed	Post Already Occupied
203	688	Intima bibi	GGPS SUCHAN NADI	GGPS SUCHAN NADI	Post Already Occupied
204	693	Nusart Jabeen	GGPS JABBAR BAGAR	GGPS JABBAR BAGAR	Post Already Occupied
205	694	Muqadis	GGPS FARID ABAD	GGPS FARID ABAD	Post Already Occupied
206	697	FAKHAR BATOOL	GGPS GALI MUGHALAN	GGPS GALI MUGHALAN	Post Already Occupied
207	698	Farzana bibi	GGPS Hastan	GGPS Hastan	Post Already Occupied
208	702	RASHIDA NAHEED	GGPS BALI MANG	GGPS BALI MANG	Post Already Occupied
209	704	FARHAT SULTANA	GGPS DALBANI	GGPS DALBANI	Post Already Occupied
210	707	ZAKIA BIBI	GGPS KHUSHLA	GGPS KHUSHLA	Post Already Occupied
211	708	BIBI ANEELA	GGPS PARHINA N.SHER	GGPS P.N.SHER	Post Already Occupied
212	709	GULSHAN	GGPS BELA BADAN	GGPS BELA BADAN	Post Already Occupied
213	713	MARIYAM SULTAN	GGPS Maira Hajam	GGPS Maira Hajam	Post Already Occupied
214	714	SAJIDA PARVEEN	GGPS MOHAYAN	GGPS MOHAYAN	Post Already Occupied
215	715	SAIQA JABEEN	GGPS CHORE BANDA	GGPS CHORE BANDA	Post Already Occupied
216	716	SAEEDA KHATOON	GGPS LANG SHARIF	GGPS LANG SHARIF	Post Already Occupied
217	718	AZMAT BIBI	GGPS SAND E SAR	GGPS SAND E SAR	Post Already Occupied
218	721	SHAZIA ASLAM	GGPS SHOROLIAN	GGPS SHOROLIAN	Post Already Occupied
219	722	BABI ZAKIA	GGPS SHAMORI CHAM	GGPS SHAMORI CHAM	Post Already Occupied
220	723	RIFFAT SULTANA	GGPS Bara Jadeed	GGPS Bara Jadeed	Post Already Occupied
221	724	BUSHRA LODHI	GGPS DHERI BAGAL	GGPS DHERI BAGAL	Post Already Occupied
222	727	JAMILA BEGUM	GGPS SARAIN	GGPS SARAIN	Post Already Occupied
223	728	BIBI RAFIA	GGPS TARIHIDA	GGPS TARIHIDA	Post Already Occupied
224	731	ASIA NAZ	GGPS GUL DHERI	GGPS GUL DHERI	Post Already Occupied
225	736	Kousar	GGPS Berchar	GGPS Berchar	Post Already Occupied
226	738	NASREEN AKHTER	GGPS GALI BADRAL	GGPS GALI BADRAL	Post Already Occupied
227	740	MEHNAZ FATIMA	GGPS CHUM BAKKI	GGPS CHUM BAKKI	Post Already Occupied
228	741	KOUSAR SHAHEEN	GGPS CHITTI DHERI	GGPS CHITTI DHERI	Post Already Occupied
229	742	Hushmat Begum	GGPS Chounlian Paras	GGPS Choun Paras	Post Already Occupied
230	748	BIBI ZUHRA	GGPS LASSA NAMBAL	GGPS LASSA NAMBAL	Post Already Occupied
231	752	NADIA SULTAN	GGPS SHAHLIA	GGPS SHAHLIA	Post Already Occupied
232	753	Zahida Rehman	GGPS HASSA	GGPS HASSA	Post Already Occupied

RSDEO (F)  
Mans...

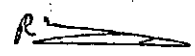
3  
26

233	754	Tehzeem Akhtar	GGPS BATSANGRA	GGPS BATSANGRA	Post Already Occupied
234	755	Nazneen Bano	GGPS Ahi Seri	GGPS Chanaki	Post Already Occupied
235	756	Nausheen Tabassam	GGPS Trawara	GGPS Trawara	Post Already Occupied
236	757	BIBI NASREEN	GGPS HADOBANDI (MC)	GGPS HADOBANDI	Post Already Occupied
237	761	DILSHAD AKHTAR	GGPS KUND TARLA	GGPS KUND TARLA	Post Already Occupied
238	769	TANVEER AKHTAR	GGPS Ghazoo	GGPS Ghazoo	Post Already Occupied
239	772	NIGHAT PARVEEN	GGPS PUNJO	GGPS PUNJO	Post Already Occupied
240	784	SHAKILA BIBI	GGPS Traoda Baffa	GGPS Traoda Baffa	Post Already Occupied
241	790	Zakia Begum	GGPS JAGIR	GGPS JAGIR	Post Already Occupied
242	792	TASLEEM AKHTAR	GGPS JHANGI	GGPS JHANGI	Post Already Occupied
243	793	Hajra	GGPS Balian	GGPS Balian	Post Already Occupied
244	794	RASHDA BIBI	GGPS DOKANI	GGPS DOKANI	Post Already Occupied
245	798	SHAKEELA HABIB	GGPS BAIDRA	GGPS BAIDRA	Post Already Occupied
246	805	SAFIA BANO	GGPS TARHA PAYEEN 2	GGPS TARHA PAYEEN 2	Post Already Occupied
247	807	ZUBADA KHATOON	GGPS ATTER SHISHA	GGPS ATTER SHISHA	Post Already Occupied
248	819	SHAGUFTA BANO	GGPS Sehki Bala	GGPS Sehki Bala	Post Already Occupied
249	821	KHADIJA SHEIKH	GGPS DANAKA SHARIF	GGPS DANAKA SHARIF	Post Already Occupied
250	823	NAHEED BIBI	GGPS SHER GARH	GGPS SHER GARH	Post Already Occupied
251	829	SHAHNAZ	GGPS PHUL KOT	GGPS PHUL KOT	Post Already Occupied
252	830	NAILA PARVEEN	GGPS POTTA	GGPS POTTA	Post Already Occupied
253	831	BIBI IRSHAD	GGPS LASSA NAMBAL	GGPS LASSA NAMBAL	Post Already Occupied
254	833	SAJIDA FAREED	GGPS CHANDOOR	GGPS CHANDOOR	Post Already Occupied
255	834	GULSHAN	GGPS PUNJO	GGPS PUNJO	Post Already Occupied
256	835	HAMIDA	GGPS PANGORI	GGPS PANGORI	Post Already Occupied
257	836	Gul Naz Begum	GGPS BUTTAKUNDI	GGPS BUTTAKUNDI	Post Already Occupied
258	840	GULSHAN ZUBEDA	GGPS BATORA	GGPS BATORA	Post Already Occupied
259	841	GUL YASMEEN	GGPS DHAMAN DHERI	GGPS DHAMAN DHERI	Post Already Occupied
260	842	BIBI SHAHIDA	GGPS MISKEEN ABAD	Miskeen Abad	Post Already Occupied
261	854	ATTIA BANO	GGPS Janda	GGPS Janda	Post Already Occupied
262	859	SHABNAM	GGPS NARI BATTANG	GGPS NARI BATTANG	Post Already Occupied
263	862	FARZANA PARVEEN	GGPS BAGAL CHAR	GGPS BAGAL CHAR	Post Already Occupied
264	864	Musrrat Shaheen	GGPS SUNGER SARIAN	GGPS SUNGER SARIAN	Post Already Occupied
265	868	BIBI NAEEMA	GGPS SHAHKOT SAWAN MERA	GGPS SHAHKOT S/M	Post Already Occupied
266	870	ASYA BIBI	GGPS BAI BAJNA	GGPS BAI BAJNA	Post Already Occupied
267	873	TASNEEM BIBI	GGPS SINGALPOIN	GGPS SINGALPOIN	Post Already Occupied
268	874	SABIHA BIBI	GGPS BATHU BANDI	GGPS BATHU BANDI	Post Already Occupied
269	877	NABEELA FIRDOS	GGPS DANNA	GGPS DANNA	Post Already Occupied
270	881	ABIDA BIBI	GGPS Arab Khun	GGPS Arab Khun	Post Already Occupied
271	884	RUQIA begum	GGPS KARORI PAYEEN	GGPS KARORI PAYEEN	Post Already Occupied
272	887	SAFFIA NAZ	GGPS KORAY	GGPS KORAY	Post Already Occupied
273	892	Hamida Begum	GGPS Mohandri	GGPS Mohandri	Post Already Occupied
274	894	SOBIA TAJ	GGPS TATAR BALA	GGPS TATAR BALA	Post Already Occupied
275	895	SHAHEEN BEGUM	GGPS BAKKI	GGPS BAKKI	Post Already Occupied
276	898	SHAHMIM AKHTER	GGPS BANDA B. JENGAN	GGPS B/Bela JENGAN	Post Already Occupied
277	902	NAHEED BIBI	GGPS KARKA SYEDAN	GGPS KARKA SYEDAN	Post Already Occupied
278	903	Bibi Sajida	GGPS PATAKA	GGPS PATAKA	Post Already Occupied
279	905	KAUSER YASMEEN	GGPS CHAKLI PANSIAL	GGPS CHAKLI PANSIAL	Post Already Occupied
280	906	SUMAIRA ZAHEER	GGPS SHAH K.GHARI	GGPS SHAH K.GHARI	Post Already Occupied

R  
S/DEC (F)

27

281	909	GUL FIRDOS	GGPS GIAR SUCHA	GGPS GIAR SUCHA	Post Already Occupied
282	911	TASNEEM KOUSAR	GGPS Reerh	GGPS Reerh	Post Already Occupied
283	912	FOZIA BANO	GGPS KHARRI	GGPS KHARRI	Post Already Occupied
284	913	NOREEN BIBI	GGPS DASTAN	GGPS DASTAN	Post Already Occupied
285	915	Saeeda bibi	GGPS Dara Shohal	GGPS Dara Shohal	Post Already Occupied
286	917	SHAHIDA PARVEEN	GGPS KARER	GGPS KARER	Post Already Occupied
287	918	SABRA BIBI	GGPS JATIAN	GGPS JATIAN	Post Already Occupied
288	919	KOSAR BIBI	GGPS DADAR	GGPS DADAR	Post Already Occupied
289	920	SULTANA BANO	GGPS KALAS RACHARI	GGPS KALAS RACHARI	Post Already Occupied
290	923	SAIMA NOREEN	GGPS KANOG	GGPS KANOG	Post Already Occupied
291	924	Husan Bibi	GGPS Shahkote Lassan	GGPS Shahkot Lassan	Post Already Occupied
292	925	UZMA SULTAN	GGPS DABBAR KATHA	GGPS DABBAR KATHA	Post Already Occupied
293	928	MEMOONA BIBI	GGPS BANDI SHINKIAL	GGPS BANDI SHINKIAL	Post Already Occupied
294	931	MAKHANI JAN	GGPS KHAND GARAN	GGPS KHAND GARAN	Post Already Occupied
295	932	Zahida bibi	GGPS TALHATTA	GGPS TALHATTA	Post Already Occupied
296	934	Farzana Quddos	GGPS PAPRANG	GGPS PAPRANG	Post Already Occupied
297	939	Shukria Muddsar	GGPS BEGHRA	GGPS BEGHRA	Post Already Occupied
298	940	Chan Mehraj	GGPS BAN	GGPS BAN	Post Already Occupied
299	941	Hamida Maskeen	GGPS Malukera	GGPS Malukera	Post Already Occupied
300	942	GHAZALA FARAZ	GGPS Tumbah	GGPS Tumbah	Post Already Occupied
301	944	RASIDA BAGAM	GGPS BATRAIR	GGPS BATRAIR	Post Already Occupied
302	946	SHAZIA NARGIS	GGPS MATSASRIAN	GGPS MATSASRIAN	Post Already Occupied
303	948	Irum Shakeel	GGPS KAMAL BAN	GGPS KAMAL BAN	Post Already Occupied
304	949	SHAMZA	GGPS DHARYAL	GGPS DHARYAL	Post Already Occupied
305	951	SALMA BIBI	GGPS NARBEER	GGPS NARBEER	Post Already Occupied
306	952	Shamaila Altaf	GGPS RAJWAL	GGPS RAJWAL	Post Already Occupied
307	954	SHAFIQA BIBI	GGPS MATHERA JALGALI	GGPS M/JALGALI	Post Already Occupied
308	955	ROBINA ILAHI	GGPS CHITTI MOHRI	GGPS CHITTI MOHRI	Post Already Occupied
309	956	SHAGUFTA DAWOOD	GGPS SERIGORIA	GGPS SERIGORIA	Post Already Occupied
310	965	GUL JAMILA	GGPS Baffa Battagram	GGPS Baffa Battagram	Post Already Occupied
311	969	KHATAM NISA	GGPS BAGWAI	GGPS BAGWAI	Post Already Occupied
312	972	PHOOL BIBI	GGPS BASUND	GGPS BASUND	Post Already Occupied
313	974	Jamila Khatoon	GGPS DARA NIKA PANI	GGPS DARA NIKA PANI	Post Already Occupied
314	976	Mehr Nisa	GGPS T/GHANOOL	GGPS T/GHANOOL	Post Already Occupied
315	979	SHAHISTA GUL	GGPS GARHALA	GGPS GARHALA	Post Already Occupied
316	980	BIBI GULSHAN	GGPS SINGAL KOTE	GGPS SINGAL KOTE	Post Already Occupied
317	984	Irum Saeed	GGPS DABRIAN	GGPS DABRIAN	Post Already Occupied
318	996	SHAKEELA BIBI	GGPS M.M. shah	GGPS M.M. shah	Post Already Occupied
319	1002	Nusrat Jabeen	GGPS Garian	GGPS Garian	Post Already Occupied
320	1003	BIBI NASEEM	GGPS GALI NAMSHERA	GGPS GALI NAMSHERA	Post Already Occupied
321	1006	BIBI SAMINA	GGPS BAQRIAN	GGPS BAQRIAN	Post Already Occupied
322	1013	GUL RUKHSNA	GGPS SHAHKOTE potha	GGPS S/k potha	Post Already Occupied
323	1019	SHAGUFTA BAGAM	GGPS NAMBLIAN	GGPS NAMBLIAN	Post Already Occupied
324	1020	BIBI TAHIRA	GGPS JINKARI	GGPS JINKARI	Post Already Occupied
325	1025	SAIMA BIBI	GGPS MANGWAL	GGPS MANGWAL	Post Already Occupied
326	1026	ABIDA NOREEN	GGPS ORISH	GGPS ORISH	Post Already Occupied
327	1029	SOBIA BIBI	GGPS PALOI	GGPS PALOI	Post Already Occupied
328	1041	NAZNEEN GUL	GGPS BELLA MUTRAIN	GGPS BELLA MUTRAIN	Post Already Occupied

  
SDEO (F)  
Manselra.

