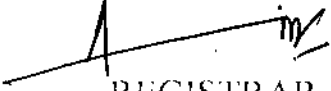


FORM OF ORDER SHEET

Court of _____

Case No. - 125/2023

S No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/1/2023	<p>The appeal of Mst. Amtul Mateen presented today by Mr. Muhammad Zafar Tahirkheli Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ Parcha Peshi is given to appellant/counsel.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 125/2023

Amtul Mateen


Versus

Govt of Khyber Pakhtunkhwa etc.

=====
I N D E X
=====

S.No	Particulars	Annexure	Dates	Pages
1	Memo of Petition			1-4
2	Affidavit			5
3	Application for Interim Relief			6
4	Impugned Order	"A"	28-09-2022	7-8
5	Departmental Appeal	"B"	29-09-2022	9
6	Order	"C"	31-05-2020	10-11
7	Transfer Order	"D"	02-08-2022	12
8	Taking Charge	"D1"	04-08-2022	13
9	Relieving Charge	"D2"	02-08-2022	14
10	Medical Certificates	"E"to"E4"		15-19
11	Notification	"F"	10-06-2022	20-21
12	Notification	"G"	22-02-2019	22
13	Vakalatnama			23

Peshawar, dated
13th January, 2023


(Muhammad Zafar Tahirkheli)
ASC,
87, Alfalah Street, Cantt Colony,
Peshawar.
0300-9597670

①

BEFORE THE SERVICE TRIBUNAL, KHYBER PUKHTUNKHWA PESHAWAR

Service Appeal No. 125 /2023

Amtul Mateen w/o Syed Zulfiqar Ali Shah.
r/o (Presently) near Faizan Madina Masjid, Mir Ahmad Khel road, Mohallah Abdullah
Colony, Kohat.
Permanent Address: College Town, Street No. 10 Kohat.

..... Appellant

Versus

1. The Hon'ble Chief Secretary,
Khyber Pakhtunkhwa, Peshawar.
2. Secretary Government of Khyber Pakhtunkhwa,
Higher Education Achieves & Libraries Department.

.... Respondents

=====

**APPEAL U/S 4 OF SERVICE TRIBUNAL ACT 1974, AGAINST THE
IMPUGNED ORDER DATED 28-09-2022 (COPY ANNEXED MARKED
"A"), WHEREIN THE APPELLANT WAS TRANSFERRED
PREMATURELY AND HER DEPARTMENTAL APPEAL DATED
29-09-2022 (COPY ANNEXED MARKED "B"), WAS NOT DECIDED
WITHIN THE STATUTORY PERIOD OF LIMITATION.**

=====

Prayer:

By accepting this appeal and setting aside the impugned pre-mature transfer order dated 28-09-2022 and allowing the appellant to continue with her service as Associate Professor (BPS-19) at Govt. Girl Degree College Bilitang, Kohat.

RESPECTFULLY SHEWETH

1. That the appellant being qualified and eligible was selected and appointed as Assistant Professor (BPS-19) by the Khyber Pakhtunkhwa Public Service Commission and was posted at Govt. Girls Degree College Thall District Hangu on 31-05-2020. (Copy annexed "C")
2. The appellant has been serving the department honestly and diligently to the utmost satisfaction of her superiors. She was neither served with any adverse remarks nor was she ever penalized by any departmental proceedings till date.
3. That while having served for more than 02 years at Thall Hangu she was transferred to Govt. Degree College Bilitang, Kohat vide order dated 02-08-2022. She relinquished the charge of her duties at G.G.D.C Thall on 03-08-2022 (afternoon) and assumed the charge of her duties G.G.D.C Bilitang, Kohat on 04-08-2022 (F.N). (Copy annexed "D" to "D2")

- (29)
4. That to the appellant's utter surprise she was once again transferred and posted as Principal Govt. Degree College Thall Hangu vide impugned order dated 28-09-2022. **(Annex "A")**
 5. The appellant was pre-maturely transferred just after 02 months of her assumption of charge as Associate Professor Physics (BPS-19) at G.G.D.C Bilitang, Kohat. The appellant was shocked to receive such an arbitrary treatment without any sufficient cause or plausible explanation, that too during her maternity leave.
 6. That the appellant preferred a departmental appeal dated 29-09-2022 for issuing corrigendum of the impugned pre-mature transfer order but was not replied upon till the lapse of statutory period of limitation. **(Annex "B")**

