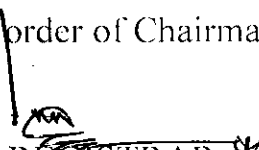


# FORM OF ORDER SHEET

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

Case No. - \_\_\_\_\_ 1866 /2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/12/2022	<p>The appeal of Mst Nighat Shaheen presented today by Roecda Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____. Notices be issued to appellant and her counsel for the date fixed.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

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

Appeal No. BBB of 2022

Mst Nighat Shaheen Ex-PST R/o Porana Bazar Karak P.o Tehsil  
District Karak.

..... Appellant

**VERSUS**

- 1) Government of KPK through Secretary Education Khyber Pakhtunkhwa KPK Peshawar.
- 2) Director Education KPK Peshawar.
- 3) District Education Officer North Waziristan.

..... Respondents

**INDEX**

S.No.	Description of documents	Annexure	Pages
1.	Memo of Appeal		1-4
2.	Addresses of the parties		5
3.	Affidavit + CONDONATION OF DELAY		6. 7 & 8 CD
5.	Copy of appointment order, Medical Certificate & Service Book	A,B,C	9-17
6.	Copy of Departmental Appeal	D	18-20
	Wakalat Nama		

Dated 17/12/2022

Nighat  
Appellant

Through

R  
Roeda Khan  
Advocate, High Court,  
Peshawar.

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

Appeal No. 1866 of 2022

Mst Nighat Shaheen Ex-PST R/o Porana Bazar Karak P.o Tehsil  
District Karak.

..... Appellant

**VERSUS**

- 1) Government of KPK through Secretary Education Khyber Pakhtunkhwa KPK Peshawar.
- 2) Director Education KPK Peshawar.
- 3) District Education Officer North Waziristan.

..... Respondents

**APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT, 1974, FOR THE ADJUSTMENT/ALLOWING THE APPELLANT FOR PERFORMING HER DUTY WITH RESPONDENT DEPARTMENT AS THE APPELLANT HAS BEEN RESTRAINED ILLEGALLY AND WITHOUT ANY REASON FOR PERFORMING HER DUTY AGAINST WHICH THE APPELLANT FILED A DEPARTMENTAL APPEAL 23/08/2022 WHICH HAS NOT BEEN DECIDED WITHIN THE STATUTORY PERIOD OF NINETY DAYS.**

**Prayer:**

On acceptance of the instant service appeal the appellant may kindly be treated accordance to law and rules by adjusting/allowing her to perform her duty with respondent Department alongwith all back benefits.

**Respectfully Sheweth:****FACTS**

The appellant respectfully submits as under:

- 1) That the appellant has been appointed as Primary School Teacher (BPS-07) at Government Girls Primary School Shawa Adda Ajab Khan Qilla at District North Waziristan. (Copy of appointment order Medical Certificate and Service Book are attached as Annexure A, B,C).
- 2) That after appointment the appellant performed her duty with full deviation and hard work and no compliant whatsoever has been made against the appellant.
- 3) That the appellant continue her duty with w.e.f 13/09/2002 to 2006.
- 4) That after that security situation at North Waziristan became worst and that's why the appellant had to leave the school and location.
- 5) That now after normal condition of the area the appellant has been submitted a Departmental Appeal on 23/08/2022 for her adjustment which has not been response by the respondent Department. (Copy of Departmental Appeal is attached as Annexure-D).
- 6) That now the appellant may be liable for adjustment on the following grounds amongst others.

- 7) That feeling aggrieved the appellant prepares the instant Service Appeal before this Hon' able Tribunal inter alia on the following grounds.

**GROUND**

- A). that the appellant is a civil servant with respondent Department which has been clarified from the appointment order medical certificate as well as service book
- B). That the appellant has never been removed nor dismissed meaning there by that the appellant is still on the strength of respondent Department.
- C) That no charge sheet no statement of allegation and no show cause has been issued against the appellant.
- D) That no proceeding/explanation has been received to the appellant by the respondent Department.
- E) That any other will be raised at the time of arguments with the prior permission of this Hon' able court.

It is therefore most humbly prayed that on acceptance of the instant service appeal the appellant may kindly be treated accordance to law and rules by adjusting/allowing her to perform her duty with respondent Department alongwith all back benefits.

Any other remedy which this august tribunal deems fit  
that may also onward granted in favor of appellant.

