13.01.2022

Appellant present through counsel.

Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Reply on behalf of respondents has been submitted in office. Learned counsel for appellant requested for withdrawal of the instant service appeal. In this respect, an application seeking withdrawal of appeal was also submitted. As such, the instant service appeal is hereby dismissed as withdrawn. No order as to costs. File be consigned to the record room.

Announced. 13.01.2022

(Rozina Rehman) Member (J) Counsel for the appellant present.

Learned counsel for the appellant contended that the appellant was initially appointed as C.T (BS-9) in District Kohistan, appointment order dated 04.07.2009. She was transferred/adjusted at GGMS Kariplian Haripur vide office order dated 28.02.2012. The respondentdepartment has issued promotion/adjustment order (06.01.2021) in respect of certain newly promoted senior CT and senior TT (Female) (BS-16) wherein private respondent No.4 appears at serial No.4 reflecting her appointment as regular C.T dated 04.32012. The appellant has challenged/assailed the said notification dated 06.01.2021 on the ground that private respondent No.4 is actually appointed as regular C.T in District Haripur on 28.02.2012, therefore the appellant is senior to private respondent No.4. The appellant preferred departmental appeal on 29.01.2021 which was not responded within the stipulated statutory period, hence the instant service appeal filed in the Service Tribunal on 27.04.2021. Learned counsel for the appellant was asked to produce seniority list of CT District Haripur on the basis of which the appellant claims her seniority. He expressed inability to have the same document and requested that the respondent-department would be in a better position to produce it. It, therefore, deems appropriate to issue pre-admission notice to the respondents to assist the Tribunal on the point. To come up for preliminary hearing on 13.01.2022 before S.B.

> (Mian Muhammad) Member(E)

# Form- A

# FORM OF ORDER SHEET

Court of		k		
			,	
	7/1/2/			,

	Case No	(404)/2021
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/09/2021	The appeal of Mst. Bibi Sabira resubmitted today by Mr. Haf Muhammad Bilal Advocate may be entered in the Institution Register an put up to the Worthy Chairman for proper order please.
		REGISTRAR W
2-		This case is entrusted to S. Bench at Peshawar. Notices be issued t
:		appellant/counsel for preliminary hearing to be put up there or
		CHARMAN
	,	
Ì		
		·

This is an appeal filed by Mst. Bibi Sabira D/O Badrul Islam W/O Qaisar Mahmood R/O Raja Abad Near TIP Colony, Haripur—today on 27/04/2021 against the impugned order dated 06.01.2021 against which she preferred/made departmental appeal/ representation on 29.01.2021 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

they removed the state of

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

- 1- Affidavit has not been attested from the Oath Commissioner, which may be done.
- 2-. Copy of impugned order dated 06.01.2021 is illegible which may be replaced by legible/better one.
- 3- Annexures of the appeal may be annexurewise/attested.

4- Annexures of the appeal may be flagged.
5-Appeal may be flagge marked according to andex.
6- Chell list 5 not aftached with appeal.

No. 76° /ST,
Dt. 03/05/2021

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

HAFIZ MUHA VIMAD BILAL, Advocate High Court, Peshawar.

I received streeth closed 13-09-2021 due 80 objections.

I resubmitted the stile after the removal of objections.

The one become mained, and file was resubmitted the one become mained, and file was resubmitted.

For heaving today, windy put before the Tribual,

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April murmons Bunc.

Adwarded High Court

Offile

(13/09/2021

# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

111 GOLD of UDU BIBI SABIRA Case Title:

1	CIDI STOIVER BY GOVE OF W	vu .	
<u>S#</u>	CONTENTS	YES	NO
1	This Appeal has been presented by: HALL M. BURG AND	AFZ 1	210
2	whether Counsel/Appellant/Respondent/Deponent have signed	-170	
	the requisite documents?	e/	
3	Whether appeal is within time?		
4	Whether the enactment under which the appeal is filed		
5	mentioned?		
6	Whether the enactment under which the appeal is filed is correct?		
	whether affidavit is appended?		
7	Whether affidavit is duly attested by competent Oath Commissioner?		
8			
	Whether appeal/annexures are properly paged?		
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?		
10	Whether annexures are legible?		
11	Whether annexures are attested?		
12	Whether copies of appearures are read-black.	·/	
13	Whether copies of annexures are readable/clear?		
j	Whether copy of appeal is delivered to AG/DAG? Whether Power of Attorney of the Council and th		
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?		
15	Whether numbers of referred cases given are correct?		
16	Whether appeal contains cutting/overwriting?		
17	Whether list of books has been provided at the end of the appeal?	<del></del>	·
18	Whether case relate to this court?		
19	Whether requisite number of spare copies attached?		
20	Whether complete spare copy is filed in separate file cover?		
21	Whether addresses of parties given are complete?	<u></u>	<del></del>
22	Whether index filed?		
23	Whether index is correct?		
24	Whether Security and Process Fee deposited? On	~	
	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules		
25	1974 Kule II, notice along with copy of appeal and appearing has		
	Deen sent to respondents? On	}	
26	Whether copies of comments/reply/rejoinder submitted? On		
	Whether copies of some the living		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On		
L	opposite party: Off		

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

Name:

Signature:

Dated:

# BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR

	Service appeal N	of 2021
Mst	Bibi Sabira	Appellant

# **VERSUS**

# **APPEAL**

# **INDEX**

S##	Description of documents	Annexure #	Page#指数/sh
1.	Memo of Appeal	-	1-7
2.	Affidavit	-	8
3.	Correct address of Parties		9
4.	Copy of appointment order and transfer order.	A &B	10-11
5.	copy of charge report	C	12
6.	Copy of impugned order.	D	13
7	Copy of Departmental appeal dated 29.01.2021.	E	14-15
8	Wakalt Nama	_	16

Dated 24.04.2021

Mst. Bibi Sabira

(Appellant)

Contact No:0333-8899216

Through:-

HAFIZ MUHAMMAD BILAL ADVOCATE HIGH COURT

Contact No:0345-9576244

## BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, , PESHAWAR

Khyber Pakhtukhwa Service Tribunal

7404 Service appeal No \_\_\_\_ of 2021 Dated 27-4-202

Mst. Bibi Sabira, daughter of Badrul Islam, wife of Qaiser Mehmood, resident of Mohallah Raja Abad near TIP Colony Hariput Tehsil & District Haripur, present posted as CT Teacher at Government Girls Higher Secondary School Pathan Colony Haripur

.....Appellant

# **VERSUS**

- 1) Government of Khyber Pakhtunkhwa through Secretary Education Peshawar.
- 2) Director Elementary and secondary Education Peshawar.
- 3) District Education officer (Female) District, Haripur.
- 4) Ghazala Gul, CT, GGHSS, Panian, District Haripur.

.....Respondents

Re-submitted to -day

21Stran

Registran W

APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL, ACT, 1974 AGAINST THE IMPUGNED ORDER NO ENDST NO. 8-529-33/CT-TT TO SR, CT-SR-TT/PROMOTION FILE DATED 06.01.2021 2000 at

ISSUED BY RESPONDENT NO. 3, WHEREBY RESPONDENT NO. 04 BEING JUNIOR TO THE APPELLANT WAS PROMOTED WITHOUT ANY REASON AT ALL, VIOLATING THE SENIORITY, PROMOTION RULES AND OTHER SERVICE BENEFITS OF THE APPELLANT.

#### PRAYER:-

On acceptance of the instant service appeal, the impugned order Endst No. 8-529-33/CT-TT to Sr, Ct-Sr-TT/Promotion file dated 06.01.2021 issued by respondent No. 03, may kindly be ordered to revised with direction to respondent No. 03 to place the name of the appellant ahead of respondent No. **04** being senior to her in terms of initial appointment, transfer and thereafter. appellant be considered for promotion and grant any other relief to which the appellant is legally found entitled in view of the facts and law on the subject.