28

329	1043	SARWAT NAHEED	GGPS KANDER	GGPS KANDER	Post Already Occupied
330	1045	SHUBNAM BIBI	GGPS KANSHIAN BALA	GGPS KANSHIAN BALA	Post Already Occupied
331	1053	SAJIDA BIBI	GGPS JISGRAN BALA	GGPS JISGRAN BALA	Post Already Occupied
332	1056	Bibi Gul Nargis	GGPS Dohran	GGPS Dohran	Post Already Occupied
333	1058	NUSRAT BEGUM	GGPS SULAN BANDI	GGPS SULAN BANDI	Post Already Occupied
334	1060	ALIA SARFARAZ	GGPS SACHAN KALAN	GGPS SACHAN KALAN	Post Already Occupied
335	1064	Bibi Zainab	GGPS GUL MERA	GGPS GUL MERA	Post Already Occupied
336	1071	AZMAT BIBI	GGPS SAMIAN	GGPS SAMIAN	Post Already Occupied
337	1076	BIBI YASMEEN	GGPS SANJIAR KAWAI	GGPS SANJIAR KAWAI	Post Already Occupied
338	1078	Nazia Begum	GGPS SERI RAJWAL	GGPS SERI RAJWAL	Post Already Occupied
339	1082	Robina Gul	GGPS Poran	GGPS Poran	Post Already Occupied
340	1084	Aisha Sadiqa	GGPS MONG	GGPS MONG	Post Already Occupied
341	1086	Gulnama	GGPS SARI BANDI	GGPS SARI BANDI	Post Already Occupied
342	1087	MUNAWAR SULTAN	GGPS BEERIAN	GGPS BEERIAN	Post Already Occupied
343	1088	SARA BIBI	GGPS PLUDRAN	GGPS PLUDRAN	Post Already Occupied
344	1090	Nusart Parveen	GGPS GHANOOL	GGPS GHANOOL	Post Already Occupied
345	1091	Bibi Zulfaqr	GGPS Jalora Sydan	GGPS Jalora Sydan	Post Already Occupied
346	1092	SAIMA TABASSAM	GGPS TATAR SYEDAN	GGPS TATAR SYEDAN	Post Already Occupied
347	1093	SHAISTA IQBAL	GGPS CHITTI GALI	GGPS CHITTI GALI	Post Already Occupied
348	1094	BIBI SAMIA	GGPS LUNDA	GGPS LUNDA	Post Already Occupied
349	1097	ABIDA JABEEN	GGPS KEHNIAN NO.1	GGPS KEHNIAN NO.1	Post Already Occupied
350	1098	NIGHAT BIBI	GGPS PHUL KARI	GGPS PHUL KARI	Post Already Occupied
351	1100	SHIREEN GUL	GGPS BADROCHA	GGPS BADROCHA	Post Already Occupied
352	1101	Nusart Bibi	GGPS PARAS BARI	GGPS PARAS BARI	Post Already Occupied
353	1103	SHAHIDA BAGAM	GGPS BALAG PAYEEN	GGPS BALAG PAYEEN	Post Already Occupied
354	1105	Rafal Mahmood	GGPS PUTAN DAS	GGPS PUTAN DAS	Post Already Occupied
355	1107	Tasleem Akthar	GGPS SERI MANOOR	GGPS SERI MANOOR	Post Already Occupied
356	1108	RASHA IQBAL	GGPS Lower K.Dobandi	GGPS Lower K.Dobandi	Post Already Occupied
357	1118	NIGHAT SHAHEEN	GGPS AHL SERI	GGPS AHL SERI	Post Already Occupied
358	1122	GHAZALA BIBI	GGPS TIMBER KHOLA	GGPS TIMBER KHOLA	Post Already Occupied
359	1125	FARZANA	GGPS CHELA BAGH	GGPS CHELA BAGH	Post Already Occupied
360	1126	SHAZIA BIBI	GGPS KOTTELY S/ ABAD	GGPS K/ S/ ABAD	Post Already Occupied
361	1129	IRRAM KALSOOM	GGPS BEER DIAR	GGPS BEER DIAR	Post Already Occupied
362	1131	BIBI MARJAN	GGPS TARARI	GGPS TARARI	Post Already Occupied
363	1142	Samina bibi	GGPS SANGAR	GGPS SANGAR	Post Already Occupied
364	1145	SAJIDA RANI	GGPS BATWAI	GGPS BATWAI	Post Already Occupied
365	1146	SHAHIDA MUNIRA	GGPS BANSIAN	GGPS BANSIAN	Post Already Occupied
366	1151	Yasmeen Humayun	GGPS Phagal	GGPS Phagal	Post Already Occupied
367	1152	AQEELA BB	GGPS JISGRAN PAIN	GGPS JISGRAN PAIN	Post Already Occupied
368	1156	SAIRA BIBI	GGPS GOREE	GGPS GOREE	Post Already Occupied
369	1157	GUL ANWAR	GGPS TONOWA KHANAN	GGPS T/KHANAN	Post Already Occupied
370	1161	NAHEED BIBI	GGPS THANDA	GGPS THANDA	Post Already Occupied
371	1163	SAIRA JABEEN	GGPS JALGALI	GGPS JALGALI	Post Already Occupied
372	1175	Tanveer wali	GGPS BARKOTE	GGPS BARKOTE	Post Already Occupied
373	1177	SAJIDA	GGPS NARMAN	GGPS NARMAN	Post Already Occupied
374	1180	SOBIA RIAZ	GGPS Khabel Mohri	GGPS Khabel Mohri	Post Already Occupied
375	1182	SAMINA BAGUM	GGPS TRARI	GGPS TRARI	Post Already Occupied
376	1187	BIBI MAJIDA	GGPS MEHMOODA	GGPS MEHMOODA	Post Already Occupied
377	1193	SAIMA BIBI	GGPS Basoo M.gucha	GGPS Basoo M.gucha	Post Already Occupied
378	1194	Abida Jaheen	GGPS DARSARI NARAN	GGPS DARSARI NARAN	Post Already Occupied

R  
 SDE/TF



(29)

379	1195	SOFIA	GGPS BELA BADAN	GGPS BELA BADAN	Post Already Occupied
380	1197	SALMA KANWAL	GGPS KAYAN	GGPS KAYAN	Post Already Occupied
381	1198	Mahida rehman	GGPS KAGAL	GGPS KAGAL	Post Already Occupied
382	1199	NADIA RAFEEQ	GGPS LUND KUND	GGPS LUND KUND	Post Already Occupied
383	1208	Nasreen Bibi	GGPS DONG DOGIAN	GGPS DONG DOGIAN	Post Already Occupied
384	1209	Yasmin Akhtar	GGPS Katha Dobandi	GGPS Katha Dobandi	Post Already Occupied
385	78	Shahzadi	GGPS Shamdhra	GGPS Shamdhra	Post Already Occupied
386	1159	Afshan Malik	GGPS Bankot	GGPS Bankot	Post Already Occupied

**The Teacher Adjusted in the Same Union Council being 2nd Senior**

SNO	Sty.No	Teachers Name	Name of School	Adjusted at	Remarks 1	Remarks 2
1	424	JAVERIA RAZA	GGPS CHARIA	Charr	Adjusted in the Same U/C.	Ag: B-15 Newly Created Post.
2	1077	Sabeeha Bibi	GGPS PAPRANG	Baida Ghanool	Adjusted in the Same U/C.	Vice Safeena bib B-12
3	901	MUSARAT SHEEN	GGPS ICHRIAN	Ramshera	Adjusted in the Same U/C.	Vice Sajida bibi B-12
4	228	MUMTAZ BEGUM	GGPS BALAKOT	Bilyani	Adjusted in the Same U/C.	Vice Rugia B-12
5	541	MOMENA GUL	GGPS JABBA	Goather	Adjusted in the Same U/C.	Vice Khalid B-12
6	930	KOSAR KHATUN	GGPS PHULRA	Khalqa Maira	Adjusted in the Same U/C.	Vice Abida Shaheen B-12
7	1113	KISHWAR SULTANA	GGPS CHINAR KOT	Chapra Payeen	Adjusted in the Same U/C.	Vice Saima B-14
8	1048	NAHEED AKHTER	GGPS MOHAYIAN KHORI	Kothra top Naka	Adjusted in the Same U/C.	Vice Nuzhat B-12
9	301	KANEEZ FATIMA	GGP PANJOL	Harian Panjol	Adjusted in the Same U/C.	Vice Rugia B-12
10	660	NASERA BEGUM	GGPS KASHTRA	Sudghar	Adjusted in the Same U/C.	Vice Shakeela B-12
11	1207	IMRANA REHMAN	GGPS DATTA NO 1	Dongala	Adjusted in the Same U/C.	Vice Tahira B-12
12	1123	IFFAT SHAHEEN	GGPS BATTANG	Bajmohri	Adjusted in the Same U/C.	Vice Gul Jabeen B-12
13	366	HUSSAN NISA	GGPS KARMANG BALA	Karmang Pain	Adjusted in the Same U/C.	Vice Marium bibi B-14
14		Hamida Miskeen	GGPS Malookra Oghi	GGPS Shahkote Oghi	Adjusted in the Same U/C.	vice Chan bibi B-12
15	705	GULNAZ	GGPS CHATTAR PLAIN	Sharkool	Adjusted in the Same U/C.	Vice Shughfta Bibi B-14
16	92	Gul Feroza	GGPS Poran	Kaghan	Adjusted in the Same U/C.	Vice Shaneela Bibi B-12
17	1162	KANEZ ZOHRA	GGPS JALOO	Lalo Bandi	Adjusted in the Same U/C.	Vice Nazma B-12
18	875	NUSRAT JAVEED	GGPS MUNGAN	Seri Baila	Adjusted in the Same U/C.	Vice Nazia Bashir B-14
19	629	ROQAYA BIBI	GGPS BAI BOHAL	Mundi Hoter	Adjusted in the Same U/C.	Vice Nosheen Akhtar B-12
20	1036	ROBINA BIBI	GGPS ORISH	Kholian	Adjusted in the Same U/C.	Against V/Post
21	838	Rafia Bibi	GGPS GARA KAWAI	Shangran	Adjusted in the Same U/C.	Vice Shaheen B-12
22		Raesa bibi	GGPS Bhogermong	Granthali	Adjusted in the Same U/C.	Vice Nadia Miskeen B-12

R  
SDEO (F)  
Manshra.



30

23	680	Rabia Bibi	GGPS Malukera oghi	Seri Arobora	Adjusted in the Same U/C.	Vice Majbees Mam B-14
24	1144	RABIA BIBI	GGPS LUNDA	Sarwai	Adjusted in the Same U/C.	Against V/Pos
25	743	NAGEENA BIBI	GGPS MUNGAN	Hado Bandi char	Adjusted in the Same U/C.	Vice bibi Tahira B-12
26	1096	NUZHAT SATAR	GGPS GIAR SUCHA	Kari Khanan	Adjusted in the Same U/C.	Against V/Post
27	1062	FARZANA HAROON	GGPS SACHAN KALAN	Kalas Nawaz Abad	Adjusted in the Same U/C.	Vice Salma B-1
28	431	NIGHAT SHAHEEN	GGPS CHARYAN	Harori Pain	Adjusted in the Same U/C.	Vice Shahida Parveen B-14
29	867	Nazneen	GGPS Oghi	Bandi Sadiq	Adjusted in the Same U/C.	Vice Nargis B-1
30	615	NAZIA NOREEN	GGPS PAKONA	Gujran	Adjusted in the Same U/C.	Vice Nusrat Parveen B-14
31	908	NAZIA BIBI	GGPS DATTA NO.1	Data No.2	Adjusted in the Same U/C.	Vice Sher Bano B-12
32	1044	NAZIA	GGPS KARER	Jamal Nakka	Adjusted in the Same U/C.	Vice Sher Bano B-12
33	412	Nasim Akhtar	GGPS BHANGIAN	Kara	Adjusted in the Same U/C.	Vice Safeela bib B-12
34	822	PARVEEN AKHTAR	GGPS BATTAL PAIN	Kund K/Muhamad	Adjusted in the Same U/C.	Vice Shughfta B-12
35	891	ALJAZBA NAZAR	GGPS MALIK PUR	Sherpur	Adjusted in the Same U/C.	Vice Nahida Bibi B-12
36	1012	BIBI GUL	GGPS CHUM BAKKI	Jacha	Adjusted in the Same U/C.	Against V/Post
37	1061	BIBI FARZANA	GGPS GALI BADRAL	Perchian	Adjusted in the Same U/C.	Vice Bibi Fozia B-12
38	1027	BIBI FARHAT	GGPS KHAN PUR	Juber Sum	Adjusted in the Same U/C.	Vice Nahid Akhtar B-12
39	696	BIBI BASHEER - UN-NIS	GGPS PEER SAHABA	Chora Behali	Adjusted in the Same U/C.	Vice Noreen bibi B-12
40	1184	BB AQLEEMA	GGPS MANGLOOR	Kothra Sydan	Adjusted in the Same U/C.	Vice Salra Bibi B-12
41	858	ASMAT BIBI	GGPS SUM (PHULRA)	Karan	Adjusted in the Same U/C.	Vice Ishrat Malik B-12
42	1099	FOZIA PARVEEN	GGPS DAWAL	Chakli Badroi	Adjusted in the Same U/C.	Vice shazia B-14
43	1007	Amara Younis	GGPS Khabal Bala	Khabel Pain	Adjusted in the Same U/C.	Vice Shafia Aslam B-12
44	295	Bibi Kosar	GGPS DOGAH	Lower bhuraj	Adjusted in the Same U/C.	Vice Shaista Rani B-14
45	1117	AISHA TAHSEEN	GGPS Koray	Jagori	Adjusted in the Same U/C.	Vice Tahira B-12
46	651	ABIDA BIBI	GGPS REHAR	Rattian	Adjusted in the Same U/C.	Vice Rashda B-12
47	86	ABIDA BIBI	GGPS MAIRA JIA	Haklay	Adjusted in the Same U/C.	Vice Saira B-12
48	654	ABIDA BIBI	GGPS BASALA	Chountry	Adjusted in the Same U/C.	Against V/Post
49	521	Tahira Jabeen	GGPS Oghi	Kote N. Abad	Adjusted in the Same U/C.	Vice Arjmand Sultana B-14