Feeling aggrieved and finding no other appropriate remedy, the appellant has been constrained to approach the Hon'ble Service Tribunal for the redress of her grievance inter-alia on the following,

Grounds

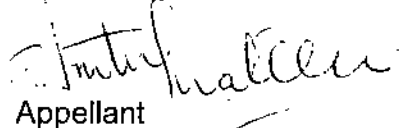
- a. That the impugned transfer order was passed in haste by the respondent department without considering the material facts on record and thus the same is illegal and void ab-initio and is liable to be set right by this Hon'ble Tribunal.
- b. The worthy department was required to act in accordance with the well-established principles of equity, law, justice and propriety. The impugned order was passed in haste, wherein the appellant has been subjected to harsh treatment without any lawful justification.
- c. The impugned transfer is not only arbitrary and discriminatory but is also against the postings / transfer policy of the Provincial Government, wherein the appellant was lawfully entitled to enjoy her normal tenure of posting for a minimum period of 03 years, but was however denied the said benefit.
- d. It is worth mentioning that impugned pre-mature transfer order was passed during her maternity leave, which is not only harsh but also arbitrary and discriminatory. **(Copies annexed "E" to "E4")**
- e. It is necessary to be mentioned that one Mrs. Ghazala Shaheen (BPS-20) was already posted as Professor / Principal G.G.D.C Thall Hangu vide notification dated 10-06-2022 and the appellant was also posted on the same post vide impugned order dated 28-09-2022. Thus the impugned order is not only self-contradictory to an earlier order dated 10-06-2022 but is also void ab-initio.
(Copy annexed "F")
- f. That the husband of the appellant Mr. Zulfiqar Ali Shah is serving as Associate Professor (BPS-19) at Govt. College of Management Sciences Kohat and under the Khyber Pakhtunkhwa Posting / Transfer Policy the appellant was required to be posted near her husband at Kohat according to the said policy.
(Copy annexed "G")

- (2)
- g. The impugned action by the worthy authority needs to be set right by the Hon'ble appellate authority by partially modifying the impugned order dated 28-09-2022 and allowing the appellant to continue with her service as Associate Professor (BPS-19) at Bilitang Kohat for her full tenure of 03 years.
- h. The impugned transfer order is not only arbitrary and discriminatory but also against the principles of equity, law, justice and propriety calling for interference by the worthy Tribunal.

The appellant seeks leave of the Hon'ble Tribunal to rely on additional grounds at the time of final arguments.

In view of the above, it is most humbly requested that by accepting this appeal the impugned pre-mature transfer order dated 12-08-2022, may kindly be set aside and be modified up to the extent of the appellant by allowing her to continue with his service as Associate Professor (BPS-19) at Bilitang Kohat for a full tenure of 03 years.

Any other relief deemed appropriate may also be granted in addition to the relief prayed above.


Appellant

Through,


(Muhammad Zafar Tahirkheli)
ASC

Peshawar, dated
13th January, 2023

(4)

Certificate:

It is certified that no such like appeal on similar grounds was filed before the Khyber Pakhtunkhwa Service Tribunal before the instant service appeal.

In the matter
Appellant

5

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. _____/2023

Amtul Mateen

Versus

Govt of Khyber Pakhtunkhwa etc.

=====
Affidavit
—

I, the appellant, Amtul Mateen w/o Zulfiqar Ali Shah, r/o Masjid Mir Ahmad Khel road, Mohallah Abdullah Colony, Kohat, do hereby state on Oath that the contents of the accompanying appeal are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Hon'ble Tribunal.

Amtul Mateen

DEPONENT

CNIC No. 14301-1872315-6

Cell No.

9
Date: - 13th January, 2023

Govt of Khyber Pakhtunkhwa

6

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. _____/2023

Amtul Mateen

Versus

Govt of Khyber Pakhtunkhwa etc.

=====
APPLICATION FOR INTERIM RELIEF

Respectfully Sheweth:

1. The above titled appeal is being filed, wherein the contents of the main appeal, may kindly be read as part and parcel of the present application.
2. The appellant has a strong prima facie case on merits in which she is most likely to succeed.
3. That the impugned premature transfer order will cause irreparable harm to the applicant and her cause would be seriously prejudiced if incase the interim relief is refused.
4. The balance of convenience lies in maintaining the status-quo order.

