To come up for arguments on 18.01.2023 before D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.

(Fareeha Paul) Member (E)

(Kalim Arshad khan) Chairman 15.07. 2022

Muhammad Nawaz (father of the appellant) present. Mr. Kabir Ullah Khattak, Additional Advocate General for the respondents present.

Father of the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in Hon'able Peshawar High Court, Peshawar. Request accepted by way of last chance. To come up for arguments on 18.10.2022 before D.B.

(Fareeha Paul) Member (E)

(Kalim Arshad Khan) Chairman

18.10.2022

Junior to counsel for appellant present.

Kabir Ullah Khattak, learned Additional Advocate General for respondents present.

Former made a request for adjournment as senior counsel for appellant is busy before Peshawar High Court, Peshawar; granted. To come up for arguments on 21.11.2022 before D.B.

(Fareeha Paul) Member(E) (Rozina Rehman) Member (J) 04.01.2022

Counsel for the appellant and Mr. Javaidullah, Asstt. AG for the respondents present.

Former seeks adjournment in order to further prepare the brief. Request accorded. To come up for arguments on 08.02.2022 before the D.B.

(Atiq-ur-Rehman Wazir) Member(E) Chairman

8-2-2022

Due to retirement of the Honible Chairman the case is adjourned to come up for the same as before on 9-5-2022

09.05.2022

Muhammad Nawaz (father of the appellant) present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Father of the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar Adjourned. To come up for arguments on 15.07.2022 before the D.B.

(Mian Muhammad) Member (E) (Salah-ud-Din) Member (J) 27.07.2021

Mr. Muhammad Nawaz (father of the appellant) present.

Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Father of the appellant sought adjournment on the ground that learned counsel for the appellant is busy before the august Supreme Court. Adjourned. To come up for arguments before the D.B on 03.11.2021.

(ATIQ-UR-REHMAN WAZIR) MEMBER (EXECUTIVE) (SALAH-UD-DIN) MEMBER (JUDICIAL)

03.11.2021

Appellant present through representative.

Muhammad Rasheed learned Deputy District Attorney for respondents present.

Former made a request for adjournment as learned counsel for appellant is not available today. Request is accorded. To come up for arguments on 04.01.2022 before D.B.

(Rozina Rehman) Member (J) Chairman

Father of appellant on behalf of appellant present.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Former made a request for adjournment as counsel for appellant is busy, Apex Court; granted. To come up for arguments on 04.03.2021 before D.B.

(Mian Muhammad) Member (E) (Rozina Rehman) Member (J)

04.03.2021

Father/Special Attorney on behalf of appellant and Asif Masood, DDA for the respondents present.

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council, the matter is adjourned to 09.04.2021 for hearing before the D.B.

(Atiq-ur-Rehman Wazir) Member(E)

Chairman

9.4.21

Due to cov10-19, the lase is adjusted to 27.7.2021 for The Lame. Das

21.12.2020

Counsel for appellant present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Abdul Qayum ADEO representative of respondent No.2 present.

Written reply on behalf of respondent No.2 was submitted. Learned A.A.G made a request for time to furnish reply of respondents No.1, 3 & 4. The instant case is posted to D.B for arguments. Respondents No.1, 3 & 4 may furnish their comments on the next date fixed as 15.01.2021 before D.B.

Adjourned accordingly.

(Rozina Rehman) Member (J)

15.01.2021

Father of appellant on behalf of appellant present.

Muhammad Rasheed learned Deputy District Attorney present. Javid Iqbal Stenographer for respondents No.1, 3 & 4 present.

Representative of respondents No.1, 3 & 4 relied upon the comments already submitted by respondent No.2. Rejoinder was also submitted.

Case is adjourned to 27.01.2021 for arguments, before

D.B.

(Mian Muhammad) Member (E) (Rozina Rehman) Member (J) 02.10.2020

Mr. Nawab f,ather of appellant on behalf of appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present. Written reply is still awaited. Notice be issued to respondents with direction to make sure submitting of replies in the instant appeal on or before 25.11.2020 before S.B.

(Mian Muhammad) Member (E)

25.11.2020

Mr. Nawab, Special Attorney for the appellant is present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents is also present.

Written reply on behalf of respondents not submitted. Learned Additional Advocate General requests for further time to contact the respondents and furnish written reply/comments on the next date of hearing. Last chance is given to the respondents for submission of written reply/comments. Adjourned to 21.12.2020 on which date file to come up for written reply/comments before S.B.

(MUHAMMAD JAMAL KHAN) MEMBER (JUDICIAL) 20.07.2020

Mr. Nawab, Special Attorney on behalf of the appellant is present. Mr. Kabirullah Khattak, Learned Additional AG for the respondents is also present. Written reply/comments on behalf of respondents not submitted. Learned Additional AG requests for further time to submit the requisite reply. May do so on next date of hearing. Adjourned to 05.08.2020 for submission of written reply/comments.

(MUHAMMAD JAMAL KHAN) MEMBER

05.08.2020

Mr. Nawab, Special Attorney on behalf of the appellant is present. Mr. Kabirullah Khattak, Additional AG is also present.

Learned Additional AG requested for further time in order to submit written reply/comments on the next date. Time is given. File to come up for written reply/comments on 20.08.2020 before S.B.

(MUHAMMAD JAMAL KHAN) MEMBER

. 20.08.2020

Mr. Nawab, Special Attorney for the appellant present.

Addl: AG for respondents present. Representative of the respondents are absent.

Written reply on behalf respondents not submitted.

Notices be issued to the respondents for submission of written reply/comments.

Adjourned to 02.10.2020 before S.B.

(Mian Muhammad) Member(E) 01.07.2020

Attorney of the appellant along with counsel present. Arguments heard and record perused.

Contends that the appellant was appointed against Vacant Industrial Home Post and thereafter, she has been serving in different schools for almost 12 years, when in the year 2018 she was transferred to her native village school i.e. GGPS Feroz Mela. This order was cancelled after 32 days, therefore, representation was preferred and transfer order was cancelled. After 5 months of the cancellation order, yet another transfer order was issued and she was again transferred to the said school i.e. GGMS Noor Ali Killi. She filed a request for cancellation order yet another order was issued vide which detailment order was cancelled. She then approached the concerned quarter but to no avail, therefore, writ petition was filed and the department was directed to decide appeal in accordance with law and it was during the pendency of C.O.C when she was informed about the fate of her departmental appeal. It was submitted that the appellant has to her credit 15 years of service and for more than 13 years, she served outside her home station.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal exceptions. The appellant is directed to deposit security and process fee within 10 days. Notice be issued to the respondents. To come up for written reply/comments on 20.07.2020 before S.B.

Appellant Deposited
Security Process Fee

Annexed with the appeal is an application for interim relief. Notice of this application also be served upon respondents for the date fixed.

FORM OF ORDER SHEET

Court of			
	000		
No	<u> </u>	/2020	

	Case No	<u> </u>
15.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	. 2	3
1-	19/06/2020	The appeal of Mst. Ambar Nawaz presented today by Mr. Sikandar Rashid Advocate may be entered in the Institution Register and put up to
	•	the Worthy Chairman for proper order please. REGISTRAR
2-		This case is entrusted to S. Bench for preliminary hearing to be put up there on Ollo7)200.
		CHAIRMAN CHAIRMAN
	· .	
,		

Service Appeal.No	/ 2020.
	9040

Mst Amber Nawaz	Vs	Director Education & others

INDEX

S.No	Discription of Documents	Annexures	Pages
1.	Service Appeal + Alidavit	_	1-7
2.	Application gor Suspension +	Afridavit	8-9
3.	Addresses of Parties	The state of the s	10
4.	Appointment Letter	Α	11: 37
5.	Order dated.16.08.2018	В	14 12
6.	Order dated.29.01.209	C.	17.
7.	Letter Dated.12.02.2019	D	15
8.	Latter dated10.04.2019	E	16
9.	Order dated.26.03.2019	F	17
10.	Letter dated.02.05.2019	G	100
11.	Explanation Letter.18.05.2019	Н	19
12.	Letter dated.29.04.209	1 .	90
13.	Reply to Explanation	<u> </u>	91
14.	Copy of Writ Petition	K	92-26
15.	Order dated.18.12.2019	L	97-90
16.	C.O.C & Order dated.10.06.2020	L-1	20-21
17.	Impugned Order dated.15.05.2020	L-2	27 <i>27</i>
18.	Copy of ACRs	M	22-20
19	Pay Slips	N	26 -27
20	Letter dated. 02 - 05 - 2019	0	30 - bi
21.	Special Power of Attorney		45-46

through

Appellant

Counsel

• In Re:

Service Appeal.No. 5895 / 2020.

Mst Amber Nawaz D/o Mohammad Nawaz	
R/o Post Office Darra Bazar, Feroz Mela,	1
Darra Adam Khel, Tehsil & District Kohat	Appellant

Vs

- 1. Director Education Newly Merged Tribal Districts (NMTD), warsak Road, Peshawar.
- 2. Education Officer, Tribal Su-Division (TSD), Darra, Kohat.
- 3. A.A.E.O, (Female) Tribal Sub-Division (TSD), Darra, Kohat.
- 4. Head Mistress GGMS M-Noor Ali Killi,
 Darra, Kohat......Respondents
 - Α. APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT 1974 AGAINST THE **IMPUGNED** ORDER DATED.15.05.2020 WHEREBY THE THE **DEPARTMENTAL** REPRESENTATION AGAINST THE TRANSFER ORDER DATED.29.01.2019 & 26.03.2019 PASSED BY RESPONDENT No.2 AS TOTALLY ILLEGAL & AGAINST THE LAW AND TO SET ASIDE THE TRANSFER ORDER, DATED.29.01.2019, AND THE SUBSEQUENT ORDER DATED.26.03.2019 AND ALSO TO DIRECT THE RESPONDENTS TO RELEASE THE SALARY OF APPELLANT WHICH HAS ILLEGALLY BEEN DEDUCTED BY THE RESPONDENTS IN THE MONTH OF MAY, 2019 & October, 2019.

.....

Respectfully Sheweeth:

1. That the Appellant was appointed in B.P.S-7 as Against Vacant Industrial Home Post on Contract Basis for a period of three years on 31.08.2005.

(True copy of Appointment Order is marked as Annexure "A")

- 2. That thereafter the Appellant has been serving in different schools for almost 12 years when in the year 2018, the Appellant was transferred to her native village school i-e GGPS Feroz Mella from GGMS Noor Ali Killi and Mst Farhana Bibi PST was transferred from GGPS Bilal Killi Tor Chappar to GGMS Noor Ali Killi against the post vacated by the Appellant on 26.01.2018.
- 3. That the above mentioned order of mutual transfer was canceled after 32 days vide Order dated.27.02.2018 whereby Mst Farhana Bibi PST was agai transferred from GGMSNoor Ali Killi to GGPS Feroz Mela against the post of Appellant.
- 4. That the Appellant preferred representation firstly to the then Agency Education Officer, F.R.Kohat on 05.03.2018 and thereafter to the then The Director Education FATA on 21.03.2018 and finally on 16.08.2018, the transfer order dated.27.02.2018 was cancelled by the then Agency Education Officer, F.R.Kohat.

(True copy of Order dated.16.08.2018 is marked as Annexure "B")

5. That after five (5) months of the cancellation Order, yet another transfer order dated.29.01.2019 was issued by Respondent No.2 whereby the Appellant was again transferred from GGMS Feroz Mela to GGMS Noor Ali Killi against the vacant post.

(True copy of Order dated.29.01.2019 is marked as Annexure "C")

6. That the Appellant against the Order dated.29..01.2019 filed a request for cancellation of Transfer Order dated.29.01.2019 to the Director Elementary and Secondary Education, KPK Peshawar on 12.02.2019 followed by a reminder dated.10.04.2019 but in vain.

(True copies of letters dated.12.02.2019 & 10.04.2019 are marked as Annexure "D" & "E" respectively)

7. That on 26.03.2019, the Respondent No.2 issued yet another order whereby the Appellant along with Seven (7) other PST Teachers were informed that their DETAILMENT ORDER dated.17.09.2018 which was never communicated to the Appellant is cancelled as is evident from the subject of the Order and they were directed to resume their duties in their original schools up to 01.04.2019 positively.

(True copy of Order dated.26.03.2019 is marked as Annexure "F")

8. That on 21.05.2019 the Deputy Director (Estab) of Directorate of Elementary & Secondary Education, Khyber Pakhtunkkhwa wrote a Letter to District Education Officer, Adam Khel Kohat whereby he was directed to take necessary action on the application of Appellant for cancellation of Transfer Order dated.29.01.2019 as per rules/policy.

(True copy of letter dated.02.05.2019 is marked as Annexure "G")

9. That the Appellant time and again approached the concerned quarters and inquired about her request and also about the directions given by the Deputy Director (Estab) but in vain when all of a sudden the Appellant received an explanation from Head Mistress GGMS Noor Ali Killi to explain her position within three days that why she has not taken charge in you respective school and remained absent from duty from Noor Ali without any information.

(True copy of Explanation letter dated.18.05.2019 & 29.04.2019 are marked as Annexure "H" & "I" respectively.

10. That the Appellant replied to the said application on 27.05.2019 wherein she explained her position.

(True copy of reply to the explanation is marked as Annexure "J")

11. That since the Respondents were not passing any final Order on the representation of Appellant, the Appellant filed a Writ Petition No.6511-P/2019 before the Honourable Peshawar High Court and the same was disposed of by the Honourable High Court vide Order dated.18.12.2019 by directing the Respondents to decide the departmental Appeal of Petitioner in accordance with law where after she may have recourse for the redressal of her grievance before the proper forum.

(True copy of Writ Petition & Order dated.18.12.2019 are marked as Annexure "K" & "L" respectively)

12. That since the Respondents were not obeying the directions of the Honourable High Court, the Appellant filed C.O.C.No.134-P/2020 and in the C.O.C reply was sought by the Honourable High Court and in pursuance of that Order, the Respondents produced the Order dated.15.05.2020 before the Honourable Court through which the Departmental Appeal of Appellant was decided and the copy of the same was handed over to the Appellant on the same date. The Honourable Court while disposing of the C.O.C.No.134-P/2020 also stated that the Petitioner (Appellant) may approach the competent forum against the Order quoted above, if so advised.

(Copy of C.O.C, Order dated.10.06.2020 & Impugned Order.15.05.2020 are marked as Annexure "L-1" & "L-2" respectively)

13. That Appellant is filling the instant Appeal against the Order dated.15.05.2020 handed over to the Appellant in Court on 10.06.2020 on the following grounds:

GROUNDS:

- a. That the Acts of Respondents are unlawful, illegal and against the well settled principles of natural justice which needs to be set aside.
- b. That if the Petitioner has been absent for such a long time, has she ever been given any Show Cause Notice or Explanation for her absence from duty.
- c. That the second transfer order within a span of one year is against the settled principles of law and rules.
- e. That after five months of the cancellation order the Appellant has yet again been transferred without assigning any reason which is totally against the law and rules.
- f. That the Appellant has to her credit 15 years of service and for more than 13 years she has served outside her home station and now its her right to be posted in the her home town.
- g. That the Appellant right from her appointment in the year 2005 has been serving as PST teacher in different schools and this fact can be substantiated from the record of attendance, ACRs & Pay Slips.

(ACRs & Pay Slips are marked as Annexure "M" & "N" respectively)

F. That despite the fact that Deputy Director (Estab) Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar wrote a letter No.45, dated.02.05.2019 to District Education Officer Adam Khel, Kohat (Respondent No.2) for taking necessary action as per Rules/Policy on the representation of Appellant but to no avail which clearly shows the malafide of Respondents.

(True copy of Letter dated.02.05.2019 is marked as Annexure "O")

It is therefore humbly requested that on acceptance of this Appeal, the impugned Transfer Order No.936, dated.29.01.2019 & subsequent Order dated.26.03.2019 may kindly be set aside and the Appellant may kindly be allowed to do her duty in GGMS Feroz Mela and the salary deducted from the Appellant for the period of May 2019 & October 2019 may kindly be reimbursed to the Appellant.

Appellant

through

Sikandar Rashid, A.S.C, Peshawar.

In Re:	, .	•	
Service A	opeal No	/ 20 🎝 రి.	
Mst Amber Nawaz			Appellant.
	Versus		A second
Director Education & ot	hers		: Respondents.

AFFIDIVIT

I, Mohammad Nawaz S/o, Nawab Khan R/o, Village Feroz Khan, P/o, Dara Bazzar, Dara Adam Khel, Kohat (Special Attorney) do hereby solemnly declare on oath that the contents of the instant Appeal are true and correct to the best of my knowledge and belief and nothing material has been concealed from this Honorable Court.

Deponent. C # 22401-5916385-5

19-06-2020

(Identified by)

Sikandar Rashid ASC

In Re:	Servic	e Appeal.No	/ 2020.	•
Mst Amber Naw	az		Арр	ellant.
	1	Vs		
Director Educati	ion & otl	ners	Resp	ondents

APPLICATION FOR INTERIM RELIEF

Respectfully Sheweeth:

- 1. That the above titled Appeal has been filed before this Honourable Tribunal in which no date of hearing has been fixed yet.
- 2. That the contents of the main appeal may be deemed as an integral part of this application.
- 3. That the Applicant / Appellant has a very good prima facie case which requires positive consideration of this Honourable Court.
- 4. That most obviously the balance of convenience is also in favor of the Applicant/Appellant. Moreover the Applicant/Appellant will suffer irreparable loss if the present application is not allowed.