#### Respectfully Sheweth:-

as CT in District Kohistan vide order No. 2412-17 on dated 04.07.2009 and thereafter appellant was transferred vide order No. Endst 2891-95/F No. 51/V.III/PST/CT(F) Kohistan on dated 28.02.2012 from District

Kohistan to District Haripur due to Spouse policy.

(Copy of appointment order and transfer order are annexed as annexure "A&B").

2. That, petitioner took over the charge in GGMS Kraplian on 01.03.2012, thereafter submitted the charge report in the office of respondent No. 03.

(copy of charge report annexed as annexure "C").

- 3. That, respondent No. 04 was fresh appointed against the CT post in Education department on 04.03.2012.
- 4. That, respondent No. 03, required documents from all teachers for promotion cases, appellant also submitted the required documents for promotion.
- 5. That, thereafter respondent No. 03 issued impugned order Endst No. 8-529-33/CT-TT Ct-Srto Sr. TT/Promotion - file on dated 06.01.2021 whereas respondent No. 04 promoted from CT (BPS-15) to Sr.CT (BPS-16) in this regard the appellant become junior without any reason by means of the impugned promotion order affecting the service rights of the appellant.

(Copy of impugned order annexed as Annexure "D").

order, appellant filed a Departmental appeal with respondent No. 02 on 29.01.2021, which has not been responded so far.

(copy of Departmental appeal dated 29.01.2021 annexed as Annexure "E").

7. That, felling aggrieved from the impugned order dated 06.01.2021, the appellant having no other remedy, files the present service appeal before this Honourable Tribunal for interference inter alia, on the following amongst other grounds.

## **GROUNDS:-**

A)

That, under the law, rules regulations on the subject, seniority is counted and determined on strength of service. Appellant was initially appointed and transfer prior to the appointment of the respondent No. 04 against the same post. Appellant had been senior from respondent No. 04 for **06 days** in the entire record of the department but all of a sudden, respondent No. 03 without any prior the appellant issued impugned order dated 06.01.2021. whereby by respondent No. 04 made

senior to appellant and also promoted **CT to Sr.CT** for unknown reasons, violating the service rights of the appellant.

- B) That, when the appellant was transferred to Haripur no objection was raised by anyone, including respondent **No 04,** nor any appeal was filed in this behalf, but changing the position, all of sudden, by respondent **No. 03** is a mind boggling and a totally absurd exercise, mala-fide, violating the transfer promotion and other service rights of the appellant.
- C) That, neither any notice was issued to the appellant, nor she was heard before changing her position. The entire impugned exercise was undertaken just to benefit the respondent No. 04 in disregard of the law at the back of the appellant, whereby an adverse action was taken at her detriment.
- D) That, even the impugned seniority list or promotion order was not communicated to the appellant rather she came to know of her own sources, thereafter, she without loss of time approached respondent No. 02

through Departmental appeal which has not been responded so far.

- E) That, under the law and rules on the subject, changing the position of the appellant without any reason is patently illegal, unlawful, without lawful authority, without jurisdiction and of having no legal effect.
- F) That, due to the impugned order vested service rights of the appellant have been violated and infringed for no justifiable reason at all.
- G) That, before revising the impugned order/seniority list, due process of law was not followed by the respondent No.
  O3, due to which, legal rights of the appellant stood compromised.

#### .....PRAYER.....

On acceptance of the instant service appeal, the impugned order No Endst No. 8-529-33/CT-TT to Sr, Ct-Sr-TT/Promotion file dated 06.01.2021 issued by respondent No. 03, may kindly ordered to be revised with direction to respondent No. 03 to place the name of the appellant ahead of respondent No. 04 being senior to her in terms of initial appointment, transfer and thereafter,

appellant be considered for promotion and grant any other relief to which the appellant is legally found entitled in view of the facts and law on the subject.

#### Dated 24.04.2021

Mst. Bibi Sabira (Appellant)

Through:-

# HAFIZ MUHAMMAD BILAL M'Bilas ADVOCATE HIGH COURT

#### **VERIFICATION:**

I, Mst. Bibi Sabira, daughter of Badrul Islam, wife of Qaiser Mehmood, resident of Mohallah Raja Abad near TIP Colony Hariput Tehsil & District Haripur, present posted as CT Teacher at Government Girls Higher Secondary School Pathan Colony Haripur, do hereby solemnly affirm and declare that the contents of fore-going Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal.

> BIBI SABIRA (DEPONENT)

13 SEP 2021/

Judicial Complex Peshawar

# BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR

Service appeal No \_\_\_\_of 2021

Mst Bibi Sabira......Appellant

# **VERSUS**

## **APPEAL**

## **AFFIDAVIT**

I, Mst. Bibi Sabira, daughter of Badrul Islam, wife of Qaiser Mehmood, resident of Mohallah Raja Abad near TIP Colony Hariput Tehsil & District Haripur, present posted as CT Teacher at Government Girls Higher Secondary School Pathan Colony Haripur, do herby solemnly affirm and declare on oath that the no such subject matter appeal has ever been filed before this honorable court nor pending nor decided. That the contents of fore-going affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Honourable tribunal.

Dated: 24.04.2021

Mst Bibi Sabira

Miss Rozina Qureshi Advocate OATH COMMISSIONER Judicial Complex Peshawar

11 3 SEP 2021

# BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR

Service appeal No \_\_\_\_\_of 2021 Mst Bibi Sabira.....Appellant **VERSUS** Govt. of KPK through Secretary Education etc......Respondents

### APPEAL

#### **CORRECT ADDRESSES OF THE PARTIES**

#### APPELLANT:

Mst. Bibi Sabira, daughter of Badrul Islam, wife of Qaiser Mehmood, resident of Mohallah Raja Abad near TIP Colony Hariput Tehsil & District Haripur, present posted at Teacher Government Girls Higher CTSecondary School Pathan Colony Haripur

#### **RESPONDENTS:**

- 1) Government of Khyber Pakhtunkhwa through Secretary Education Peshawar.
- Director Elementary and secondary 2) Education Peshawar.
- 3) District Education officer (Female) District, Haripur.
- 4) Ghazala Gul, CT, GGHSS, Panian, District Haripur.

Dated 24.04.2021

Mst. Bibi Sabira

(Appellant)

Through:-

HAFIZ MUHAMMAD BI ADVOCATE HIGH COURT

ISTRICT OFFICER ELEMENTARY & SECONDARY EDUCATION KOHISTAN

#### APPOINTMENT

Consequent upon approval of District Departmental Selection Committee of E & SE Department Kohistan the Competent authority is pleased to appoint the following (Female) candidate against the vacant post of CT in BPS-9 in the schools noted against each according to the policy issued by the Government of NWFP Elementary & Secondary Education Department in the interest of public service with immediate

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#### CONDITIONS

No TA/DA is allowed to any one

Charge report should be submitted to all concerned.

Their appointment is purely on temporary basis and liable to termination at any time with out assigning any reason motice.

They will be governed by such rules & regulation enforced and as prescribed by the

Government from time to time for the category of the Government Servants to which they belong.

In case above candidates failed to assume the charge of his post with in fifteen days of the issuance of this order their appointments will automatically stand cancelled.

They should produce Age & Health Certificate from EDO Health Kohistan.

They should not be allowed to take over charge if their age is less than 18-years & above 35years.

Their original certificates/Degree /Domicile Certificate should be verified by Dy: District Officer (Female) E&SE Kohistan from the concerned board/university /institution before drawl of their pay.

Endst: N

Dated Kohistan the

Copy of the above is forwarded to the

PS to Secretary E&SE Depart NWFP Peshawar

PA to Director E&SE NWFP Peshawar

District Coordination Officer Kohistan

District Nazim Kohistan

District Accounts Officer Kohistan's 5.

District Officer (F) E&SE Kohistan is 6.