SDEO (F)  
Manshra

3.15

50	345	Tahira Gohar	GGPS Oghi	Batang	Adjusted in the Same U/C.	Vice Ikhraj B-1
51	1149	AMBREEN	GGPS CHATTAR PLAIN	Nakholi	Adjusted in the Same U/C.	Vice Phol Sakt B-14
52	686	Bibi Yasmeen	GGPS SUCHAN NADI	Dana Ganala	Adjusted in the Same U/C.	Vice Marium B-12
53	598	NAZIMA BIBI	GGPS Jabbori	Banda Geesach	Adjusted in the Same U/C.	Vice Rehana B-12
54	401	FARKHANDA JABEEN	GGPS GIRWAL	Shatay	Adjusted in the Same U/C.	Vice Shamim B-14
55	1008	FARHAT NAZ	GGPS MALIK PUR	Shanai Tarli	Adjusted in the Same U/C.	Vice Rifat Rabana B-12
56	1139	FARIANA GUL	GGPS BEER DIAR	Jaman Mohri	Adjusted in the Same U/C.	Vice Shaheen B-12
57	362	DISHAD BEGUM	GGCMS FAQIR A/TAJAL	GGPS.Sokar	Adjusted in the Same U/C.	Vice Samina Talhat B-12
58	852	DILSHAD BEGUM	GGCMS FAQIR ABAD TAJAL	Nari	Adjusted in the Same U/C.	Vice Shahnaz B-14
59	890	Bibi Jabeen	GGPS PAMBAL	Naran	Adjusted in the Same U/C.	Vice Kinza B-1
60	916	BUSHRA BIBI	GGPS NAMBAL	Karori Bala	Adjusted in the Same U/C.	Vice Zakia Khawaj B-14
61	1192	BIBI KHALIDA	GGPS OGRA	Jandran	Adjusted in the Same U/C.	Vice Saeeda Begum B-12
62	480	Bibi shanaz	GGPS NANOHA KHURD	GGPS Tali sydan	Adjusted in the Same U/C.	Vice Fehmida B-12
63	1132	Bibi Shaheen	GGPS KAMAL BAN	Khanian	Adjusted in the Same U/C.	Vice Bibi sughr B-12
64	1066	BIBI SHABANA	GGPS Katha Dobandi	Dheri Showai	Adjusted in the Same U/C.	Vice Farah Naz B-12
65	876	BIBI NUSRAT	GGPS CHARIAN	Harori Bala	Adjusted in the Same U/C.	Vice Ishrat B-14
66	1154	BIBI NASREEN	GGPS DANDA KHOLIAN	Malhar	Adjusted in the Same U/C.	Against V/Post
67	223	BIBI NAEEMA	GGPS BHER KUND NO.1	Kachi	Adjusted in the Same U/C.	Vice Saima Noreen B-12
68	800	Fazeelat Bibi	GGPS Malukera oghi	Dhara	Adjusted in the Same U/C.	Vice Saira Bibi B-12
69	1068	CHAN BIBI	GGPS KARORI PAYEEN	Chanian Karori	Adjusted in the Same U/C.	Vice Shamim bit B-12
70	656	SHAZIA BIBI	GGPS BEHALI	Charach	Adjusted in the Same U/C.	Vice Shareen Bibi B-12
71	856	SURIA AZIZ	GGPS Miskeen Abad	Mari Safdar shah	Adjusted in the Same U/C.	Vice Abida Imra B-12
72	1210	SHAMS UN NISA	GGPS KORAY	Bulkhoi	Adjusted in the Same U/C.	Vice Bushra Sarfaraz B-14
73	384	SAMINA AFZAL	GGPS PANO DHERI NO.1	Pano Dheri 2	Adjusted in the Same U/C.	Against B-15 N/C/Post.
74	1179	SHAMA NAZ	GGPS HALLAN	Sharota	Adjusted in the Same U/C.	Against V/Post
75	1052	SAMINA YOUSAF	GGPS MANAWAL	Kehanian Phulra	Adjusted in the Same U/C.	Vice Nazia Rehman B-14
76	1168	SHAZIA BIBI	GGPS MORBAFFA KALAN	Bandi Mur Baffa	Adjusted in the Same U/C.	Vice Rizwana Mushtaq B-12

(32)

77	957	SHABNAM QAYUM	GGPS BAI BAJNA	Namshera Miangan	Adjusted in the Same U/C.	Vice Anees Ayub B-14
78	1119	Shazia Bibi	GGPS Garian	Kalas Ganala	Adjusted in the Same U/C.	Vice Safeena B-14
79	190	SAMINA	GGPS BAJNA	Bajna Maira	Adjusted in the Same U/C.	Vice Saira Sadam B-12
80	937	SHAGUFTA AZIZ	GGPS BAI DRA	Bandian Baidra	Adjusted in the Same U/C.	Vice Jamila Khatoon B-12
81	1114	SOBIA RUSTAM	GGPS MERA KALAN	Chansar	Adjusted in the Same U/C.	Vice Musarat B-12
82	437	SHAGUFTA BEGUM	GGPS CHARIA	Lalan Da Dara	Adjusted in the Same U/C.	Vice Bibi Shaheen B-14
83	185	SHAHEEN AKHTER	GGPS GULI BAGH	Tanawal Banda	Adjusted in the Same U/C.	Vice Sabeha B-12
84	1110	Shahida Begum	GGPS Jalora Sydan	Reen	Adjusted in the Same U/C.	Vice Tasleem Kosar B-12
85	938	SHAZIA ANJUM	GGPS JALOO	M.B.Khurd	Adjusted in the Same U/C.	Vice Tahira Jabeen B-12
86	882	SHAUKIA PARVEEN	GGPS DAWAL	Shanya bala	Adjusted in the Same U/C.	Vice Robina B-12
87	1135	Shasta Saddqi	GGPS JAREED BELA	Katha, B/ Jareed	Adjusted in the Same U/C.	Vice sobia Jabeen B-14
88	640	SHAHNAZ	GGPS Shinkiari No.1	Jhandwal	Adjusted in the Same U/C.	Against V/Post
89	567	SHAHNAZ BEGUM	GGPS ICHRIAN	Kotli Bala	Adjusted in the Same U/C.	Vice Nusrat B-12
90	1042	SADAF BIBI	GGPS BALAKOT	Bela Baggar	Adjusted in the Same U/C.	Vice Tayaba Bibi B-12
91	1069	SHAFQAT NAHEED	GGPS JALOO	Gujran Jaloo	Adjusted in the Same U/C.	Vice Nasim Kosar B-12
92	482	SAJIDA BAGUM	GGPS BATDEHRIAN	Rata Bana	Adjusted in the Same U/C.	Vice Naila Bibi B-12
93	799	Zeenat Bibi	GGPS Oghi	Rasheeda Oghi	Adjusted in the Same U/C.	Vice Sajida Ghani B-12
94	825	ZAKIA BIBI	GGPS PHULRA	Bandi Maira	Adjusted in the Same U/C.	Vice Gulnaz B-12
95	1165	SAEEDA BIBI	GGPS BAQRIAN	Pairan	Adjusted in the Same U/C.	Vice Nazia Bibi B-12
96	645	Zahida Parveen	GGPS Ghazikote	Bujia	Adjusted in the Same U/C.	Vice Saima Rani B-12
97	818	ZAHIDA PARVEEN	GGCMS ZAFAR ABAD	Kote	Adjusted in the Same U/C.	Vice Nelofore B-12
98	720	SAFOORA BIBI	GGPS BAI BALA BATTAL	Shakoora	Adjusted in the Same U/C.	Vice Sanum B-12
99	1037	SAIMA NOREEN	GGPS Khanpur	Timbri Baing	Adjusted in the Same U/C.	Vice Sitara Jabeen B-12
100	973	SAIMA NOUREEN	GGPS KHARAR MAIRA	Lambi Dheri	Adjusted in the Same U/C.	Vice Shahgul B-12
101	1024	SAIMA SUBHAN	GGPS ICRIAN	Ahi	Adjusted in the Same U/C.	Vice Nasim Akhtar B-12
102	438	ZAHIDA NASEEM	GGPS DANDA KHOLIAN	Salabut	Adjusted in the Same U/C.	Vice Nargis B-12

R.  
 (SIGNED BY)  
 Mansab

(33)

103	871	SOBIA BIBI	GGPS PARHINA NAWA-SHER	Darwaish	Adjusted in the Same U/C.	Vice Tahira B-1
104	336	YASMEEN FAZA ELAHI	GGPS BHORAJ	Maddan	Adjusted in the Same U/C.	Vice Rukhsand Jabeen B-14
105	1155	SYEDA NAEIDA BIBI	GGPS SHAHKOT S/ MERA	Bela Trappi	Adjusted in the Same U/C.	Vice Huma Khurshid B-12
106	476	UZAMA Naveed	GGPS BALAKOT	Khait Sarach	Adjusted in the Same U/C.	Vice Bibi Aqeel B-12
107	869	Sajida Hanan	GGPS LIAS	Jaba Ilyas	Adjusted in the Same U/C.	Vice Yasmeen I 14
108	695	Salma	GGPS SANDU SANGAR	Josacha	Adjusted in the Same U/C.	Vice Shughfta Eibi B-14
109	886	Tahira Bibi	GGPS SUNGER SARIAN	Loorn	Adjusted in the Same U/C.	Vice Musrat Nis B-14
110	492	TALHAT YASMEEN	GGPS NARRAH	Tangri	Adjusted in the Same U/C.	Vice Naila Gul B 14
111	280	YASMEEN USMAN	GGPS MUNGAN	Baqrial	Adjusted in the Same U/C.	Vice Syeda Naima B-12

**The Teacher Adjusted in adjacent Union Councils being junior**

112	1018	SURRIYA KHANAM	GGPS Chanja	Blug Bala	Adjucnt U/C due to( N.A.P)	Vice Sajida Begum B-12
113	380	GULNAR BIBI	GGCMS FAQIR ABAD TAJAL	Panyali	Adjucnt U/C due to( N.A.P)	Vice Musarat Bibi B-12
114	635	SHAMSHAD BIBI	GGPS JABBA	Seri Khair Abad	Adjucnt U/C due to( N.A.P)	Vice Nazia Sadig B-12
115	897	FEHMEEDA BANO	GGPS Shinkhari No.1	Talian M.gucha	Adjucnt U/C due to( N.A.P)	Vice Azmat B-12
116		Yasmeen Akhtar	GGPS Katha Dobandi	Madwana	Adjucnt U/C due to( N.A.P)	Vice Ghazala bibi B-12
117	1128	Sajida Bibil	GGPS KOTTELY S/ ABAD	Peshgah	Adjucnt U/C due to( N.A.P)	Vice Shabana Naz B-12
118	747	Yasmeen Begum	GGPS GARLAT PAYEEN	Showgran	Adjucnt U/C due to( N.A.P)	Vice Tahira bibi B-12
119		Bibi Shahida	GGPS Baga	Khair Abad	Adjucnt U/C due to( N.A.P)	Vice Bibi Ulfat B-12
120	1147	SHAZIA PARVEEN	GGPS DAWAL	Akhun bandi	Adjucnt U/C due to( N.A.P)	Vice Saima B-12
121	589	BIBI ZAKIA	GGPS TANGRI PAYEEN	Tatar	Adjucnt U/C due to( N.A.P)	Vice Aneecia Mujeeb B-12
122	947	SHAZIA NIAZ	GGPS AZIZ ABAD	Janglan	Adjucnt U/C due to( N.A.P)	Vice Shamim Akhtar B-12
123	513	AMEENA SHAHEEN	GGPS SAFAIDA	Lunda Paian	Adjucnt U/C due to( N.A.P)	Vice Shaheen bibi B-12
124	1085	FARZANA NAZ	GGPS SIKANDARA	Kothri	Adjucnt U/C due to( N.A.P)	Vice Bilqees Begum B-12
125	1001	SHABANA SARFRAZ	GGPS BHER KUND NO.1	Jabian Nelore	Adjucnt U/C due to( N.A.P)	Vice Majbeen B-12
126	943	Chand Bibi	GGPS Oghi	Gurda	Adjucnt U/C due to( N.A.P)	Vice Bibi Mukhtar B-12
127	592	GULNAZ TAJ	GGCMS FAQIR ABAD TAJAL	Susal Jhangar	Adjucnt U/C due to( N.A.P)	Vice Bibi Shaheen B-12
128	662	SHABANA JAHAN ZEB	GGPS ARAB KHAN	Nazim Dana	Adjucnt U/C due to( N.A.P)	Vice Shaheena B-12

R  
SDEO (P)  
Manshra.

(34)

129	961	SALEEM AKHTER	GGPS CHOIAN	chamb	Adjucent U/C due to( N.A.P)	Vice bibi Neelum B-12
130		Nahid bibi	GGPS Sarwai	Banda bolala	Adjucent U/C due to( N.A.P)	Vice Bushra B-12 (C/Case)
131	739	NAHEED BEGUM	GGPS TANGRI PAYEEN	Jambra	Adjucent U/C due to( N.A.P)	Vice Nazma Shaheen B 14
132	927	NUSRAT ALI KHAN	GGPS BARAR KOT	Bani Karnol	Adjucent U/C due to( N.A.P)	Vice Abida bibi B-12
133	369	NUSRAT BIBI	GGPS NOKOT	Chowki	Adjucent U/C due to( N.A.P)	Vice Nazla Gul B-14
134	1063	MARRIUN BIBI	GGPS HARI MERA	sirakote	Adjucent U/C due to( N.A.P)	vice Aqeela B-12
135	801	SHAHIDA PARVEEN	GGPS DARBAND	Bradar	Adjucent U/C due to( N.A.P)	Vice Musrat Bibi B-12
136	461	SAIRA BIBI	GGPS SERI NARAL	Karnol	Adjucent U/C due to( N.A.P)	Vice bibi rukhsana B-12
137	950	Hussan Jan	GGPS BAN	Paras	Adjucent U/C due to( N.A.P)	Vice Sadia bibi B-14
138	1137	ROBINA GUL	GGPS JALOO	Nanoha Kalan	Adjucent U/C due to( N.A.P)	Vice Bibishaheen B-12
139	1081	SHAHNAZ BIBI	GGPS PATAKA	Jabri Kalesh	Adjucent U/C due to( N.A.P)	Vice Nahida Bibi B-12

**The Teachers adjusted in other U/C due no availibility of Posts in their own U/C, adjucent U/C and 2nd or 3rd U/C**

140	1205	Bibi Asmaha BEGUM	GGPS HASSA	Kund Sacha	Second Adjuscnt U/C due to NAP	Vice Safeena Begum B-12
141	1121	ZOBIA GUL	GGPS SHAMORI CHAM	Jamal Mari	Second Adjuscnt U/C due to NAP	Against V/Post
142	420	BIBI MURTAZA	GGPS SHANAI BALA	KandoGali	Second Adjuscnt U/C due to NAP	Vice Samina Akbar B-14
143	1133	NAZMA SHAHEEN	GGPS REERH	Paghora	Second Adjuscnt U/C due to NAP	Vice Bibi Naghma B-12
144	229	Sabiha begum	GGCMS KULHARY	Chuldrian	Second Adjuscnt U/C due to NAP	Vice saima Noreen B-14
145	1057	SABEELA BIBI	GGPS GANDIAN NO.2	Fauj dara	Second Adjuscnt U/C due to NAP	Vice Nahid Akhtar B-12
146	1148	NIGHAT SHAHEEN	GGPS BAT DHARIAN	Budikha	Second Adjuscnt U/C due to NAP	Vice Ruqia bibi B-14
147	815	TAHIRA PARVEEN	GGPS Dokani	Thakra	Second Adjuscnt U/C due to NAP	Against V/Post
148	1055	NIGHAT ZEB	Khularay Gharbi	Shams Abad	Second Adjuscnt U/C due to NAP	Vice Saima Kala Khan B-14
149	1080	Badsha Bibi	GGPS GHULLah	Bhoonja	Second Adjuscnt U/C due to NAP	Against V/Post
150	1172	YASMEEN	GGPS KAGOOOTH GALI	Naryala	Second Adjuscnt U/C due to NAP	Against V/Post
151	863	Nuzhet Shaheen	GGPS Begra	Andar Baila	Second Adjuscnt U/C	Vice Naseem B-12

R.