Dated 17/12/2022

*Nigat*  
Appellant

Through

*N*  
Roeda Khan  
Advocate, High Court,  
Peshawar.

**Verification:**

Verified that the contents of the above appeal are true  
and correct to the best of my knowledge and belief.

*Nigat*  
Deponent

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

Appeal No. \_\_\_\_\_ of 2022

Mst Nighat Shaheen Ex-PST R/o Porana Bazar Karak P.o Tehsil  
 District Karak.

..... Appellant

**VERSUS**

- 1) Government of KPK through Secretary Education Khyber Pakhtunkhwa KPK Peshawar.
- 2) Director Education KPK Peshawar.
- 3) District Education Officer North Waziristan.

..... Respondents

**ADDRESSES OF THE PARTIES**

**Appellant**

Mst Nighat Shaheen Ex-PST R/o Porana Bazar Karak P.o Tehsil  
 District Karak.

**Respondents**

- 1) Government of KPK through Secretary Education Khyber Pakhtunkhwa KPK Peshawar.
- 2) Director Education KPK Peshawar.
- 3) District Education Officer North Waziristan.

Dated 17/12/2022

Nighat  
 Appellant

Through



**Rooeda Khan**  
**Advocate, High Court,**  
**Peshawar.**

6

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

Appeal No. \_\_\_\_\_ of 2022

Mst Nighat Shaheen Ex-PST R/o Porana Bazar Karak P.o Tehsil  
District Karak.

..... Appellant

**VERSUS**

- 1) Government of KPK through Secretary Education Khyber Pakhtunkhwa KPK Peshawar.
- 2) Director Education KPK Peshawar.
- 3) District Education Officer North Waziristan.

..... Respondents

**AFFIDAVIT**

I, Mst Nighat Shaheen Ex-PST R/o Porana Bazar Karak P.o Tehsil District Karak do hereby solemnly and oath that the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon' able Court.

*Nighat*  
Deponent



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

Appeal No. \_\_\_\_\_ of 2022

Mst Nighat Shaheen, Ex-PST R/o Porana Bazar Karak P.o Tehsil  
 District Karak.

..... Appellant

**VERSUS**

- 1) Government of KPK through Secretary Education Khyber Pakhtunkhwa KPK Peshawar.
- 2) Director Education KPK Peshawar.
- 3) District Education Officer North Waziristan.

..... Respondents

**APPLICATION FOR CONDINATION OF DELAY**  
**IF ANY**

**Respectfully Sheweth:**

**Petitioner submits as under:-**

1. That the above mentioned appeal is filing before this Hon' able Court in which no date is fixed for fixed for hearing so far.
2. That the appellant continue her duty with w.e.f 13/09/2002 to 2006.
3. That after that security situation at North Waziristan became worst and that's why the appellant had to leave the school and location.
4. That now after normal condition of the area the appellant has been submitted a Departmental Appeal on 23/08/2022 for her adjustment which has not been response by the respondent Department..
5. That prior to Departmental Appeal the appellant submitted so many applications for her adjustment to respondent Department but in vain.

6. That the appellant there are many Judgments of the superior court that cases should be decided on merit then on technicalities.
7. That That the appellant has never been removed nor dismissed meaning there by that the appellant is still on the strength of respondent Department.

It is therefore, requested that the limitation period (if any) may kindly be condoned in the interest of justice.

Dated: 17/12/2022

Nigat

Appellant

Through

R

Roeda Advocate  
High Court Peshawar

# Annex A 9

OFFICE OF THE SECRETARY, EDUCATION, NORTH WEST FRONTIER PROVINCE, AGENCIES.  
APPOINTMENT ORDER

Consequent upon the approval of Departmental Selection Committee, the following FFC (Female) Non Local Trained Candidates are hereby appointed in PPS-7 (NS:2220-120-5820/PS). Plus usual allowances on CONTRACT basis for Three Years with effect from their taking over charge in the schools noted against their names:-