Candidates concerned

Evecutive District Officer

E&SE Kohistan

Executive District Officer E&ŞE Kohistan

ANNEAURE

DIRECTORATE OF ELEMENTARY & SECOND PAKHTUNKHWA, PESHAWAR.

## **OFFICE ORDER**

Consequent upon the approval/ban relaxation of the competent authority the following CT (F) teachers are hereby transferred/adjusted on their own pay and BPS in the schools noted against each in the interest of public service with immediate effect.

S.#.		Present Posting	To	Remarks
1.	CT	GGMS Dadboon Kohistan	GGMS Kriplian Haripur	A.V.P.
	Mst. Bibi Sabra CT	GGMS Soyal Kohistan	-do-	A.V.P.

Note: -

Endst: No.

- Charge report should be sent to all concerned.
- 2. No TA/DA etc are allowed.
- 3. The EDO's concerned are directed to check their original service documents before making payment of salary.
- Their Seniority will be determined as per rules. 4.

2881-85

DIRECTOR

ELEMENTARY & SECY; EDUCATION KHYBER PAKHTUNKHWA

2012

F.No.51/V.III/PST/CT(F)Kohistan Dated Peshawar the

Copy of the above is to the:-

- Executive District Officer (E&SE) Haripur & Kohistan..
- 2. District Accounts Officers Haripur & Kohistan.
- Teacher concerned. 3.
- PA to Director (E&SE) Khyber Pakhtunkhwa, Peshawar. 4

M/File.

Deputy Directress (Estab) Elementary & Secondary Education

Khyber Pakhtunkhwa, Peshawar

\*M.Rahi\*

Amexuro "C" (13)

In compliance with the transfer order in No.2 Mist. Rid. respect of the following CT (Female) from district Kohistan to Dist Haripur issued under endorsment No. 2891-95/F. No. SI/VIII/PST/CT(F) Kohistan dated 28-02-2012 are hereby take charge of his duty in GGMS Kriplian, Haripur on today dated 01-03-2012.

He reacher

Headmistress Govic Haripur





ANWERGRE

#### OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) HARIPUR

(Office Phone No. 1993-920135, Fanadi: emis/parinum/ternell.com)

#### Notification.

In pursuance of the ortification issued by the Directorate of Elementary and Secondary Education KPK Perhawar vide Endst No. 8763-68/A-17/DPC-2020/KPK dated Peshawar the 04-01-2021, the following newly promoted Sr CT and Sr. TT Female (BPS-16) are hereby further adjusted against the vacant post of Sr. CT & St. TT HIS-16 (Rs.18919-1520-64510) Plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Government on the terms and condition given below with immediate effect.

ITEM NO.1 PROMOTION OF CT B-15 TO SCT IL-16 ON REGULAR BASIS

¥.2	E.List Nig	Name Of Official	Name of School	U/O Appointment at Regular CT/	Adjusted	Repurts
1	13	Sobia Mustelaq	GGM5 Jenu	09/04/2012	OGHSS KTS No.2	Againn Vaces Post
3	14	Shabana Missacer	GGMS Quzim	10/01/2012	GGHSS KTS No.2	Against Vacina Frant
,	15	Kaner Aista	GGHS Pathan Colony	10/01/2012	OGUS No. 2 Harrour	Against Vecant Post.
سو	lě	Citacata Cul	GGCMHSS Kex Najiballah	04/03/2012	GGISS Panian	Against Vacant Post

S N a	S.IAI No.	Name Of Official	Name of School	DAT Approximent at Regular CT/	Asfirmed	Remode
1	ы	Sharin Arte	GGAIS Paid Hashim Khaa	01/09/2004	GGHS Mise Dhati	Against Vaccint

#### CONSEQUENTIAL ADJUSTMENT ON NEED HASIS:

S.Na	Name & Designation	From		
	The state of the s	Marie Carlotte Carlot	\$.CP	Kemarky
,01	Bushen Naz C I	GGHS Bagra	GGHS KTS No 4	AVP
********* * * * * *	The artist in the second of the second		The the state of t	

#### TERM AND CONDITIONS:-

They would be on probation for a period of one year extendable for another one year

The will be governed by such rules and regulations as may be issued from time to time by the Govt.

3. Their services can be terminated at any time, in case their performance is found unanisfactory during the probation period in case of inteconduct, they shall be preceded under the rules farmed from time to time.

Charges reports should be submitted to all concerned.

5. Their inter-Se-Seniority on lower past will contained intect.

No TA / DA are allowed for joining her dety.

They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered if this is wrongly promoted she will be revised.

> 0.0104544.40 (Samilia Altabi District Education Officer i

Kanton Na B-SL TI in Se.CT Sell'Prempilon file. Copy to -

Harimer Deted Baching the 5 101/2014

The Director Elementary and Secondary, Khylier Pakithankhwa, Peshawar

The District Accounts Officer Floriper 1.

The Principal Headmistrem Concerned

Official Concerned.

Office Record File

District Education HATHER

Butel Coff

## OFFICE OF THE **DISTRICT EDUCATION OFFICER (FEMALE) HARIPUR**

(Office phone No.0995-920155, Email: emisharipur@gmail.co.)

#### **Notification:**

In pursuance of the notification issued by the directorate of elementary and secondary education KPK Peshawar vide Endst No 8763-68/A-17/DPC-2020/KPK dated rpeshawar the 04-01-2021, the following newly promoted Sr. TT Female (BPS-16) are hereby further adjusted against the vacant post of SR.CT & TT BPS-16 (Rs 18910-1520-64510) plus usual allowances as admiossible under the rules on regular basis under the existing policy ogf the provincial government on the terms and conditions given bwlow with immediate effect.

#### ITEM NO 1 PROMOTION OF CT B-15 TO SCT B-16 ON REGULAR BASIS.

s. no	S, list	Name of officials	Name of school	D/O appointment as regular CT	Adjusted	Remarks
1	13	Sobia Mushtaq	GGMS Jama	09/01/2012	GGHSS KTS No 2	Against vacant post
2	14	Shabana Manzoor	GGMS Qazian	10/01/2012	GGHSS KTS No 2	Against vacant post
3	15	Kaneez Arsha	GGHS Patha Colony	10/01/2012	GGHS No 2 Haripure	Against vacant post
4	(16)	Ghazala Gul	GGCMHSS Kot Najibullah	04/03/2012	GGHSS Panian	Against vacant post

#### ITEM NO 2 PROMOTION OF TT B-15 TO STT B-16 ON REGULAR BASIS.

s. no	S, list no	Name of officials	Name of school	D/O appointment as regular CT	Adjusted	Remarks
1	14	Shazia AZIZ	GGMS pind	01/09/2004	GGHS Mian	Against
			hashim khan		Dhati	vacant post

Consequential adjustment on need basis:

	Tion day as till control of the day as the d								
S.NO	name and Designation	FROM	то	REMARKS					
1	BUSHRA NAZ ct	GGHS Bagra	GGHS KTS No4	AVP					

#### **TERMS AND CONDITIONS"**

- 1. They would be on probation for a period of one year extendible for another one year.
- They will be governed by rules regulations as may be issued from time to time by government.
- There services can be terminated at any time as there performance is found unsatisfactory during the probation period in case of misconduct, they shall be proceeded under the rules formed from time to
- Charge report should be submitted to all concerned.
- There inter-se seniority on lower post will remained intact.
- 6. No ta/da are allowed for joining her duty
- 7. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to him in light their order will be recovered if she is wrongly promoted she will be reversed.