(35)

					due to NAP	
152	1170	Bibi Ambreen	GGPS Batang	Guldheri Kaghan	Second Adjusnt U/C due to NAP	Vice Nagina Humayun B-12
153	1109	Nazia Bibi	GGPS L/Katha Dobandi	Badalgran	Second Adjusnt U/C due to NAP	Against V/Post
154	802	SAIMA YOUNIS	GGPS BAT DHARIAN	Bagi Bandi	Second Adjusnt U/C due to NAP	Vice Fozia Naz B-12
155	1138	SOBIA HAROON	GGPS BHER KUND NO.1	Dilbori	Second Adjusnt U/C due to NAP	Vice Saiga Noreen B-12
156	745	ASMA NOREEN	GGPS LOHAR BANDA (M.C)	Bareela	Second Adjusnt U/C due to NAP	Vice Rashda B-12
157	1166	NUZAT SABA	GGPS DASTAN	Shadore	Second Adjusnt U/C due to NAP	Vice chand bibi B-12
158	744	YASMEEN BIBI	GGCMS Trangri Bala	Bandi dost Muhammad	Second Adjusnt U/C due to NAP	Against V/Post
159	889	SAEEDA BIBI	GGPS BHERKUND NO.2	Khalian arian	Second Adjusnt U/C due to NAP	Vice Amna Sarwar B-12
160	657	CHAN BIBI	GGPS BUZBELA	Devli	Second Adjusnt U/C due to NAP	Against V/Post
161	1173	HAFIZA BEGUM	GGPS Sanda Sar	Gorian Bangash	Second Adjusnt U/C due to NAP	Vice Zubarria Zahoor B-14
162	785	Gulnaz	GGPS Makria	Khakoo	Second Adjusnt U/C due to NAP	vice Mehnaz B-12
163	1130	Hajra Ali	GGPS KULHARY ADAM	Kathi Poloi	Second Adjusnt U/C due to NAP	Vice shazia Aurangzeb B-12
164	866	NAZIA LOHDI	GGPS JANDAR BANDA	Chingar	Second Adjusnt U/C due to NAP	Vice ShaheenAbid B-14
165	382	GHAZALA YASMEEN	GGPS BAFFA Kalan	Bimbai	Second Adjusnt U/C due to NAP	Vice Asma Noreen B-12
166	839	HASREET MAMOOD	GGPS Kanoch	Noori	Second Adjusnt U/C due to NAP	Vice Ruqia B-12
167	846	SHAHIDA PERVEEN	GGCMS FAQIR A/TAJAL	Tetoli	Second Adjusnt U/C due to NAP	Vice Gulnaz B-14
168	311	IRSHAD BAGUM	GGPS MANSEHRA NO.1	GGPS Kaloo Basti	Second Adjusnt U/C due to NAP	Against V/Posty B-15
169	1073	SHAHIDA MAHROOF	GGPS Bara Jadeed	Sinjli	Second Adjusnt U/C due to NAP	Vice Vice Mehnaz B-12
170	725	MUSARAT IQBAL	GGPS EID GAH	Doshum Balimong	Second Adjusnt U/C due to NAP	Vice Zakia Bibi B-14
171	883	FAHMEEDA GUL	GGPS DHODIAL No.2	Sharkote	Second Adjusnt U/C	Vice Sabeeta B-12

R  
SDEO (F)  
Manshera

36

					due to NAP	
172	789	BIBI RUKHSANA	GGCMS KULHARY	Ramkote	Second Adjusnt U/C due to NAP	Vice Shahida bibi B-12
173	1059	SHAZIA BIBI	GGPS Mansehra No.1	Sawan Maira	Second Adjusnt U/C due to NAP	Vice Sajida Begum B-12
174	1186	BIBI NUSRAT	GGPS BATRAIR	Salaya	Second Adjusnt U/C due to NAP	Vice Alia Gohar B-12
175	896	BUSHRA KHATOON	GGPS GANDA	Kala Maira	Second Adjusnt U/C due to NAP	Vice Gul Naz B-12
176	1102	BUSHRA BIBI	GGPS KHARAR MAIRA	Ashwal	Second Adjusnt U/C due to NAP	Vice Munaza Daud B-12
177	1140	Bibi Zatoon	GGPS BHANGIAN	Shangrian	Second Adjusnt U/C due to NAP	Vice Sheeba Dilwar B-12
178	1033	NAILA BIBI	GGPS LANG SHARIF	Kothra	Second Adjusnt U/C due to NAP	Vice Majbeen B-12
179	735	BIBI WASEELA	GGCMS JABA Sheikhabad	Chungari	Second Adjusnt U/C due to NAP	Vice Salma B-12
180	240	BIBI SUGHRA	GGPS MANSEHRA NO.1	Khail Nallah	Second Adjusnt U/C due to NAP	Vice Bushra Gilani B-12
181	250	SHEHNAZ AKHTAR	GGPS MANSEHRA NO.1	Bai timber	Second Adjusnt U/C due to NAP	Vice Samina Malik B-12
182	470	SAMINA MURTAZA	GGPS MAIRA JIA	Chanial	Second Adjusnt U/C due to NAP	Vice Lubna Younis B-12
183	786	GUL BENAZEER	GGPS Makria	Chambati	Second Adjusnt U/C due to NAP	Against V/Post
184	1070	BIBI RABIHA	GGPS PHAGLA	Raitra Pain	Second Adjusnt U/C due to NAP	Vice Tahira bibi B-12
185	1115	SOBIA NOREEN	GGPS Bajna	Battal	Second Adjusnt U/C due to NAP	Against V/Post
186	824	SHAFQAT BIBI	GGPS SHANAI BALA	Kharyala	Second Adjusnt U/C due to NAP	vice Aneela bibi B-12

ote:

Their Promotion is consivdered form the date of Promotion i.e 26/02/2013.

TERMS & CONDITIONS.

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.

R  
SDEO (F)  
Mansehra

37


5. Their Inter-seniority on lower post will remain intact.
6. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in order will be recovered and if he is wrongly promoted he will be reversed.
7. Checking & verification of all the documents shall be ensure by the DDO concerned.
8. Necessary entries to this effect should be recorded in their S/Book.
9. No TA/DA is allowed for joining their duty's.

Sd/-  
(SHAMIM AKHTAR)  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA

Endst: No. 339-927 /Estt: (F) Promotion: Primary School Head Teacher (F) Dated 21/3/2013.

Copy forwarded for information and necessary action to the:-

1. PS to Secretary to Government of Khyber Pakhtunkhwa E&SE Department Peshawar.
2. Director E&SE Department Khyber Pakhtunkhwa Peshawar.
3. ASDEO (f/M) Circle , 1 Balakot, 2 Kaghan, 3 Phuirah, 4 Oghi, 5 Shergar, 6 Mansehra, 7 Battal, 8 Baffa, 9 Dhodial.
4. District Accounts Officer Mansehra
5. Dy:District Officer Finance & Planning Mansehra
6. B&AO local office.
7. Officials concerned.

  
SUB DIVISIONAL EDUCATION OFFICER  
(FEMALE) MANSEHRA



# Annexure H (38)

چارچ رپورٹ

میں مسماٹ کوثر سلطانی Pst نے ڈسٹرکٹ ایجوکیشن  
آفیسر صاحبہ ضلع مالسپہرہ کے آفس آرڈر نمبر 339-927 مورخہ  
21-3-2013 کے مطابق گریڈ 15 BPS میں ترقی پانے پر  
آج مورخہ 25-3-2013 کو گورنمنٹ گرلز پرائمری سکول  
نمبر 1 دائرہ چارچ لے لیا ہے۔

اطلاعی رپورٹ ارسال دفتر ہے۔

کوثر سلطانی Pst گورنمنٹ گرلز پرائمری سکول دائرہ نمبر 1 مالسپہرہ

25/03/2013

Attest

AB  
DISTRICT COURT ABBOTTABAD

(22)

(38)

Am... ..

0


# Annexure H (38)

چارچ رپورٹ


میں مسماٹ کوثر سلطانی Pst نے ڈسٹرکٹ ایجوکیشن  
آفیسر صاحبہ ضلع مانسہرہ کے آفس آرڈر نمبر 339-927 مورخہ  
21-3-2013 کے مطابق گریڈ 15 Bps میں ترقی پانے پر  
آج مورخہ 25-3-2013 کو گورنمنٹ گرلز پرائمری سکول  
نمبر 1 داتا کا چارج لے لیا ہے۔

اطلاعی رپورٹ ارسال دفتر ہے۔

کوثر سلطانی Pst گورنمنٹ گرلز پرائمری سکول داتا مانسہرہ

  
Officer  
Date  
25/03/2013

Attest

  
District Court Abbottabad

# Annexure 9

(39)

(92)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

TRANSFER ORDER.

The following P S H teachers are hereby Transfer on their own pay and grade in the interest of public service with immediate effect.

S.No	Name of Teacher	From	To	Remarks
1.	Bibi Bashir Un Nisa PSHT	GGPS Niloor	GGPS Datta No.1	V.N.2
2.	Kousar Sultana PSHT	GGPS Datta No.1	GGPS Niloor	V.N.1

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.

Sd/-  
DISTRICT EDU:OFFICER  
(FEMALE) MANSEHRA

Endst: No 3425-30 /GB/PK-53


Dated 14/07/2013.

Copy to the:-

1. ASDEO Circle Concerned.
2. DEMIS Branch Local office.
3. Head-Teacher Concerned.
4. Teacher concerned.

SDO (CF)

  
SDEO (FEMALE)  
MANSEHRA

  
Advocate  
M.A. LL.B. Advocate  
DISTRICT COURT ABBOTTABAD

11/09/13 tenure

# Annexure J

40

مہنوں = ٹرانسفر  
 مورچہ نڈاریشن سے کہ سالانہ 16-18 سالوں سے کہتے ہیں  
 PSHT ٹیوٹی سے انجام دے رہی ہے۔ سالانہ بیماری  
 ہے۔ پوری سروس سالانہ کے اپنے ہوم اسٹیشن  
 سے منتقلیوں میں دوری ہے۔

اب چونکہ سالانہ بیماری سے کہتے ہیں  
 سے سالانہ پیدل نہیں چل سکتی = مزید = ان کے  
 ہے کہ سالانہ کسی مجبوروں کو مدنظر رکھتے ہوئے سالانہ  
 سی ٹرانسفر گورنمنٹ ٹرنزیراٹی سکول جانے میں  
 کی جائے۔

help for nearest place  
 کی نوز میں ہوگی

Minister for Elementary & Secondary Education  
 Khyber Pakhtunkhwa

Badin

PSHT

کی بی بی

گورنمنٹ ٹرنزیراٹی سکول

SARAJI ZEBUN AHMED  
 Member Provincial Assembly  
 Pk-53 Islamabad

Attested

Minister for Elementary & Secondary Education  
 Khyber Pakhtunkhwa

خدمت جیل ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ زخاندہ مدارسن مالک

جناب عالیہ

گزارش ہے کہ سالہ سابقہ آپ کے زیر سایہ گورنمنٹ گولڈ میڈل اسکول میں بطور (PHT)

کی پوسٹ پر اپنی ذمہ داری سرانجام رہ رہی ہے۔ سالہ کی کافی سروس اپنے فرائض سے دور گزار چکی ہے اب سالہ کافی عرصے سے بہ اپنی گاؤں میں والیسی لائی ہے

جناب عالیہ! سالہ کو خلیانہ آرڈر نمبر 30-25-3 بتا رہے

14-9-13 عت گورنمنٹ گولڈ میڈل اسکول تیلور میں

بشرط النساء کی جگہ سے ملے ہوئے ہیں۔

سالہ گاؤں دامانی رہائشی ہے اور خلیانہ سے تبادلہ پر مابینہ دگائی ہوئی ہے۔ اور سالہ کی جگہ سے ملے ہوئے آئے والے موصوفہ کا نام بھی معجزہ اسکول میں پورا نہیں ہوا۔

لہذا ایروپائی فوٹو سالہ نے آرڈر کو منسوخ کر کے دوبارہ واقا میں تصدیق کیا جائے۔

الما دم

سالہ کوثر سلطانہ (PHT) گورنمنٹ گولڈ میڈل اسکول میں دامانی

Alleged

RECEIVED BY THE COURT ADVOCATE SOCIETY COURT ASSOCIATION

Annexure ~~K~~ K1 (42)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

CANCELLATION.

As approved by the competent the Transfer order issued vide this office Endst: 3425-30/GB/PK-53 dated 14-9-2013 is hereby cancelled with immediate effect in the interest of public service.

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.

Sd/-  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA

Endst: No 3460-164 /MT/SDEO(F)

Dated 23/09/2013.

Copy to :-

1. The ASDEO(F) circle concerned.
2. Head Teacher concerned.
3. Teacher concerned.

  
1/2 SUB-DIVISIONAL EDU: OFFICER  
(FEMALE) MANSEHRA

23/9/2013

*A. Fresher*  
~~SECRETARY~~  
M.A. ...  
DISTRICT COURT ABBOTTABAD

# Annexure L 43

JAN FEB MARCH APRIL  
MAY JUN JUL AUG  
SEP OCT NOV DEC

رجسٹر حاضری مدرسہ اسلامیہ اعلیٰ ثانویہ لاہور

۲۰۱۳

۱۱۳

نام لڑکے											
BPS: 15											
BPS: 12											
P	P	P	P								
X	X	X	X								
P	P	P	P								
P	P	P	P								
P	P	P	P								

No Information

Sat 12:30 Sun 7:30  
 Sat 12:30 Sun 7:30  
 Sat 12:30 Sun 7:30  
 Sat 7:30

The promotion the adjustment order  
 dated 21-3-2013  
 Miss. Choudhary (Mrs. B. S.)  
 (Choudhary Balakrishna)  
 has been promoted to the post of  
 BPS-15. The date of joining is  
 20/3/2013. All BPS-15  
 employees (BPS-15) who are  
 holding the post of BPS-12  
 should report to the main office  
 of the establishment  
 MANSEHRAH.

۱۲/۱۱
۱۳/۱۱
۱۴/۱۱
۱۵/۱۱
۱۶/۱۱
۱۷/۱۱
۱۸/۱۱
۱۹/۱۱
۲۰/۱۱
۲۱/۱۱
۲۲/۱۱
۲۳/۱۱
۲۴/۱۱
۲۵/۱۱
۲۶/۱۱
۲۷/۱۱
۲۸/۱۱
۲۹/۱۱
۳۰/۱۱
۱/۱۲
۲/۱۲
۳/۱۲
۴/۱۲
۵/۱۲
۶/۱۲
۷/۱۲
۸/۱۲
۹/۱۲
۱۰/۱۲
۱۱/۱۲
۱۲/۱۲

۱
۰
۰
۱

۱	۰	۰	۱								

Attested

خطیب



# Annexure L,

(44)

76

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

## TRANSFER ORDER.

As approved by the competent authority in the light of enquiry report the following Posting transfer of Primary School Head Teachers are hereby ordered in the best interest of innocent children with immediate effect.

S.No	Name of Teacher	From	To	Remarks
1.	Mst: Bashir Un Nisa PSHT	GGPS Chora Behali	GGPS Neloor Circle Baffa	V.N.2 under disciplinary Grounds
2.	Mst:Zahida Khatoon PSHT	GGPS Neloor	GGPS Chora Behali	V.N.1

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.
3. Absent period of Mst: Bashir Un Nisa is treated as leave with out pay.