S.No.	M/No.	Name With Father's Name	Name of School	Remarks
1.	01	Shamim Akhtar D/O Mehr Amin(BU)	GGPS Nek Umer Kot	V/Post
2.	02	Rozina Shabnum D/O Mohd Azim(Pesh.)	GGPS Haji Mohd	V/Post
3.	03	Parya Bibi D/O Noor Mohd (MKD)	GGPS Akraa Kot	"
4.	04	Sharafat Begum D/O Nek Mohd(LKD)	-do-	"
5.	17	Sunara Iftikhar D/O Iftikhar Ahmad(PR)	GGPS Noor Mohd(Khush)	
6.	46	Samina Raz D/O Akbar Ali(Kardk)	GGPS Sardar Kot	V/Post
7.	07	Maryum Jwails D/O Dr:Iqbal H.Shah(KK)	-do-	"
8.	67	Mussarat Perveen D/O Mir Sarfaraz(KK)	GGPS Gul Zura Goryum	
9.	09	Ume Kalsoom D/O Amin Ahmad (LKD)	GGPS Madak Kot	"
10.	10	Kalsoom Ara D/O Fazli Kabir(LKD)	-do-	"
11.	12	Naheed Akhtar D/O Ghulam Qasim(BU)	GGPS Mir Zali Kot	"
13.	13	Shafiqta D/O Patch Khan (Kardan)	GGPS Mir Kazim Kot	"
14.	31	Bes Nihar D/O Rahim Dad (Kardan)	-do-	"
15.	14	Nasreen Akhtar D/O Hakim Khan(KK)	GGPS Jehangir Kot	"
16.	15	Sakoon Akhtar D/O Dilwar Khan(KK)	-do-	"
17.	16	Bibi Amin D/O Mehr Amin (BUE)	GGPS Hanayun	"
18.	05	Janet Bibi D/O Rahim Gul (Pesh.)	GGPS Mohd Khan Boor Kot	"
19.	19	Zalun Nisa D/O Rahim Gul(Pesh.)	-do- -do-	"
20.	18	Irum Panous D/O Amir Sultan(BU)	GGPS Sardar Ali	"
21.	20	Ghozala Bukhari D/O Kifoyat Ali Shah(PR)	GGPS Balhtali	"
22.	21	Shakila D/O Amir Zaman (LKD)	GGPS Gul Mati	"
23.	22	Surraya Bibi D/O Bin Mohd (KK)	GGPS Janet Mir Kot	"
24.	23	Gul Naz Akhtar D/O Nek Nawaz(KK)	-do- -do-	"
25.	24	Nazia Bibi D/O S.Sadiq Shah(KT)	GGPS Noor Khan Sheera	"
26.	25	Rozina Salim D/O Mohd Salim (LKD)	GGPS Ahmed Gul	"
27.	23	Rozina D/O Hamid Khan (LKD)	GGPS Gul Dad Kot	"
28.	32	Naheed Akhtar D/O Mohd Hazrat(LKD)	GGPS Danger Kot	"
29.	34	Tabassum Ara D/O Sher Zaman (LKD)	GGPS Zinda	"
30.	40	Shazia D/O Sultan Zeb (LKD)	-do- -do-	"
31.	47	Naheed Khan D/O Khandaqia (LKD)	GGPS Qutub Khan Mand Rogha	"
32.	48	Sardar Begum D/O Dil Wali Khan(LKD)	GGPS Alan Gul	"
33.	64	Kishwar Begum D/O Bakht Munir Khan(LKD)	GGPS Sardar Khan	"
34.	74	Margus Perveen D/O Saadullah Khan(MKD)	GGPS Gul Khoon	"
35.	77	Farzana D/O Rehman Sharif (LKD)	-do- -do-	"