(Samina altaf) District education officer (female) Haripure

Endst No: -8-529-33/CT-TT to Sr. CT Sr/TT/Promotion file

dated haripure the 06-01-2021

- The Director Elementary And Secondary, Khyber Pakhtoonkhwa, Peshawar
- The District Account Officer Haripur
- The Principal/Headmistress Concerned
- Officials Concerned.
- Office Record File

District education officer (female) Haripure

Durted mystel

# بخدمت جناب دائر يكثرصاحب محكمه المليمنر ى ايندسيندرى ايجيشن (زنانه) پياور

عرفان: ۔ الپید کی اور خسواست برخلاف آرڈرنمبر No.8-529-33/CT-TT to Sr,CT-Sr-TT/promotion

البید کی البید کی البید کی البید کردہ ڈسٹر کٹ ایجو کیشن آفیس (زنانہ) ہری پور وشامل کرنے نام سائلہ درآرڈ ریڈور۔

# جناب عاليه! درخواست ذيل عرض ہے۔

- ا)۔ بید کہ سائلہ کی تعیناتی محکمہ ایلمینٹر کی اینڈ سینڈری ایجو کیشن کو ہستان میں ہوئی۔ اور بعد از ال بندریعہ آرڈر نمبر (Endst No 2891-95/F No 51/V.III/PST/CT,(F) بذریعہ آرڈر نمبر (Kohistan مورخہ 28.02.2012 کوشلع کو ہستان سے ضلع ہریپوری میں بوجہ کی چوہ Spouse policy ہوئی۔ (نقل آرڈرلف ہیں)۔
- ر پلیاں میں ہوئی اورکوہستان سے میں اورکوہستان سے مورخہ 1 1 0 2 . 0 2 . 0 2 . و کا اورکوہستان سے مورخہ 1 1 0 2 . 0 2 . و کا کو اور کوہستان سے مورخہ 1 0 1 . 0 2 . و چارج حاصل کیا اوررپورٹ دفتر DO(f) ہری پور میں جمع کروائی۔ (نقل Releving چٹ وچارج رپورٹ لف ہے)۔
- ۳)۔ یہ کہ جب پروموثن کیلئے سائلہ سے کاغذات طلب کیئے گئے تو سائلہ نے اپنے جملہ کاغذات کی مرتبہ دفتر میں جمع کروائے۔ جبکہ آڈرزیرا پیل میں سائلہ کا نام سہوا شامل نہیں ہوسکا۔
- س)۔ لیکہ ساکلہ نے ضلع ہر یپور میں مورخہ 01.03.2012 کوچارج حاصل کیا اورجس ٹیچر کا آرڈر نہ کور میں سر میل نمبر 04 پر پروموثن کا آڈر ہوا، جبکہ اس کی تعیناتی ساکلہ کی تعیناتی /ٹرانسفر سے بعد کی یعنی مورخہ 04.03.2012 کی ہے ساکلہ بمطابق قانون وضابطہ مذکورہ ٹیچر سے 6 دن سینئر ہے اور ساکلہ کونظر انداز کر کے مسماۃ غزالہ گل کی پروموثن کرناغیر قانونی اورغیر آئینی ہے۔
- ۵)۔ یہ کہ ساکلہ نے دفتر DO(F) ہری پور میں رابطہ کیا تو معلوم ہواہے کہ دفتر کے ریکارڈ/سروس بک

(15)

Attasted

میں ساکلہ کی تخواہ مور ند 2012.2012 کے ضلع کو ہتان سے جاری شدہ ہے۔ جبکہ دیگر تمام کا غذات / چارج رپورٹ میں ساکلہ کی چارج لینے کی تاریخ درست طور پریتر کریشدہ ہے کہ ساکلہ کی چارج ہیں واضح طور پریتر کریشدہ ہے کہ ساکلہ کی ٹرانسفر مور ند 28.02.2012 ضلع ہری پور میں ہو چکی ہے۔ ندکورہ غلطی Clerical کی ٹرانسفر مور ندہ 28.02.2012 ضلع ہری پور میں ہو چکی ہے۔ ندکورہ غلطی اور اس بناء پرساکلہ کو میں موت اور اس بناء پرساکلہ کو اس کے آئینی اور قانونی حقوق سے محروم نہیں کیا جاسکتا، اور غلطی کو درست کرنا قرین انصاف ہے کیونکہ ندکورہ غلطی سے ساکلہ کے قیمتی حقوق متاثر ہو رہے ہیں اور تاریخ بمطابق قانون کیونکہ ندکورہ غلطی سے ساکلہ کے قیمتی حقوق متاثر ہو رہے ہیں اور تاریخ بمطابق قانون کے 28.02.2012

لبد ااستدعا ہے کہ ڈسٹر کٹ ایج کیشن آفیسر ہری پورکو حکم صادر فر مایا جائے کہ وہ آڈرزیرا پیل کونظر ثانی کر کے سائلہ کا نام بھی آڈر/ پر وموش میں شامل کرے۔

مورخه 29.01.2021

ارض علام المحال المحال

صابره بی بی دختر بدرالسلام زوجه قیصرمحمودسا کنه محلّه راجه آباد نزد TIP کالونی هریپورخصیل وضلع هریپور حال تعینات CT ٹیچر گورنمنٹ گرلز ہائر سینڈری سکول پٹھان کالونی ہری پور

MR. K Jing Com باعث تحرية نكه كافيظ على الا مندرجه بالاعنوان میں اپن طرف سے پیروی دجوابد ہی مقام موجع بدیں شرط دکیل مقرر کیا ہے کہ میں ہر پیش پر خود یا بذر بعد مختار خاص روبروعدالت حاضر ہوتا رہوں گا۔اور بوقت یکارے جانے وکیل صاحب موسوف کواطلاع دے کرحاضر کروں گا۔اگر کسی پیش پرمظبر حاضر نہ ہوااور غیرماضری کی وجہ سے کسی طور برمقدمہ میرے خلاف ہوگیا تو ساحب موسوف اس کے کسی طرح ذمہ دار نہ ہوں جے نیز وکیل صاحب موصوف صدرمقام بجبری کے علاوہ کی اور جگہ یا بجبری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز ندہوں گے۔اگر مقدمہ مقام بچبری کے کس اور جا۔ اعت ہونے پر یابروز بچبری کے اوقات کے آجے یا بیجھے ہونے پر م مظهر کوکوئی نقصان بینیج تو ذ مدداریاس کے واسطے کس معا د ضدا داکر نے نتار نامد دا پس کرنے ہے بھی صاحب موسوف ذ مددار نه بول مے ۔ مجھے کل ساختہ برداختہ صاحب مثل کردہ ذات خودمنظور و تبول ہوگا۔ اور صاحب موصوف کوعرضی دعویٰ اور درخواست اجرائے ڈھری ونظر ٹانی ایل مجرانی دائر کرنے نیز برتسم کی درخواست پردسخط تقید این کرنے کا بھی افتیار ہوگا اور کسی تحکم یا ڈگری کے اجراء کرانے اور ہرتشم کا رویسے دسول کرنے اور رسید دینے اور داخل کرانے کا ہرتشم کا بیان دینے اور میرو ڈالٹی و راضی نامه و نیصله برخلان کرنے وا قبال دعویٰ کا اختیار ہوگا ادر بصورت اپیل و برآیدگی مقدمه یامنسوخی ذکری یک طرفه « درخواست محتم انتای یا دُگری قبل از فیصلها جرائے و گری بھی صاحب موسوف کو بشرط ادائیس ملیحد و بیروی مختار نامه کرنے کا مجاز ہوگااوربھورت ضرورت اپل یا اپل کے داسطے ک دوسرے وکیاں یا بیرسٹرکو بجائے اینے ہمراہ مشرر کریں ادرا یسے مشیر قانونی کو مجی اس امر میں وہی اختیارات حاصل ہول گے بیے ساحب موسوف کو۔ یوری نیس تاریخ پیش ہے پہلے ادا نہ کرول گا تو صاحب موسوف کو بوراا ختیار ہوگا کے مراحد مورا بیرون نہریں اورائی مالت میں میرامطالبہ صاحب موسوف کے برخلاف نہیں ہوگا۔لہذا مخار نامہ کھھ دیا ہے کہ سندر ہے۔<del>''</del> المال المالي المالي المالي المراجعي المرح مجورات اورمنظور ب I Attended, 9 Regted

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#### BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 7404 /2021

Mst. Bibi Sabira D/O Badrul Islam W/O Qaisar Mehmood Resident of Mohallah Raja Abad near TIP Colony Tehsil and District Haripur

Applicant

#### Versus

- 1. Govt: of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar.
- 2. Director Elementary and Secondary Education Peshawar.
- 3. District Education Officer (F) Haripur.