It is therefore humbly prayed that on acceptance of this application, the Transfer Order dated.29.01.2019 & Order dated.26.03.2019 may kindly be suspended till the final decision of the main appeal.

Applicant/Appellant

through

Counsel

In Re:	•	
Service Appeal No	/ 20 🕽 👳	
Mst Amber Nawaz		Appellant.
Versus		
Director Education & others		Respondents.

AFFIDIVIT

I, Mohammad Nawaz S/o, Nawab Khan R/o, Village Feroz Khan, P/o, Dara Bazzar, Dara Adam Khel, Kohat (Special Attorney) do hereby solemnly declare on oath that the contents of the instant Application are true and correct to the best of my knowledge and belief and nothing material has been concealed from this Honorable Court.

> NOTARY PUBLIC

Deponent.

CNIC # 22401-5916385-5

(Identified by)

Sikandar Rashid ASC

In Re:		
	Service Appeal.No	/ 2019.
	ADDRESSES OF PARTIES	r
ADDELLA NIT		

APPELLANT:

Mst Amber Nawaz D/o Mohammad Nawaz (Special Attorney) R/o Post Office Darra Bazar, Feroz Mela, Darra Adam Khel, Tehsil & District Kohat.

RESPONDENTS:

- 1. Director Education NMTD, warsak Road, Peshawar.
- Education Officer, TSD, Darra, Kohat. 2.
- A.A.E.O, (Female) TSD, Darra, Kohat. 3.
- Head Mistress GGHS M. /Noor Ali Killi, 4. Darra, Kohat.

Through

Cell No.0300 5984087

which is beneficial to them plus usual allowances as admissible under the rules with effect from their taking over charge in the school noted against their names in the interest of public service.

S.No.	Name of candidate With address	Name of school Where appointed	Merit Position	Remarks
	Amber Nawaz D/O Mond Nawaz	GCHS Mohd Huscain Mela Sheraki FR KT	1	Against vacent Indultrial Home Post.
		And the second s		

1. No TA/DA etc is allowed.

2. Charge report should be submitted to all concerned in duplicate,

They will not be entitled to get pay unless their documents/NIC, and their academic professional qualifications certificates are got verified from the concerned Offices/Institutions for which the DDO will be responsible.

4. They will have to provide Health & Age certificate from the Medical Authorities.

5. The appointment is made on temporary/contract basis liable to termination at any time without assigning any reason/notice, if the c. didate wants to resign, He/She will have to give one-month's prior notice OR forefiet one month pay in lieu thereof.

The Pay scales and service rules should be subject to the revision in accordance with the order to be issued by the Govt of NWFP from time to time.

The should not be handed over charge of the post, if their/his/her age exceed 35 years or below 18 cars except those who rendered Govt Afghan refugees are entitled for relaxation equal their service period upto maximum of 10 years.

they fail to take over charge within 15 days, their appointment will be automatically as cancelled.

No cundidate be handed over charge of the post of leave vacancy if conveyed erroneously vacant by the AAEO/Head teacher concerned. Such cases be immediately detected and conveyed through special messenger in such cases the service of the last candidate will be terminated by the effects/effectees concerned.

AGENCY EDUCATION OFFICER FRIKOHAT AT KDA KOHAT

7799 - 801 / Appointment

Dated KT the 3/8 /2005

as of the above is forwarded for information and necessary action to the:

Director of Education (FATA) NWFP, Peshawar.

APA FR, Kohat.

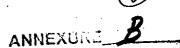
District Accounts Officer, Kohat.

: Headmaster/Headmistress concerned schools.

Candidate Concerned.

Accountant in the local office.

AGENCY EDUCATION OFFICER
FR KOHAT AT KDA KÖHAT





OFFICE OF THE AGENCY EDUCATION OFFICER F.R KOHAT, Gate No.2 K.D.A Kohat,

Phone & Fax No. 0822 9204521

Dared: 16 1 08 /2018.

Cancellation of Transfer Order.

The transfer/exchange of post between Mst. Farieina Bibi PST & Mst Amber Nawaz PST issued vide this office Mo. 10072-73 dated: 27/02/2018 is bureby cancelled in the best interest of public service with immediate effect.

> Agency Education Officer the same of participations at Mar. Foreign and A. H. 18 C. of

1. Head Mistress GGMS Noor All Kall P.E. Kolass. Company Company

TO SECTION WAS A WARREN

3. Candidates concerned.

grow par eller our with invitable and real 4. NAEO Female in the local office.

5. Office Record.

Agency Education Office · FR Robert

Ayency Education Office. Was Kanat, Co.

Agonly brivesium Office F.R Kohat.



Letter No.143 dated 16-08-2018

Cancellation of transfer order.

The transfer / exchange of post between Mst.Parhana BiBi PST & Mst. Amber Nawaz PST issued vide this office No.10072-73 dated 27-02-2018 is hereby cancelled in the best interest of public service with immediate dffect.

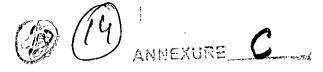
Egency Education officer F.R Kohat.

- 1. Head Mistress GGMS Noor Ali Killi F.R Kohat
- 2. Head Mistress GGMS Feroz Mela F.R Kohat.
- 3. Candidates concerned.
 - **4**. AAEO Female in the local office .
 - **≰**. Office Record.

Egency Education officer F.R Kohat.

Egency Education officer F.R Kohat.

Egency Education officer F.R Kohat.





OFFICE OF THE EDUCATION OFFICER TSD DARRA KOHAT.

Gate No.2 K.D.A Kohat Phone & Fax No. 0922-9260321

Letter No: 936 Dated 29/1/2019.

TRANSFER ORDER.

The transfer of the following PST female teachers are hereby ordered in their own pay and BPS-17 to the schools noted against their names in the best interest of the public service w.c.f the date of their taking over charge.

5.#	Name	Desg:	From	To	Rennek
1.	Mehroon	PST	GGPS Qayum Mela TSD Darra Kohat	GGPS Sunikhel No.2 TSD Darm	Against the viscoint
<u> </u>	! !	 		Kohat	post
2.	Smat Bibi	PST	GGPS Surak TSD Darra Kohat	GGPS Kot Mela.TSD Dar	- Against the vecant
		!		KGhar	post
			and the second s	<u>}</u>	,
! 3	Ambar	PST	GGMS Feroz Meia	GGMS Noor Ali Killi	Against the vacant
	1 · · · · · · · · · · · · · · · · · · ·	 			pand

NOTE:

- Charge Report Should be Submitted to all Concerned as the con
- 2. No TA/DA is allowed.

Education Officer TSD Darra Kohat.

CC:

- 1. Director Education NiviTD Warrok road Peshawar
- 2. Deputy Commissioner kolast.
- 3. District Account Office Kohat.
- 2. AAEO (female) TSD Darra Konat.
- 3. Headmistress GGHS M-Hussain Mela/Noor ali killi.
- 5. Office Record.

Education Officer TSD Darra Kohot. ⊵€ Tα,



The Director, Elementary and Secondary Education, KPK Peshawar.

ANNEXUES D

Subject:

REQUEST FOR CANCELLATION OF TRANSFER ORDER LETTER NO. 936
DATED 29-01-2019

Respected Sir,

I have the honour to give a reference of transfer order letter No. 936 date 29-01-2019 containing my transfer from my village school GGMS Feroz Mela back to GGMS Noor Ali Kalay. I was transfer about a year ago to GGMS Feroz Mela as a result of mutual transfer with Naznine Akhtar PST vide letter No. 9973-74 dated 26-01-2018 (copy of application and transfer order attached).

I am a permanent resident of village Feroz Mela as well as wedded in the same village where GGMS Feroz Mela is situated. I have about the 13 years service and have assumed duty for the first time at the aforesaid village school after having served for about 12 years at other schools.

Earlier I was transfer)just within a month of taking charge at GGMS. Feroz Mela vide letter No. 10072-73 dated 27-02-2018 which was cancelled later on vide letter No. 143 dated 16-08-2018. The current transfer order is the second one within a period of one year issued vide letter No. 936 dated 29-01-2019. It is further stated, that I was provided with no copy of the transfer order officially but obtained the same unofficially. Perhaps it was meant to keep me unaware and deprived me of the right of appeal to higher authorities. While this transfer order is taking place at the time when annual examinations are about to commence.

My repeated transfer without cogent reasons is tantamount to keep me upset and torch me mentally. Which give rise a question as to under which law rules and regulations my repeated transfer order is issued. This also negates the posting and transfer rules and regulations.

It is therefore requested to kindly]into(matter and direct the education officer Dara Adam Khel to cancel the under subject transfer order dated 29-01-2019 please.

Yours Faithfully

AMBER NAWAZ

Amber

PST (GGPS Feroz Mela)

STD Dara Adam Khel.

Dated: 12-02-2019

ANNEXURE E

Τo,

The Director, Elementary and Secondary Education, KPK Peshawar.

Subject:

REMAINDER

Respected Sir,

I have the honour to give a reference of my application dated 12.2.2019 regarding request for the cancellation of my unlawful transfer order dated 29.01.2019 which has consumed about two months and is yet to be disposed of and communicated.

In the mean time education officer, TSD, Dara Adam Khel, Kohat has issued another order titled cancellation of detailment order of female, vide letter No. 1171-75 dated 26.03.2019, directing the teachers on detailment to resume duty at original schools.

The education officer has also included my name in the detailment order as detailed teacher which is not correct and it is also evident from the aforementioned order which reads "the detailment order of Female teacher was issue vide this office No. 787-89 dated 17/09/2018 but you did not resume their duties in their original schools. You are once & last strictly directed to resume your duties in their original schools" where is my recent unlawful transfer order has issued on 29.01.2019 against which I have submitted application dated 12.2.2019, which has not yet disposed of by you sir.

This demands urgent attention and speedy disposal please.

Yours Faithfully

Ambed
Amber NAWAZ
PST (GGPS Feroz Mela)
STD Dara Adam Khel

Dated: 10-04-2019



ANNEXURE F



OFFICE OF THE AGENCY EDUCATION OFFICER
F.R KOHAT
Gate No. 2 K.D.A Kahat
Phone # 4922-9264321 Fax # 4922-9264521

Letter No: 117/-75

Duted: 26 / 3 /2019.

CANCELLATION OF DETAILMENT ORDER OF FEMALE.

The detailment order of Female teachers was/issue, vide this office No. 787-89 dated. 17/09/2018 but you did not resume their duties in their original schools. You are once & last strictly

directed to resume your duties in their original schools.

Noted against their names up to 01/09/2019 positively.

Otherwise your monthly pay will be stopped.

SH	Name of Teachers	Design	LOughal Schools 1984	Schoolsavene deputeds Remarks
		PET	GGMS Surak Toor Chapper	GGPS Atariwal
2.	1	PSHT.	GGPS Sher Hussain Mela Toor Chapper	GGPS Khan Mast Kalli
	Nusrat Afzal	PSHT	GGPS Surak Toor Chapper	GGPS Mazid Khel
į	Nuseuma	СТ	GGMS Bilal Kalli Toor Chapper	GGHS Turki Ismail Khel
	Falmiceda Afridi	PSHT	GGPS Bilal Kalli Toor Chapper	GGPS Noor Ali Kalli
	Nadia 8 hawaja	psT	GGPS Noor Ali Kalli	GGPS Mulan Sharif Khel
: 7.	Sadaf Afridi	CT.	GGMS Suni Khel	GGMS Feroz Mela
	Amber	PST	GGMS Noor Ali Kalli her original school IFIC	GGPS Foroz Mela
1()]	P.:-		*	

Charge report should be submitted in duplicate to all concerned.

Education Officer TSD Darra Kohat

CC

- Director Education NMTD Warsak Road Peshawar.
- 2. District Account Office Kohat,
- 3. Head Mistress Concerned.
- 4. Candidates Concerned.
- 5. Office Record.

Education Officer TSD Darra Kohat

0



Directorate of El. 1. entary and Secondary Education Pakhtunkhwa Peshc. var PH No. 091-921028', 9210938,



Fax 091-9210936

9210437, 61.0957, 9210468

ANNEXURE_

,			
No	/E-6/KC/Bajaur/Transfe	r	Dated/2019.
То	•		
	The District Education Officer, Adam Khel, Kohat.		Sub Division Darra
Subject:-	REQUEST FOR CANCELLATION	OF TRANSFER ORI	DER.
Memo:-			
	I am directed to refer to the	subject noted a	bove and to enclose herewith
anapplication	in respect of Mst. Amber Nawa		_
	essary action as per rules/policy		·
Encl: As Abov	<u>e.</u>		Affre 20041 I
•			Deputy Director (Estab)
Endst.No		Dated	2019.
Copy t	0:-		

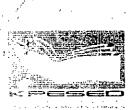
PA to Director E&SE, KPK Peshawar.

Deputy Director (Estab)

Miss Amber IHC PST GGPS Noor Acli (ii) Mirs Bina Afridi PST GGPS Noo, Acti. Subject: Explaination 917 Report-due to wilful absence.

Under the letter Endst No 1414-22 dated 29/04/2019 I an directed from the Education office TSD Daire to call explainations from above Psts on the wilful absence from their posts at GGPs Moor Ali Killi. There Jose you are directed to submit your Explainations on The above cited Subject That why you haven't taken change in your respective school and venuer absent from 56Ps sloo. Ali without any.
information, with in three days.

wind 12/c. dated 18/5/2019. Therens Him Alich. GGMS NOOT Au



OFFICE OF THE EDUCATION OFFICER

Tribal Sub: Division Datan Kelah.

ANNEXURE

Gate No: 02 K.D.A Kohat Phone & Fax No. 0923-95603 H

Dated: 21/ 5 /2018 No. 14/4-22

(1)Mr. Riaz Hussain TT GPS Tumir Khel.

(2)Mst: Sabir Jana Caller GGPS Sra Mela

(3)Mr, Zamrud Sweeper GGMS Gadia Khel.

(IMiss: Amber (IHC) PST GGMS Noor Afi Killi

75)Miss: Bina Afridi PST GGMS Noor Ali Killi

(5)Mr. Zakria Chow: GGMS Atariwal (Substitute)

(7)Mr. Khan Nawaz Chow: GHS Bosti Khel (Substitute)

(8)Mr. Zahid Lab: Assat: GHS Bosti Khel (Substitute)

(9)Mr. Sher Nawaz W/C GHS Bosti Khel (Substitute)

v (10)Mr. Sher Zada Chow: GH5 Akhunval (Substitute)

ν(11)Mr, Hassan Khao Lab: Asstt: GHS Akhurwal (Substitute)

√(12)Mr. M-Israr N/Q GHS Akhurwaf (Substitute)

(13)Mr. Nawaz Mali GHS Akhurwai (Substitute)

√ (14) Mr. Freoz N/Q GHS Akhurwal

EXPLANATION GIT REPORT. Subject: -

Mema:

Above mentioned education staff found absent/Substitute on the day of monitoring of Coverner inspection team.

On their willful absent all the principal/Head Master and Head Mistress are directed to can their explanation and report should to be submitted within three days that why, they remain absent or working substitute in Govt institutions. Their this act is actionable, and against the service rules.

> Education Officer TSD Darra Kohat.

1. Director Education NMD Warsok Road Penhawlar.

All The Principals, H/M, H Misuress CHS GGMS TSD Darra Kohat

3. D.C Kohat

4. ACTSD Darra Kohat5. All the Concerned.

- 6. Office record.

Education Officer TSD Darra Kohat.

Recieved by Moor Al Hair on 10/5/219 on friday.



To

The Education Officer, TSD, Darra Kohat.

Subject: Explanation GIT Report

Respected Sir,

Reference Memo No:1414-22 Dated: 29/04/2019, citing GIT visit to GGMS Noor Ali Killy and seeking my explaination for being marked absent by GIT on that day.

The Plea adopted in the memo with regard to my absence is inappropriate and unjust because presently I am not part of the GGMS Noor Ali Killy staff and rendering duty at GGMS Feroz Mela on account of transfer to GGMS Feroz Mela Vide transfer order No:9973-74 Dated: 26/01/2018.

Whereas Farhana bibi (PST) was transferred from GGPS Bilal Killy Toor Chappar to GGMs Noor Ali killy under the same order and since then her original duty station is GGMS Noor Ali Killy.

It is further stated that my post at GGMS Noor Ali Killy is not vaccant but has been filled by Farhana bibi (PST) who has been kept at GGMS Feroz Mela uninterrupted and unjustly.

Moreover, I received the aforementioned explaination memo on 24/05/2019(Friday) at 5:00 pm while it has been issued on 29/04/2019.

Dated: 27/05/2019

Yours Faithfully Ambes Amber Nawaz (PST)

GGMS, Feroz Mela

BEFORE THE HONOURABLE PESHAWAR HIGH COURT, PESHAWAR

In	Ė	R	e	•

W.P.No.	/ 2019.
	/ EU IJ.

Mst Amber Nawaz D/o Mohammad Nawaz (Special Attorned R/o Post Office Darra Bazar, Feroz Mela, Darra Adam Khel, Tehsil & District Kohat

۷s

- 1. Director Education NMTD, Warsak Road, Peshawar.
- 2. Education Officer, TSD, Darra, KDA Gate No.2 Kohat.
- 3. A.A.E.O, (Female) TSD, Darra, Kohat.

WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF THE ISLAMIC REPUBLIC OF PAKISTAN, 1973.

Respectfully Sheweeth:

1. That the Petitioner was appointed in B.P.S-7 as Against Vacant Industrial Home Post on Contract Basis for a period of three years on 31.08.2005.

(True copy of Appointment Order is marked as Annexure "A") ;

Alle

PESTED OF HIGH Court

- 2. That thereafter the Petitioner has been serving in different schools for almost 12 years when in the year 2018, the Appellant was transferred to her native village school i-e GGPS Feroz Mella from GGMS Noor Ali Killi and Mst Farhana Bibi PST was transferred from GGPS Bilal Killi Tor Chappar to GGMS Noor Ali Killi against the post vacated by the Petitioner on 26.01,2018.
- 3. That the above mentioned order of mutual transfer was canceled after 32 days vide Order dated.27.02.2018 whereby Mst Farhana Bibi PST was again transferred from GGMS Noor Ali Killi to GGPS Feroz Mela against the post of Petitioner.
- 4. That the Petitioner preferred representation firstly to the then Agency Education Officer, F.R.Kohat on 05.03.2018 and thereafter to the then The Director Education FATA on 21.03.2018 and finally on 16.08.2018, the transfer order dated.27.02.2018 was cancelled by the then Agency Education Officer, F.R.Kohat.

(True copy of Order dated.16.08.2018 is marked as Annexure "B")

5. That after five (5) months of the cancellation Order, yet another transfer order dated.29.01.2019 was issued by Respondent No.2 whereby the Appellant was again transferred from GGMS Feroz Mela to GGMS Noor Ali Killi against the vacant post.

(True copy of Order dated.29.01.2019 is marked as Annexure "C")

6. That the Petitioner against the Order dated.29..01.2019 filed a request for cancellation of Transfer Order dated.29.01.2019 to the Director Elementary and Secondary Education, KPK Peshawar on 12.02.2019 followed by a reminder dated.10.04.2019 but in vain.

(True copies of letters dated.12.02.2019 & 10.04.2019 are marked as Annexure "D" & "E" respectively)

EXAMIN Peshawar Hig



7. That on 26.03.2019, the Respondent No.2 issued yet another order whereby the Petitioner along with Seven (7) other PST Teachers were informed that their DETAILMENT ORDER dated.17.09.2018 which was never communicated to the Petitioner is cancelled as is evident from the subject of the Order and they were directed to resume their duties in their original schools up to 01.04.2019 positively.

(True copy of Order dated.26.03.2019 is marked as Annexure "F")

8. That on 21.05.2019 the Deputy Director (Estab) of Directorate of Elementary & Secondary Education, Khyber Pakhtunkkhwa wrote a Letter to District Education Officer, Adam Khel Kohat whereby he was directed to take necessary action on the application of Petitioner for cancellation of Transfer Order dated.29.01.2019 as per rules/policy.

(True copy of letter dated.02.05.2019 is marked as Annexure "G")

9. That the Petitioner time and again approached the concerned quarters and inquired about her request and also about the directions given by the Deputy Director (Estab) but in vain when all of a sudden the Petitioner received an explanation from Head Mistress GGMS Noor Ali Killi to explain her position within three days that why she has not taken charge in you respective school and remained absent from duty from Noor Ali Killi without any information.

(True copy of Explanation letter dated.18.05.2019 & 29.04.2019 are marked as Annexure "H" & "I" respectively).

10. That the Petitioner replied to the said application on 27.05.2019 wherein she explained her position that her absence is inappropriate and unjust because presently I am not part of GGMS Noor Ali Killi staff rather I am rendering my duties at GGMS Feroz Mela and the school administration is regularly marking me present.

(True copy of reply dated.27.05.2019 and attendance sheet are marked as

Annexure "J" & "K" respectively)

eshawar High Court

11. That it was yet another bolt from the blue that an amount of Rs. 11,460/was deducted from the salary of Petitioner in the month of May, 2019 as
Adj Basic Pay and against that the Petitioner filed an
Application/Representation to Respondent No. 2 for clarification that on
what ground deduction has been made from her salary by the
Respondents. In that Application, the Petitioner also requested the
Respondents to provide her relevant Order/instruction for deduction
from her basic pay but in vain.

(True copy of pay slip & Application are marked as Annexure "L" & "M" respectively)

12. That instead of giving any reply to the Petitioner, the Respondents again deducted an amount of Rs. 29,989/- from the gross pay/salary i-e Rs. 39,666/- from the salary of the Appellant in the month of October, 2019.

(True copy of Pay Slip of October, 2019 is marked as Annexure "N")

- 13. That as the Respondents have not decided the Departmental Appeal of the Appellant within the statutory period and there is no final Order in the field, therefore the Petitioner cannot approach the Services Tribunal.
- 14. That the Petitioner has got no other remedy but to invoke the Writ Jurisdiction of this Honourable Court on the following grounds:

GROUNDS:

- a. That the Acts of Respondents are unlawful, illegal and against the well settled principles of natural justice which needs to be set aside.
- b. That if the Petitioner has been absent for such a long time, has she ever been given any Show Cause Notice or Explanation for her absence from duty.

.

4

EXAMINÉR Cestagyar High Court

- c. That the Appellant has served for almost 12 years in schools which are away from her hometown and is now entitled for transfer to the area of her residence as per policy of the government.
- e. That in a span of eight months the Appellant has been transferred twice which is totally against the rules and policy of the Government.
- f. That the most astonishing aspect of the instant case is that the Respondents deducted the salary of Appellant in the month of May, 2019 and then in October, 2019 as according to them she was absent from duty but neither any show cause notice has been given to the Appellant nor any enquiry has been conducted by the Respondents which act of the Respondents is totally against the Law and rules.

INTERIM RELIEF:

History 2

As an interim Relief, the Respondents may kindly be restrained from deducting any further amount from the salary of Petitioner till the disposal of main Writ Petition.

It is therefore humbly requested that on acceptance of this Writ Petition,

- A. The Impugned deduction from the salary of Appellant may kindly be set aside and the salary deducted from the Appellant for the month of May, 2019 & October 2019 may kindly be reimbursed to the Petitioner.
- B. The Respondents may kindly be directed to Pass/Final Order on the Application/Representation of the Petitioner.

Petitioner

through

Sikandar Rashid, A.S.C, Peshawar.

ATESTEL

Peshawar High Court

PESHAWAR HIGH COURT, PESHAWAR

FORM OF ORDER SHEET

Date of Order of Proceedings	Order or other Proceedings with Signature of Judge.
	2
ORDER 18.12.2019	Writ Petition No.6511-P/2019 with Interim Refer Files
,	Present: Mr. Sikandar Rashid, Advodate for Mst. Amber Nawaz, petitioner

OAISER RASHID KHAN, J.-Since the petitioner is admittedly a civil servant and the relief, she is seeking from this court through the instant petition exclusively falls within the terms and conditions of service, therefore, this court in view of the explicit bar contained under Article 212(2) of the Constitution of the Islamic Republic of Pakistan, 1973 cannot step in such like matters.

However, as per available record, the appeal of the petitioner is pending undecided before the departmental authority and until and unless its decisions, she is handicapped to approach the proper forum i.e. Khyber Pakhtunkhwa Service Tribunal for the redressal of her grievance. Hence, we, in the peculiar facts and circumstances of the case, hereby direct the departmental authority to decide the departmental appeal of the petitioner in accordance

Atestes

ATTESTED

with law, whereafter, she may have recourse for the redressal of her grievance before the proper forum. This petition is disposed of accordingly. Announced. 18. 12. 2019 SENIOR PUISNE JUDGE JUDGE (Fayaz) (D.B) Justice Qaiser Rashid Khan & Justice Abdul Shakoor

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA, PESHAWAR

In Rb.						
In Re:	ij	li L	14	111	+	_

C.O.C.No. 2011 2020

in

W.P.No. 6511-P /2019



Vs

- 1. Masood Khan, Education Officer, TSD, Darra, KDA Gate No.2, Kohat.
- 2. Hafiz Dr Mohammad Ibrahim, Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.......Respondents

APPLICATION UNDER ARTICLE 204 OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN READ WITH SECTION 3 & 4 OF THE CONTEMPT OF COURT ORDINANCE, 2004.

Respectfully Sheweeth:

1. That the above titled Writ Petition was decided by this Honourable Court vide Order dated.18.12.2019 whereby a direction was given to the Respondents in the following terms:

"Hence, we, in the peculiar facts and circumstances of the case, hereby direct the departmental authority to decide the departmental Appeal of the Petitioner in accordance with Law, where after, she may have recourse for the redressal of her grievance before the proper forum".

FILED TODAY

ATTESTED

Deput Registrar

18 FEB 2020

EXAMINER
Peshawar High Court

- 2. That almost about two months have lapsed since the Order dated.18.12.2019, was passed by this Honourable Court but till date the Respondents have not passed any final order against the Petitioner.
- 3. That despite the fact that no final order has yet been passed against the Petitioner, the Respondents have illegally deducted huge amount from the salary of Petitioner without any reason.
- 4. That it is yet another astonishing fact that the Respondents have neither given any show cause notice or conducted any inquiry against the Petitioner but still they have deducted certain amount from the salary of Petitioner.
- 5. That the Respondents have illegally deducted a handsome amount from the salary of Petitioner despite the fact that no final order has been passed yet.
- 6. That the Petitioner is supporting her family with her salary and the Respondent are illegally depriving the Petitioner of her salary and that too without any reason.

It is therefore humbly prayed that strict action may kindly be taken against the Contemptners for flouting the Order dated.18.12.2019 of this Honourable Court by not passing the final Order.

Petitioner

through

Sikandar Rashid,

ASC, Peshawar.

FILES TODAY
Deputy Registrar

18 FEB 2020

Peshawar High Court

PESHAWAR HIGH COURT PESHAWAR ORDER SHEET

Order or other Proceedings with Signature of Judge or that of Date of Order or Proceedings 10.06.2020 Present: Mr. Sikandar Rashid, advocațe for the petitioner. Syed Qaiser Ali Shah, Addl. AG on behalf of respondents. WAQAR AHMAD SETH, CJ:-In view of order No. 2027-31 dated TSD Darra Kohat, the 15,5,2020, produced before the Court today, the judgment of this Court dated 18.12.2019, whereby respondents were directed to decide the pending appeal of petitioner, has been complied with, hence, this contempt petition has served its purpose, disposed of accordingly. Show cause notice issued to respondents-contemnor is hereby recalled. Petitioner may approach the competent forum against the order quoted above, is so advised.

Received By

Judge

ANTIBEST HIS CONTRACTOR

15 JUN 2020

OFFICE OF THE DISTRICT EDUCATION OFFICE TSD DARRA KOHAT.

ANNEXURE L-2

32

NOTIFICATION.

- 1. WHEREAS, You Mst: Amber Nawaz D/O Muhammad Nawaz R/O Feroz Mela was working as PST Industrial Home at GGPS Feroz Mela.
- AND WHEREAS, You were transferred vide DEO Male TSD Darra Kohat Under transfer order dated 29-01-2019 from GGPS Feroz Mela to GGPS Noor Ali Kalli on your sanction post. (Industrial Home).
- 3. AND WHEREAS, You filed write petition No.6511 P 2019 for the honorable Peshawar High Court Peshawar the said transfer order issued by District Education Officer TSD Male Kohat.
- 4. **AND WHEREAS**, The honorable Peshawar High court was directed the responded No.2 (DEO TSD Darra Kohat) to consider the departmental appeal already submitted by you to this DEO Office.
- 5. AND WHEREAS, as the committee scrutinized and examined your case/appeal under the prevailing rules and policy in vogue, the committee members unanimously reject the departmental appeal on ground your real sanction post.

NOW THEREFORE, I Mr, Masaud Khan DEO TSD Darra Kohat in exercise of powers conferred upon me under section 17 rule 2 (a) pleased to reject the appeal of you Mst: Amber Nawaz D/O Muhammad Nawaz R/O Feroz Mela TSD Darra Kohat.

District Education Officer
TSD Darra Kohat

Endst No. 20 27-31

Dated TSD Darra Kohat the 15/ 5/2020

- 1. Additional Registrar Peshawar High Court Peshawar in write petition No.6511 P/2019.
- 2. Director Education NMD Peshawar.
- 3. Mst: Amber Nawaz D/O Muhammad Nawaz R/O Feroz Mela TSD Darra Kohat.
- 4. Officer record.

District Education Officer TSD Darra Kohat

CONFIDENTIAL REPORT

(TEACHING STAFF)
CONFIDENTIAL REPORT FOR THIE YEAR ENDING 3151 DECEMBER, 2016

Name Amber Nawaj FName M. Nawaz Date of Birth 11.14.198	3.9.
2. Name of service P.S.T. Date of 1" Appttie. 3 1. 08. 2005.	
3. Qualification B. A	• • • • •
1 Total Service on 31" December 14xS	
5. Scale of pay and present pay. 12	
6. Various post held during the year with periods	
7. Period of report Ist Jan 2016 to 3/st Dec 20/6	
8. Seniority list No	•
Particulate Remarks on:-	
1. Judgment and sense of proportion	• • • •
2. Initiative and drive	•••••
1. Technical knowledge and application	
4. Supervision and control over students	
5. Integrity Good	
a. Co-operation with staff.	
Relations with the Public	
82 Suitability for promotion Fit fox Promotion	
9. Knowledge of language Urau , Pash to Friglish	
General Remarks:-	,
CHAIT IN AFRIDI.	
Name (in Block Letters) and	

General Remarks by Higher Officer:-

Designation of the Reporting Officer Head Mistress G.G.M. School all Noor All Kella

(With seal)

F.R Kokar

CONFIDENTIAL REPORT

39)

CONFIDENTIAL REPORT FOR THIE YEAR ENDING 31 ⁵¹ DECEMBER, 20 17
Name Amber Names F/Name M. Namag Date of Birth 11.11.1989.
Name of service P.S.T. Date of 1" Apptt: 31. 8. 2005
Qualification B.A
Total Service on 31" December 12 485 4 months
5. Scale of pay and present pay
6. Various post held during the year with periods
7. Period of report Ist Jan 2017 to 31st Dec 2017
S: Seniority list No
Particulate Remarks on:-
I studgment and sense of proportion
2. Initiative and drive
Technical knowledge and application
4. Supervision and control over students
5. Integrity Con of
6. Co-operation with staff
8. Suitability for promotion Fit for MAD. TO TIME
9. Knowledge of language USAU Pashto English
General Remarks:-
HAZIA HT KIDI MANUEL (in Block Letters) and
Designation the the Repunding Officer (With seap G. G.W. School
General Remarks by Higher Officer:- Party Hall Noor All Kala
the transfer of the second of

Government of Pakistan **District Accounts Office Kohat** Monthly Salary Statement (May-2019)



Personal Information of Miss AMBER NAWAZ d/w/s of MUHAMMAD NAWAZ

Personnel Number: 00276504

CNIC: 2240185259592

Date of Birth: 11.11.1984

Entry into Govt. Service: 11.11.2002

Length of Service: 34 Years 06 Months 022 Days

Employment Category: Active Temporary

Designation: P.T.C.TEACHER

0000006-Min. Of Education

DDO Code: KT0071-AGENCY EDU OFFICER (FR)-SAPKT

GPF Section: 001

Cash Center:

Payroll Section: 001 GPF A/C No:

Interest Applied: Yes

GPF Balance:

113,154.00

Vendor Number: - .

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 12

Pay Stage: 10

Wage type		Amount	Amount Wage type		Amount
1000	Basic Pay	22,920.00	1000	House Rent Allowance	1,961.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	1,000.00	2148	15% Adhoc Relief All-2013	475.00
2199	Adhoc Relief Allow @10%	324.00	2211	Adhoc Relief All 2016 10%	1,754.00
2224	Adhoc Relief All 2017 10%	2,292.00	2247	Adhoc Relief All 2018 10%	2,292.00

Deductions - General

Wage type	Wage type Amount		Wage type	Amount
3012 GPF Subscription - Rs2220	-2,220.00	3609	Income Tax	-100.00
3661 E.E.F (Exchange)	-100.00	3701	Benevolent Fund(Exchange)	-180.00
3705 R. Ben & Death Comp(Exch)	-500.00		Adj-Basic Pay	-11,460.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
	•			

Deductions - Income Tax

Payable:

1,000.00

Recovered till MAY-2019:

901.00

Exempted: 0.48-

Recoverable:

99.48

Gross Pay (Rs.):

37,374.00

Deductions: (Rs.):

Payee Name: AMBER NAWAZ

-14,660.00

Net Pay: (Rs.):

22,714.00

Account Number: 3002

Bank Details: MCB BANK LIMITED, 240159 DARRA ADAM KHEL DARRA ADAM KHEL, KOHAT

Leaves:

Opening Balance:

Availed:

Eamed:

Balance:

Permanent Address: DARRA ADAM KHEL

City: KOHAT

Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address: City:

Email: ff123ff.faisal@gmail.com



Directorate of El. 1. entary and Secondary Education er Pakhtunkhwa Peshe, var PH No. 091-921028 , 9210938,

9210437, 92 0957, 9210468

Fax 091-9210936

ANNEXURE_C

Deputy Director (Estab)

No/E-6/KC/Bajaur/Tra	nsfer.	Dated 2/5 /2019.	
То			
The District Education Off Adam Khel, Kohat.	icer,	Sub Division Darra	
Subject:- REQUEST FOR CANCELLAT	TION OF TRANSFER O	RDER.	
Memo:-		**************************************	
I am directed to refer to anapplicationin respect of Mst. Amber N Kohat for necessary action as per rules/p	lawaz PST, Govt: Girl	above and to enclose herewith s Primary SchoolDara Adam Khel,	4
Encl: As Above.		Deputy Director (Estab)	
Endst.No	S/, Dated	2019.	
Copy to:	•		
PA to Director E&SE, KPK P	eshawar.		