36	43	Zahida Bibi D/O Jani Mohd (Charsadda)	GGPS Kashibeer V/Pout
37	55	Shama Begum D/O Sarin Khan (Charsadda)	GGPS S. Saleh Gul "
38	65	Rukhshana Begum D/O Zarin Khan (Charsadda)	-do- -do-
39	26	<u>Shahida Begum D/O Shad Mohd (KK)</u>	GGPS Bider Jan "
40	27	Halima Bibi D/O Shamsud Din (Sawabi)	GGPS Sakhi Mar Jan "
41	70	Nazir Jamal D/O Sayed Jamal (Sawabi)	-do- -do- "
42	29	Hanida Begum D/O Aminullah (KKD)	GGPS Mohd Nawaz Spitwar
43	30	Alocha Bibi D/O Jafri Jan (Lakki)	GGPS Mir Saleh Jan "
44	11	Safia Bibi D/O Aman Gul (KK)	GGPS Shadat Khan "
45	42	Nilofar D/O Mohd Gul (Lardan)	GGPS Gul Mansoor "
46	59	Shemim Akhter D/O Mubarak Shah (Mardan)	GGPS Mohd Noor Dalil K
47	90	Malika D/O Mahmood Khan (Mardan)	GGPS Mohd Nawaz Khuchel
48	35	Sharafat Bibi D/O Muntasir Khan (PR)	GGPS Mar Daraz M. Khel.
49	37	Amina Begum D/O Duro Khan (PR)	-do- -do-
50	36	Ghand Gul D/O Ahmad Saeed (Charsadda)	GGPS Akbar Khan Spinwam.
51	95	Shazia Gul D/O Bad Shah Gul (Charsadda)	-do- -do-
52	39	Shaukat Sultana D/O Amin Jan (KK)	GGPS Faqir Mitari V/P
53	56	Hargus Sultana D/O Amin Jan (KK)	-do- Noor Mohd M. Khel
54	38	Sedra Rehman D/O Mohd Rehman (BU)	GGPS Sayed Nawaz Ippi.
55	41	Bibi Sajida D/O Gul Poyo (KK)	GGPS Sardar Habibullah
56	44	Zubida Khatoon D/O Sahib Gul (KK)	GGPS Najim Khan Spalga
57	45	Mahmooda Salim D/O Shar Bewal (KK)	GGPS Gul Saro Tall
58	06	<u>Tahira Amberu D/O Mohd Ayes (KK)</u>	GGPS Ajab Khan Shawa
59	52	<u>Nighat Shaheen D/O Mohd Ayes (KK)</u>	-do- -do-
60	49	Shamim Ara D/O Talcoor Khan (Mardan)	GGPS Shera Ayub Spalwan
61	79	Zabeen Begum D/O Mohd Ayub Bqcha (Mardan)	-do- -do-
62	80	Kosia Naz D/O Sayed Zamin (LKD)	GGPS Noor Daraz Nawaz
63	86	Zind Bibi D/O Ghulam Shah (MKD)	-do- -do-
64	71	Azifa Akbar D/O Akbar Ali Khan (BU)	GGPS Aman Gul
65	63	Rifat Shaheen D/O Miaz Gul (Kohat)	GGPS Wali Mohd Khan Spix
66	102	Shankad Bibi D/O Said Akbar (Kohat)	-do- -do-
67	60	Noor Shabeen D/O Wahid Ali Shah (BU)	GGPS Saiful Kot
68	81	Azra Bano D/O Noorud Din (BU)	-do- -do-
69	93	Armuz Begum D/O Mir Badam (BU)	GGPS Noor Din Dandey D. PK
70	94	Suraya Begum D/O Mohd Nawaz (BU)	GGPS Amanullah Jan
71	53	Mahood Kazim D/O Khub Nawaz Khan (KK)	GGPS Faqir Mitari K. Rogha
72	50	Zarina Khatoon D/O Mohd Umar (Kohat)	GGPS Ayub Maliken Rzk:
73	57	Anila Gul D/O Abdullah Jan (Kohat)	-do- Haq Nawaz Kot
74	58	Janet Khatoon D/O Noor Ahmad (Kohat)	GGPS Adnan Khan Doodali
75	61	Ghazala Yasmin D/O Abdur Rashid (Kohat)	-do- -do-
76	51	Mahood Akhter D/O Saffor Khan (Pesh.)	GGPS Kadir Kot
77	62	Mizakat Bibi D/O Noor Mohd (Pesh.)	-do- -do-
78	54	Bas Pari D/O Khair Mohd (KK)	GGPS Rasool Khan K. Pari
79	63	Nagima Bibi D/O Rahim Gul (KK)	-do- -do-