In view of the above, it is most humbly requested that by accepting this application the impugned transfer order dated 28-09-2022 being premature and politically motivated, may kindly be suspended pending adjudication the instant service appeal.

Amtul Mateen

Applicant

Through,

Muhammad Zafar Tahirkheli

(Muhammad Zafar Tahirkheli)
ASC

Peshawar, dated
13th January, 2023

Affidavit:

I, the applicant, Amtul Mateen w/o Zulfiqar Ali Shah, r/o Masjid Mir Ahmad Khel road, Mohallah Abdullah Colony, Kohat, do hereby state on Oath that the contents of the application are true and correct to the best of my knowledge and belief, and nothing has been concealed from this Hon'ble Tribunal.

Amtul Mateen
13/01/23

Amtul Mateen

Deponent



ANNEXURE A

7

**GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT**

Dated Peshawar the September 28, 2022

NOTIFICATION

No.SO(C-III)/HEP/1-3/Posting/Transfer/ The Competent Authority (Chief Secretary Khyber Pakhtunkhwa) is pleased to order posting/transfer of the following Female Associate Professors of college cadre at colleges mentioned against each with immediate effect in the best public interest:-

S#	Name & Designation	From	To	Remarks
1.	Ms. Farah Naz, Associate Professor of English (BS-19)	Principal/ Associate Professor at GGDC Pahina, Mansehra	GGPGC No.1, Abbottabad	AVP
2.	Ms. Seema Gul, Associate Professor of Political Science (BS-19)	GGDC, Daggar, Buner	GGDC, Nowshera	AVP
3.	Ms. Neelam Associate Professor of Economics (BS-19)	GGPGC, Mardan	GGDC, Daggar, Buner	AVP
4.	Ms. Shahida Akhtar Associate Professor of Islamhyat (BS-19)	GGDC Maneri, Swabi	GGDC Karnal Sher Khill, Swabi	AVP
5.	Ms. Irum Naz Associate Professor of Computer Science (BS-19)	GGDC Mankaral, Haripur	GGDC, Havelian, Abbottabad	AVP
6.	Ms. Qudsia Saleem Associate Professor Computer Science (BS- 19)	GGDC (W), Haripur	GGDC Mankaral, Haripur	Vice Sr. No.5
7.	Ms. Hafiza Ali Associate Professor of Zoology (BS-19)	GGDC No.2, Parachinar	GGDC Haripur	AVP
8.	Ms. Taskeen Kausar Associate Professor of Urdu (BS-19)	GGDC Nowanshehr, Abbottabad	GGDC Qalandar, Jod, Abbottabad	AVP
9.	Ms. Hasiba Safdar, Associate Professor of Geography (BS-19)	GGDC Kotlang, Mardan.	GGDC Talhat Bhai, Mardan	AVP
10.	Ms. Musarrat, Principal/Associate Professor of Political Science (BS-19)	Principal GGDC, Lachi Kohat	As Principal GGDC Bilal Tang, Kohat	AVP
11.	Ms. Ambul Mateen Associate Professor of Physics (BS-19)	GGDC Bilal Tang, Kohat	As Principal GGDC Thal Hangu	AVP
12.	Ms. Shahana Bibi Associate Professor of Chemistry (BS-19)	GHEC Abbottabad	GGDC, Ujala, Nowshera, Abbottabad	AVP
13.	Ms. Hida Bukhari Associate Professor of Chemistry (BS-19)	GGDC Pz Pal Nowshera	GGDC Chaghanjattal, Peshawar	AVP
14.	Ms. Irum Naz Associate Professor of Urdu (BS- 19)	GGPGC Saidu Sharif Swat	GGDC Zaryab Colony, Peshawar	AVP