*Sd/-*  
DISTRICT EDU: OFFICER  
(FEMALE) MANSEHRA

Endst: No 2721-26 /GB/PK-53/SDEO(F) Dated 05/06/2013.

Copy to:-

1. The District Edu: Officer (F) Mansehra.
2. ASDEO (F) Baffa & Mansehra.
3. Head Teacher concerned.
4. Teacher concerned.

*Attest*  
*[Signature]*  
DISTRICT COURT ABBOTTABAD

*[Signature]*  
SDEO (FEMALE)  
MANSEHRA

*[Signature]*  
O/C

# Annexure M (45)

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (F) MANSEHRA

No 3884 /  
Dated 14/12/2013.

To

Mst. Bashir Un Nisa PSHT  
Govt: Girls Primary School Nelore.

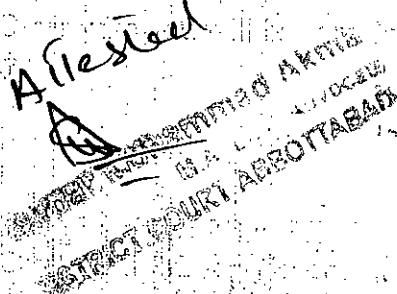
Subject:- ARRIVAL REPORT.

Memo:-

You are directed to join your original place of posting at Govt: Girls Primary School Nelore, till the decision of Court/Departmental appeal.

Other wise you will be considered as absent and disciplinary action would be take against you.

  
S:D.E.O (F)  
MANSEHRA

*Affected*  
  
ADVOCATE  
M.A. L. K. VOKKAL  
DISTRICT COURT, ABBOTTABAD

# Annexure M, (46)

19

## OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (F) MANSEHRA

### RESTORATION.

Consequent upon the acceptance of appeal by the appellant authority and on the approval of the competent authority, the Transfer order issued vide this Office Endst No. 3425-30/GB/PK-53 Dated 14/9/2013 is hereby restored in the interest of Public Service with immediate effect.

Note:-

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned.

Sd/-  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA.

Endst.No 432-35 PK-53-II Dated 8-5- /2014.

Copy to the:

1. District Account Officer, Manshra.
2. ASDEO Circle concerned.
3. Head Teacher concerned.
4. Teacher concerned.

*[Signature]*  
SUB DIVISIONAL EDUCATION OFFICER  
(FEMALE) MANSEHRA.

*Affidavit*

*[Signature]*  
ADVOCATE  
DISTRICT COURT ABBOTTABAD

# Annexure N (47)

خدمت جناب ڈائریکٹر ایجوکیشن صوبہ خیبر پختونخواہ پشاور

عنوان :- اپیل بمرادٹرانسفر آرڈر نمبری PK53-35-432-35-2014-08-05

جاری کردہ ڈسٹرکٹ ایجوکیشن آفیسر زنانہ ضلع مانسہرہ

جناب عالی!

مذکورہ گذارش ہے کہ سائلہ آپ کے زیر سایہ PST پوسٹ پر گزرا پرائمری سکول نمبر 1 داتہ میں تعینات تھی۔ حالیہ پرموشن مورخہ 25/02/2013 سالانہ کو سکیل 15 میں اسی سکول میں پالیسی کے مطابق PSHT پر تعینات کیا گیا۔ لیکن مورخہ 14/09/2013 کو آرڈر نمبر 30-3425 کے تحت مسماۃ بشیر النساء جو کہ عرصہ سے اپنے سکول سے غیر حاضر تھی کو ایک سیٹل سکول میں میری جگہ تبدیل کر دیا گیا۔ جو کہ قانون کے خلاف ہے۔ کیونکہ ایک پوسٹ کا ٹائل Tenure تین (3) سال کا ہے۔ سائلہ نے اس ٹرانسفر آرڈر کے خلاف دفتر میں اپیل کی جس پر اس وقت کی Dy. DEO صاحبہ نے مذکورہ آرڈر مورخہ 23/09/2013 آرڈر نمبر 64-3460 کے تحت کینسل کر دیا۔ پھر مورخہ 26/09/2013 کو متعلقہ ٹیچر نے اس آرڈر کو جناب سینئر سول جج صاحبہ مانسہرہ کی عدالت میں حکم اتناعی حاصل کرنے کے لیے دعویٰ دائر کیا اور سکول میں زبردستی حاضری وغیرہ کرتی رہی۔ مورخہ 27/01/2014 کو عدالت نے بشیر النساء کا دعویٰ Return کر دیا (مصدقہ نقل فوٹو سٹیٹ فیصلہ عدالت بذالذات ہے) تاہم یہ ٹیچر اسی سکول میں بیٹھی رہی۔

جناب عالیہ! مسماۃ بشیر النساء اپنے متعلقہ سکول گزرا پرائمری سکول نیلور سے تقریباً 8 ماہ غیر حاضر رہی اور بغیر دفتری آرڈر کے اس سکول میں رہی اور دھونس بھی دیتی رہی کہ میرا خاندان صحافی ہے میرا کوئی کچھ نہیں کر سکتا۔

جناب عالیہ! متعلقہ ٹیچر نے دفتر اور عدالت سے غلط بیانی کی کہ وہ عرصہ دراز سے اپنے گاؤں میں تعینات نہیں رہی جبکہ یہ اس سے پہلے عازلی کوٹ یونین کونسل داتہ گزرا پرائمری سکول داتہ نمبر 1، گزرا پرائمری سکول کھیل موری داتہ اور گزرا پرائمری سکول پیر صحابہ میں جو کہ مقامی سکول ہیں تعینات رہی ہے۔ پھر مورخہ 08/05/2014 کو آرڈر نمبر 35-432 کے تحت آرڈر کو بحال کر دیا گیا۔

جناب عالیہ! یہ بحالی آرڈر جو کہ تقریباً 9 ماہ بعد بحال ہو گیا۔ جبکہ یہ قانون کے خلاف ہے اور کسی ملی بھگت سے قانون اور پالیسی کو بالائے طاق رکھ کر بحال کیا گیا۔

جناب عالیہ! سائلہ آپ سے گزارش کرتی ہے کہ اس آرڈر کو کینسل فرما کر مشکور فرمائیں۔ عین نوازش ہوگی۔

ارض

کوثر سلطانہ PSHT گورنمنٹ گزرا پرائمری سکول نمبر 1 داتہ

19/05/2014

کاپی برائے اطلاع

Affected

ABOTTABAD DISTRICT COURT  
DISTRICT COURT ABBOTTABAD

۱- وزیر تعلیم خیبر پختونخواہ

۲- سیکریٹری تعلیم خیبر پختونخواہ

۳- ڈپٹی کمشنر مانسہرہ

# وکالت نامہ

Before the Service Tribunal K.P.K. Peshawar

Kousar Sultana نام Govt Education کے سرکار

منجانب: Appellant

نوعیت مقدمہ: Service Appeal

باعث تحریر آنکہ

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

Sardar Muhammad Akmal Advocate High Court

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 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 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 بمراء استجارت نائش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

الرقوم: 29/2014

بمقام: Peshawar

Accepted

Sultana

SECRETARY

GOVERNMENT COURT PESHAWAR  
29/2014

خدمت جناب رجسٹرار KPK سروس ٹریبونل ایٹور

غفران، سماعت اپیل نمبر 1156/2014

912  
14-11-14

جناب عالی،

مؤدبانہ گزارش ہجرت سائلہ نے غیر فالوٹے تبادلہ خدمت اپیل

کی سائلہ نے اپیل کیسٹا کو درخواست دی تھی کہ سائلہ کی اپیل

سماعت کیلئے ایٹور میں رکھی جائے مگر اپیل سماعت کیلئے

ایسٹ آفیسر کو روکی گئی ہے

اسد عاقبت سائلہ کی اپیل کو سماعت کیلئے ایٹور میں رکھ کر

سماعت کی تاریخ مقرر کی جائے

but up to the Court P SHT <sup>14-11-2014</sup> *Per* الحاضرہ کو ٹر سلطانہ

with ~~irrelevant~~ appeal

سروس اپیل نمبر 1156/2014

Reader concerned

*[Signature]*  
14/11/14

مورہوہ تاریخ 16-3-2015

بخدمت جناب چیئرمین KPK سروس ٹریبونل پشاور

عنوان۔ سماعت اپیل سروس نمبر 1156/14

جناب عالی۔

مؤدبانہ گزارش کہیہ سائلہ نے ٹرانسفر آرڈر کے خلاف سروس اپیل نمبر 1156/14  
سماعت کیلئے جمع کروائیے۔

اسد عاقلید سائلہ کی اپیل کی سماعت پشاور میں ہی کی جائے  
اور سائلہ کی اپیل کی جلدی تاریخ مقرر کی جائے سماعت کیلئے

کوئٹہ سلطانہ PSHT

گورنمنٹ گنرل پرفیسری سکول داتا تحصیل و ضلع مانسہرہ

سروس اپیل نمبر 1156/14

Put up to the court  
with relevant appeal.

Reader  
concerned

23/10/14

المرفوعم 28.10.2014

بذریعہ وکیل  
23

The first part of the document discusses the importance of maintaining accurate records of all transactions. It is essential for the company to have a clear and concise system in place to ensure that all financial data is properly documented and easily accessible. This will help in the preparation of financial statements and provide a clear picture of the company's financial health.

In addition, it is important to regularly review and update the accounting system to reflect any changes in the company's operations or financial structure. This will help to ensure that the records are always up-to-date and accurate.

The second part of the document outlines the specific steps that should be taken to implement a robust accounting system. This includes identifying the key areas of the business that require accounting attention, such as sales, purchases, and payroll. It also involves setting up a chart of accounts and defining the rules for recording transactions.

Finally, the document emphasizes the need for ongoing monitoring and reporting. Regularly reviewing the accounting records will help to identify any potential issues or discrepancies early on, allowing for prompt correction. This will help to ensure that the company's financial records are always accurate and reliable.

2.1.3



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

**APPEAL NO. 1156/2014.**

Mst: Kousar Sultana PSHT D/O Gulzaman, Resident of Datta, District Mansehra, presently  
Government Girls Primary School No.1, Tehsil and District Mansehra.

.....APPELLANT

**VERSUS**

1. Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber Pakhtun Khuwa, Elementary & Secondary Education, Peshawar.
2. Director of Elementary and Secondary Education, Government of Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer, Elementary and Secondary Education, (Female), Mansehra.
4. Sub Divisional Officer, Elementary and Secondary Education (Female), Mansehra.
5. Mst: Bashirun Nisa, PSHT, Government Girls Primary School, Nelor, Tehsil and District Mansehra

.....RESPONDENTS.

Written reply on behalf of the Respondent No. 1, 2,3, and 4.

**PRELIMINARY OBJECTIONS.**

1. That this Honorable Service tribunal has got no jurisdiction to entertain the present appeal.
2. That the appellant has got no cause of action/locus standi to file the present appeal.
3. That the appeal is not maintainable in its present form.
4. That the appellant has not come to the Tribunal with cleans hands.
5. That the appellant is estopped by his own conduct to being the instant appeal.
6. That the transfer of the appellant was in interest of public Service and is further bound by section 10 of Khyber Pakhtunkhwa Civil servant act 1973 to obey the orders.
7. That the appeal is groundless based on malafide.
8. That the appeal is based on false and malafide hence deserves dismissed.
9. That the appeal is barred by law and limitation.

**RESPECTFULLY SHEWTH.**

1. Para No.1 needs no comments, as at is related to the service record of the appellant.
2. Para No.2 is correct up to the extant that the appellant is the employ of the Education Department.
3. Para No.3 is Correct, but as a government servant she is bound to perform her duties at any station in District Mansehra.
4. Para No.4 is correct, but as stated in Para above the appellant is bound to perform her duty any where in the best interest of public service
5. Para No.5 is correct, that the appellant was promoted in BPS-15 on 21-03-2013 against the post which is already occupied by her in GGPS Datta No-1.
6. Para No.6 is incorrect. The appellant already completed her 2 years tenure at GGPS Data No-2 hence her transfer from GGPS Data No-1 to GGPS Neelor is justified.

No political intervention is involved in the transfer of appellant.

7. Para No.7 is Correct.
8. Para No. 8 is Correct, up to the extent that respondent No-5 was also promoted letter on and was posted from GGPS Peer Sahaba to GGPS Choorah Behali in BPS-15 rest of the Para is incorrect.
9. Para No.9 is Correct, up to the extent that respondent No-5 was transferred to GGPS Neeloh, rest of the Para is incorrect.
10. Para No.10, is incorrect, the restoration of the order No 34-35\_\_\_30 dated 08-05-2014 was restored in the best interest of Public service.
11. Para No-11 is related to the service matter to the appellant. The appellant is bound to perform her duty at any station assigned to her by the department.
12. Para No-12 is correct up to the extent that the appellant submitted the departmental appeal to the Director (E & S) Peshawar. But the worthy Director did not Honor her appeal being not Justified.

#### **GROUND:**

- A:- Para A is incorrect. The transfer order of the appellant is in accordance with the policy.
- B:- Para B as stated in Para (a) that the order is not malafied, disarmingly and in the best interest of Public service.
- C:- Para C is incorrect. The appellant already completed her tenure at GGPS Data No-2.
- D:- Para D is incorrect. The order is in the jurisdiction of the Department.
- E:- Para E is incorrect. No political pressure is involved in transfer order of the appellant.
- F:- Para F is incorrect, before the promotion of the appellant in BPS-15, she already Completed 2 years service at GGPS Data No-2.
- G:- Para G needs no comments, as no political involvement is engaged in transfer order of appellant.
- H:- Para H needs no comments.

Para I, the instant appeal is time barred.

**Prayer:-**

It is humbly prayed that the instant appeal may kindly be dismissed.

RESPONDENT NO 1.....

1. SECRETARY ELEMENTARY & SECONDARY  
EDUCATION DEPARTMENT, KPK, PESHAWAR.

RESPONDENT NO 2.....

2. DIRECTOR OF ELEMENTARY & SECONDARY  
EDUCATION GOVERNMENT OF KPK PESHAWAR.

RESPONDENT NO 3.....

3. DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA.

RESPONDENT NO 4.....

4. SUB DIVISIONAL OFFICER, (E & S) EDUCATION  
(FEMALE) MANSEHRA.

**SDEO (Female)**  
Mansehra

## AFFIDAVIT

I, Raja Fazal dad, Superintendent SDEO (Female) Mansehra, do, hereby solemnly affirm and declare that the contents of reply in the instant Appeal No. 1156/2014, titled case Kausar sultana PSHT Versus Education are correct and true to the best of my knowledge and belief and I have concealed nothing as material facts before this Honorable Tribunal.

  
DEPONENT

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHWA PESHAWAR**  
**(CAMP COURT ABBOTTABAD)**

Appeal No.1156/2014

Mst. Kousar Sultana

...APPELLANT

**V E R S U S**

Government of Khyber Pakhtunkhwa & Others

...RESPONDENTS

**REJOINDER AGAINST COMMENTS SUBMITTED BY RESPONDENT**  
**NO.1,2,3 AND 4**

*Respectfully Sheweth;*

*The Para-wise replies of the comments are as under:-*

**PRELIMINARY OBJECTIONS:**

- i) That objection No.1 is incorrect, Honorable Service Tribunal has got jurisdiction to entertain the present appeal.
- ii) That objection No.2 is totally wrong hence denied, the appellant has got cause of action.
- iii) That objection No.3 is wrong hence denied. Appeal is maintainable in the eye of law. Service Tribunal is proper forum for disposal of service matter of the civil servants.
- iv) That objection No. 4 is wrong hence denied, appellant has come to this Honorable Court with clean hand but respondents concealed and distorted material facts from this Hon'ble Tribunal and misuses the exercise of their powers.