80	69	Saeeda Abida Bibi D/O S. Taj Hussain Khan (KK)	CCPS	AD/12
81	75	Shah Naz Begum D/O Khan Mohd (Nawabshah)	CCPS	Pir Kohli Kot
82	76	Rabia Rauf D/O Rauf Khan (Sewabi)	-do-	-do-
83	87	Sadeqat D/O Rehman Nabi (KED)	CCPS	Gulistan Road
84	83	Balqis Akhtar D/O Gul Nawar Khan (KK)	CCPS	Adil Pir
85	66	Fehmida Begum D/O Aziz Rahman (KK)	CCPS	Gulistan
86	72	Asin Khatoon D/O Pir Mohd (KK)	CCPS	Ulman Kot
87	73	Farzana Bibi D/O Mir Ali Khan (KK)	CCPS	Sahar Khan
88	78	Samina Bibi D/O Gul Rais Khan (KK)	-do-	-do-
89	83	Rehana Adil D/O Adil Bad Shah (KK)	CCPS	Muzai Kot
90	84	Shamim Akhtar D/O Farakh Zaman (KK)	CCPS	Pir Kohli S
91	85	Moor Shad Begum D/O Mohd Khan (KK)	CCPS	Adil Mur S
92	82	Zarge Muir D/O Rasul Hiaz (BU)	CCPS	Mohd Salim
93	108	Hajira Bibi D/O Haroon Khan (Malakand)	CCPS	Sher Mohd
94	88	Bibi Abida D/O Mohd Afzal (KK)	CCPS	Zafar Ali
95	89	Hajma Perveen D/O Mir Dil Khan (KK)	CCPS	Bawar Kot
96	94	Zainab Fardus D/O Adem Khan (KK)	CCPS	Zar Ghun S
97	92	Zubida Khatoon D/O Yousof Khan (KK)	-do-	-do-
98	96	Rehanna Yasmin D/O Pashan Khan (Lakha)	CCPS	Gulistan
99	97	Shazia Salim D/O Mohd Salim (BU)	CCPS	Sahar Kot
100	98	Shahana Bibi D/O S. Shamim Hussain (KK)	CCPS	Muzai Kot
101	99	Gulshan Ara D/O Hakim Khan (KK)	CCPS	Adil Mur S
102	100	Shabana Yasmin D/O Munwar Khan (KK)	-do-	-do-
103	101	Shah Naz Begum D/O Multan Khan (Charsadda)	CCPS	Muzai Kot
104	103	Zar Shad Begum D/O Habib Rasul (Charsadda)	-do-	-do-
105	104	Bas Nihar D/O Mohd Makin (KK)	CCPS	Darshan Kot
106	105	Bibi Razia D/O Imtiaz Khan (KK)	CCPS	Balwant
107	33	Akhtar Begum D/O Mir Kalam Khan (KK)	-do-	-do-
108	106	Saeeda Nureen D/O Abdur Rahim (KK)	CCPS	Muzai Kot B
109	107	Musrat Hashad D/O Pir Saib Shah (KK)	CCPS	Muzai Kot
110	109	Khalida Yasmin D/O Gul Zada (KK)	CCPS	Sahar Kot
111	110	Samina Begum D/O Gul Muhammad (KK)	CCPS	Zafar Kot B
112	111	Gul Haya D/O Razi Mohd (Kardan)	CCPS	Darshan Jan K
113	112	Hadia Bibi D/O Jamat Gul (KED)	CCPS	Gulistan
113	113	Shazia Yasmin D/O Adil Mir (KK)	-do-	-do-

TERMS & CONDITIONS

1. Their appointment are being made purely on CONTINGENT basis liable to termination with out any notice, if they wish to resign from their Posts they should give one Month prior notice or fore. One Month Pay in lieu thereof.

2. They should not be handed over charge of the same posts, if they are below 18 Years Or 40 Years age.

3. They should produce their Health & age Certificate from the Medical Officer AHQ Hospital Peshawar.

4. Their Original qualification, Date of Birth and Domestic Certificate should be checked and Photo Copy be placed on report before handed over charge of the same Posts.
5. If they failed to resume their Charge with in 15 days, the same should be treated as cancelled.
6. Their academic/Professional Certificates will be referred to all concerned Board/University (by depositing usual Fee/charges) for necessary Verification till the receipt of their Certificate, the Salary will not be drawn.
7. No TA/DA is allowed.
8. They should be produced their National Identity Card to the AAECs circle concerned.
9. Charge Report should be submitted in duplicate to all concerned.
10. The Services of the above Candidates will be terminated, if they are found absent un-authorizedly.
11. They will not be entitled for Annual Increments.

(MULI MUWAZ KHAN MASOOD)  
 Agency Education Officer  
 North Waziristan Agency.

Endst: No 3355-3472/AEO/PWA/PTC (T)

Dated 13/9/2002

Forwarded to:-

1. The Director of Education PATA, NWFP, Peshawar.
2. The Agency Accounts Officer North Waziristan Agency.
3. The AAEC circle concerned.
4. Candidates concerned.
5. Accountant Local Offices.

Agency Education Officer  
 North Waziristan Agency.

13/9/02

*Handwritten notes in Urdu:*  
 کاپی  
 ڈیپوٹ  
 ڈیپوٹ

MEDICAL CERTIFICATE.