PHOTOCOPY

8

15.	Ms. Itrat Fatima Associate Professor of History (BS-19)	Under transfer from GGDC Peshawar to GGDC Shabqadar, Charsadda	GGDC Peshawar	AVP
16.	Ms. Humera Shuja Associate Professor of Political Science	Under transfer from GGDC Mathra, Peshawar	GGDC Mathra, Peshawar	AVP
17.	Ms. Rukhsana Anwar Principal/Professor of Botany	GGDC, Umerzai, Charsadda	GGDC, Mathra, Peshawar	AVP
18.	Ms. Fozia Anjum Associate Professor of Political Science	GGDC Dara Adam Khel, Kohat	GGDC No.1, Hayatabad, Peshawar	AVP
19.	Ms. Farah Nadir Associate Professor of Home Economics	GGDC, Tarkha, Nowshera	GFC (V) Peshawar	AVP
20.	Ms. Farah Naz Associate Professor of English	GGDC Parhina Mansehra	GGDC No.1 Abbottabad	AVP
21.	Ms. Bushra Naz Associate Professor of Maths (BS-19)	GGDC, Chitti Dheri, Mansehra	GGDC, Malikpura, Abbottabad	AVP
22.	Ms. Kakab Almas Professor of Home Economics/Principal (BS-20)	GGDC Katlang, Mardan,	GGDC as Principal Umerzai Charsadda	AVP
23.	Ms. Farzana Aziz Associate Professor of Zoology	GGDC KTS Haripur	GGDC Malikpura, Abbottabad	AVP
24.	Ms. Rukhsana Khalid Associate Professor of English	GGDC Sarai Saleh Haripur	GGDC Haripur	AVP
25.	Ms. Asia Sattar Associate Professor of Law	Under transfer from GGDC Thall Mangu to GGDC Tahht Bhai, Mardan	Principal GGDC, Tangl, Charsadda	AVP
26.	Ms. Zahida Khatoon Associate Professor of Political Science	GGDC Wana South Wardistari	Principal GGDC, Ekka Ghund Mohmand	AVP
27.	Ms. Wahida Khan Associate Professor of English	Under transfer from GGDC, Chagharmatti, Peshawar to GGDC Pankip, Swabi	GGDC Narsaqi Peshawar	AVP
28.	Ms. Shamia Associate Professor of Chemistry	GGDC Sawadher, Mardan	GGDC Mardan	AVP

-Sd-

SECRETARY

HIGHER EDUCATION DEPARTMENT

Encls: No. & Date Even

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Higher Education, Khyber Pakhtunkhwa Peshawar.
3. Deputy-Director HEETS Cell Higher Education Department.
4. District Accounts Officer, concerned.
5. Principals of the colleges concerned.
6. Manager, Govt. Printing Press Khyber Pakhtunkhwa, Peshawar.
7. Associate Professors concerned.

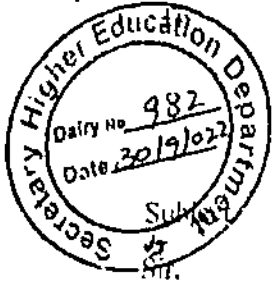
SECTION OFFICER (COLLEGES-III)

28/3/22

TRUE COPY

ANNEXURE B

9



The Secretary,
Higher Education, Archives & Libraries Department,
Govt. of Khyber Pakhtunkhwa

APPLICATION FOR CORRIGENDUM

With high veneration it is stated that I am transferred from Govt. Girls Degree College Bilitang Kohat to Govt. Girls Degree College Thall Hangu vide notification No: SO(C-III)/HED/1-3/Posting/Transfer dated:28-9-2022 (copy attached) which is against the posting/transfer Policy of the government.

Sir, I have already served for more than two years at GGDC Thall Hangu and I am transferred to GGDC Bilitang Kohat in the last month i.e. August 2022 vide notification No: SO(C-III)/HED/1-3/Posting/Transfer dated:02-8-2022 (copy attached) and have not even received my first salary in this new station.

It is, therefore, requested to your kind authority to please allow me to serve at my home station Kohat by retaining me at Govt. Girls Degree College Bilitang Kohat and issue a corrigendum in this regard.

I shall be highly obliged for this kindness.

Dated:29-9-2022

Yours Sincerely

Mrs. AMTUL MATEEN,
Principal Associate Professor,
GGDC Bilitang Kohat.