- v) That objection No.5 is incorrect therefore is denied, the appellant has got cause of action to bring the appeal against injustice.
- vi) That objection No. 6 is totally wrong hence denied, section 10 of Khyber Pakhtunkhwa civil servant act, 1973 deal against the legal and valid orders but in present case respondent No.3 & 4 malafidely and at political basis transferred the appellant from one station to other station for a short span with connivance of respondent No.5 which is not sustainable in the eye of law.
- vii) That objection No.7 is incorrect hence denied.
- viii) That objection No.8 is totally wrong hence denied, facts and material placed on the file showed malafide of the respondent not of the appellant.
- ix) That objection No.9 is incorrect, appeal of the appellant is well within time.

**ON FACTS:-**

1. That Para No.1 of the comments need no reply.
2. That Para No.2 of the comments is correct need no reply.
3. That Para No. 3 comments are incorrect, whereas Para No. 3 appeal of the appellant is correct, appellant was transferred malafidely and on political basis from one place to another, appellant was not treated according to the transfer policy of Khyber Pakhtunkhwa.
4. That Para No.4 comments are incorrect, whereas Para No. 4 appeal of the appellant is correct the comprehensive reply of para No. 4 has already been given above Para No.3.
5. That Para No.5 is correct hence need no reply.

6. That Para No.6 comments are incorrect, whereas Para No.6 appeal of the appellant is correct, after promotion of the appellant at GPS Data No.1 in BPS-15; the appellant only six months performed her duty on the said school and without completing her tenure on the said school respondent No. 4 malafidely transferred the appellant from Data No.1 to GGPS Nelore in place of respondent No.5, which is against the transfer and promotion policy of the Government.
7. That Para No.7 is correct hence need no reply.
8. That Para No.8 is also correct to the extent that respondent No.5 promoted in GGPS Choorā Behali in BPS-15 but respondent No.5 did not bother to comply with order of respondent No.3, during the visit of the said school respondent No.5 was found absent from her duty.
9. That Para No.9 comments are incorrect whereas Para No.9 appeal of the appellant is correct, respondent No.5 was transferred under disciplinary action through order No. 2721-26 dated 05.06.2013 by respondent No.3 from GGPS Choorā Behali to GGPS Nelore.
10. That Para No.10 comments are incorrect whereas Para No.10 appeal of the appellant is correct , order No. 3435-30 dated 08.05.2014 was restored is not in the best interest of public service because respondent No.5 under disciplinary action transferred to GGPS Nelore and after few months again transferred at the place of appellant in GGPS Data No.1, which is clear cut violation of the transfer policy of Government of KPK. Moreover appellant is most senior teacher being seniority basis she was adjusted at GGPS Data No.1. of his own union council. The respondent No.3 only disturbed the appellant through transfer order again and again but none of the other upgraded teachers was transferred from their existing schools.



11. That Para No.11 need no reply, comprehensive reply has already been given in above Para No.10.
12. That Para No.12 is also correct hence need no reply.

**ON GROUNDS:-**

- a) Para (a) ground of the comments is incorrect, whereas Para (a) ground of the appeal is correct
- b) Para (b) ground of comments is in correct, whereas Para (b) grounds of the appeal is correct, respondent No.4 malafidely and on political basis transferred the appellant which is not in the interest of Public service.
- c) Para (c) grounds of the comments is incorrect whereas Para (c ) grounds of the appeal is correct, appellant had not completed her tenure at GGPS Data No.1.
- d) Para (d) grounds of the comments is incorrect whereas Para (d) of appeal is correct , respondent department violated the transfer policy of the KPK Government, transfer order dated 08.05.2014 is result of misuse of their powers.
- e) Para (e) grounds of the comments is incorrect, whereas Para(e) ground of the appeal is correct, political pressure is involved in transfer order of the appellant.
- f) Para (f) grounds of the comments is incorrect whereas Para (f) ground of the appeal is correct.
- g) Para (g) grounds of the comments is incorrect whereas Para (g) ground of the appeal is correct.
- h) Para (h) grounds of comments need no reply


- i) Para (i) grounds of the comments is incorrect, appeal of the appellant is well within time.

It is, therefore, humbly submitted that the comments of the respondents be rejected/ dismissed and the instant Appeal of the appellant may graciously be accepted in the favour of appellant against the respondents.

  
...APPELLANT

*Through:*

Dated:-15/12/2015

  
(Sardar Muhammad Akmal)  
Advocate High Court,  
Abbottabad.

**VERIFICATION:**

Verified that the contents of the foregoing *Rejoinder* are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this honorable court.

Dated:15/12/2015

  
...APPELLANT

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHWA PESHAWAR**  
**(CAMP COURT ABBOTTABAD)**

Appeal No.1156/2014

Mst. Kousar Sultana,

...APPELLANT

**V E R S U S**

Government of Khyber Pakhtunkhwa & Others

...RESPONDENTS

**REJOINDER AGAINST COMMENTS SUBMITTED BY RESPONDENT**

**NO.1,2,3 AND 4**

*Respectfully Sheweth;*

*The Para-wise replies of the comments are as under:-*

**PRELIMINARY OBJECTIONS:**

- i) That objection No.1 is incorrect, Honorable Service Tribunal has got jurisdiction to entertain the present appeal.
- ii) That objection No.2 is totally wrong hence denied, the appellant has got cause of action.
- iii) That objection No.3 is wrong hence denied. Appeal is maintainable in the eye of law. Service Tribunal is proper forum for disposal of service matter of the civil servants.
- iv) That objection No. 4 is wrong hence denied, appellant has come to this Honorable Court with clean hand but respondents concealed and distorted material facts from this Hon'ble Tribunal and misuses the exercise of their powers.

1

**BEFORE THE SERVICE TRIBUNAL KHYBER**  
**PAKHTUNKHWA PESHAWAR**  
**(CAMP COURT ABBOTTABAD)**

Appeal No.1156/2014

Mst. Kousar Sultana

...APPELLANT

**V E R S U S**

Government of Khyber Pakhtunkhwa & Others

...RESPONDENTS

**REJOINDER AGAINST COMMENTS SUBMITTED BY RESPONDENT**

**NO.1,2,3 AND 4**

*Respectfully Sheweth;*

*The Para-wise replies of the comments are as under:-*

**PRELIMINARY OBJECTIONS:**

- i) That objection No.1 is incorrect, Honorable Service Tribunal has got jurisdiction to entertain the present appeal.
- ii) That objection No.2 is totally wrong hence denied, the appellant has got cause of action.
- iii) That objection No.3 is wrong hence denied. Appeal is maintainable in the eye of law. Service Tribunal is proper forum for disposal of service matter of the civil servants.
- iv) That objection No. 4 is wrong hence denied, appellant has come to this Honorable Court with clean hand but respondents concealed and distorted material facts from this Hon'ble Tribunal and misuses the exercise of their powers.

- v) That objection No.5 is incorrect therefore is denied, the appellant has got cause of action to bring the appeal against injustice.
- vi) That objection No. 6 is totally wrong hence denied, section 10 of Khyber Pakhtunkhwa civil servant act, 1973 deal against the legal and valid orders but in present case respondent No.3 & 4 malafidely and at political basis transferred the appellant from one station to other station for a short span with connivance of respondent No.5 which is not sustainable in the eye of law.
- vii). That objection No.7 is incorrect hence denied.
- viii). That objection No.8 is totally wrong hence denied, facts and material placed on the file showed malafide of the respondent not of the appellant.
- ix) That objection No.9 is incorrect, appeal of the appellant is well within time.

**ON FACTS:-**

1. That Para No.1 of the comments need no reply.
2. That Para No.2 of the comments is correct need no reply.
3. That Para No. 3 comments are incorrect, whereas Para No. 3 appeal of the appellant is correct, appellant was transferred malafidely and on political basis from one place to another, appellant was not treated according to the transfer policy of Khyber Pakhtunkhwa.
4. That Para No.4 comments are incorrect, whereas Para No. 4 appeal of the appellant is correct the comprehensive reply of para No. 4 has already been given above Para No.3.
5. That Para No.5 is correct hence need no reply.

6. That Para No.6 comments are incorrect, whereas Para No.6 appeal of the appellant is correct, after promotion of the appellant at GPS Data No.1 in BPS-15, the appellant only six months performed her duty on the said school and without completing her tenure on the said school respondent No. 4 malafidely transferred the appellant from Data No.1 to GGPS Nelore in place of respondent No.5, which is against the transfer and promotion policy of the Government.
7. That Para No.7 is correct hence need no reply.
8. That Para No.8 is also correct to the extent that respondent No.5 promoted in GGPS Choorā Behali in BPS-15 but respondent No.5 did not bother to comply with order of respondent No.3, during the visit of the said school respondent No.5 was found absent from her duty.
9. That Para No.9 comments are incorrect whereas Para No.9 appeal of the appellant is correct, respondent No.5 was transferred under disciplinary action through order No. 2721-26 dated 05.06.2013 by respondent No.3 from GGPS Choorā Behali to GGPS Nelore.
10. That Para No.10 comments are incorrect whereas Para No.10 appeal of the appellant is correct, order No. 3435-30 dated 08.05.2014 was restored is not in the best interest of public service because respondent No.5 under disciplinary action transferred to GGPS Nelore and after few months again transferred at the place of appellant in GGPS Data No.1, which is clear cut violation of the transfer policy of Government of KPK. Moreover appellant is most senior teacher being seniority basis she was adjusted at GGPS Data No.1. of his own union council. The respondent No.3 only disturbed the appellant through transfer order again and again but none of the other upgraded teachers was transferred from their existing schools.

11. That Para No.11 need no reply, comprehensive reply has already been given in above Para No.10.
12. That Para No.12 is also correct hence need no reply.

**ON GROUNDS:-**

- a) Para (a) ground of the comments is incorrect, whereas Para (a) ground of the appeal is correct
- b) Para (b) ground of comments is in correct, whereas Para (b) grounds of the appeal is correct, respondent No.4 malafidely and on political basis transferred the appellant which is not in the interest of Public service.
- c) Para (c) grounds of the comments is incorrect whereas Para (c ) grounds of the appeal is correct, appellant had not completed her tenure at GGPS Data No.1.
- d) Para (d) grounds of the comments is incorrect whereas Para (d) of appeal is correct , respondent department violated the transfer policy of the KPK Government, transfer order dated 08.05.2014 is result of misuse of their powers.
- e) Para (e) grounds of the comments is incorrect, whereas Para(e) ground of the appeal is correct, political pressure is involved in transfer order of the appellant.
- f) Para (f) grounds of the comments is incorrect whereas Para (f) ground of the appeal is correct.
- g) Para (g) grounds of the comments is incorrect whereas Para (g) ground of the appeal is correct.
- h) Para (h) grounds of comments need no reply


- i) Para (i) grounds of the comments is incorrect, appeal of the appellant is well within time.

It is, therefore, humbly submitted that the comments of the respondents be rejected/ dismissed and the instant Appeal of the appellant may graciously be accepted in the favour of appellant against the respondents.

  
...APPELLANT

Through:

Dated:-15/12/2015

  
(Sardar Muhammad Akmal)  
Advocate High Court,  
Abbottabad.

**VERIFICATION:**

Verified that the contents of the foregoing *Rejoinder* are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this honorable court.

Dated:15/12/2015

  
...APPELLANT



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

Mst. Kousar Sultana (PSHT) daughter of Gul Zaman resident of Datta Tehsil and District Mansehra.

.....Appellant

Versus

Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber Pakhtunkhwa Elementary and Secondary Education Peshawar etc.

.....Respondents

**SERVICE APPEAL**

Written Reply on behalf of Respondent No.5

**Preliminary Objections:**

1. That the Honourable Service Tribunal has got no jurisdiction to entertain the present appeal.
2. Appellant has got no cause of action to file the present appeal.
3. Appeal is not maintainable in its present forum.
4. That the appellant is estopped by her own conduct to file the present appeal.
5. The appeal is groundless based on malafide.
6. The appeal is badly barred by law and limitation.
7. That the appellant was transferred by respondent No.3 & 4 according to Rules and Regulation of Khyber Pakhtunkhwa Civil Servant Act 1973.

**Factual Objection:**

1. Para No.1 related to service record of appellant and needs no comments.
2. Para No.2 is correct upto the extent that appellant is Government Servant and employ of Education department.

3. Reply of para No.3 is that appellant is Government Servant and being Government servant she under section 10 of KPK Civil Servant Act 1973, is duty bound to perform her duties at any station in District Mansehra.
4. Reply of para No.4 is that appellant is bound to perform her duties wherein the best interest of public service, similarly respondent No.5 also remains for away during her 19 years service from her home station to Remote hilly, hard, areas like GGPS Chitta Mohri in PK57, Pir Sohawa, Arhalya, Neelor etc and perform her duties in the interest of public service.
5. Reply of para No.5 is that appellant was performing her duties already in GGPS Datta not before her promotion in Scale-15 since 6 years back and again after promotion she remained at GGPS Data No.2 while she remain for such a long tenure of her service for more than 2 years, which is clear cut violation of service Rules.
6. Para No.6 is incorrect, except false allegation leveled by appellant nothing else, appellant was rightly transferred after completion of her two years tenure at GGPS Datta No.2 by respondents according to policy of Government and Service Rules and respondent No.5 rightly transfer vide endorsement No.3425-30 dated 14.09.2013 by competent authority; and after transfer of respondents at GGPS No.1 Datta respondent No.5 took charge and she by performing her duties at GGPS Datta No.1. (copy of order is annexed)
7. Reply of para No.7 is that order bearing endost No3460-64 dated 23.09.2013 was cancelled by respondent No.3 due to using political influence by appellant through concerned MPA, which is clear cut violation, of Government Policy and Rules and Regulation of Khyber Pakhtunkhwa Civil Servant Act 1973 and that that transfer order of respondent was based on malafide, endorsement No.3460-64 dated 23.09.2013 which is after 9 days. (copy is annexed), against the cancellation order

No.3425-30 dated 14.09.2013 application was moved by respondent No.5 before the Chief Minister of KPK, which was marked to Director Education KPK, Peshawar. It was prayed that political influence was involved, Director KPK, order to DEO, Female Mansehra for restoration of order of respondent No.5 and vide endorsement No.432-35 PK 35II Dated 08.05.2013, respondent was again restored at GGPS Datta No.1 (copy of application, appeal, restoration order is annexed).

8. Reply of para No.8 upto the extent of promotion in BPS-15 is correct, rest of para is incorrect.
9. Reply of para No.9 is that vide endorsement No.2721-26 dated 05.06.2013 respondent No.5 joined GGPS Neelior. Rest of para is incorrect. Photocopy is annexed. Meanwhile appellant also instituted a civil suit (declaration against respondents on 09.07.2014 which was dismissed on 15.01.2015. (photocopy of annexed).
10. Para No.10 is incorrect, Vide endorsement No.432-35 dated 08.05.2014 order of respondent No.5 endorsement No.3425-30/GP/Pk-53 dated 14.09.2013 was again restoration in the best interest of public services.
11. Para No.11 is related exclusively to service matter and according to civil servant Act, 1973 any one including appellant is duty bound to perform duties whereas the department assigned the duties.
12. Appellant according to rules and regulation is not deserving due to which her departmental appeal was dismissed.