Name of Official: MRS. NIGHAT SHAHEEN

Caste or race: MUSLIM

Father's name: MR. MOHAMMAD AYAZ

Residence: OF VILLAGE KARRAK, TEHSIL KARRAK, DISTRICT KARRAK

Date of birth: 18.9.1974

Exact height by measurement: 5' 4"

Personal mark of identification: Dand Scar on the eyebrow

Signature of the Official: Nighat Shaheen

Signature of head of office:

Seal of Office

I do hereby certify that I have examined Mrs. NIGHAT SHAHEEN candidate for employment in the Office of the EDUCATION DEPARTMENT and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except...

I do not consider this as disqualification for employment in the office of the EDUCATION DEPARTMENT. His age according to his own statement... year and by appearance about... year.

LEFT HAND THUMB AND FINGER IMPRESSIONS

Medical Superintendent, Civil Hospital, MIRANSHAH

Annex C

# SERVICE BOOK

# سروس بک

# کتاب ملازمت



Name	م: Nishat Nishwan
Father's Name	م: M. Ayaz
Qualification	ب: B.A.
Designation	م: P.T.C.
Department	م: Education
Permanent Address	م: Kavel P.O. Kaveli Taluka Dist: Kaveli

G.G.P.S. Ajab Khan Showa



1. Name (ت) Nighat Shaheen
2. Nationality and Religion Pakistani Islam  
(قومیت اور مذہب)
3. Residence Borana bazar Karak P.O. Teh. Dist. Karak  
(مستقل رہائش)
4. Father's Name and residence Muhammad Ayaz (Asabul)  
(والد کا نام اور پتہ)
5. Date of birth Christian era as 18-9-1974  
nearly as can be ascertained  
(تاریخ پیدائش مطابق سن عیسوی)
6. Exact height by measurement 4-6  
(قد و قامت)
7. Personal mark of identification wound Scar on Rt eyebrow.  
(نشان شناخت)

8. Left hand/right hand thumb and finger impressions of (Non-gazetted officer)

(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (چھنگلیا)



Ring Finger (چھنگلیا کے ساتھ کی انگلی)



Middle Finger (انگشت میاں)



Fore Finger (انگشت شہادت)



Thumb (انگوٹھا)



Nighat Shaheen

9. Signature of Govt. Servant (سرکاری ملازم کے دستخط)

10. Signature and designatin of the Head of the Office or other Attesting officer

(تصدیق کنندہ افسر کے دستخط اور مہر)

Agency Education Officer  
U.P. Agency Miroushab

Note: The entries in this page should be renewed or re-aggested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہو یا ضروری ہیں اور نمبر ۹ اور ۱۰ میں دستخطوں کے نیچے تاریخ لکھی جائیے۔

انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

1 Name of Post	2 Whether Substantive of officiating any whether permanent or temporary	3 If officiating state: (i) substantive appointment of (ii) whether service counts for pension under rule 3-20 of C.S.R. (Pb.) Volume II	4 Pay in substantive position		5 Additional pay for officiating		6 Other emoluments falling under the term pay	7 Date of appointment	8 Signature of Government servant	9 Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8
			Rs.	Ps.	Rs.	Ps.				
PTC Post G9 P5	مادری مستقل تام مقام	اگر مادری ہے تو رول کے مطابق پشیم کا مستحق ہے؟	تعمولہ بلور مادری ملازمت	زائد تعولہ بلور تام مقام	ماہانہ تعولہ دیگر الذاتی	بدنق تقریبی	مادری ملازم	دستخط انسر مجاز		
Ajab Khan Cot Shawa	B.P. Solo	7 - RS	9900	120	5820					
			RS		2220 PM		14/2 2003		A.E.O. Miranshab: 30-2003	
					RS- 2340 PM		1/2 2003		A.E.O. Miranshab: 30-2003	
					RS- 2460 PM		1/2 2004		A.E.O. Miranshab: 30-2004	
					<u>Pay Revised B.P. Solo - 7 RS 2555-140-6255</u>					
					RS- 2835 PM		1/2 2005		A.E.O. Miranshab: 30-2005	
					RS- 2925 PM		1/2 2005		A.E.O. Miranshab: 30-2005	
					RS- 3115 PM		1/2 2006		A.E.O. Miranshab: 30-2006	

8	Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination (such as promotion or appointment)	Reason of termination (such as promotion or demerit etc.)	Signature of the head of office or other attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debtable to another Government	Signature of the Head of the office or other attesting officer	Reference to any recorded punishment or censure or reward or praise to the Government servants
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Sup.