(Respondents)

#### **SERVICE APPEAL**

#### **INDEX**

S.No	Description	Page Nos	Annexure
1	Para wise Reply / Affidavit	01-02	
2	Affidavit	03	
3	Copy of Service Book	04-09	A
4	Copy of Reply Appeal letter	10	В
5	Copy of Seniority list	11-14	С

Respondent

District Education Office (F)

Mipur

#### BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

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- 3. District Education Officer (F) Haripur.

(Respondents)

#### **Respectfully Sheweth:**

Para wise reply/Comments for and on behalf of respondent No.1 to 3.

#### **Preliminary Objections:**

- 1. That the appellant has got no cause of action to file the instant appeal.
- 2. That the appellant has not come to this Honorable Court with clean hands.
- 3. That the appellant has got no locus standi to file the instant appeal.
- 4. That the appellant has concealed the material facts from this Honorable Court, hence the appeal in hand is liable to be dismissed.
- 5. That the appellant has filed the instant appeal on malafide motives.
- 6. The appellant has filed the instant appeal just to pressurize the respondents.
- 7. That the appellant is estopped by his own conduct to file the present appeal.

#### Para wise reply/Comments on facts are as under:-

- 1. That Para No.1 pertains to the subject to the record of service appeal of the appellant, hence needs no comments.
- 2. That the appellant took over charge 01-05-2012 in GGMS Kraplian according to service book record. The charge report she submitted not dully signed by the Deputy District Education Officer (F) Haripur according to law. The pay be active after counter signed by the Deputy District Education Officer Haripur, with original service books of the employees.
- 3. That the para no. 3 is correct and needs no comments.
- 4. That the para no. 4 is correct and needs no comments.
- 5. That the appellant was junior at that time according to her service record. According to her service book record, she took over charge 01.05.2012 in District Haripur due to inter-district transfer from Kohistan. She had been drawn her salary from Kohistan GGMS Sogal Kohistan till dated 30-04-2012. (Copy of service book Annexed as Annexure-A)
- 6. That the respondent no. 3 has been answered to the appellant in-time dated 18-01-2021 (Copy of reply appeal letter Annexed as Annexure-B).
- 7. That the order is according to law and appellant his no right to file service appeal.

#### Para wise reply of grounds

A) That the appellant is junior from respondent no.4 according to seniority list and service book record (Copy of seniority list attached Annexure-C)

Diary No. 362

Dated 29

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- B) That the appellant was junior at that time according to her service record. According to her service book record, she took over charge 01.05.2012 in District Haripur due to inter- district transfer Kohistan. She had been drawn her salary from Kohistan GGMS Sogal Kohistan till dated 30-04-2012.
- C) That the respondent no. 3 has been answered to the appellant in time dated 18-01-2021.
- D) That the ground (D) is not correct Seniority list is available anyone in the office record. No one can denied to show the seniority of any employees.
- E) That the ground (E) is incorrect the department issued the promotion order of senior CT according to law.
- F) That the order has been issued by competent authority according to service books record.
- G) That the ground (G) is incorrect due process of law followed by the respondent no.3.

#### **PRAYER**

In view of the above made humble submissions, it is most respectfully prayed that on acceptance of forgoing factual position /comments, the instant service appeal no.7404 of 2021 may be graciously be dismissed being meritless, please.

Dated	/	' /	2021.

RESPONDENT

District Education Officer (F)

Haripur.

#### BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 7404/2021

Mst. Bibi Sabira D/O Badrul Islam W/O Qaisar Mehmood Resident of Mohallah Raja Abad near TIP Colony Tehsil and District Haripur

**Applicant** 

#### Versus

- 1. Govt: of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Peshawar.
- 2. Director Elementary and Secondary Education Peshawar.
- 3. District Education Officer (F) Haripur.

MESTEL

(Respondents)

#### **AFFIDAVIT**

I Mrs. Sadia Aziz District Education Officer (F) Haripur do hereby solemnly affirmed and declare that the contents of accompanying Para wise comments service Appeal 7404/2021 are true and correct to the best of my knowledge and belief and nothing has been suppressed/concealed from this Honorable Service Tribunal Khyber Pakhtunkhwa Peshawar.

Deponent

District E

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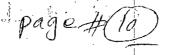
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# OFFICE OF THE DISTRICT EDUCATION OFFICER (F) HARIPUR



Ph. No. 0995-920154,920155

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То

Mst;Bibi Sabira CT GGHS Pathan Colony Haripur

Subject:- <u>APPEAL/APPLICATION FOR PROMOTION.</u>

Memo;- Reference your Appeal/Application for promotion from CT to Senior CT without recommendation of Headmistress and your signature has Received this office.

As per Service Book record, you took over Charge in District Haripur.

On 01-05-2012 and relieving date From District Kohistan is 30-04-2012.

Your Service from 01-12-2011 to 30-04-2012 verified by the District

Education (Female) Kohistan at page No (9), hence your appeal is hereby rejected.

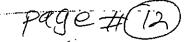
District Education Officer (F)

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	<del>ار</del> ا	<u> </u>				1	₹		- ("	<i></i>	•	
	- [-	<del></del>	OFFICE OF T	HE DI	STRICT EDU	JCATIO	ON OFFICER (FEMAL)	El Disapion	MADIDID	<u> </u>		
		OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT HARIPUR.  SENIORITY LIST OF CT BPS-15 OF DISTRICT HARIPUR										
. ,	หือ, รา	IST Deacher Name	Father Name	, Aca	d Profess;	Post		Date Of Birth	6/0 1	1580 HV 4 150		
	1	SHAHEEN BIBI	Facel B. t.	-	Í	- 1	Ţ.,	Date Of Birth	Appret:	On CT post		
-			Fazai ur Rehman	FA	CT-Agricult	ur CT-15	GGHS P.K.Khan	05/12/196	05/03/1984	05/03/198	Not Eligible due to required Less Qualification	
	2 2	MARINA JAN	RAZA MUHAMMAD	ВА	CT-B.Ed	CŢ-15	GGHSS BEER	15/04/196	25/08/1984	04/01/2009	<del></del>	
-	3 3		ABDUL REHMAN ABBASSI	FA	CT-Gen	CT-15	GGMS TIP HOUSING	11/08/1966	<del> </del>	<del>                                     </del>	Not Eligible due to required Less	
4	4	ZUBEDA BIBI	MUHAMMAD YOUSAF	MA	CT / M.Ed	CT-15	GGMS Kohala payeen	12/12/1967	17/10/1989	17/10/1989	Qualification  Retired on 31/08/2020	
5	5	NAZISH TAYYAB	ZULFIQAR HAMEED LODH	FA	CT-Gen	CT-15	GGCMHS Haripur No.1	28/04/1968		04/02/1991	Not Eligible due to	
6	6	SHAHEEN KOUSAR	ZAFAR SAEED	FA	CT-Gen	CT-15	GGCMHS Haripur No.1	03/01/1965	10/05/1992	10/05/1992	Not Eligible due to	
7	7	GUL RAIZ BIBI	MUHAMMAD PERVIAZ GUL	FA	CT-Gen	CT-15	GGHS KHOLIAN BALA	02/04/1967	21/05/1992	21/05/1992	Not Eligible due to required Less Qualification	
8	8	LUBNA WAHEED	TANVEER HUSSAIN YOUSAF	FA	CT-Gen	CT-15	GGMS Kailege	05/01/1970	03/07/1993		Not Eligible due to required Less	
<u> </u>	<del>  </del>	ISMAT ROBAB ABBAS	AZHAR ABBAS	ВА	CT / B.Ed	CT-15	GGMS Garam Thoon	26/06/1971	06/12/2003	06/12/2000	Qualification	
10	10	<b>SHAHMIM ВІВІ</b>	MIR AFZAL	ВА	CT / B.Ed	<del></del>	GGM5 KANGRA NO.2	<del>}</del>		06/12/2003	For Go	
11	11	RASHIDA REHMAN	MUHAMMAD AYUB	ВА	CT / B.Ed		GGMS KANGRA NO.2	02/04/1962		26/11/2006	For Go	
						01.25	OUNS KANGKA NO.2	01/05/1962	12/09/1982	02/12/2006	For Go	
12	12	MEHRUN NISA	M RAMZAN	FA	CT-Gen	CT-15	GGHS Baldher	08/10/1966	15/09/1987	01/09/2007	Not Eligible due to required Less	
13	13	SOBIA MUSHTAQ	MUHAMMAD MUSHTAQ	ΜA	CT-Gen	CT-15	3GMS Jama	21/10/1002	20/04/2000		Qualification	
14	14	SHABANA MANZOOR	Manzoor Elahi	MA		T		31/10/1983	09/01/2012	09/01/2012	Recommended	
15-	15	Large Management of the second	1411144444	MA			GMS QAZIAN	21/03/1980	10/01/2012	10/01/2012	Recommended	
16	16	A STATE OF THE STA					GGHS Pathan Colony	22/03/1983	10/01/2012	10/01/2012	Recommended	
- 17	17	#1502 1 1200 a 200 a			. 1		GCMHS Kot Najibullah	01/04/1967	05/09/1985	04/03/2012	Recommended	
•	-			MIM	CT / M.Ed	UI-15	GMS Jhamra	26/08/1972	28/06/1997	01/05/2012	Recommended	