CHARGE ASSUMPTION REPORT

Certified that I took over the charge of the post of PST

at <u>GGPS Fenoz mela</u> today on <u>o1 - 02 - 20/8</u> (Before Noon) under agency education officer FR Kohat:

Oder No: 9973 - 74 | Dated 26-01-2018

Amber

Name. Amber, Nawaz

Post. *PST* * 43. F

Station. GGPS Fenoz mela

F.R Kohat.

Headmistress

JAN FED MAR APR MAY JUN JUL AUG SEP OCT NOV DEC ANNEXURE 9 12 3 1 713 1 12 21 THO M ALLER LE SETTONY WOODS 1111 1117 1 1 1 12 20 1 1 7 3 RI 12 20 RT 7.3 11/2 / 1 1 A Ta R. 113 P. T. Va. 一口河南南南南南 المثلل لويدلا فيهر صليات أود باراد الدور 1.10 1 . 1 26.0

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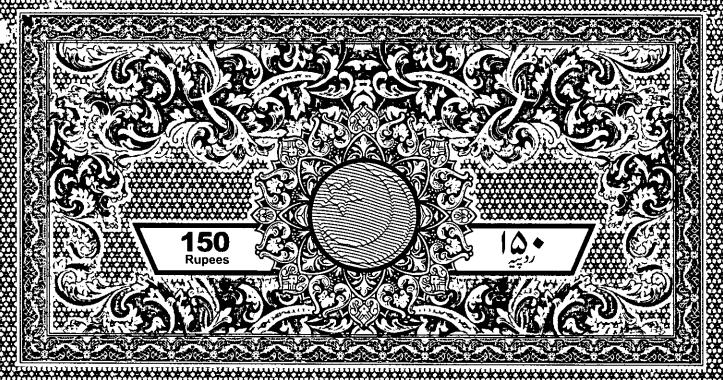
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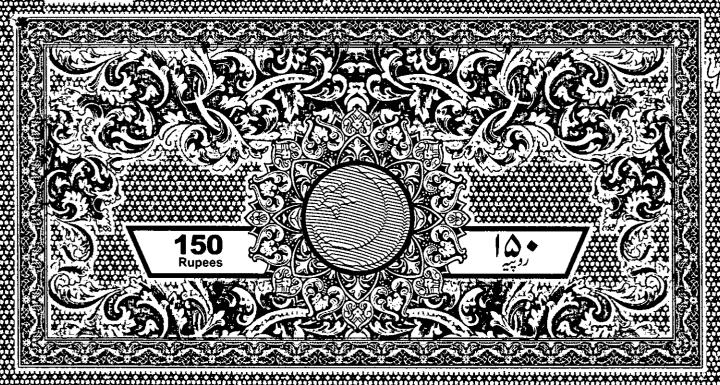
BEFORE THE LEARNED KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Mst. Ambar Nawaz Versus Director Education and others

SPECIAL POWER OF ATTORNEY

By this Special Power of Attorney, I, Mst. Ambar Nawaz D/o Muhammad Nawaz R/o Post Office Darra Bazar, Feroz Mela, Darra Adam Khel, Tehsil & District Kohat, do hereby appoint/ authorize and constitute my real father Muhammad Nawaz S/o Nawab Khan R/o Post Office Darra Bazar, Feroz Mela, Darra Adam Khel, Tehsil & District Kohat, as my Special Attorney and authorize him to do as under in my name and on my behalf and under his own signatures;

- 1. To appear on our behalf in the above titled case which is pending before this Hon'ble Court, to sign all the documents, papers and things, to appoint advocates for the case to withdraw powers from him and to appoint others to record statements of witnesses and to produce any documentary evidence or proof and to do all the attendance in the concerned courts of law and to do all the needful in that connection till the final disposal of the case.
- 2. To file appeal, review, revisions, leave to appeal, writs; applications, misc. applications, statements, written statement, and all other deeds and things, right from the original courts to appellate, revisional, High Court and Supreme Court of Pakistan, to sign all the deeds and things to appoint advocates for any courts of law and to do the needful in that connection.



- 3. To compromise or withdraw the case or to send the case to Arbitration or Jirga.
- 4. To do all the other acts, deeds and things which are not specifically mentioned here but which shall be needed to be done legally and in legal faith in accordance with the circumstance of the case.

EXECUTED BY

Mst. Ambar Nawaz

CNIC No. 22401-8525959-2

ACCEPTED BY

Muhammad Nawaz

CNIC No. 22401 - 59/6385-5

WITNESSES:

1) Mukhtar Ali 3/0 Miskeen Me.2) Lola Kaley P.O Bornal Form Reshow

CNIC No. 17301-3202749-9

Yasir Namaz 90 Muhamman Namaz

Ferg mole Darra Adam (

CNIC No. 12401-5249982-9

MSY Ambay Haway

Appellant Petitioner

Versus 7

Respondent/Defendant

Complainant/Plaintiff

KNOW all to whom these present shall come that I/We the undersigned appoint

SIKANDAR RASHID KHAN

ADVOCATE

To be the Advocate for <u>Feshaves</u> in the above mentioned case to do all the following acts, deeds, and things or any of these that is to say.

- 1. To act appear and plead in the above mentioned case in this court or any other courts in which the same may be tried or heard in the first instance or in appeal or execution or in any other stage of its progress until its final decision.
- 2. To present pleadings, appeals. Cross objections for execution review, revision, withdrawal, compromise or other petitions or affidavits or other documents as shall be deemed necessary or, advisable for the prosecution / defense of the said cause at all its stages.
- 3. To withdraw or compromise the said case or submit to arbitration any differences or disputes that shall arise touching or in any manner to the said case.
- 4. To receive and grant receipts therefore and to do all other acts & things which may be necessary to be done for the progress in the course of prosecution / defense of cause.
- 5. To employ, authorize any other legal practitioner to assist or exercise the power and authori6ty hereby conferred on the advocate whenever he may think to do so.

AND I/WE agree to ratify whatever the advocate or his substitute shall do in this behalf AND I/WE hereby agree not to hold the advocate or his substitute responsible for the result of the said case consequences of his absence from the court when the said case called up for hearing.

AND I/WE hereby agree that in the event of the whole or any part of the fee agreed by me /us to be paid to the advocate remaining unpaid, he shall be entitled to withdraw from the prosecution/ defense of the said case until the same is paid.

WHERE FOR I/WE here under set my/our hands to these presents the contents of which have been explained to and understood by me/us.

Dated.

Accepted subject to the above terms

& payment of settle-fee.

Sikandar Rashid Khan, Advocate Supreme Court of Pakistan.

Off: Suite No. 11-B, 2nd Floor

Cantonment Super Plaza, Peshawar Cantt.

Cell No. 0300-8155474 & 0336-1777124.

Client.

Amber

Signature/ Thumb Impression of

My (dis lis)

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.	
JUDICIAL COMPLEX (OLD), KHYBER ROAD,	
PESHAWAR. S.B.	
No. Appeal No. 5895 of 20 20	
MSt: Awbey Nawa2 Appellant/Petitioner	
lage Director Edu Merged Area Respondent	
Folycantion (Fricer Tropal Su-D	 ivi 8i
Notice to: - (TSD) Darra Kohat	
WHEREAS an appeal/petition under the provision of the North-West Front Province Service Tribunal Act, 1974, has been presented/registered for consideration, the above case by the petitioner in this Court and notice has been ordered to issue. You a hereby informed that the said appeal/petition is fixed for hearing before the Tribunton	in are nal the ich
the case may be postponed either in person or by authorised representative or by a Advocate, duly supported by your power of Attorney. You are, therefore, required to file	

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

this Court at least seven days before the date of hearing <u>4 copies</u> of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the

> Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

2. Always quote Case No. While making any correspondence.

appeal/petition will Le heard and decided in your absence.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.	•
JUDICIAL COMPLEX (OLD), KHYBER ROAD,	
$^{\circ}$ PESHAWAR. $\mathcal{A}\mathcal{R}$	
<u> </u>	
No.	
Appeal No	
- MSt. Ambes Nawa. 2 Appellant/Petitioner	
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291 Dixactor Fadu Merged Aven Respondent	•
Respondent No	
Respondent No	
Notice to: _ A.A. [2.0 (12 male) 181 ban	
Notice to: - A.A. 12.0 (12 male) Triban Sub- Division (TSD) Darra K	ioh
WHEREAS an appeal/petition under the provision of the North-West Front	
Province Service Tribunal Act, 1974, has been presented/registered for consideration	
the above case by the petitioner in this Court and notice has been ordered to issue. You hereby informed that the said appeal/petition is fixed for hearing before the Tribu	
*onat <u>8.00 A.M.</u> If you wish to urge anything against	
appellant/petitioner you are at liberty to do so on the date fixed, or any other day to wh	
the case may be postponed either in person or by authorised representative or by	
Advocate, duly supported by your power of Attorney. You are, therefore, required to file	_
this Court at least seven days before the date of hearing 4 copies of written statem	
alongwith any other documents upon which you rely. Please also take notice that	, in
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this appeal/petition.	C OI
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Copy of appeal is attached. Copy of appeal has already been sent to you vide	his
office Notice Nodateddated	
Given under my hand and the seal of this Court, at Peshawar this3.15	•••••
Day of	
Day of	
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Régistrar,	

Khyber Pakhtunkhwa Service Tribunal, Peshawar.

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

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

	JUDICIAL CON	MPLEX (OLD),	KHYBER ROAD,
•		PESHAWAR	
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Notice to: —	FIRAM	PUPIN 1835	(10)
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WHER	EAS an appeal/peti	tion under the pr	ovision of the North-West Frontier
Province Ser	vice Tribunal Act, 13	974, has been prese	ented/registered for consideration, in
the above cas	se by the petitioner in	n this Court and not	tice has been ordered to issue. You are xed for hearing before the Tribunal
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	,	•	Registrar,
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Peshawar.

Note:

^{1.} The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.

^{2.} Always quote Case No. While making any correspondence.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR. O.R
No
Appeal No. 5.8.95 of 20 20
Received MSt: Amber Nawaz Appellant/Petitioner
Versus
Dixactor Edu Merged Area Reitsporrent
14/1
Respondent IV
Notice ig: -
Notice to: Notice to: Notice to: WHEREAS an appeal/petition under the provision of the North-West Frontier
De shaway.
WHEREAS an appeal/petition under the provision of the North-West Frontier
Province Service Tribunal Act, 1974, has been presented/registered for consideration, in
the above case by the petitioner in this Court and notice has been ordered to issue. You are
hereby informed that the said appeal/petition is fixed for hearing before the Tribunal
*onat <u>8.00 A.M.</u> If you wish to urge anything against the appellant/pefitioner you are at liberty to do so on the date fixed, or any other day to which
the case may be postponed either in person or by authorised representative or by any
Advocate, duly supported by your power of Attorney. You are, therefore, required to file in
this Court at least seven days before the date of hearing 4 copies of written statement
alongwith any other documents upon which you rely. Please also take notice that in
default of your appearance on the date fixed and in the manner aforementioned, the
appeal/petition will to heard and decided in your absence.
Notice of any alteration in the date fixed for hearing of this appeal/petition will be
given to you by registered post. You should inform the Registrar of any change in your
address. If you fail to furnish such address your address contained in this notice which the
address given in the appeal/petition will be deemed to be your correct address, and further
notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.
inis appear/petricin.
Copy of appeal is attached. Copy of appeal has already been sent to you vide this
office Notice Nodateddated
Given under my hand and the seal of this Court, at Peshawar this

Registrar, Khyber Pakhtunkhwa Service Tribunal, Peshawar.

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

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

		PESI	HAWAR.	•	
No.	7		,	<u> </u>	<u>73</u>
	- Appeal	No	895	of 20 of 20	Petitioner
)	Mst	Amber	ersus waz	~	
N	Director	s Izdu Nav	Jy Maged Respondent N	aRespo	ngfent
Notice to	»: - E	ducation	officer,	Fribal	Su- Division
Proving the abo	ce Service Tribun ove case by the peti	al Act, 1974, has t tioner in this Cou	peen presented/ ort and notice ha	registered for as been order	orth-West Frontier r consideration, in ed to issue. You are efore the Tribunal
*on appelle the cas Advoca	ant petitioney your se may be postpon ate, duly supported	at 8.00 And a second se	A.M. If you wish o so on the date son or by autho f Attorney. You a	n to urge any fixed, or any rised represo re, therefore	ything against the other day to which entative or by any , required to file in
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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

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No.					J.B
- -	Appeal	•	5895		ے۔ الاPetitioner
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Notice to	· _	lead Mis	tress C	ncyms	M- Noo8 Ofth West Frontier
Province the about hereby *on	ve case by the per informed that the informed period of your appears of your appears of your appears of your appears to you by registers. If you fail to furst given in the approposted to this addreal/petition.	titioner in this Co he said appeal/p	s been presence ourt and notice etition is fixed A.M. If you do so on the correct of Attorney. You date of her which you refixed and it in your absect of the fixed for her begins of the fixed for he	ted/registered to has been ordered for hearing I wish to urge at late fixed, or an uthorised represonant of the manner and the manner and the Registrar of secontained in the your correct deemed sufficients.	or consideration, in ered to issue. You are before the Tribunal nything against the yother day to which sentative or by any re, required to file in a fwritten statement take notice that in a forementioned, the peal/petition will be any change in your this notice which the address, and further ent for the purpose of
_					sent to you vide this
office I	Notice No	••••••	dated		3.4.
	Given under my	hand and the sea	al of this Cou	rt, at Peshawar	this
Day of.	······································		5-6	,20 . ≻~o	
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The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays. Always quote Case No. While making any correspondence.

AKHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No.3047-59ST

Dated 23 / 10 / 2020

To

- The Director Education Newly Marged Tribal District, Government of Khyber Pakhtunkhwa, Warsak Rd Peshawar.
- 2. Education Officer, Tribal Sub Division, Darra, Government of Khyber Pakhtunkhwa, Kohat.



- 3. A.A.E.O (Female) Tribal Sub Division Darra, Government of Khyber Pakhtunkhwa, Kohat.
- 4. Head Mistress GGMS M-Noor Ali Killi, Darra, Government of Khyber Pakhtunkhwa, Kohat.

SUBJECT: - ORDER IN APPEAL NO. 5895/2020 MST. AMBER NAWAZ.

I am directed to forward herewith a certified copy of order dated 02.10.2020 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REĞISTRAR KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR

KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No.3047-50/ST

Dated 23 /10/2020

То

- 1. The Director E&SE Department, Government of Khyber Pakhtunkhwa, Peshawar.
 - 2. Education Officer, Tribal Sub Division Darra, Government of Khyber Pakhtunkhwa, Kohat.
 - 3. A.A.E.O (Female) Tribal Sub Division Darra, Government of Khyber Pakhtunkhwa, Kohat.
 - 4. Head Mistress GGMS M-Noor Ali Killi Darra, Government of Khyber Pakhtunkhwa, Kohat.

SUBJECT: - ORDER IN APPEAL NO. 5895/2020, MST. AMBER NAWAZ.

I am directed to forward herewith a certified copy of order dated 02.10.2020 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGISTRAR

KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL

PESHAWAR.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESH SERVICE APPEAL NO. 5895/2020 Mst. Amber Nawaz D/O Muhammad Nawaz Appellant Versus Govt. of Khyber Pakhtunkhwa & Others Respondents INDEX

S.No	Description of documents	Annexure	Pages	4
1 .	Comments		1-2	
2	Affidavit		3 ;	
3	Departmental appeal	A	. !	
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District Education Officer Tribal Sub Division Darra Kohat

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESH

SERVICE APPEAL NO. 5895/2020

Mst. Amber Nawaz D/O Muhammad Nawaz......Appellant

Versus

Govt. of Khyber Pakhtunkhwa & Others.....

Respondent

Comments on behalf of Respondent No.1, 2&3

<u>Preliminary objections.</u>

- That the appellant has got no cause of action, locus stands to file the instant appeal.
- That the appellant has concealed material facts from honorable Tribunal.
- That the appellant has not come to this Tribunal with clean hands.
- That the appellant case is badly time barred and hit by Principle of Laches.
- The appeal is badly time barred.

ON FACTS.

- 1. Correct.
- 2. Correct. The department has been giving relaxation to the appellant to transfer on different vacant post for her service period.
- 3. Pertains to record.
- 4. The appellant committee dismissed her departmental appeal. (copy attached a Annexure-A).
- 5. Correct. Pertains to record.
- 6. The appellant was transfer from GGMS Feroz Mela to GGMS Noor Ali killi on her sanctioned Industrial home post as the appellant herself elucidated in para-1 in the appeal. furthermore mentioned that there are only two sanction Industrial home post in Tribal Sub Division Darra. The said post at GGMS Noor Ali Killi is the nearest station of the appellant where the appellant has transferred.
- 7. Incorrect. that the appellant was transferred on detailment basis which is wrong post and she was back transfer to her original post.
- 8. As stated in para-4.
- 9. No comments.
- 10.No comments.
- 11.The respondent submitted reply in the Honorable in the Honorable High Court Peshawar on 10.06.2020, as a result of said reply the appellant COC was dismissed.
- 12.As elucidated in para-11.
- 13.No comments.