8	9	10	11	12	13	13	14	15
Signature of Government servant	Signature and Designation of the Head of the office or other attesting officer in attestation of column 1 to 8	Date of termination or appointment	reason of termination: (such as promotion, transfer, dismissal etc.)	Signature of the head of the officer or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government	Signature of the Head of the office other attesting Officer	Reference to any recorded punishment of censure, or reward, or praised o the Government servants
دستخط سرکاری ملازم	دستخط افسر مجاز	تاریخ اختتام ملازمت	دلیلات انتقال ملازمت ترقی تہذیب یا طرئی	دستخط افسر مجاز	رضعت کی نوعیت و مدت	پارہنگ کی رضعت کے لئے اوسط محوارہ کا تعین	دستخط افسر مجاز	پہلی تا چھ ماہ کی کارکردگی کا ریکارڈ
						Period	Government to which debitable	
								passed B-A. Examination from University of Peshawar Session 1999 Annual. Under Roll No. 9425. Marks obtained 272/550. Result declared 22-11-1999.
								Agency Education Office N.W. Agency Miranah
								passed P.T.C. Examination A.I.O.U. Islamabad. Session 1995. Marks obtained 584/900. Result declared 31-12-1996.
								Agency Education Office N.W. Agency Miranah
								Service Verified w.o.f. 1-12-2004 to 30-11-2006 from Office Record
								Agency Education Office N.W. Agency Miranah
								Service Verified w.o.f. 1-12-2003 to 30-11-2004 from Office Record
								Agency Education Office N.W. Agency Miranah

To

The Worthy District Education  
Officer North Waziristan Miran Shah

Subject:

DEPARTMENTAL APPEAL FOR ADJUSTMENT /  
ALLOWING THE APPELLANT FOR PERFORMING  
HER OFFICIAL DUTY.

Respected Sir!

1. That the Appellant has been appointed as Primary School Teacher at Govt. Girls Primary School Shawa Adda Ajab Khan Kala in District North Waziristan.
2. That after appointment the appellant performed her duty with full devotion and hard work and no complaint whatsoever has been made against the appellant.
3. That the appellant continued his her duty with respondent departments w.e.f 2002 to 2006.
4. That after that the security situation in North Waziristan became worst and that's why the appellant had to leave the school and location.

3. That now the appellant may be liable for adjustment of the following grounds.

Grounds:-

- A. That admittedly the appellant is a Civil Servant with respondent department which has been clarified from the appointment order medical, certificate, arrival report and service book (Copies are attached).
- B. That the appellant has never been removed nor dismissed meaning there by, that the appellant is still on the strength of respondent department.
- C. That no charge sheet, no statement of allegation and no show cause notice has been issued against the appellant nor received by the appellant.
- D. That no proceeding / explanation has been received to the appellant by the respondent department.
- E. That trial to the instant departmental appeal the appellant also submitted an

5. That now the appellant may be liable for adjustment of the following grounds.

Grounds:-

- A. That admittedly the appellant is a Civil Servant with respondent department which has been clarified from the appointment order medical, certificate, arrival report and service book (Copies are attached).
- B. That the appellant has never been removed nor dismissed meaning there by, that the appellant is still on the strength of respondent department.
- C. That no charge sheet, no statement of allegation and no show cause notice has been issued against the appellant nor received by the appellant.
- D. That no proceeding / explanation has been received to the appellant by the respondent department.
- E. That trial to the instant departmental appeal the appellant also submitted an

20  
application to respondent department for  
her adjustment.

*It is, therefore most humbly prayed that on  
acceptance of the instant departmental  
appeal the appellat may kindly be adjust on  
his original post along with all back benefits.*

Dated: 23/08/2022

Appellant

Mst. Nighat Shaheen  
PST District North  
Waziristan



Before Service Tribunal Islamabad  
بجدرالت



2 منجانب

بنام

Nigal Shaukeen / s KPK Govt

(Education Deptt)

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ  
آن مقام کیلئے (فیس شدہ) ارسال شدہ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی  
اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت  
مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے  
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے  
اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے  
سبب سے دہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔  
کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

2022

ماہ دسمبر

19

المرقوم

واہ العبد

Attested by D. Shaukeen

مقام عدالت  
Nigal