TRUE COPY

Copy for information to:

1. Director Higher Education Department Khyber Pakhtunkhwa, Peshawar.

PL examine

SS

29/9/2022

ALL



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT
CIVIL SECRETARIAT

REGISTERED

10

DATED 31ST May, 2020

NOTIFICATION

NO.SO(C-1)/HE/1-13/KP-PSC/Female Physies/2018. Consequent upon the recommendations of Khyber Pakhtunkhwa Public Service Commission, the Competent Authority is pleased to appoint the following recommendees as Female Associate Professor (BPS-19) of Physies in Higher Education Department with immediate effect with the following terms and conditions and to post them against the vacant posts in the Colleges noted against their names:-

S#	Name with Father Name	Adjusted at	Remarks
1	Raheema Maroof D/O Abdul Maroof	GGDC, Sadda (Kurram)	AVP
2	Amtul Mateen D/O Main Muhammad Anis	GGDC, Thal, Hangu	AVP
3	Zubaida Tahir D/O Haroon Khan	GGDC, Lund Khwar, Mardan	AVP
4	Razia D/O Shams Bahadar	GGDC, Kemal Sher Killa, Swabi	AVP
5	Benazir D/O Aziz Ul Rahman	GGDC, Panjpir, Swabi	AVP

TERMS AND CONDITIONS:

- They will have all rights / privileges contained in Khyber Pakhtunkhwa Civil Servants Act, 1973 and rules made there under.
- The appointees should join their posts within thirty (30) days of the issuance of this Notification, failing which it shall be presumed that they are not interested to join the same. Charge Report shall be submitted to all concerned. The Director, Higher Education Khyber Pakhtunkhwa, Peshawar shall furnish a certificate to the effect that the appointees have joined their posts or otherwise, after one month of the issuance of this Notification.
- In case of disciplinary matters, Khyber Pakhtunkhwa Civil Servants Act, 1973 and Khyber Pakhtunkhwa Civil Servants (Efficiency & Disciplinary) Rules, 2011 shall be applicable.
- They will be on probation for a period of one (01) year, extendable for another one year in terms of Rule-15 of Khyber Pakhtunkhwa Government Servants (Appointment, Promotion & Transfer) Rules, 1989.

P.T.O

TRUE COPY

- (11)
- v. They will undergo mandatory training for the purpose of promotion, as the case may be.
 - vi. They will get pay, i.e. initial pay of BPS-19 including usual allowances as admissible under the rules. They will be entitled to annual increment like other Civil Servants.
 - vii. Their appointment will be subject to verification of their testimonials / documents.

SECRETARY
HIGHER EDUCATION DEPARTMENT

ENDST. NO. & DATE EVEN.

Copy forwarded to the:

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Director, Higher Education Khyber Pakhtunkhwa, Peshawar.
4. Director Recruitment, Khyber Pakhtunkhwa Public Service Commission, Peshawar.
5. District Accounts Officers in concerned Districts.
6. Director General Information, Khyber Pakhtunkhwa.
7. Principal(s) of concerned Colleges).
8. PS to Chief Secretary, Khyber Pakhtunkhwa.
9. PS to Secretary Establishment, Khyber Pakhtunkhwa.
10. Manager, Govt. Printing Press, Peshawar.
11. PS to Secretary to Govt. of Khyber Pakhtunkhwa, Higher Education Department.
12. Director (HEMIS), Higher Education Department.
13. Officers concerned.
14. Master File.


SECTION OFFICER (COLLEGES-I)

TRUE COPY



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT

Dated Peshawar the August 02, 2017

NOTIFICATION

No. SO(C-III)HED/1-3/Posting/Transfer/ Posting/transfer of the following female Associate Professors of college cadre are hereby ordered at colleges mentioned against their names in the next public interest with immediate effect:-

S.#	Name & Designation	Present Station	Posted Station	Remarks
1.	Ms. Sobia Rani Associate Professor of Mathematics (BS-19)	GGDC Umarzai, Charsadda	GGDC Mathra, Peshawar	Vice S.no.02
2.	Ms. Humera Shuja Associate Professor of Political Science (BS-19)	GGDC Mathra, Peshawar	GGDC Umarzai, Charsadda	Vice S.no.01
3.	Ms. Qurat-ul-Ain Associate Professor of Statistics (BS-19)	Under transfer to GFC(W) Peshawar	GGDC Peshawar	Vice S.no.04
4.	Ms. Itrat Fatima Associate Professor of History (BS-19)	GGDC Peshawar	GGDC Shabqadar, Charsadda	AVP
5.	Ms. Isma Yousaf Associate Professor of Urdu (BS-19)	GGDC Sarai Salen Haripur	GGDC No.1 Abbottabad	AVP
6.	Ms. Amlal Mateen Associate Professor of Physics	GGDC, Hangu	Thal, GGDC, Baktang, Kohat	AVP