Grounds.

- A. Incorrect. the respondent follow existing rule and policy.
- B. Incorrect. as the appellant elucidated in her appeal para-9.
- C. Incorrect. as elucidated in para-2.
- D. Incorrect, the respondent follow existing rule and policy because her basis post is Industrial Home on which she was transfer.
- E. Incorrect, the present post is the nearest station of her home,
- F. Subject. To record.
- G. No comments.

Pray:

In the light of above legal and factual position it is humbly requested that the instant petition is baseless may be dismissed.

Respondent No. 1-28/3

District Education Officer Tribal Sub Division Darra Kona

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESH

SERVICE APPEAL NO. 5895/2020

Mst. Amber Nawaz D/O Muhammad Nawaz.......Appellant
Versus

Govt. of Khyber Pakhtunkhwa & Others......Respondents

Affidavit

I Qayum Khan, ADEO and Focal Person (litigation) of District Education Officer, sub Division Darra Kohat do hereby solemnly affirm and declare that the contents of the accompanying para wise comments submitted by the respondent No.1, 2 & 3, are correct to the best of their knowledge and belief and nothing has been concealed from this honorable court.

Respondent No. 1, 2 & 3

District Education Officer
Tribal Sub Division Darra Kohat

OFFICE OF THE DISTRICT EDUCATION OFFICE TSD DARRA KOHAT.

NOTIFICATION.

- 1. WHEREAS, You Mst: Amber Nawaz D/O Muhammad Nawaz R/O Feroz Mela was working as PST Industrial Home at GGPS Feroz Mela.
- 2. **AND WHEREAS**, You were transferred vide DEO Male TSD Darra Kohat Under transfer order dated 29-01-2019 from GGPS Feroz Mela to GGPS Noor Ali Kalli on your sanction post. (Industrial Home).
- 3. **AND WHEREAS**, You filed write petition No.6511 P 2019 for the honorable Peshawar High Court Peshawar the said transfer order issued by District Education Officer TSD Male Kohat.
- 4. **AND WHEREAS**, The honorable Peshawar High court was directed the responded No.2 (DEO TSD Darra Kohat) to consider the departmental appeal already submitted by you to this DEO Office.
- 5. AND WHEREAS, as the committee scrutinized and examined your case/appeal under the prevailing rules and policy in vogue, the committee members unanimously reject the departmental appeal on ground your real sanction post.

NOW THEREFORE, I Mr, Masaud Khan DEO TSD Darra Kohat in exercise of powers conferred upon me under section-17 rule 2 (a) pleased to reject the appeal of you Mst: Amber Nawaz D/O Muhammad Nawaz R/O Feroz Mela TSD Darra Kohat.

District Education Officer
TSD Darra Kohat

Endst No. 2027-31

Dated TSD Darra Kohat the

157 5 /2020

- Additional Registrar Peshawar High Court Peshawar in write petition No.6511 P/2019.
- 2. Director Education NMD Peshawar.
- 3. Mst: Amber Nawaz D/O Muhammad Nawaz R/O Feroz Mela TSD Darra Kohat.
- 4. Officer record.

District Education Officer
TSD Darra Kohat

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWR
SERVICE APEAL NO.5895/2020
Mst: Amber Nawaz D/O Muhammad Nawaz
VS
K.P GovernmentRespondents
Reliance Certificate.
We the undersigned Respondent No.3 and 4 are reliance/agree with the
comments/reply submitted by respondent No.2 in since appeal No.5898 title Amber
Nawaz GGPS Feroz Mela.
Respondent No.3 ADEO (F)
The Mault
Respondent No.4 Head Mistress GGMS Noor Ali Kalay
Responded No Struction Control of Principal Show of MMTD KPK Persiawar

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REFORE THE	SERVICE TRIBUNAL	KHYBER PAKHTU	NKHWA PESHAWR
•	AL NO.5895/2020		
•	waz D/O Muhammad N	Jawaz	Appellant
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K P Governmer	nt		Respondents
K.1 Governmen			
	Reliano	ce Certificate.	
We the undersi	gned Respondent No.3	/ and 4 are reliance/agr	ee with the
comments/reply	submitted by responde	ent No.2 in since appe	eal No.5898 title Amber
Nawaz GGPS F	eroz Mela.		1.11
Respondent No	.3	ADEC)(F)
Respondent No		Stress GGMS Noor A	li Kalay Mu Milli
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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

In Re:

Service Appeal No. 5886/2020

	•		
Mst.	Amber Nawaz	Vs	DEO, TSD Darra and Kohat & others

INDEX

S.NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE.NO
1	Rejoinder		1 - 4
2	Relevant Documents		5 - 19

Appellant

Through

SIKANDAR RASHID

Advocate, Supreme Court of Pakistan

Cell# 0336-1777124

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

Service Appeal No. 5886/2020

$\mathcal{V}_{i,i}$		
Mst. Amber	Nawaz D/o, Muhammad Nawaz	Appellant
	VEDCUC	
	VERSUS	
Director Edu	ication Officer TSD, Darra, Kohat and Others	Respondents
Subject:	RE-JOINDER ON BEHALF OF APPELLA	ANT.
onojeot.		

Preliminary Objections:

1. Incorrect because the appellant is a civil servant and an employee of Education Department. She was illegally transferred for Mst. Farhana Bibi, PST within 32 days after assuming charge at GGMS Feroz Mela vide order no. 9973-74 dated 26-01-2018 (copy enclosed). Earlier Mst. Farhana Bibi was transferred from GGPS Bilal Kalay, Tor Chappar to GGMS Noor Ali Kalay against the Industrial PST post of appellant.

The appellant filed representation against the aforementioned transfer order No. 10072-73 dated 27/02/2018 with the Ex-Director Education FATA which was cancelled on 16-08-2018. Shortly after the cancellation order, the District Education Officer, TSD Darra issued another transfer order No. 936 dated 29-01-2019 of the appellant back to GGMS Noor Ali Kalay with mallafide intention, despite the fact that no vacant post of PST (BPS-12) was available because there were only two regular PST posts including the Industrial PST (BPS-12) at GGMS Noor Ali Kalay.

Out of which one PST post (BPS-12) was occupied by Mst. Bina Afridi whose name and school of duty has been highlighted / mentioned at Ser.5 of the explanation letter No. 1414-22 dated 29-04-2019 while against the second Industrial PST post (BPS-12) Mst. Farhana Bibi was posted.

- 2. In reply to Para 2 it is humbly submitted that the Appellant has not concealed any material fact from this Honourable Tribunal.
- 3. In reply to Para 3, it is respectfully submitted that detailed reply to the instant Para has already been given in the preceding Paras. Similarly the issuance of explanation to the appellant along with others vide letter no. 1414-22 dated 29-04-2019 on account of Governor inspection team visit to GGMS Noor Ali Kalay and marking the appellant absent as well as deduction of an amount of Rs. 14,660/-and Rs. 26,444/- from the salary of the appellant for the month of May and Oct were not genuine / correct because the appellant was neither absent nor responsible because at that time Mst. Farhana Bibi was doing duty at GGMS Noor Ali Kalay and not the appellant. The explanation should have been sought from Mst. Farhana Bibi, PST while the Education Officer held appellant responsible for the absence of Mst. Farhana Bibi. The main reason for this was that the Education Officer TSD, Darra, Kohat was annoyed on the representation of the appellant to the Ex-Director Education, FATA against his illegal transfer order which was cancelled on16-08-2018. Therefore, the Education Officer as a revenge again

- e. Why the appellant name has included in the PST Seniority lists at Serial no. 101 and Serial no. 94. (Copies enclosed).
- f. Why their salary budget and head of account is one and not separate.
- g. Why the appellant was allowed to participate in one refresher course training and second professional development program training which she completed. The refresher course training was arranged by Education Department at GGMS FerozMela in Mar-April 2016. This training was of 15 days duration and at the end of the training Rs. 8000/- in cash were paid to each participant of the training. No certificate in this regard was given.
- h. The second professional program training for Primary School Teachers was initiated in May 2019 and concluded in Feb 2020. This training was held at GGMS Germany Kalay. For this training neither payment was made nor were certificates distributed. While the third profession development program training for the Primary School Teachers has launched in Sep 2020 at GGMS BaziKhel and is continued. The appellant is also attending this course. This training is conducted only one day in a month.
- i. Why the appellant pay slip carry PST designation.
- j. Why no separate service structure has given.
- k. Why DEO did not raise any objection at time of cancellation of the appellant transfer order by the Ex-Education Director, FATA.
- 7. The instant Para is subject to verification from record.
- a. The appellant was transferred on detailment, the mention of which has been made in the text of the detailment cancellation order issued by DEO Darra Adam Khel on 26/03/2019. The detailment order was not communicated / delivered to the appellant.

(Copy of the cancellation order marked as annexure "F")

- 8. No committee was constituted as explained in para 4 of the re-joinder.
- 9. Not contested.
- 10. Not contested.
- 11. The respondent did not dispose of the representation dated 12-02-2019 of the appellant despite the Deputy Director, Establishment of Directorate of Elementary and Secondary Education letter no. 45 dated 02-05-2019 directing the respondent for disposal of the case as per rules and regulations and it was after the COC No. 134-P/2020 in writ petition no. 6511/2019 that the respondent produce the final order dated 15-05-2020 in the Peshawar High Court and gave it to the appellant.
- 12. As explained in para 11 above.
- 13. Not contested.

GROUNDS:

- A. In reply to Para A, it is humbly submitted that the respondents did not observe law, rules and regulations.
- B. Correct as the respondent has referred to para no. 9 of the appeal but not contested that.

- C. Correct as explained in para no. 2 of the re-joinder.
- Dr. The respondent did not observe the existing rules and policy as explained in para 6.
- E. In reply to Para E, it is humbly submitted that the nearest station to the appellant is GGMS Feroz Mela and not GGMS Noor Ali Kalay.
- F. In reply to Para F, it is respectfully submitted that the instant Para is subject to verification from record.
- G. Not contested.

PRAYER:

In the light of above legal and factual position, it is humbly requested that the Appeal of Appellant may kindly be accepted as prayed for and strict departmental proceedings may kindly be ordered against the Respondents for their miss doings.

Appellant

Through

SIKANDAR RASHID

Advocate, Supreme Court of Pakistan

Cell# 0336-1777124

<u>AFFIDAVIT</u>

I, Muhammad Nawaz S/o Nawab Khan R/o Village Feroz Khan P.O Darra Bazar Darra Adam Khel Kohat (Special Attorney) do hereby solemnly affirm and declare on oath that the contents of this rejoinder are true and correct to the best of my knowledge and belief and nothing material had been concealed from this learned Tribunal.

ATTESTED

Deponent.

CNIG # 22401-5916385-5

(Identified by)

Sikandar Rashid ASC





OFFICE OF THE AGENCY EDUCATION OFFICER F.R KOHAT. Gate No.2 K.D.A Kohat Phone & Fax No. 0922-9260321

Letter No: 9973-79 Dated: 26/0//2018.

TRANSFER ORDER

The following female teachers are hereby transferred to the schools noted against their names in the interest of public service.

Name Design From	
Amber PST GGPS Noor Ali Kalli	To
2. Farhana PST GGPS Dilat V. II.	GGPS Feroz Mela
3. Naznine PST GGPS Fore- M. I	Vice No:1
Akhtar OGFS Feroz Mela	Vice No:2

Agency Education Officer, F.R Kohat.

CC:

- Office Record.
 AAEO(F) F.R Kohat.
 School Concerned.
- 4. Female Teachers Concerned.

Agency Education Officer, F.R Kohat.



OFFICE OF THE EDUCATION OFFICER TSD DARRA KOHAT.

Gate No.2 K.D.A Kohat

Phone & Fax No. 0922-9260321

Letter No: 936 Dated: 29 / / /2019.

TRANSFER ORDER.

The transfer of the following PST female teachers are hereby ordered in their own pay and BPS-17 to the schools noted against their names in the best interest of the public service w.c.f the date of their taking over charge.

S.#	Name	Desg	From	To	Romark
1,	Mekreen	PST	GGPS Qayum Mela TSD Darra Kohat.	GGPS Sunikhel No.2-TSD Darra	Against the vacant
	1			Kohat	post
2.	smat Bibi	PST	GGPS Surak TSD Darra Kohat	GGPS Kot Mela TSD Dar	- Against the vocant
	 			KChat	post
		· ·		_{	destructive dark Manday SAN - on the form of the day of the control and the co
! 3 !	Amber	JPST	GGMS Feroz Mela	GGMS-Noor Abi Killi	Against the wacan
	1.				post

NOTE:

- 1. Charge Report Should be Submitted to all Concerned
- 2. No TA/DA is allowed?

Education Officer TSD Darra Kohat.

CC:

- 1. Chrector Education NMTID Warsak road Peshawar
- 2. Deputy Commissioner kohat.
- 3. District Account Office Kohat.
- 2. AAEO (female) TSD Darra Kohat.
- 3. Headmistress GGHS M-Hussain Mela/Noor ali killi.

o tradición de la Arteri

5. Office Record.

Education Officer
TSD Darra Kohat.





OFFICE OF THE AGENCY EDUCATION OFFICER
F. R. KOHAT
Gate No. 2 K. O. A. Kohai

Letter No: //7/-75

Duted: 26 / 3 /2019.

CANCELLATION OF DETAILMENT ORDER OF FEMALE.

The detailment order of Female teachers was/issue vide this office No. 787-89 dated. 17/09/2018 but you did not resume their duties in their original schools. You are once & last strictly directed to resume your duties in their original schools.

Noted against their names up to 01/09/2019 positively.

Otherwise your monthly pay will be stopped.

	11 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3	· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·	I
(3)	H Name of Teachers	Desig:	COMOTION SONOTENIES		v Die de la company
		PET	GGMS Surak Toor Chapper	GGPS Atariwal	Remarks
2.	Rahat Bibi	PSHT	GGPS Sher Hussain Mela Toor Chapper	GGPS Khan Mast Kalli	
3.	Musiah Afzal. Nasaema	PSHT	GGPS Surak Toor Chapper	GGPS Mazid Khel	
4	· :	CT	GGMS Bilal Kalli Toor	GGHS Turki Ismail Khel	
5	Fahmenday finiali	PSHT	Chapper GGPS Bilal Kalli Toor	GGPS Noor Ali Kalli	
6	Nadioxhwaya	PST	Chapper	 	l ·
7		CI	GGPS Noor, Ali Kalli GGMS Suni Khel	GGPS Mulan Sharif Khel	
8	Amber	PST	GGMS Noor Ali Kalli her	GGMS Feroz Mela GGPS Feroz Mela	
No	TE	<u> </u>	original school IHC confu	OOF S LCION WEIR	

Charge report should be submitted in duplicate to all concerned.

Education Officer TSD Darra Kohat

CC

- 1. Director Education NMTD Warsak Road Peshawar.
- 2. District Account Office Kohat.
- Head Mistress Concerned...
- Candidates Concerned.
- Office Record.

Education Officer TSD Darra Kohat

ATTESTED



OFFICE OF THE AGENCY EDUCATION OFFICER F.R KOHAT.

Gate No.2 K.D.A Kohaj. Phone & Fav No. 0922-9250321

Letter No: 143 Dated: 16 1 08 /2018.

Cancellation of Transfer Order.

The transfer/exchange of post between Mst: Farhana Bibi PST & Mst. Amber Nawaz PST issued vide this office No. 10072-73 dated: 27/02/2018 is hereby cancelled in the best interest of public service with immediate effect.

Agency Education Officers F.R Kohat.

CC:

- 1. Head Mistress GGMS Noor Ali Kalli F.R Kohat.
- 2. Head Mistress GGMS Feroz Mela F.R Kohat.
- 3. Candidates concerned.
- 4. AAEO Female in the local office.
- 5. Office Record.

Agency Education Office F.R Kohat.

TO BE TRUE COPY



OFFICE OF THE AGENCY EDUCATION OFFICER F.R KOHAT. Gate No.2 K.D.A Kohat Phone & Fax No. 0922-9260321. Letter No: 10072.73 Dated: 27

EXCHANGE OF POSTS

Exchange of posts between Mst: Farhana Bibi PST GGMS Noor Kalli F.R Kohat and Mst: Amber PST GGMS Feroz Mela F.R Kohat on their own pay and BPS in the interest of public service w.e.f their taking over charge.

Note: No TA/DA etc allowed to any one. Charge report should be submitted to all concerned.

Agency Education Officer F.R Kohat. 2

CC:

O

1. H/M concerned.

2. Teachers concerned.

3. AAEO(Female) in the education office. 4. Office Record.

> Agency Education Officer F.R Kohat.