#### GROUNDS

- A. Para A is incorrect. Transfer order is in accordance with the policy of education department.
- B. Para B is incorrect.

- C. Para C is in correct. Appellant already completed her tenure at GGSP Data No.2.
- D. Para D is incorrect. Department having exclusive jurisdiction to deal all the matters according to law.
- E. Para No.3 is incorrect.
- F. Para F is incorrect. Appellant already completed her tenure 2 years service at GGPS Datta No.2.
- G. Para G is incorrect, except leveling false baseless allegations against the respondents nothing else.
- H. Appellant having no case of action.
- I. Appeal is badly time barred.

It is humbly prayed that appellant having no cause of action appeal is badly time barred, which may kindly be dismissed.

Dated: 17/12/2015

*Bashir-un-Nissa*

MST. BIBI BASHIR-UN-NISSA  
Respondent No.5

Through.

*H. Khan*

MR. HAKIM KHAN ADVOCATE  
High Court Mansehra.

VERIFICATION.

Verified that all the contents of reply are true and correct to the best of my knowledge and belief nothing has been concealed or suppressed.

Dated: 17-12-2015

*Bashir-un-Nissa*

MST. BIBI BASHIR-UN-NISSA  
Respondent No.5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Mst. Kousar Sultana (PSHT) daughter of Gul Zaman resident of Datta Tehsil and District Mansehra.

Appellant

Versus

Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Peshawar.

Respondents

SERVICE APPEAL

Replication from Respondent No.5.

Respectfully Sheweth!

- (i) This replication may kindly be considered part and parcel of written reply.
- (ii) Para No.2 is incorrect. Appellant having no prima facie case nor balance of convenience lies in her favour.
- (iii) Para No.3 is incorrect. Appellant was rightly transferred according to the Government Policy, and already completion her two years tenure at GGPS Datta No.2.
- (iv) Para No.4 is incorrect. Respondent No.5 is performing her duties from her transfer order from GGPS Neloor to GGPS Datta and if the impugned order was suspended the respondents would suffer irreparable loss and become inconvenient.

It is therefore prayed that application is based on malafide, having no locus standi, and just to waste the precious time of this Honourable Court, being badly time barred which may kindly be dismissed.

Dated: 17.12.2015.

*Bashir-un-Nissa*

MST. BIBI BASHIR-UN-NISSA  
Respondent No.5

*Through Malik Hakim Khan*  
Advocate High Court  
Mansehra

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

TRANSFER ORDER.

The following P S H teachers are hereby Transfer on their own pay and grade in the interest of public service with immediate effect.

S.No	Name of Teacher	From	To	Remarks
1.	Bibi Bashir Un Nisa PSHT	GGPS Niloor	GGPS Datta No.1	V.N.2
2.	Kousar Sultana PSHT	GGPS Datta No.1	GGPS Niloor	V.N.1

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.

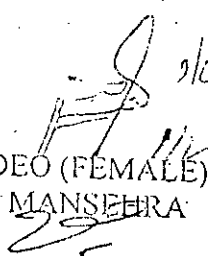
Sd/-  
DISTRICT EDU:OFFICER  
(FEMALE) MANSEHRA

Endst: No 3425-30 /GB/PK-53

Dated 14 /09/2013.

Copy to the:-

1. ASDEO Circle Concerned.
2. DEMIS Branch Local office.
3. Head Teacher Concerned.
4. Teacher concerned.

  
SDEO (FEMALE)  
MANSEHRA


مکتوبہ جناب سب ڈویژنل ایجوکیشن آفیسر صاحبہ خانم سردار سے  
منعہ مانندہ

جناب عالیہ

JOINING REPORT چارج رپورٹ

موربانہ ڈیپارٹمنٹ کے لئے سہ ماہی نے ماسٹر انسٹرکٹر اور ماسٹر  
3425-30/GB/PK-53 مورخہ 14 نومبر کے مکتوب کو  
گورنر پرائمری سکول منبراہ داتا میں چارج لیٹر اپنی  
ذمہ داریاں شروع کر دی ہیں۔

15/09/2013  
المنعم



B. M. S. 15/09/2013

مسماہ بی بی لیسٹر  
پرائمری سکول منبراہ داتا  
گورنمنٹ گورنر پرائمری سکول منبراہ داتا

(منعہ مانندہ)

گورنمنٹ  
15/09/2013  
B. M. S.

Annexure ~~4~~ Ki (42)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

CANCELLATION.

As approved by the competent the Transfer order issued vide this office Endst: 3425-30/GB/PK-53 dated 14-9-2013 is hereby cancelled with immediate effect in the interest of public service.

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.


Sd/-  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA


Endst: No 3460-64 /MT/SDEO(F)

Dated 23/09/2013.

Copy to :-

1. The ASDEO(F) circle concerned.
2. Head Teacher concerned.
3. Teacher concerned.

  
1/2 SUB-DIVISIONAL EDU: OFFICER  
(FEMALE) MANSEHRA  
23/9/2013

Affesial  




To,

The Chief Minister & Minister for Education (S&L)  
Khyber Pakhtunkhwa (Peshawar).

Subject: APPEAL FOR RESTORATION OF TRANSFER ORDER NO. 3425-30  
DATED 14-09-2013 BY DEO (FEMALE) MANSEHRA

Respected Sir,

Respectfully stated that Petitioner is ill, and having small Children which are studying. Due to illness it is very difficult for petitioner to walk on foot for long distance.

For the above mentioned reasons, petitioner was transfer vide order No. 3425-30 dated 14-09-2013 by District Education officer Female Mansehra who is a competent Authority to Government Girls Primary School No. 1 Datta. But unfortunately, due to political Rivary, order of petitioner was cancelled by the concerned MPA of Pakistan Muslim League (N), which is totally against the Manifesto of Pakistan Tehreek-e- Insaf (PTI).

Therefore it is kindly requested before your honour that directions may kindly be giving to DEO ( F ) Mansehra to restore the order dated 14-09-2013 and petitioner may kindly be adjusted to Government Girls Primary School No 1 Datta.  
I may very thankful to you for this acts of kindness.

Thanking you,

Your faithfully  
Bibi Bashir Un Nisa  
Primary School Head Teacher  
Govt. Girls Primary School No 1 Datta  
Tehsil & District Mansehra

*DEO F  
Mansehra  
Please will do same and restore  
order of 14/9/13 if she was not healthy  
was victimizing -  
to  
21/11/13*

*Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar*

Annexure - M, (46)

19

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (F) MANSEHRA

RESTORATION.

Consequent upon the acceptance of appeal by the appellant authority and on the approval of the competent authority, the Transfer order issued vide this Office Endst No. 3425-30/GB/PK-53 Dated 14/9/2013 is hereby restored in the interest of Public Service with immediate effect.

Note:-

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned.

Sd/-  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA.

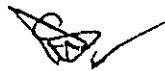
Endst.No 432-35 /PK-53-II Dated 8-5- /2014.

Copy to the:

1. District Account Officer, Mansehra.
2. ASDEO Circle concerned.
3. Head Teacher concerned.
4. Teacher concerned.

Sd/-  
SUB DIVISIONAL EDUCATION OFFICER  
(FEMALE) MANSEHRA.

Affesid



ملک احمد علی خان صاحب علی احمد علی خان

۱۱  
۹. 7. 13

۱۷۲/۱۵

کوہاٹ ضلع سید پور تحصیل

۱۵  
۱۹۰۹

کوہاٹ ضلع سید پور تحصیل

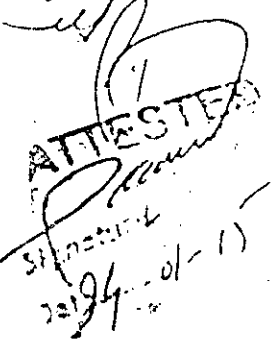
۱۳۳۱



۱- زمین (زمانہ) مالک  
۲- زمین (زمانہ) مالک  
۳- زمین (زمانہ) مالک  
۴- زمین (زمانہ) مالک  
۵- زمین (زمانہ) مالک  
۶- زمین (زمانہ) مالک  
۷- زمین (زمانہ) مالک  
۸- زمین (زمانہ) مالک  
۹- زمین (زمانہ) مالک  
۱۰- زمین (زمانہ) مالک  
(مستحق)

۱۱-۱۶-۱۳

۱۱-۱۶-۱۳  
۱۵  
۲۱-۰۲-۱۳  
۳۶۲۵-۳۷



۱۳-۰۹-۱۳  
۳۶۶۵-۳۶  
۳۵-۳۲  
۱۳-۰۵-۱۳  
۳۵-۳۲

بند ۱۰ کے تحت اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں  
دہلی کے شہر میں ایک مکان کی تعمیر کے لئے ایک معاہدہ کی صورت میں  
کے تحت اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں

21.02.13 کے لئے ایک معاہدہ کی صورت میں  
اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں

432-35 کے تحت اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں  
دوسرے معاہدہ کی صورت میں اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں

Restoration کے تحت اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں  
3425-38 کے تحت اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں

بند ۱۰ کے تحت اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں  
میں ایک معاہدہ کی صورت میں اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں  
اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں

ATTACHED  
01-11

Restoration کے تحت اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں  
بند ۱۰ کے تحت اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں

2007

بند ۱۰ کے تحت اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں  
Restoration کے تحت اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں

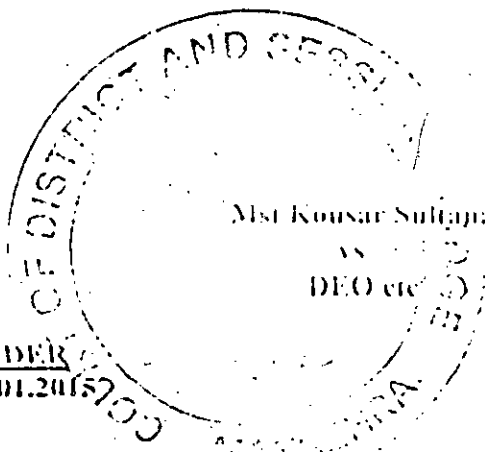
بند ۱۰ کے تحت اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں  
بند ۱۰ کے تحت اور اس کے تحت درج ذیل کے لئے ایک معاہدہ کی صورت میں

مجلس عالی ۱۵۰۰ ...

۳ ...

۱۵-۱۱-۵۹

مجلس عالی ...



ORDER  
15.01.2015

Handwritten notes and signature on the left side of the page, including the date '24-01-15'.

Learned counsel for plaintiff present.

As result of successful resolution of the matter plaintiff's counsel has made an application (EXPB) for withdrawal of the suit in hand. To this effect he rendered his statement recorded in the court & exhibited his wakalatnama which is Ex.P.V.

Consequently the suit of the plaintiff is dismissed as withdrawn. File be consigned to record room after necessary procedure.

Announced:  
15.01.2015

619

Amir Ali Mughal  
Civil Judge-I N. Manshera

Handwritten notes and stamps at the bottom of the page, including the date '24-01-15' and other illegible markings.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Mst. Kousar Sultana (PSHT) daughter of Gul Zaman resident of Datta Tehsil and District Mansehra.

12811

DBM No.	78
BC No.	10-2755
Name of Advocate.	حکیم حاکم خان

S.No. \_\_\_\_\_

وکالت نامہ



Alim Nawaz Khan  
Advocate High Court  
2015-16  
General Secretary  
District Bar Ass: Mansehra

بعدالت سندس ڈیوٹی فیڈریشن خواتین اور بچوں

عنوان: صاحبہ کونڈی سلطانہ PSHT نام صاحبہ سیدہ - مندرجہ ذیل فیڈریشن خواتین اور بچوں

منجانب: ایس ایڈوکیٹ ریک نوعمیت مقدمہ ال ایڈوکیٹ ریک ایڈوکیٹ ریک ایڈوکیٹ ریک

دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے بیروی و جواب دہی بمقام ایڈوکیٹ ریک ایڈوکیٹ ریک کے لیے  
 کتبہ حکیم حاکم خان ایڈوکیٹ ریک ایڈوکیٹ ریک  
 کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے  
 جانے وکیل موصوف کو اطلاع دیکر حاضر کروں گا اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ  
 میرے خلاف ہو گیا تو وکیل موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام پکھری کے علا  
 کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام پکھری کے علا  
 کسی اور جگہ سماعت ہو یا پکھری کے اوقات کے آگے پیچھے سماعت ہونے پر مظہر کو کوئی نقصان پہنچے تو وکیل موصوف ذمہ دار  
 نہ ہوں گے اور وکیل موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست  
 بیان حلفی و تصدیق کرنے اور اسپر دستخط کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کا روپیہ وصول  
 کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپر دائر نامہ و دستبرداری و اقبال دعویٰ کا اختیار بھی ہوگا  
 بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کطرفہ درخواست حکم امتناعی یا فیصلہ قبل از ڈگری اجراء ڈگری بھی وکیل موصوف  
 کو بشرط ادائیگی علیحدہ محتاتانہ ادا کرنے کا مجاز ہوگا اور بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا بیرسٹر کو  
 بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے وکیل موصوف کو  
 اور اگر پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو وکیل موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ کریں اور ایسی حالت  
 میں میرا مطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پرداخت وکیل موصوف مثل ذات خود منظور و قبول ہوگا۔  
 لہذا وکالت نامہ لکھ دیا ہے اور دستخط/انگوٹھا ثبت کر دیا ہے تاکہ سند ہے۔ مضمون وکالت نامہ سن لیا ہے۔ اور اچھی طرح سمجھ لیا ہے۔

صاحبہ سید سلطانہ  
 ایڈوکیٹ ریک ایڈوکیٹ ریک  
 Datta Tehsil, Mansehra

مورخہ 20/5

ACCEPTED  
 ALIM NAWAZ KHAN  
 Advocate High Court  
 Mansehra.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Mst. Kousar Sultana (PSHT) daughter of Gul Zaman resident of Datta Tehsil and District Mansehra.

.....Appellant

Versus

Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber Pakhtunkhwa Elementary and Secondary Education Peshawar etc.

.....Respondents

SERVICE APPEAL

Written Reply on behalf of Respondent No.5

Preliminary Objections:

1. That the Honourable Service Tribunal has got no jurisdiction to entertain the present appeal.
2. Appellant has got no cause of action to file the present appeal.
3. Appeal is not maintainable in its present forum.
4. That the appellant is estopped by her own conduct to file the present appeal.
5. The appeal is groundless based on malafide.
6. The appeal is badly barred by law and limitation.
7. That the appellant was transferred by respondent No.3 & 4 according to Rules and Regulation of Khyber Pakhtunkhwa Civil Servant Act 1973.

Factual Objection:

1. Para No.1 related to service record of appellant and needs no comments.
2. Para No.2 is correct upto the extent that appellant is Government Servant and employ of Education department.