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<b>.</b>	SENIORITY LIST OF CT BPS-15 OF DISTRICT HARIPUR										
	S.LISZ	Teacher Name	Father Name	Acad	Profess;	Post	School Name	Date Of Birth	D/O Apptt;	On CT post	Remarks
18	18		BADAR UL ISLAM	ВА	CT / B.Ed		GGHS Pathan Colony		12/02/2007		Out District Transfer Mansehra to Haripur / 01/05/2012' Recommended
19	19	ANEELA KHAN AFRIDI	HASHIM KHAN AFRIDI	M.Sc	CT / M.Ed	CT-15	GGMS ALI KHAN	16/12/1975	17/06/1997	01/06/2012	Recommended
20	20	MAQSOOM BIBI	S MUNAWAR SHAH	ВА	CT-Gen	CT-15	GGHSS K.T.S No.2	13/05/1969	07/12/1989	01/07/2012	
21	21	BIBI MOHAIDA	MISLI ARAB	ВА	CT / B.Ed	CT-15	GGMS Khoi Kaman	02/02/1976		02/08/2012	
22	22	SURIYA JABEEN	MUHAMMAD YOUSAF	ВА	CT / B.Ed	CT-15	GGHSS BANDI Muneem	12/12/1963	01/09/1985	02/03/2013	
23	23	NUZHAT AFZA	MUHAMMAD SADIQ	MA	CT / B.Ed	CT-15	GGMS NARA AMAZAI	15/08/1966	15/12/1986	03/03/2013	• •
24	24	ROBINA SHAHEEN	BASHIR AHMED	BA	ст	CT-15	GGMS ISLAMPUR	19/08/1969	05/10/1991	04/03/2013	
25	25	GHUZALA SHABNAM -	ABDUL AZIZ	ВА	CT-Bed	CT-15	GGHS-KTS-4	05/04/1969	01/11/1988	05/03/2013	
26	26_	SHAGUFTA JABEEN	MUHAMMAD SHAFI KHAN	ВА	CT / B.Ed	CT-15	GGHS Chapra	30/04/1970	04/11/1990	05/03/2013	
27	27	SHAZIA GUL	M IKHLAQ	MA	CT / M.Ed	CT-15	GGM5 KARWALI	08/09/1971	02/04/1990	06/03/2013	
28	28`	SAEEDA KHATOON	MUMTAZ AHMAD	MA	CT / M.Ed	CT-15	GGMS Paswal	09/05/1967	20/11/1989	09/03/2013	
29	29	BUSHRA SABEEN	Ghulam Rasool	MA/Me	CT-Gen	CT-15	GG Jaka Model	15/04/1972	21/01/1993	22/03/2013	
30	30	TASNEEM AKHTAR	RAJA FARAmurz KHAN	MA	CT / B.Ed	CT-15	GGHS Kohala Bala	19/12/1972	07/10/1992	22/03/2013	
31	31	FARZANA BIBI	KHALID MEHMOOD	MA	CT / B.Ed	CT-15	GGMS Meelum	01/04/1969	01/11/1990	25/03/2013	
32	32	FARZANA BEGUM	GHULAM KHAN	МА	CT / M.Ed	CT-15	GGHS Behra	08/01/1974	31/01/1993	25/03/2013	
33	33	SUGRA GUL	Abdul Majeed	ВА	CT-Gen	CT-15	GGMS Bugnian	23/04/1965	07/10/1987	29/03/2013	
34	34	RIZWANA SHAHEEN	MUHAMMAD BANARIS	MA	CT / B.Ed	CT-15	GGHS Halli	28/12/1979	18/11/2013	20/11/2013	
35	35	Tahira Bibi	Fazal ur Rehman	M.Sc	M.Ed	CT-15	GGHS Halli	12/11/1988	06/01/2014	06/01/2014	
36	36	Nadia Bibi	Safdar Zaman	M.Sc	B.Eď	CT-15	GGHSS BANDI Muneem	16/07/1984	01/06/2014	01/06/2014	
37	37	Shahnaz	Safdar Khan	ВА	CT / B.Ed/ME	CT-15	GGMS TIP HOUSING SOCIE	20/04/1974	03/04/1996	21/11/2014	
38	38	Rukhsana Mir	Mir Afzal	МА	CT / B.Ed	CT-15	GGMS Jatti Pind	11/02/1968	22/11/2014	22/11/2014	
39	39	Mussrat Naeem	Fazal-e-Rabi	MSC	CT / B.Ed/Me	CT-15	GGHS Ghazi Khalo	21/04/1968	21/11/1994	22/11/2014	
40	40	Farah Zaman	Muhammad Zaman	BSC	CT	CT-15	GGMS Milkiyar	31/01/1969	01/11/1995	22/11/2014	
41	41	Ghazala Shaheen	Nazik Khan	ВА	CT / B.Ed	CT-15	GGMS Chapri	01/05/1973	02/04/1996	22/11/2014	
42	42	Shazia Zaman	Shah Zaman	MA	CT / B.Ed	CT-15	GGHSS BANDI Muneem	04/08/1976	11/04/1996	22/11/2014	
43	43	Fozia Tabsum	Muhammad Akram	ВА	CT / B.Ed	CT-15	GGHS Sarai Saleh	15/05/1972	01/11/1995	23/11/2014	
44	44	Tahira Ali	Muhammad Ali	MA	CT / M.Ed	CT-15	GGHS Sirya	05/01/1972	01/11/1995		. <u>.</u>
45	45	Rabia Akhtar	Muhammad Akram	BA	CT / B.Ed	CT-15	GGHSS BANDI Muneem	01/03/1969			
46	46	Amina Bibi	Jahadad		ст	CT-15	GGHS Kalu Pind	12/04/1975	11/04/1996		
47	47	Farzana Shaheen	Muhammad Aslam		CT / B.Ed		GGMS Pind Muneem	06/05/1966			
48	48	Noor-un- Nisa	Sadiq Hussain Shah	BA	M.A CT / B.E	CT-15	GGHS Chijjian	01/01/1969	01/11/1995	02/12/2014	

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT HARIPUR.