Tribal Sub: Division Darra Kohat Gate No: 2 KDA Kohat, Phone & Fax No. 0922-9260321

Final Seniority List of PSHT/SPST/PST Female Teachers in R/O TSD Darra Kohat

S.No.	Sen:	Name of Teachers	Father Name	School	DOB	Desig:	BPS	Qu	ali:	DO 1 st App:	Domicile	Remarks
3.140.	No.	Name of Teachers	1 52.7.2					Acad:	Prof:	As PST		
1	1	Haseena Alam	Abdur Rehman	GGPS Suni Khel	01/10/62	PSHT	15	FA	PTC	25/01/1993	Kohat.	<u> </u>
2	2	Robina Bukhari	Mubarrak Shah	GGPS Wakil Khan Kalli	02/02/62	PSHT	1.5	FA	PTC	29/05/1994	Kohat.	ļ
3	3	Samina	Inayat Illahi	GGPS Landi Khel Gadia Khel	16/02/64	PSHT	15	FA	PTC	29/05/1994	Peshawar	
3 1	4	Tahmina Begum	Ahmed Jan	GGPS Mazid Khel	01/04/65	PSHT	15	BA 、	B.ED	29/05/1994	Kohat.	ļ
5	5	Sabiha Khatoon	Rahmat Ullah	GGPS Landi Khel Gadia Khel	23/04/69	PSHT	15	BA '	PTC	29/05/1994	TSDD Kohat	<u> </u>
6	<u>5</u>	Ghazala Yasmeen	Noor Muhammad	GGPS Surak Toor Chapper	30/04/69	PSHT	15	FA	PTC	29/05/1994	Kohat.	<u> </u>
7	7	Nazia Bashir	Bashir ud Din	GGPS Kot Mela Akhurwal	18/01/70	PSHT	15	FA	PTC	29/05/1994	Peshawar	<u> </u>
8	8	Robina Shaheen	Khaista Khan	GGPS Donga Sabz Ali Kalli	15/02/73	PSHT	15	FA	PTC	29/05/1994	TSDD Kohat	-
9	9	Farhat Jabeen	Inayat Hussain	GGPS Taimer Khel	02/06/67	PSHT	15_	BA	PTC	09/01/1995	Peshawar .	
10	10	Shagufta Parveen	Abdul Jabbar Khan	GGPS Shin Dhand No.2	11/03/69	PSHT	15	FA	PTC	09/01/1995	Kohat.	
11	11	Shahnaz Begum	Muhammad Hussain	GGPS Donga Timer Khel	21/03/61	PSHT	15	FA	PTC	25/05/1995	Peshawar	
12	12	Noshaba	Amin Shah	GGPS Chatter Jawaki	01/01/72	PSHT	15	FA	СТ	25/05/1995	Koliat.	
13	13	Shaheen Akhter	Shams ud Din	GGPS Sardar Khel Suni Khel	13/04/67	PSHT	15	MA	B.Ed	01/04/1996	Kohat.	ļ
14	14	Tahira Waheed	Abdul Wahid	GGPS Malak Gul Khan Kalli	05/05/76	PSHT	15	MA	B.Ed	25/05/1996	TSDD Kohat	
15	15	Shukat Parveen	Faiz Muhammad	GGPS Dingan	13/08/59	PSHT	15	FA	PTC	30/08/1996	Kohat.	
16	16	Shamsa Bibi	Said Mir Badshah	GGPS Pirwal Khel Akhurwal	10/02/65	PSHT	15	FA	PTC	30/08/1996	Peshawar	
17	17	Gul Nargis	Abdul Satar	GGPS Sherin Mela Bosti Khel	07/01/70	PSHT	15	MA	B.ED	31/12/1996	Kohat.	
18	18	Asia Parveen	Muhammad Yousaf	GGPS Lasgari No.1	18/04/72	PSTH	15	MA	B.ED	31/12/1996	Kohat.	<u></u>
19	19	! Noshcen Jan	Muhammad Igbal	GGPS Drab Kass	21/09/72	PSHT	: 15	FA	CT	31/12/1996	Kohat.	<u> </u>
20	20	Kousar Shaheen	Israf Khan	GGPS Kohiwal No.2	11/03/66	PSHT	15	MA	M.Ed	13/05/1997	Kohat.	
21.	21	Bibi Abida	Amin Shah	GGPS Mullayan Ara Khel	01/09/67	PSHT	15	FΔ	PTC	13/05/1997	Kohat.	
22	22	: Gulshan Yawas	Yawas Khan	I GGPS M Surat Khan Kalli	16/12/68	PSHT	: 15	BA	PTC	13/05/1977	Kohat	
23	23	Hasmat Bano	Saif ur Rehman	GGPS Donga Timer Khel	: 04/10/70	PSHT	1.5	MA	B.ED	13/05/1997	Peshawar	·: ··· · ·
24	24	· Asma Rasheed	Muhammad Rasheed	GGPS Qayoom Kallay	20/03/72	PSHT	1.5	FA	PTC	13/05/1997	Kohat.	
25	25	Naheed Akhter	Abdullah Jan	GGPS Atteriwal Akhurwal	30/07/72	PSHT	15	BA	PTC	13/05/1997	Peshawar	••
26		Gul Naz	Muhammad Inayat	GGPS Kohiwal	10/10/72	: PSHT	15	FA	PTC	13/05/1997	Kohat.	
27	27	Kalsoom	Khail Muhammad	GGPS Sheendhand No.1	01/01/73	, PSHT	15	FA	PTC.	13/05/1997	: Mohat.	



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28		
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128 28 Naheed Ashter	Domicile	- Remark
305 30 8ib Zaineb		
1908 23 30	Peshawar	
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32 32 Rozina 8i5 Salfor Khan GGPS Suni Khel NO3 06/11/71 PSHT 15 FA PTC 27/21998 Kn 33 33 Farhat Naz Bagh wali Shah GGPS Behram Khel 17/08/72 PSHT 15 FA PTC 27/21998 Kn 34 Dinar 8i5 Atta Muhammad GGPS Akbar Mela 06/09/73 PSHT 15 FA PTC 27/21998 Kn	TSDD Kohat	
33 33 Farhat Nar 3agh wali Shah GGPS Behram Rhe 17/08/72 PSHT 15 FA PTC 27/2/1998 KA 34 34 Dinar Bibi Atta Muhammad GGPS Akbar Mela 06/09/73 PSHT 15 FA PTC 27/2/1998 KA 35 35 Shehnaz Begum Saif Ullah GGPS Casim Khei 08/03/78 PSHT 15 MA B.Ed 27/2/1998 KA 37 37 Samina Qadir Khan GGPS Titkle 12/10/74 PSHT 15 MA B.Ed 20/10/1998 TS 37 37 Samina Qadir Khan GGPS Shahi Khel 15/05/72 PSHT 15 BA PTC 11/05/1999 KA 38 38 Rozina Khatoon M.Sharif GGPS Shahi Khel 05/02/73 PSHT 15 BA PTC 11/05/1999 KA 39 Naheed Begum Suliman Khan GGPS Shahi Khel 03/03/76 PSHT 15 FA PTC 11/05/1999 KA 40 Jamila Jan Mer Din GGPS Chapper Khel 03/03/76 PSHT 15 FA PTC 11/05/1999 KA 40 Jamila Jan Mer Din GGPS Chapper Khel 03/03/76 PSHT 15 FA PTC 11/05/1999 KA 40 Jamila Jaheen S.Kamal Shah GGPS Shahikiwal 01/04/60 PSHT 15 FA PTC 11/05/1999 KA 41 Atta	Kohat	
34 34 Dinar Bib Atta Muhammad GGPS Akhar Mela 06/09/173 PSHT 15 FA PTC 27/2/1998 KN 35 35 Shehnaz Begum Saif Ullah GGPS Qassim Khel 08/03/78 PSHT 15 FA PTC 27/2/1998 KN 36 36 Noor Taj Shahzad Mir GGPS T.I. Khel 12/10/74 PSHT 15 FA PTC 27/2/1998 TS 37 Samina Qadir Khan GGPS T.I. Khel 12/10/74 PSHT 15 FA PTC 27/2/1998 TS 37 Samina Qadir Khan GGPS Shahi Khel 15/05/72 PSHT 15 BA PTC 11/05/1999 KN Samina Qadir Khan GGPS Shahi Khel 15/05/72 PSHT 15 BA PTC 11/05/1999 KN Samina Qadir Khan GGPS Shahi Khel 05/02/73 PSHT 15 BA PTC 11/05/1999 KN Samina Qadir Khan GGPS Shahi Khel 05/02/73 PSHT 15 BA PTC 11/05/1999 KN Samina Samina Mer Din GGPS Chapper Khel 03/03/76 PSHT 15 FA PTC 11/05/1999 KN Samina Sami	Kohal	
35 35 Shehnaz Begum Sail Ulah GGPS Qasim Khel 08/03/78 PSHT 15 FA PTC 27/2/1998 TS RS RS RS RS RS RS RS	Kohat	
36 36 Noor Taj Shahzad Mir GGPS T.I. Khel 12/10/74 PSHT 15 FA PTC 17/2/1998 15 37 37 37 Samina Qadir Khan GGPS Shahi Khel 15/05/72 PSHT 15 BA PTC 11/05/1999 Kr. Research Researc	Kohat	
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40 40 Jamila jan Mer Din GGPS Chapper Khel 03/03/76 PSHT 15 FA PTC 11/05/1999 Ke Ke 14 41 Saeeda Begum Gul Haider GGPS Chapper Khel 03/03/76 PSHT 15 FA PTC 11/08/1999 TS TS TS TS TS TS TS	Kohat	
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42 42 Irfana Jabeen S. Kamal Shah GGPS Aman Shah Kaly 18/02/73 PSHT 15 BA PTC 25/04/2000 [15] 43 43 Shamim Aqil Khan GGPS Chatter 01/10/73 PSHT 15 FA PTC 25/04/2000 [15] 44 44 Nazakat Saadullah Khan GGPS Chatter 01/10/73 PSHT 15 FA PTC 25/04/2000 [15] 45 45 Nagina Daraz Omer Daraz GGPS Sra Mela 07/03/72 PSHT 15 FA PTC 03/03/2001 TS 46 46 Fehmeeda Afridi Almir Khan GGPS Bilal Toor Chapper 03/08/77 PSHT 15 BA B.Ed 13/08/2001 TS 47 47 Rahat Habib ur Rehman GGPS Sher Hussain Mela 01/01/78 PSHT 15 BA B.Ed 13/08/2001 TS 48 48 Asmat Afral Mir Afzal GGPS Cayrum Mela 13/02/74 PSHT 15 BA TT 31/03/2002 TSI 49 49 Nusrat Afridi Mir Afzal GGPS Surak Tor Chapper 14/07/75 PSHT 15 BA TT 31/03/2002 TSI 50 50 Naureen Akhter Khan Bahadur GGPS Miraj Gul Kaly 29/10/75 PSHT 15 BA PTC 31/03/2002 TSI 51 51 Uzma Gul Ashraf Khan GGPS Qasim Khel 02/06/76 PSHT 15 FA PTC 31/03/2002 TSI 53 53 Mehnaz Begum Mastana Din GGPS Landi wal No1 16/10/76 PSHT 15 FA PTC 31/03/2002 TSI 54 54 Shazia Bibi Gul Akber GGPS Gul Akbar Kaly 01/01/79 PSHT 15 FA PTC 31/03/2002 TSI 55 55 Romana Afridi Khan GGPS Careh Mulan Sharif Khel 01/04/80 PSHT 15 FA PTC 31/03/2002 TSI 56 56 Tasleem Gul Badshah GGPS Ara Khel 01/04/80 PSHT 15 FA PTC 31/03/2002 TSI 57 57 Nigat Bibi Suliman Khan GGPS Landiwal No 2 03/05/80 PSHT 15 FA PTC 31/03/2002 TSI 58 58 Nusrat Bibi Khwaja Muhammad GGPS Landiwal No 2 03/05/80 PSHT 15 FA PTC 31/03/2002 TSI 59 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 58 58 Nusrat Bibi Khwaja Muhammad GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 59 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 59 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI	TSDD Kohal	
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15 15 15 15 15 15 15 16 16	ISDD Kohat	
46 46 Fehmeeda Afridi Almir Khan GGPS Bilal Toor Chapper 03/08/77 PSHT 15 BA B.Ed 13/08/2001 TSI	ISDD Kohat	
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48 ASmat Atzal Mir Atzal GGPS Qayyum Mela 13/02/74 PSHT 15 BA CT 31/03/2002 TSI 49 49 Nusrat Afridi Mir Afzal GGPS Surak Tor Chapper 14/07/75 PSHT 15 BA PTC 31/03/2002 TSI 50 50 Naureen Akhter Khan Bahadur GGPS Miraj Gul Kaly 29/10/75 PSHT 15 BA PTC 31/03/2002 TSI 51 Uzma Gul Ashraf Khan GGPS Qasim Khel 02/06/76 PSHT 15 FA PTC 31/03/2002 TSI 52 Shaheen Akhter Aqil Khan GGPS Landi wal No1 16/10/76 PSHT 15 FA PTC 31/03/2002 TSI 53 Mehnaz Begum Mastana Din GGPS Abdullah Aman Arra Khel 11/02/78 PSHT 15 FA PTC 31/03/2002 TSI 54 54 Shazia Bibi Gul Akber GGPS Gul Akbar Kaly 01/01/79 PSHT 15 FA PTC 31/03/2002 TSI 55 SF Romana Afridi Khan Badshah GGPS Toor Tandi 24/01/79 PSHT 15 FA PTC 31/03/2002 TSI 56 56 Taslcem Gul Badshah Gul GGPS Ara Khel 01/04/80 PSHT 15 BA CT 31/03/2002 TSI 57 Nigat Bibi Suliman Khan GGPS Landiwal No 2 03/05/80 PSTH 15 FA PTC 31/03/2002 TSI 58 58 Nusrai Bibi Khwaja Muhammad GGPS Mulan Sharif Khel 10/10/80 PSHT 15 BA 3.Ed 31/03/2002 TSI 59 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 59 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 59 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 50 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 50 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 50 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 50 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 50 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 50 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 50 59 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 50 59 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSI 50 50 50 50 50 50 50 50 50 50	ISDD Kohat	
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54 54 Shazia Bibi Gul Akber GGPS Gul Akbar Kaly 01/01/79 PSHT 15 FA PTC 31/03/2002 Kol 55 55 Romana Afridi Khan Badshah GGPS Toor Tandi 24/01/79 PSHT 15 FA PTC 31/03/2002 TSC 56 56 Tasleem Gul Badshah Gul GGPS Ara Khel 01/04/80 PSHT 15 BA CT 31/03/2002 TSC 57 57 Nigat Bibi Suliman Khan GGPS Landiwal No 2 03/05/80 PSTH 15 FA PTC 31/03/2002 TSC 58 58 Nusrat Bibi Khwaja Muhammad GGPS Mulan Sharif Khel 10/10/80 PSHT 15 BA 3.Ed 31/03/2002 TSC 59 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSC	SDD Kohat	
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56 56 Tasleem Gul Badshah Gul GGPS Ara Khel 01/04/80 PSHT 15 BA CT 31/03/2002 TSE 57 57 Nigat Bibi Suliman Khan GGPS Landiwal No 2 03/05/80 PSTH 15 FA PTC 31/03/2002 TSE 58 58 Nusrat Bibi Khwaja Muhammad GGPS Mulan Sharif Khel 10/10/80 PSHT 15 BA 3.Ed 31/03/2002 TSE 59 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSE	SDD Kohat	1
57 Nigat Bibi Suliman Khan GGPS Landiwal No 2 03/05/80 PSTH 15 FA PTC 31/03/2002 TSD 58 58 Nusrat Bibi Khwaja Muhammad GGPS Mulan Sharif Khel 10/10/80 PSTT 15 BA 3.Ed 31/03/2002 TSD 59 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSHT 15 FA PTC 31/03/2002 TSD	SDD Konat	 -
58 58 Nusrat Bib. Khwaja Muhammad GGPS Mulan Sharif Khel 10/10/80 PSTT 15 BA B.Ed 31/03/2002 TSD 59 59 Nazia Afridi Munawar Khan GGPS Zarghun Khel Darra 07/07/81 PSTT 15 FA PTC 31/03/2002 TSD	SDD Konat	
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60 1- 60 Rokhsana Sabir Khan GGPS Ibrahim Khel 10/04/77 PSHT 15 BA 3 1/07/2002 TSD	SDD Kohat	
61 61 Amina Bibi Zafar Javed GGPS Shahabuddin Mela 130/04/80 PSUT 15 FA DEC 131/07/2002		
62 62 Basreen M.Amin GGPS Amal Khel Bala 05/03/75 IPSUT 15 DA 1/1/ 2770/2002 ISD	SDD Kohat	i
63 63 Bas Pari Aman Ullah GGPS Suni Khel No2 01/02/71 PSTU 15 BA CU 01/05/2003		
64 : 64 : Farida Biei Acil Khan GGPS Shera Baz Paya 01/03/74 [PSHT] 15 FA DTC 165 705 70002	DD Kohat	
65 65 Parista Davida (92/05/2003 TSD)	SDD Konat	
OS 3.3.18.2 Bashir M.Bashir GGPS Tarhi Kaly 14/04/74 PSHT. 15 MA B.E. 05/05/2003 TSD	DD Kohat	