3. Reply of para No.3 is that appellant is Government Servant and being Government servant she under section 10 of KPK Civil Servant Act 1973, is duty bound to perform her duties at any station in District Mansehra.
4. Reply of para No.4 is that appellant is bound to perform her duties wherein the best interest of public service, similarly respondent No.5 also remains for away during her 19 years service from her home station to Remote hilly, hard, areas like GGPS Chitta Mohri in PK57, Pir Sohawa, Arhalya, Neelor etc and perform her duties in the interest of public service.
5. Reply of para No.5 is that appellant was performing her duties already in GGPS Datta not before her promotion in Scale-15 since 6 years back and again after promotion she remained at GGPS Data No.2 while she remain for such a long tenure of her service for more than 2 years, which is clear cut violation of service Rules.
6. Para No.6 is incorrect, except false allegation leveled by appellant nothing else, appellant was rightly transferred after completion of her two years tenure at GGPS Datta No.2 by respondents according to policy of Government and Service Rules and respondent No.5 rightly transfer vide endorsement No.3425-30 dated 14.09.2013 by competent authority and after transfer of respondents at GGPS No.1 Datta respondent No.5 took charge and she by performing her duties at GGPS Datta No.1. (copy of order is annexed)
7. Reply of para No.7 is that order bearing endost No3460-64 dated 23.09.2013 was cancelled by respondent No.3 due to using political influence by appellant through concerned MPA, which is clear cut violation, of Government Policy and Rules and Regulation of Khyber Pakhtunkhwa Civil Servant Act 1973 and that that transfer order of respondent was based on malafide, endorsement No.3460-64 dated 23.09.2013 which is after 9 days. (copy is annexed), against the cancellation order

No.3425-30 dated 14.09.2013 application was moved by respondent No.5 before the Chief Minister of KPK, which was marked to Director Education KPK, Peshawar. It was prayed that political influence was involved, Director KPK, order to DEO, Female Mansehra for restoration of order of respondent No.5 and vide endorsement No.432-35 PK 35II Dated 08.05.2013, respondent was again restored at GGPS Datta No.1 (copy of application, appeal, restoration order is annexed).

8. Reply of para No.8 upto the extent of promotion in BPS-15 is correct, rest of para is incorrect.
9. Reply of para No.9 is that vide endorsement No.2721-26 dated 05.06.2013 respondent No.5 joined GGPS Neelor. Rest of para is incorrect. Photocopy is annexed. Meanwhile appellant also instituted a civil suit (declaration against respondents on 09.07.2014 which was dismissed on 15.01.2015. (photocopy of annexed).
10. Para No.10 is incorrect, Vide endorsement No.432-35 dated 08.05.2014 order of respondent No.5 endorsement No.3425-30/GP/Pk-53 dated 14.09.2013 was again restoration in the best interest of public services.
11. Para No.11 is related exclusively to service matter and according to civil servant Act, 1973 any one including appellant is duty bound to perform duties whereas the department assigned the duties.
12. Appellant according to rules and regulation is not deserving due to which her departmental appeal was dismissed.

#### GROUNDS

- A. Para A is incorrect. Transfer order is in accordance with the policy of education department.
- B. Para B is incorrect.

- C. Para C is in correct. Appellant already completed her tenure at GGSP Data No.2.
- D. Para D is incorrect. Department having exclusive jurisdiction to deal all the matters according to law.
- E. Para No.3 is incorrect.
- F. Para F is incorrect. Appellant already completed her tenure 2 years service at GGPS Datta No.2.
- G. Para G is incorrect, except leveling false baseless allegations against the respondents nothing else.
- H. Appellant having no case of action.
- I. Appeal is badly time barred.

It is humbly prayed that appellant having no cause of action appeal is badly time barred, which may kindly be dismissed.

Dated: 17/12/2015

*Bashir-un-Nissa*

MST. BIBI BASHIR-UN-NISSA  
Respondent No.5

Through.

*Hakim Khan*

MR. HAKIM KHAN ADVOCATE  
High Court Mansehra.

VERIFICATION.

Verified that all the contents of reply are true and correct to the best of my knowledge and belief nothing has been concealed or suppressed.

Dated: 17-12-2015

*Bashir-un-Nissa*

MST. BIBI BASHIR-UN-NISSA  
Respondent No.5

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Mst. Kousar Sultana (PSHT) daughter of Gul Zaman resident of  
Datta Tehsil and District Mansehra.

Appellant

Versus

Government of Khyber Pakhtunkhwa through Secretary to  
Government of Khyber Pakhtunkhwa, Elementary and Secondary  
Education Peshawar.

Respondents

SERVICE APPEAL

Replication from Respondent No.5.

Respectfully Sheweth!

- (i) This replication may kindly be considered part and parcel of written reply.
- (ii) Para No.2 is incorrect. Appellant having no prima facie case nor balance of convenience lies in her favour.
- (iii) Para No.3 is incorrect. Appellant was rightly transferred according to the Government Policy, and already completion her two years tenure at GGPS Datta No.2.
- (iv) Para No.4 is incorrect. Respondent No.5 is performing her duties from her transfer order from GGPS Nelloor to GGPS Datta and if the impugned order was suspended the respondents would suffer irreparable loss and become inconvenient.

It is therefore prayed that application is based on malafide, having no locus standi, and just to waste the precious time of this Honourable Court, being badly time barred which may kindly be dismissed.

Dated: 17.12.2015.

*Bashir-un-Nissa*

MST. BIBI BASHIR-UN-NISSA  
Respondent No.5

*Through Malik Hakim Khan*  
Advocate High Court  
Mansehra

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

TRANSFER ORDER.

The following P S H teachers are hereby Transfer on their own pay and grade in the interest of public service with immediate effect.

S.No	Name of Teacher	From	To	Remarks
1.	Bibi Bashir Un Nisa PSHT	GGPS Niloor	GGPS Datta No.1	V.N.2
2.	Kousar Sultana PSHT	GGPS Datta No.1	GGPS Niloor	V.N.1

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.


Sd/-  
DISTRICT EDU:OFFICER  
(FEMALE) MANSEHRA.

Endst: No 3425-30 /GB/PK-53

Dated 16 /09 /2013.

Copy to the:-

1. ASDEO Circle Concerned.
2. DEMIS Branch Local office.
3. Head Teacher Concerned.
4. Teacher concerned.

  
SDEO (FEMALE)  
MANSEHRA

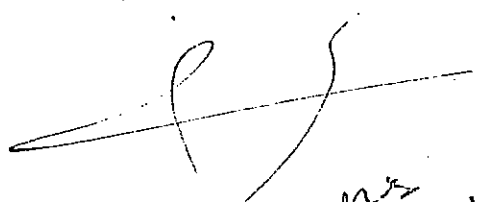
کھنور ضلع سب ڈویژنل ایجوکیشن آفیسر صاحبہ زناہ دراز سے  
منسلک ممبر

جناب عالیہ

JOINING REPORT چارج رپورٹ

موربانہ ڈائریسٹس کے لئے مسائل کے لئے انسپکٹر آرڈر ممبر  
3425-30/GB/PK-53 مورخ 14 نومبر کے کٹ ڈورنٹ  
گورنر پرائمری سکول ممبرہ داتا میں چارج لیٹر اپنی  
ذمہ داریاں شروع کر دی ہیں۔

الموجود  
15/09/2013



B. S. - 15/09/2013

ممبرہ بی بی لبتہ النساء  
پرائمری سکول پٹوہ  
گورنر پرائمری سکول ممبرہ داتا

(منسلک ممبرہ)

گورنر پرائمری سکول پٹوہ  
15/09/2013

Annexure K1 (42)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

CANCELLATION.

As approved by the competent the Transfer order issued vide this office Endst: 3425-30/GB/PK-53 dated 14-9-2013 is hereby cancelled with immediate effect in the interest of public service.

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.

Sd/-  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA

Endst: No. 3460-64 /MT/SDEO(F)

Dated 23/09/2013.

Copy to :-

1. The ASDEO(F) circle concerned.
2. Head Teacher concerned.
3. Teacher concerned.

  
1/2 SUB-DIVISIONAL EDU: OFFICER  
(FEMALE) MANSEHRA

23/9/2013

A. Faisal  


To,

The Chief Minister & Minister for Education (S&L)  
Khyber Pakhtunkhwa (Peshawar).

Subject: APPEAL FOR RESTORATION OF TRANSFER ORDER NO. 3425-30  
DATED 14-09-2013 BY DEO (FEMALE) MANSEHRA

Respected Sir,

Respectfully stated that Petitioner is ill, and having small Children which are studying. Due to illness it is very difficult for petitioner to walk on foot for long distance.

For the above mentioned reasons, petitioner was transfer vide order No. 3425-30 dated 14-09-2013 by District Education officer Female Mansehra who is a competent Authority to Government Girls Primary School No. 1 Datta. But unfortunately, due to political Rivary, order of petitioner was cancelled by the concerned MPA of Pakistan Muslim League (N), which is totally against the Manifesto of Pakistan Tehreek-e- Insaf (PTI).

Therefore it is kindly requested before your honour that directions may kindly be giving to DEO ( F ) Mansehra to restore the order dated 14-09-2013 and petitioner may kindly be adjusted to Government Girls Primary School No 1 Datta.  
I may very thankful to you for this acts of kindness.

Thanking you,

*DEO F  
Mansehra*

*Please will do same and restore  
order if she was not healthy  
9/14/13  
21/1/13  
Mansehra*

Your faithfully  
Bibi Bashir Un Nisa  
Primary School Head Teacher  
Govt. Girls Primary School No 1 Datta  
Tehsil & District Mansehra

*21/1/13*  
District Education Officer  
Mansehra & Sessions Judge  
Khyber Pakhtunkhwa Peshawar



Annexure M, (46)

19

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (F) MANSEHRA

RESTORATION.

Consequent upon the acceptance of appeal by the appellant authority and on the approval of the competent authority, the Transfer order issued vide this Office Endst No. 3425-30/GB/PK-53 Dated 14/9/2013 is hereby restored in the interest of Public Service with immediate effect.

Note:-

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned.

Sd/-  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA.

Endst.No 432-35/PK-53-II Dated 8-5- /2014.

Copy to the:

1. District Account Officer, Manshra.
2. ASDEO Circle concerned.
3. Head Teacher concerned.
4. Teacher concerned.

*1*  
SUB DIVISIONAL EDUCATION OFFICER  
(FEMALE) MANSEHRA.

*Subscribed*

*[Signature]*

ملک اعظم انجمن ترقی ہندوستان علی اعظمی ہندی

۱۱  
۹.7.13

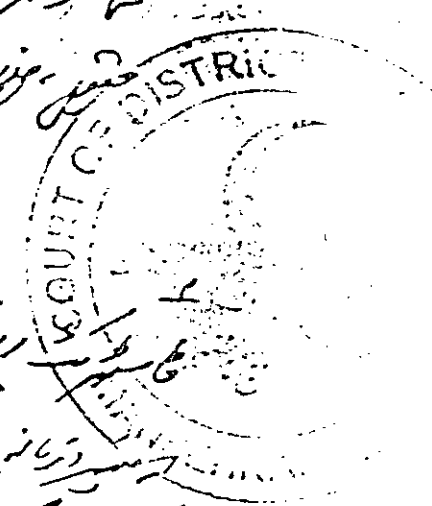
۱۷۲/۱۵

کمیونٹی ہاؤس ہندوستان علی اعظمی ہندی

۱۵

۱۹۰۹ء

۱۳۳۱



۱- جنسیت (زنانی) مالکیت  
۲- سب و غیر سب  
۳- جوڈیشل  
۴- سب و غیر سب  
۵- مالکیت  
۶- سب و غیر سب  
۷- سب و غیر سب  
۸- سب و غیر سب  
۹- سب و غیر سب  
۱۰- سب و غیر سب  
(مستطعم)

۱۳-02-13  
۱۵  
۳۶۲۵

ATTESTED  
Signature  
22/9/13

۱۳-09-13  
۳۶۶۵-۶۶  
۳۵-۳۲  
۳۵-۵۵  
۱۱

بیرہ لکھو از بیہ دستن کو در تیرہ حصہ کے لیے سب سے پہلے سے طریقہ کی  
دیکھ کر پتہ چلے گا کہ یہ کیا ہے۔ جبکہ یہاں سے جو سب سے پہلے  
کی اسٹیٹمنٹ حاصل ہے اور اس کے ساتھ ساتھ اس کی سفارش کر

ایم ای 21.02.13 کے لیے لکھو از بیہ دستن کی 15 نو  
کوئی اور اسٹیٹمنٹ اور نہ ہی کوئی بھی ہے۔ اس کو تو سب سے پہلے

کاموں کو فٹن کرنے کے لیے لکھو از بیہ دستن کی 35-432 فرم 05.11.08  
دوسرے حصہ کی کاپی اسٹیٹمنٹ کے ساتھ ساتھ اس کے ساتھ

Restoration کی فرم 14/08 کے ساتھ ساتھ لکھو از بیہ دستن

38-34 فرم 13.08.14 کے ساتھ ساتھ Restored کی کاپی

بے ہدف ترقی کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ  
عینہ ہزارہ، عدالت عالیہ کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ  
بے ہدف ترقی کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ  
اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ

Restoration کی فرم 14/08 کے ساتھ ساتھ لکھو از بیہ دستن

بے ہدف ترقی کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ

14/08

بے ہدف ترقی کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ  
Restoration کی فرم 35-432 فرم 05.11.08

بے ہدف ترقی کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ  
اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ اس کے ساتھ ساتھ

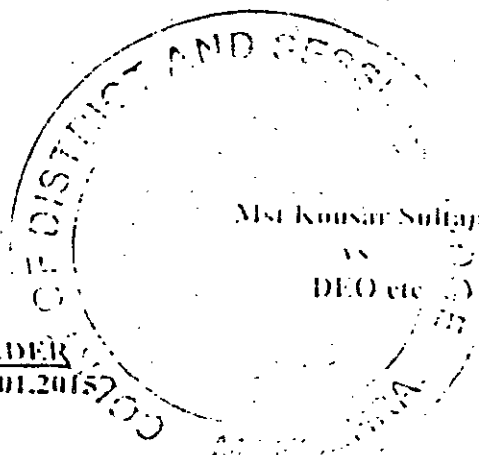
ATTACHED  
14/08/14

میں نے اس پر عمل کرنا شروع کیا ہے۔

3  
- 2002 -

15-11-2004

میں نے اس پر عمل کرنا شروع کیا ہے۔



ORDER  
15.01.2015

Handwritten notes in a circle: 74, 24-01-15

Learnt counsel for plaintiff present.

As result of successful resolution of the matter plaintiff's counsel has made an application (EXPB) for withdrawal of the suit in hand. To this effect he rendered his statement recorded in the court & exhibited his wakalatnama which is EX.P.A.

Consequently the suit of the plaintiff is dismissed as withdrawn. File be consigned to record room after necessary procedure.

Announced:  
15.01.2015

614

Signature of Amir Ali Akbar  
Civil Judge - Mansoura

Handwritten notes and stamps: 23-01-15, COURT, 24-01-15, 24-01-15

Handwritten notes at the bottom of the page.