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# OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT HARIPUR. SENIORITY LIST OF CT BPS-15 OF DISTRICT HARIPUR Acad Profess; Post School Name Date Of Birth D/O Apptt:

	ÑO S.	LIST Jeacher Name	Father Name	Acad			Section Control	TARIPUR		1000000000000	METERS OF THE STATE OF THE STAT
,,		49 Rehana Gul	Bostan	MA	CT / B.Ed	POSL	School Name		U/O Apptt;	On CT post	Remarks
´ [:	50 .	50 Kalsoom Bibi	AZIZ UR REHMAN	BA	CT / B.Ed		GGMS ISLAMPUR GGMS Makhan	04/04/1969		<u>5  02/12/2014</u>	,
	1 .	Nawishta Begum	Ghulam Sawar	BA	CT / B.Ed		GGHSS Panian	20/11/1970		3 02/12/2014	
	2 !	52 Sadia Manawar	Manawar Din	BA	CT / B.Ed		GGMS Chapri	06/08/1972		4 02/12/2014	
	3 !	53 Sadia Alm	Naved Elahi	BA	CT / B.Ed	CT-15	<del></del>	21/04/1975		5 02/12/2014	· · ·
<u>,</u>	4 !	54 Saddiga Muzammal	Muzanımal Shah	BA	CT / B.Ed	CT-15		10/05/1975		6 02/12/2014	
5	5 5	S Farhat Gul	Gul Dad	BA	CT / B.Ed	CT-15	<del></del>	25/09/1975		02/12/2014	
	6   5	6 Zohra Mubarak	Taj Mubarak	BA	CT / B.Ed	CT-15		03/02/1974		03/12/2014	<u> </u>
5	7   5	7 Hina Nawaz	Muhammad Nawaz	BSc	CT / B.Ed	CT-15	<del></del>	30/05/1970		31/12/2014	<del> </del>
5	8 5	8 Sundas Jabeen	Mussarat Hussain	M.Sc	M.Ed CT	CT-15	<del></del>	02/01/1990		16/03/2015	
5	9   5	9 Kosar Parveen	Khuda Bukhsh	ВА	CT / B.Ed	CT-15				17/03/2015	<u> </u>
6	0 6	O Sabra Bibi	Muhammad Yagoob	ВА	CT / B.Ed		GGHS Hattar	14/07/1965		17/08/2015	
6	1 6	1 Saeeda Nader	Nadar Gul	ВА	CT / B.Ed	CT-15		15/01/1973		17/08/2015	
6	2 6	2 Shakira Bibi	Muhammad Umar	MA	CT / B.Ed		GGHS KTS.4	20/06/1974			
6		3 Tasleem Akhtar	Muhammad Saleem Khan	MA	CT / B.Ed	CT-15	<del></del>	17/01/1975		17/08/2015	
6		4 Farah Naz	Syed Imdad Hussain	MA	CT / B.Ed		GGHS Sirya	15/09/1976		17/08/2015	
6.		Saeeda Bibi	Muhammad Faroog	MA	CT / Med/B.		GGHS Sec:3 KTS	15/11/1979		17/08/2015	<u> </u>
66			Banaras khan	MA	CT / B.Ed	<del></del>	GGHS Kangra Colony	05/01/1980 26/06/1996		17/08/2015	
67	_		Mir Zaman	ВА	CT / B.Ed		GGHS Sirya	01/06/1976		17/08/2015	· · · · · · · · · · · · · · · · · · ·
68			Muhammad Nawaz	МА	CT/Med/Bed		GGHSS Khanpur	09/09/1977		19/08/2015	<u></u>
69	~	11	Muhammad Zareen	МА	CT / B.Ed	<del></del>	GGHS Bagra	17/08/1981		19/08/2015	
70	_		Musarrat Rehman	MA	CT / B.Ed		GGMS Noor Pur	09/04/1982		19/08/2015	·
71			Muhammad Din	ВА			GGMS Kohala payeen	12/04/1972		19/08/2015	
72		<del></del>	Fazal ur Rehman	ВА	CT / B.Ed		GGHS Pharhari	09/05/1973		20/08/2015	<del></del> -
73		<del></del>	Faqar Zaman	ВА	CT / B.Ed	+	GGMS Najif Pur	23/02/1975		20/08/2015	<del></del>
74		- <del></del>	Hassan Gul		Med/Bed/CT			04/10/1975		20/08/2015	
75	<del></del>	<del> </del>	Muhammad Ayub	_	CT / B.Ed		GGMS Bandi Main Per Dad	03/06/1976		20/08/2015	<u> </u>
76	_		Muhammad Kaleem		CT / B.Ed		GGMS Neelan Bhotan	23/04/1979	04/10/1997	20/08/2015	<u>.</u>
77	77						GGHS Sarai Selah			20/08/2015	
78	78	<del></del>			<del></del>		GGHS Kharian			21/08/2015	
79	79	SADAF MEHRINE	SHER MUHAMMAD				GGHSS BEER			21/08/2015	
80	80	Shakeela Akhter	1				GGHS Panian	01/01/1970 3		03/09/2016	<del></del>
81	81	Nazia Bibi					GGMS Kachi	11/01/19/0/3	0.11.1388	22/06/2016	
82	82	Samina Bibi	4.1				GGMS Kachi	18/07/1981		22/06/2016	<del></del>
83	_83	IMTIAZ BIBI			<del></del>	$\overline{}$	GGMS QAZIAN	09/05/1967	<del></del>	22/06/2016	
						<u>  </u>	OCITIO CAZIAN	03/03/130/		23/06/2016	