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	68 ℃.	68	Zahida A	Ghulam Serwar Khan - 18 -	GGPS Feroz-Mela			_[15 €	ΒA	PIC	05/05/2003	1 + 1 + 1 + 1	Acad:	
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ed -3.	69	<u>.⊪</u> 69	Jameela Bibi	Calaam I/A	GGPS Germany Kaly	20/04/76	PSHT	1 1 2	15.		106/06/2003	TSDD Kohat		
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- 1			Janicela Naz	l'oor Kamal Khan	CODE	16/08/80	PSHT	15 %	FA	÷		TSDD Kohat		ij
- 1	71	71	Hascena Naz	N	GGPS T.I Khel No 2	22/08/80	PSHT		-	<u>C</u> T	01/09/2003			
	72	72	(O	Nawab Khan 🗽 "	GGPS Azadi Mela		TSELL	15	JBA " "	3.Ed	01/09/2003	TSDD Kohat		- 1
r			Qamar U Nisa	M.Sher Khan	CCDO C. L. T.	[24/01/8]	:PSHT	115	FΛ			TSDD Kohat		
L	73	73		A 1. J 13 13	GGPS Gula Baz Kaly	02/03/82	PSHT	+:	11//	PTC	01/09/2003	TSDD Kohat		
i	74	74	C	∧bdur Rauf	GGPS Noor Ali Kaly		1.2111	[15	FA		01/09/2003			
-			Samina Begum	Maweez Gul	CCDC NI	10/01/84	PSHT	115	FΛ			TSDD Kohat		
ļ	75	75	Salma Afridi	121 1 1 1	GGPS Nizam Khel Bilal	01/03/79	CDCT	1.5	17/	<u> </u>	01/09/2003	TSDD Kohat		
- 1	76	76	114-	Khyal Mast	GGPS Bazi Khel		jSPST	14	JFA	PTC	1.7700			
- -			Mewa Jan	Nazir Khan	CCBS VIJ L G	17/04/84	SPST	14	FA			Kohat		
-	77	77			GGPS Malak Gul Khan Kaly	15/02/77	SPST			<u> </u>	01/10/2003	TSDD Kohat		- }
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Assistant DE (Female)

Education Officer TSD Darra Kohat







OFFICE OF THE EDUCATION OFFICER

Tribal Sub: Division Darra Kohat Gate No: 2 KDA Kohat, Phone & Fax No. 0922-9260321

Final Seniority List of PST Female Teachers in R/O TSD Darra Kohat

S.No.	Sen: No.	Name of Teachers	Father Name	School	DOB	7 117 177 0			Kohat	t		
81	81	Wahida Iftikhar	ha		008	Desig:	BPS	Quali:	Quali:	DO 1st App:	Domicile	Romani
82	82	Atia Bibi	Munir Khan	GGPS Sardar Khel	01/01/64	PST		Acad:	Prof:	PST	20th Cite	Remarks
83	83	Khatoon Akbar	Zaheer Ali Shah	GGPS Sherabaz Paya	10/12/72	PST	12	SSC	PTC	17/01/1990	Kohat.	ļ
84	84	Amina Bibi	Mir Akbar	GGPS Amal Khel Bala	02/01/73	PST	12	SSC	PTC	27/2/1998	TSDD Kohat	
85	85	Samina Siraj	Muhammad Ayub	GGPS Sherin Mela	05/03/79	PST	12	SSC	PTC	27/2/1998	Kohat	
86	86	Alwida Afridi	Siraj	GGPS Wilayat Khan Kaly	03/04/73	PTC	12	SSC	PTC	22/09/1998	TSDD Kohal	
. 87	87	Piyaw Jana	Sher Akbar	GGPS Donga Sabz Ali	02/04/78	PTC	12	SSC	PTC	11/05/1999	Kohat	
88	88	Najma	Badshah Gui	GGPS Dingan	03/05/77		12	SSC	PTC	31/07/1999	TSDD Kohat	
89	89	Yasmeen Bibi	Ghulam Rasool	GGPS Mulayan Ara Khei	20/04/67	PTC	12	SSC	PTC	01/09/1999	TSDD Kohat	
90	90	Aqsa Akbar	Gul Akbar	GGPS Kohiwal No 2	15/02/75	PTC		SSC	PTC ·	25/04/2000	Kohat	
91	91	Zubaida Nawaz	Gul Akbar	GGPS Kami Khe!	02/11/80	PTC/PS		SSC	PTC	25/04/2000	TSDD Kohat	
92	92	Alia Ahmad	Gul Nawaz	GGPS Germany Kaly	12/08/78	PTC/Ps			TC	31/03/2002	TSDD Kohat	
93	93	Sadia .	Barakat Mir	GGPS Gulabaz Kaly	01/01/81	PST		BA]	PTC	21/02/2005	TSDD Kohat	
Market Comment		5 - 10 mars - 10	M.Inam	GGPS Serwar Khel	27/04/84	PST	 -	Α	PTC	01/09/2005	TSDD Kohat	
95	95		M.Naway	IHC Noor Ali Kaly	11/11/84	PST		BA _	CT	01/09/2005	TSDD Kohat	
96	96	Zainat Begum	Aman Ullah Khan	GGPS Wali Muhammad	16/11/78	PST	 	Α	PTC	05/09/2005	TSDD Kohat	
97	97	Amber Naheed	Ahmad Shah	GGPS Shahab Uddin Mela		PST		1A	_	24 102 1	Karak	 j
98	98	Bakhta Meena	Khijab Gul	GGPS Suni Khei NO 2	01/03/80		12 F.	A		24 /2 0 /2	Kohat	
99	99	Khursheeda	Khalid Khan	GGPS Wali Muhammad	15/04/76		12 B	A		09/01/2006	TSDD Kohat	
90		Shehnaz Bibi	Khan Khel	GGPS Gul Hussain Mela	01/01/80		12 F	4		09/01/2006	TSDD Kohat	
91			Missal Khan	GGPS Las Garhi No.1 · · ·	07/06/77		12 SS	SC		201-1	TSDD Kohat	
92		Dur-e-Shehwar	Mushtaq Ahmad	GGPS Zorh Ahur	28/04/82		1.2 B/	1		20/05/		
93		Benazir	Sharab Din	GGPS Sarwar Khel	01/09/79		12 FA				TSDD Kohat	········ · - ·
94 :		Yasmeen Nawas	M.Nawaz M.Nawaz	GGPS Zarghun Khel	11/06/80		12 ,rA			**** *** *** *********	TSDD Kohat	
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116 116 116 116 116 116 116 116 116 116 117 118	114	114	Rozina Dilawar	Dilawar Khan	GGPS Drabkas	30/01/88	PST	12	ВА	PTC	01/09/2012	TSDD Kohat	
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118 118	116	116	Bas Naz	Sakhi Rehman	GGPS Taimer Khel	03/12/88	PST	12	SSC	PTC	07/01/2013	TSDD Kohat	
119	117	117	Nargis Perveen	Manzoor Hussain	GGPS Bagh Kaly	18/07/73	PST	12	MA	PTC	10/04/2013	Kohat	
120 120 Haleema Gul Khyal Muhammad GGPS Shendhand No1 07/12/80 PST 12 SSC PTC 10/04/2013 Kohat 121 121 Shama Fazal Raheem GGPS Khan dad Kaly 07/05/85 PST 12 SSC PTC 10/04/2013 TSDD Kohat 122 122 Raham Taj Shah Jehan GGPS Pirwal Khel 13/04/86 PST 12 FA PTC 13/04/2013 TSDD Kohat 123 123 Samina Khatoon Syed Shah GGPS Said Kamal Kaly 04/11/60 PST 12 BA PTC 16/10/2014 Kohat 124 124 Robina Mushtri Mushtri Khan GGPS Sherabaz Kaly Paya 14/11/79 PST 12 SSC PTC 16/10/2014 Kohat 125 125 Saida Zulishan Syed Dilbar Shah GGPS Asif Khel 04/02/64 PST 12 FA PTC 14/01/2015 Kohat 126 126 Saima Noureen Taj Muhammad GGPS Landiwal No1 03/01/89 PST 12 SSC PTC 16/01/2015 Kohat 127 127 Humaira Malik Mamrez Khan GGPS Samandi Mela 01/08/74 PST 12 BA PTC 19/01/2015 Kohat 128 128 Noor Ul Ain Noor Hussain Shah GGPS Mir Ghulam Kaly 27/03/86 PST 12 BA PTC 21/04/2015 Kohat 129 129 Mchnaz Nazir Khan GGPS Abdul Qayyum 04/09/84 PST 12 MSc PTC 21/09/2017 TSDD Kohat 130 130 Bibi Neclam Mir Aslam GGPS Surak 05/04/88 PST 12 MA PTC 27/09/2017 TSDD Kohat 131 131 Ismal Noorz Ali Noorz Ali Khan GGPS Surak 05/04/88 PST 12 MA PTC 27/09/2017 TSDD Kohat	118	118	Shabina Ayub	M.Ayub	GGPS Tara Kaly	15/03/78	PST	12	MA	PTC	10/04/2013	Kohat	
121 121 121 121 122 122 123 124 124 124 124 124 124 124 124 124 124 124 124 124 125	119	119	Sidra	Abdul Jalil	GGPS Mehraj Gul Kaly	30/05/80	PST	12	SSC	PTC	10/04/2013	TSDD Kohat	
122 122 Raham Taj Shah Jehan GGPS Pirwal Khel 13/04/86 PST 12 FA PTC 13/04/2013 TSDD Kohat 123 123 Samina Khatoon Syed Shah GGPS Said Kamal Kaly 04/11/60 PST 12 BA PTC 16/10/2014 Kohat 124 124 Robina Mushtri Mushtri Khan GGPS Sherabaz Kaly Paya 14/11/79 PST 12 SSC PTC 16/10/2014 Kohat 125 125 Saida Zufishan Syed Dilbar Shah GGPS Asif Khel 04/02/64 PST 12 FA PTC 14/01/2015 Kohat 126 126 Saima Noureen Taj Muhammad GGPS Landiwal No1 03/01/89 PST 12 SSC PTC 16/01/2015 Kohat 127 127 Humaira Malik Mamrez Khan GGPS Samandi Mela 01/08/74 PST 12 BA PTC 19/01/2015 Kohat 128 128 Noor Ul Ain Noor Hussain Shah GGPS Amal Khel 15/12/83 PST 12 BA PTC 21/04/2015 Ko	120	120	Haleema Gul	Khyal Muhammad	GGPS Shendhand No1	07/12/80	PST	12	SSC	PTÇ	10/04/2013	Kohat	
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128 128 Noor UI Ain Noor Hussain Shah GGPS Mir Ghulam Kaly 27/03/86 PST 12 SSC PTC :21/04/2015 Kohat 129 129 Mehnaz Nazir Khan GGPS Amal Khel 15/12/83 PST 12 BA PTC 29/09/2017 Kohat 130 130 Bibi Neclam i Mir Aslam GGPS Abdul Qayyum 104/09/84 PST 12 MSC PTC 27/09/2017 TSDD Kohat 131 131 Ismal Noorz Ali Noorz Ali Khan GGPS Surak '05/04/88 PST 12 MA PTC 27/09/2017 TSDD Kohat	127	. 127	Humaira Malik	Mamrez Khan	GGPS Samandi Mela	01/08/74	PST	12	BA	PTC	19/01/2015	Kohat	
129 129 Mehnaz Nazir Khan GGPS Amal Khel 15/12/83 PST 12 BA PTC 29/09/2017 Kohat 130 130 Bibi Neclam i Mir Aslam GGPS Abdul Qayyum 104/09/84 PST 12 MSc PTC 27/09/2017 TSDD Kohat 131 1.31 Ismal Noorz Ali Noorz Ali Khan GGPS Surak '05/04/88 PST 12 MA PTC 27/09/2017 TSDD Kohat	128	128	Noor Ul Ain	· ·		27/03/86	PST	12	ISSC			Kohat	
130 130 Bibi Neclam i Mir Aslam GGPS Abdul Qaγγum 104/09/84 PST 12 MSc 1 PTC 27/09/2017 TSDD Koha: 131 131 Israel Noorz Ali 1 Noorz Ali Khan GGPS Surak 105/04/88 PST 12 MΛ 1 PTC 27/09/2017 TSDD Koha:	129	129	Mchnaz	Nazir Khan	GGPS Amal Khel	15/12/83	PST		ļi				** *** ** *** ***
131 131 Ismal Noorz Ali / Noorz Ali Khan GGPS Surak '05/04/88 PST 12 MA PTC 27/09/2017 TSDD Kehat	130	130	Bibi Neclam	i Mir Aslam	GGPS Abdul Qayyum	04/09/84	PST	12	MSc				
	131	1.31	Ismal Noorz Ali	Noorz Ali Khan		05/04/88	PST	1?	MA !			***************************************	
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133 Asma Bibi	<u> </u>	- Lander de la companya de la compa		19					
134 Bibi Mastara	Abdûl Hamid	t IGGPS Qavvum Mela // // // /	105/02/00 :	PST	12 MSc	PTC	20/10/2017		
135 We 135 Fozia Bibi	Almir Khan & Real 4 See	GGPS Samandi Mela GGPS M.Hussain Mela	31/01/02	PST 1	Z 10 1 BA	PTC	21/10/2017	TSDD Kohat	
136 3 1 36 Sobia 5 7 7 7 7 1 37 1 37 1 37 1 37 1 37 1 37	Suggestation 2 States	GGPS Amal khel Bala	25/08/87	PST 1	2 MA	PTC	07/11/2017	TCDD e a	-
7 138 Nida Gul			10/06/80		2 γγν γ γ	· PTC	08/11/2017 26/09/2017	TSDD Kohat	
139 139 Aneela Hayat -		GGPS Ghulam Saleh	1		2 FA	PTC'	29/09/2017	TSDD Kohat	
140 140 Rabia Khanam	Karim Khan"	GGPS Bilal Kalli	10000	PST 1			24 (2 - 4	Kohat	
							31/01/2016	TSDD Kohat	

Assistant DE (Female)