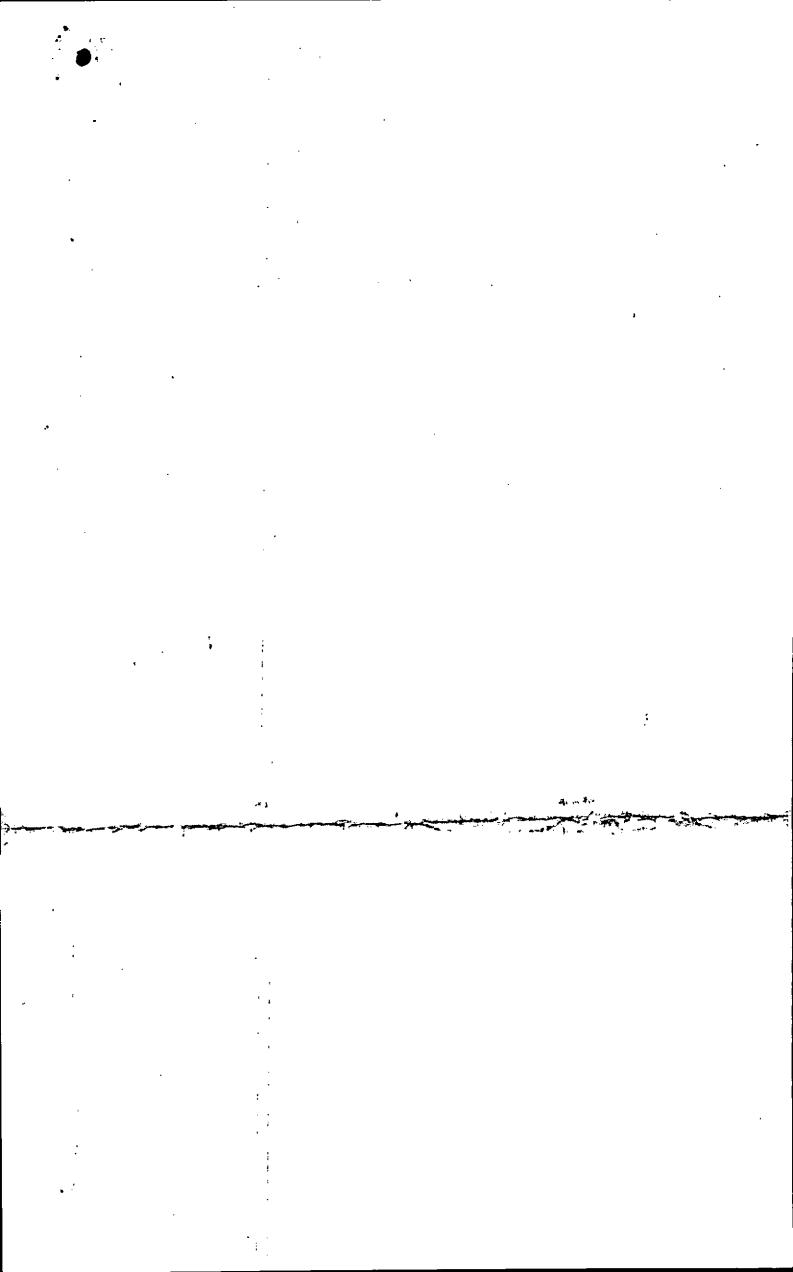
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			OFFICE OF	THE DI	STRICT ED	TICAT	ION OFFICER (FEMALE		. ·	· ·	
				SENIO	RITY LIST	OF C	BPS-15 OF DISTRICT	DISTRIC	r haripur	4	
۶.	NG 5	UST Teacher Name	Father Name	Aca	d Profess;		BPS-15 OF DISTRICT				
	84	34 Gul Bibi	Kalo Khan	<u> </u>		FUS		Date Of Birth	D/O Apott;	On CT po	st Remarks
		35 Bushra Shaheen	Muhammad Ashraf	BA BA	MA/CT	<u> </u>	15 GGHS DEHDAN	01/01/19	71	23/06/20	16
	86 8	6 Arzbia Khatoon	Sultan Muhammad	BA	CT/BED		15 GGHS Alloli	04/03/19	71	23/06/20	
	37 ξ	7 Robina Shaheen	Mahroof Sultan	BA	CT/BED	<u>CT-</u>	15 GGHS KTS-4	11/11/197	2 19/01/19	95 23/06/20	
	38 8	8 Safeena Bibi	Muhammad Akser '	BA	MA/CT		15 GGHS BAGRA	04/01/197	4	23/06/20	
	39 8	9 Shamshad	Khuwaj Muhammad	BA BA	MA/CT		15 GGHS Sangian	02/03/197	4	23/06/20:	
<u> </u>	0 9	0 Khalida Parveen	Abdul Rehman	BA	MA/CT	<u> </u>	L5 GGMS JAMA	25/03/197	4	23/06/20:	
9	1 9	1 Anjum Ara	Sultan Muhammad	BA	MA/CT	<u>  CT-</u>	L5 GGMS BANDI SHER KHAN	03/03/197		23/06/201	
9	2 9	2 Gul Jabeen	Mureed Hussain	MA	MA/CT		.5 GGMS TEER	25/07/197	6 10/02/20:	16 23/06/201	
9	3 9	3 Mehnaz Bibi	Muhammad Raiz	MA	CT/BED	CT-1		23/03/197		06 23/06/201	
9		4 Samina Shaheen	Abdul Qayyum		CT/MED	CT-1			7 19/10/2005	23/06/201	
9.	5 9:		Abdul Razzaq	BA	Bed/CT	CT-1		10/02/197	03/09/200		
9	6 96		Qazi Saad	BA	BEd/CT	CT-1	5 GGMS BANDI SHER KHAN	29/07/197			
• 9	7 97		Muhammad Islam	MA	CT/BED/ME		5 GGMS Abdullahpur	01/02/1980		23/06/201	
98	98 _ 8		Fageer Hussain Khan	BA	CT/BED	CT-1	5 GGMS MOHRI MALYA	29/12/1980		23/06/201	
99	99	<del></del>	Doud ul Rehman	BA	CT/BED	CT-1	5 GGHS Chamba Pind	30/08/1969		4 01/07/201	6
10	0 100		Fazal ur Reman	MA	CT/BED	CT-1	GGMS Rehana	22/04/1975		0 16/08/201	6
10	1 10:		Muhammad Ayub		CT/BED		GGHS Chamba Pind		1	16/08/2010	
10	2 102	Nida Javed	Raja Javed Akhtar	<del></del>	CT/BED		GGHS SN Khan		<del></del>	16/08/2016	
10:		Nazia Gul	Abdul Salam		CT/BED		GGMS Jab		<del>                                     </del>	16/08/2016	
104		<del></del>	M Amin Khan	<del></del>	CT/BED		GGHS Alooli			16/08/2016	
105	105	<del></del>	Abaid ur Rehman		CT/BED	CT-15				16/08/2016	
106	106		Chanan Din	<del></del>	CT/BED	CT-15				16/08/2016	
107	107		M Aslam	<del> </del>	CT/BED	CT-15				16/08/2016	
108	108		Gul Dad		CT/BED	CT-15				16/08/2016	
109	109	Naheed Akhtar	Nasir ud Din		MA/CT	CT-15				16/08/2016	
$\Gamma$	1		Syed Imdam Hussain	<del> </del> -	MA/CT	CT-15	GGHS Alooli			16/08/2016	
110	110	Bibi Nayyer Naheed	Shah	1	1					10/08/2016	<del>                                     </del>
111	111	Khatoon Bibi	Haider Zaman	<del> </del>	MA/CT	CT-15	GGHS Chambad Pind			16/08/2016	
112		Shazia Bibi	Dolat Khan	<del> </del>	MA/CT	CT-15	Jica Model KTS-2		<del>_</del>	16/08/2016	
113		Shabnum BIbi		<u> </u>	BA/CT	CT-15	GGMS Noor Colony			16/08/2016	
114		Nazia Yaqoob	Gashtasf Khan		MA/CT	CT-15	GGHSS Kotnajibullah		<u>-</u> -	16/08/2016	
115		Shareen Zaman	Muhammad Yaqoob		MA/Bed/CT	CT-15	GGHS KTS 4	01/12/1978	20/10/2005		
116		Sumaira Noor	Mir Zaman		MA/CT	CT-15	GGMS Ali Khan	02/22/25/6	20/10/2003	16/08/2016	
117		Rafia Bibi	Noor Muhammad		MA/CT	CT-15	GGHS Shah Maqsood			16/08/2016	
118	_	Bibi Amina	Taj Muhammad		MA/CT	CT-15	GGHS Hattar			16/08/2016	<u> </u>
			Jamil ur Rehman		MA/CT		GGHS SN Khan		<del></del>	16/08/2016	
119	119	Parveen Akhtar	Abdul Rasheed		MA/MED/CT			01/01/1976	09/05/1998	16/08/2016 08/09/2015	transfer out district wef 01-

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# BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR

Service appeal No 7404 of 2021

Mst Bibi Sabira......Appellant

# **VERSUS**

#### **APPEAL**

# APPLICATION SEEKING WITHDRAWAL OF THE AFORE-SAID SERVICE APPEAL

#### Respectfully sheweth!

- 1) That, the above titled service appeal is pending before this Hon'ble Court.
- 2) That, appellant wants to withdraw the case/appeal.

IT IS THEREFORE, very humbly prayed that on acceptance of the instant application, the aforesaid service appeal may kindly be dismissed as withdrawn.

Dated 07.01.2022

Mst. Bibi Sabira (Appellant)

Through:-

HAFIZ MUHAMMAD BILAL ADVOCATE HIGH COURT

# BEFORE THE SERVICE TRIBUNAL K.P.K PESHAWAR

Mst Bibi Sabira......Appellant

# **VERSUS**

# **AFFIDAVIT!**

I, Mst. Bibi Sabira, daughter of Badrul Islam, wife of Qaiser Mehmood, resident of Mohallah Raja Abad near TIP Colony Hariput Tehsil & District Haripur, present posted at CT Teacher Government Girls Higher Secondary School Pathan Colony Haripur do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed from this Hon'ble court.

Dated:07.01.2022

(DEPONENT)