Education Officer TSD Darra Kohat



OFFICE OF PRIE AGENCY EDUCATION OF PERER ROPAR

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	S.#	Ser		Father Name	Name of School	L.D.O.B.	Desig:	* # 3.	L Gua	lification	D/O	Domicile	
		No		Carlotta Car				1		Prof:	Appoint as		Remarks
	l:	11	Wahida Iftikhar	Mosavika							PST;		
	2.	2.	Haseena Alam	Abdur Rehman	GGPS Sardar Khel	01/01/64	PTC/PS			PTC	17/01/1990	Kohat.	
	-3.	3.	Mahjabeen Afridi	Malak M. Jan	GGPS Suni Khel		1	1.	ĮFΑ	PTC	25/01/1993	Kohat.	
•	4.	4.	Robina Bukhari	Mubarrak Shah	GGPS Bazi Khel			<u></u>	FA.	PTC	29/05/1994	F.R KT.	
	5,	5.	Samina	Inayat Illahi	GGPS Wakil Khan Kalli	02/02/62		•	ļFΑ	PTC	29/05/1994	Kohat.	
	6.	6.	Tahmina Begum	Ahmed Jan	GGPS Landi Khel Gadia Khel					PTC	29/05/1994	Peshawar	· -
	7	<u> </u>	Gul Naz:	Paio Khan	GGPS Mazid Khel	01/04/65				B.ED	29/05/1994	Kohat.	· .
·	8.	8.	Saoiha Khatoon	Rahmat Ullah	GGPS Aman Shah Kalli	- 15/04/67	PST/PS			PTC	29/05/1994	Kohat.	
ŀ	9.	9.	Ghazala Yasıneen	Noor Muhammad	GGPS Landi Khel Gadia Khel			,		PTC	29/05/1994	F.R KT.	
ľ	10.		Nazia Bashir		GGPS Toor Tandi Paya	30/04/69					29/05/1994	Kohat.	
-	11.	<u> </u>	Robina Shaheen	Bashir ud Din Khaista Khan	GGPS Kot Mela Akhurwal	18/01/70					29/05/1994	Peshawar	
	12.		Amina Bibi	Subhan ud Din	GGPS Donga Sabz Ali Kalli	15/02/73		15			29/05/1994	F.R KT.	
	13.		Farnat Jabeen	Inayat Hussain -	GGPS Suni Khel	23/12/58					09/01/1995	Kohat:	
ı	14.		Shagufta Parveen	Abdul Jabbar Khan	GGPS Taimer Khel	02/06/67					09/01/1995	Peshawar	
	15.		Shahnaz Begum	Muhammad Hussain	GGPS Chapper Khel	11/03/69		_ •			09/01/1995	Kohat.	
İ	16.		Musarat Shaheen	Muhammad Ayub	GGPS Donga Timer Khel GGPS Noor Ali Kalli	21/03/61					25/05/1995	Peshawar	
	17.		Noshaba	Amin Shah		05/06/64					25/05/1995	Kohat.	
1	13.		Shaheen Akhter	Shams ud Din		01/01/72					25/05/1995	Kohat.	
j	19.		Tahira Waheed	Abdul Wahid	1	13/04/67		15 :				Kohat.	
i	20.			Faiz Muhammad	GGPS Dingan	05/05/76	·	15 :	<u> </u>			F.R KT.	
-	21.		Shamsa Bibi	Said Mir Badshah		13/08/59		15	<u>.</u>	·		Kohat.	
	22.			· · · · · · · · · · · · · · · · · · ·	GGPS Suni Khel No.3	10/02/65		15 :				Peshawar	
						18/04/68					7	Kohat.	
						07/01/70		15			<u></u>	Kohat.	
****	25.	25.				18/04/72		5				Kohat.	
						21/09/72					31/12/1996		
	27.	27.				11/03/66					3/05/1997		
	···· }				Sono Diditayan Ma Kilej	01/09/67		2 i	A - I	4C - []	3/05/1997	Kohat.	<u>.</u>
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2	28 29	2	8."- 9	Hasmar Rang Training	Yawas Khan a	GGPS Malak Surat Khan Ka	illi i 16/12/6	8 PTC/P	S i	2 BA	PTC	113/05/1007	K Ahar	P 375.	į
	30	5 3	<u>ៈៈ</u> ព	Asma Rashced			U4/10//	0 Jr 511.1	- 1) IMA	- B.ED	13/05/1997	e Peshawar	- A	
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	32	. 3	2.	Gul Naz	Muhammad Inaya:	GGPS Attariwal Akhurwal	.XXI30/07/7	2 PSHT	.]	5, BA.	PTC &	- 113/05/1997	Peshawari	; .	 ŧ
	33			Kalsoom	Khail Muhammad	OOFS Koniwai	10/10/7	2 PSHT	1.	5 FA	PTC	113/05/1997	Kohat,		
	34.			Naheed Akhter	Haji Taj Muhammad	GGPS Sheendhand No.1	(01/01/7		1.	FA	PTC	13/05/1997	Kohat.	·	
	35.			Shahcen Aziz	Aziz Khan		03/03/7		!	MA	B.Ed	113/05/1997	Peshawar !		- `
	36.			Bibi Zainab	Gul Zaman	GGPS Zorh Kalli		4 PSHT	1.	MA	B.Ed	13/05/1997	Kohat.	 -	<u>-</u>
	37.			Anjuman	Ghulam Shah	GGPS Amal Khel		7 PSHT	115	FΛ	b.L.C ·	28/12/1997	F.R Kohat		
	38.			Bibi Ayesha	M.Ramazan	GGPS Las Garhi No2	101/04/61			BA	B.Ed	27/2/1998	Kohai j		Ϊ.
	39.			Rozina Bibi	Saifor Khan	GGPS Sheendhand No2		PTC/PS		FA	PTC	27/2/1998	Kohai		<u>:</u>
	40.			Farhat Naz	Bagh wali Shah	GGPS Suni Khel NO3	06/11/71			FΛ	PTC	27/2/1998	Kohat		<u>:</u>
	41.			Atia Bibi	Zaheer Ali Shah		17/08/72	_ !		FA	PTC	27/2/1998	Kohat		!
	42.			Khatoon Akbar	Mir Akbar	GGPS Sherabaz Paya GGPS Amal Khel Bala		PTC/PS			PTC	27/2/1998	F.R KT		1
٠.	43.				Atta Muhammad	GGPS Akbar Mela		PTC/PS			PTC	27/2/1998	Kohat		
39. 2	[44.	44	. [5		Saif Ullah k	GGPS Qasim Khel	06/09/73	i	-	MSc	B.Ed.	27/2/1998	Kohat	.]	
	45.				M.Ayum	GGPS Sherin Mela	08/03/78			FA	PTC	27/2/1998	F.R Kohat		
	46.	46.	. 1		Shahzad Mir	GGPS T.J Khel	05/03/79				PTC	22/09/1998	F.R Kohat		:
	47.	47.	. S		Qadir Khan	GGPS Shahi Khel	12/10/74		╂——	MA	B.Ed	20/10/1998	F.R Kohat		
	⁺48.⁻			Rozina Khatoon	M.Sharif	GGPS Samandi Mela	15/05/72		15		PTC		Kohat		
-	<u>-49.</u>	-49.	S		Siraj	GGPS Ghulam Saleh Ghariba	05/02/73	. 1	15	ВА	PTC		Kohat		
=	-50	-50.	. 1		Suliman Khan	GGPS Wilayat Khan Kaly					PTC		Kohat		
•	, 51.	. 51.	Α		Shor Akbar	GGPS Donga Sabz Ali	03/04/76	•		FA	PTC :		Kohat		٨.
~	:52:	:52.	`Ja	amila jan - * ""	Mer Din	GGPS Wilayat khan Kaly	02/04/78			-	PTC		F.R Kohat		
	±53.⁼	53.	ŀ	iyaw Jana 🔭 😘	Badshah Gul	GGPS Dingan	03/03/76			FA	PTC	· · · · · · · · · · · · · · · · · · ·	F.R Kohat		,
ا بد	-54	:54.	S	aceda Begum	Gul Haider	GGPS Shpalkiwal	03/05/77			·	PTC		F.R Kohat .		
	≨55 :∶	<u>.</u> 55.	N	ajma (Ghulam Rasool		01/04/60	DTC/DC	15	BA	PTC	25/04/2000	F.R Kohat _	<u>****</u> ***	
7	3 <u>0</u> .	<u>:</u> 56.	jir	lana Jabeen	S.Kamal Shah	GGPS Mulayan Ara Khel	118/02/72-	DOLLES	12.	88C_	NIC ===	25/04/2000 =	Kohat 🚎 🗓	A STATE OF THE STA	٦,
	57.	57.	SI	namim:		GGPS Aman Shah Kaly- GGPS Gul Akbar Kaly Paya	10/02/73	LOUIT.	12	1. A. T.	PIC	[25/04/2000 =		<u></u>	
攀 :	, 38.7	₹58 <u>.</u> `	įΥ.	asmeen Bibi. 🚾 🚾 (Gul Akbar 🕮 🔠	GGPS Kohiwal No 2	15/02/75	PTC/PS	12	1.A .			R Kohat		S
-	59.	597	N	azakat. 🚅 🎞 🔭 S	Saadullah Khan		15/02/75 02/05/78						R-Kohat		X
	60.	60.	Ņ	agina Daraz	Omer Daraz		07/03/72		15		···		R Kohat ·		- ·
	61.	61:	l) è	amceda Afridi 📝	Imir Khan -	GGPS Bilal Kaly Tor Chapper	03/09/77	DOLL	15				Cohat		C of
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196. 9	06. Azyana	Abdur Rehman								·
	27. Bibi Fludda	Sher Ahmad	GGPS Mazid Khel	08/11/83 PTC/F	י גיוו כוניאנ	. Mas-	07/12/2004	E.R. Kohat		٠,
98. 9	98. Zubaida Nawaz	Gul Navaz	GGPS Abdul Qayyam Kal GGPS Germany Kaly	y 16/01/83 :PTC/F	S 12-1BA	PTC		F.R. Kohat		
99. 9	9. Alia Ahnad :	Barakat Mir	GGPS Gulahaz Kaly	12/08/78 PTC/F	S 12 BA	PTC	121/02/2005	P.R Kohat	 	
	C- Sadia	. M.Inam	GGPS Gulabaz Kaly GGPS Serwar Khel-	27/04/94 PTIC/P	S 12. FA.	PTC	01/09/2005	F.R Kohat		
	01. Amber Nawaz	M.Nawaz	IHC Noor Ali Kaly	27/04/84 PTC/P	S 12 BA	CT	101/09/2005	F.R. Kohat		- the
102.1	02.Zainat Begum	Aman Ullah Khan	GGPS Wali Muhammad Ja	11/11/84 PTC/P	S 12 BA	PTC	05/09/2005	F.R Kohat		
103. 10	03. Amber Naheed	Ahmad Shah	GGPS Shahab Uddin Mela	01/03/80 PTC/P	S 12 MA	B.Ed	21/09/2005	Karak		
	04 Bakhta Mcena	Khijab Gul	GGPS Suni Khel NO 2	15/04/76 PTC/P	S 12 PA	PTC.	21/10/2005	Kohat	- +	•
1 105.] 10	05.Khursheeda	Khalid Khan	GGPS Wali Muhammad Jar	nan 01/01/80 IPTC/P	SII2 BA	PTC PTC		F.R Koha!		
100. 10	06. Shehnaz Bibi	Khan Khel	GGP'S Gul Hussain Mela	07/06/77 PTC/PS	S 12 SSC	PTC	09/01/2006	F.R Kohat		
	08.Dur-e-Shehwar	Missal Khan	GGPS Las Garhi No.1	28/04/82 PTC/PS	S 12 BA	PTC	20/06/2006	F.R Kohat		
100. 10	19. Benazir	Mushtaq Ahmad	GGPS Zorh Ahur	01/09/79 PTC/PS	5 12 FA	PTC	01/09/2006	F.R Kohat		
	0. Yasmeen Nawas	Sharab Din	GGPS Sarwar Khel	11/06/80 PTC/PS	12 EA	PTC	01/09/2006	F.R Kohat F.R Kohat		
	1 Saima Nawaz	M.Nawaz M.Nawaz	GGPS Zarghun Khen Dara I	3zr 25/10/81 PTC/PS	12 DA	PTC	01/09/2006	F.R Kohat		- ,
	2. Zubaida Sabir	Sabir Khan	GGPS Zarghun Khel Dara B	zr :15/02/86 PTC/PS	12 BA	 		F.R Kohat	···	-
	3. Zareen Taj	Races Khan	GGPS 1.1 Khel No 2	14/05/82 PTC/PS	12 FA		09/09/2006	F.R Kohat		-
	4. Kousar Naz	M.Nawaz	GGPS Zor Kaly	.07/01/77 PTC/PS	12 FA	+		F.R Kohat		
115. 11.	5. Fatima	Raza Khan	GGPS Wald Khel	24/09/82 PTC/PS				F.R Kohat		7
116. 11	6. Nadia Khwaja	Khwaja Muhammad	GGPS Wakil Khan Kaly GGPS Akbar Mela	17/08/83 PTC/PS	12 BA	PTC .		F.R Kohat		-
117. 11'	7. Mehrcen	Anwar	GGPS Shpalkiwal	10/02/82 PTC/PS	 		10/04/2007	F.R Kohat	· ,,	Ţ
	8. Mehnaz	Khan Muhammad	GGPS Surat Khan Kalli	06/06/85 PTC/PS	12 BA -		13/04/2007	F.R Kohat		7
	Musarat Banu	Sardar Khan	GGPS Pirwal Khel	'01/04/70 PTC/PS	12 SSC			F.R Kohat		7
). Shazia Begum	Khan M.Khan	GGPS Attari wal	10/10/75 PTC/PS	12 FA			F.R Kohat]
	Azya Gul	Gul Nawaz	GGPS Mullan	04/02/79 PTC/PS 08/03/81 PTC/PS	12 SSC			F.R Kohat		
	Maryam Bibi	M.Zaman	GGPS Gul Hussain Mela	01/12/85 PTC/PS	12 BA			F.R Kohat]
123. 123	_!	Sultan Akbar	GGPS Sher Hussain Mela	05/10/87 PTC/PS	12 BA	3.Ed	13/02/2010	R Kohat	_/}_	\vdash
	Bina Afridi	Sherzada	GGPS Alam Khel	05/10/87 PTC/PS	12 PA	1 C	13/02/2010	R Kohat		Ž
	Fehmeeda	Sher M. Khan	GGPS Chattar Jawaki	26/03/89 PTC/PS 25/02/90 PTC/PS	12-12/14-12	TC T	13/02/2010	:R Kohat!	1	5-
	Zainab Bibi Zainab Bibi	Anwar Khan	GGPS Lass Garhi No2	11/08/88 PTC/PS	12 FA P					1
	Amina Khatoon	Mir Bat Khan	GGPS Mulla Khel	21/03/85 PTC/PS	12 FA P		5/12/2010 1	R Kohati		1
129. 129.		Dilbar Khan	GGPS Mella Khel	20/02/73 PTC/PS	12 SSC P			R Kohati		i
	****	Abdul Samad	GGPS Nizam Khel Bilal	03/04/83 PTC/PS	l2 BA P		····	R Kohat		į
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		Amina Bibi		GGPS Tor Tandi	19/10/85	PTC/PS	,12	-βA:	CT	01/09/2012	F.R Kohat	
	~}	Rozina Dilawar		GGPS Drabkas						.]01/09/2012		
· }		Zahida Anwer -	Anwer Khan	GGPS T.1 Khel	28/02/83	PTC/PS	12	BA	CT.	04/09/2012	JF.R Kohat	
		Bas Naz	Sakhi Rehman 🏋 🏋	GGPS Taimer Khel	103/12/88	PTC/PS	12	SSC	PTG	07/01/2013;	F.R Kohat	:
134.		Nargis Perveen	Manzoor Hussain	GGPS Abdul Aman Bagh Kaly	18/07/73	PTC/PS	12	MΛ	PTC	10/04 2013	Kohat	
135.	·	Shabina Ayub	M.Ayub	<u> </u>	15/03/78	PTC/PS	12	MA	PTC	10/04/2013	Kohat	-
136.	136.	Sidra	Abdul Jalil	GGPS Mehraj Gul Kaly	30/05/80	PTC/PS	12	SSC	PTC	10/04 2013	F.R Kohat	
137.	137.	Haleema Gul	Khyal Muhammad	GGPS Shendhand NoT	07/12/80	PTC/PS	12	:SSC	PTC	10/04 2013	Kohat	
138.	138.	Shama	Fazal Raheem	GGPS Khan dad Kaly	07/05/85	PTC/PS	12	SSC	PTC	110/04 2013	F.R Kohat	
139.		Raham Taj	Shah Jehan	GGPS Pirwal Khel	13/04/86	PTC/PS	12	IFA	PTC	13/04/2013	F.R Kohat	
140.	140.	Samina Khatoon	Syed Shah	GGPS Said Kamal Kaly	04/11/60	PTC/PS	12	BA	PTC	16/10.2014	Kohat	
141.	41.	Robina Mushtri	Mushtri Khan	GGPS Sherabaz Kaly Paya	14/11/79	PTC/PS	12	SSC	PTC	16/10/2014	Kohat	
142.	ļ42.	Saida Zufishan	Syed Dilbar Shah	GGPS Asif Khel	04/02/64	PTC/PS	12	FA	PTC	114/01/2015	Kohat	i
143.	143.	Saima Nourcen	Taj Muhammad	GGPS Landiwal No1	03/01/89	PTC/PS	12	SSC	PTC	16/01/2015	Kohat	
144.	44.	Humaira Malik	Mamrez Khan	GGPS Samandi Mela	01/08/74	PTC/PS	12	BA	PTC	19/01/2015	Kohat	
145.	145.	Noor UI Ain	Noor Hussain Shah	GGPS Mir Ghulam Kaly	27/03/86	PTC/PS	12	SSC	PTC	21/04/2015	Kohat	
146.	146.	Mehnaz	Nazir Khan	GGPS Amal Khel	15/12/83	PTC/PS	12	BA	PTC	29/09/2017	Kohat	
147.	47.	Bibi Neelam	Mir Aslam	GGPS Abdul Qayyum	04/09/84	PTC/PS	12	MSc	PTC	27/09/2017	F.R Kohat	
148.	148.	Ismal Noorz Ali	Noorz Ali Khan	GGPS Surak	05/04/88	PTC/PS	12	MA	PTC	27/09:2017	F.R Kohat	
149.	49.	Mehreen Afridi	Abdul Ghafar	GGPS Qayyum Mela	09/05/89	PTC/PS	12	FA	PTC	 	F.R Kohat	
150.	50.	Asma Bibi	Abdul Hamid	GGPS Qayyum Mela	06/03/89	PTC/PS	12	MSc	PTC	1,	F.R Kohat	
151.	51.	Bibi Mastara	Gul Zaman	GGPS Samandi Mela	25/10/88	PTC/PS	12	BA	PTC		F.R Kohat	
152.	152.	Fozia Bibi	Almir Khan	GGPS M.Hussain Mela	21/01/92	PTC/PS	12	MA	PTC		F.R Kohat	
153.	153.	Sobia	Sher Bahadur	GGPS Amal Khel Bala	25/08/87	PTC/PS	12	MA	PTC		F.R Köhat	
154.	.54.	Nurgis Bibi	Nazar Hussain	GGPS Mir Ghulam Kalli	10/06/80	PTC/PS	12				F.R Kohat	
155.	55.	Nida Gul	Abdul Ghafar	GGPS Behram Khel	03/04/88	PTC/PS	12				F.R Kohat	
156.	156.	Aneela Hayat	Sher Khan		15/02/78					·	Kohat	
157.	157.	Rabia Khanam Afridi	Karim Khan	······································	12/01/84	1					F.R Kohat	
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AAEO Female



Agency Education Officer . F.R Kohat.

BEFO	RETHE SERVICE	TRIBUNAL KHYE	BER PAKHTUN	KHWA PESH	AWR
SERVI	ICE APEAL NO.58	395/2020			
Mst: A	mber Nawaz D/O l	Muhammad Nawaz		App	ellant
•	L ,	VS	•		
K.P Go	overnment		.,	Resp	ondents
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	est de la companya d La companya de la co	Reliance Cert	ificate.		
		10-1			
We the	e undersigned Resp	ondent No.3 and 4 a	re reliance/agree	with the	
comme	ents/reply submitted	d by respondent No.2	2 in since appeal	No.5898 title	Amber
Nawaz	z GGPS Feroz Mela	1.		· ,	
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Respo	ndent No.3		ADEO (F)	1 h_4
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Respo	ndent No.4	Head Mistress G	GMS Noor Ali I	Kalay ////	m tillam
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N	mdet: NO	1.	Tud or	Edula	ehon?
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