-Sd-

SECRETARY TO
GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION DEPARTMENT

Endst: No. & Date Even

Copy forwarded to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Higher Education, Khyber Pakhtunkhwa Peshawar.
3. Deputy Director HEMIS Cell Higher Education Department.
4. District Accounts Officers concerned.
5. Principals of the Colleges concerned.
6. Manager, Govt. Printing Press Khyber Pakhtunkhwa Peshawar.
7. Associate Professors concerned.
8. Master file

(SAMIA JABEEN)
Section Officer (Colleges-III)



GOVERNMENT GIRLS DEGREE COLLEGE BILLITANG, KOHAT
PINDI ROAD SENI GUNBAT, KHYBER PAKHTUNKHWA
e-mail: ggdcbillitang@gmail.com



CERTIFICATE OF TAKING OVER CHARGE.

In Pursuance of Government of Khyber Pakhtunkhwa Higher Education, Archives & Libraries Department Peshawar Vide Notification No. SO(C-III)HED/1-3/Posting/Transfer, dated Peshawar the 02/08/2022 and Posting/transfer at Govt: Girls Degree College Billitang, (Kohat) and she is hereby took over charge of Associate Professor of Physies (BPS-19) at Govt: Girls Degree College Billitang, (Kohat) on 04/08/2022 (F.N).

Signature of Relieved _____

Name of the Govt: Servant: Vacant

Designation: Principal, (BPS-19)

Dated: 04/08/2022 (F.N)

Station: GGDC Billitang, (Kohat)

Signature of Receiving Amitul Mateen

Name of the Govt: Servant: Amitul Mateen

Designation: Associate Professor (BPS-19)

Endst No. 50-54 /P.Filé

Dated Kohat the 04 /08/2022.

Copy of the:

1. PS to Secretary Govt: of Khyber Pakhtunkhwa Higher Education, Archives and Libraries Department Peshawar.
2. Director Higher Education, Khyber Pakhtunkhwa Peshawar in duplicate.
3. District Account Office Kohat.
4. Officer Concerned.
5. Office Record.

TRUE COPY

Amitul Mateen
Principal
Govt: Girls Degree College
Billitang, (Kohat).

D₂

(19)

CERTIFICATE OF TRANSFER OF CHARGE

Certified that I have on the Afternoon of this day respectively made over and relieved charge of this office from the post of **Associate Professor of Physics BPS-19 Govt. Girls Degree College Thall, (Hangu)**, Vide Achieves and Libraries Department Higher Education Khyber Pakhtunkhwa, Peshawar, Notification No. (C-III)HED/1-3/Posting/Transfer, Dated 02/08/2022.

Signature of relieved: _____

Amtul Mateen

Government Servant: Ms. Amtul Mateen

Designation: Associate Prof. of Physics

Govt. Girls Degree College Thall.

Station: GGDC Thall, (Hangu)

Dated: 03-08-2022 (After-noon)

Signature of received: _____

Government Servant: Vacant Post

Designation: Associate Prof. BPS-19

Govt. Girls Degree College Thall, Hangu.

Endst: No.2073-78 /Transfer file

Dated Thall the: 10/08/2022

Copy Forwarded to the:

1. Director Higher Education Department, Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary, Higher Education Department, Khyber Pakhtunkhwa, Peshawar.
3. Deputy Director HEMIS Cell, Higher Education Department, Khyber Pakhtunkhwa, Peshawar.
4. Accountant General, Khyber Pakhtunkhwa, Peshawar.
5. District Accounts Officer, Hangu.
6. Officer Concerned.
7. Office record.

Shahida

Principal,

Govt. Girls Degree College
Thall, Hangu.


Principal

Govt. Girls Degree College
Thall, Hangu.

MEASURE 15

GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT

ANTENATAL MATERNITY LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient Amtul Mateen 

Certified that Ms. Amtul Mateen DIW/O Syed Zulfikar Ali Shah
resident of Kohat
Designation Associate Professor Department MED Kohat Paktunkhwa
having CNIC No. 14301-1938818-7 has been examined in this hospital vide
Emergency / G.P.D No. 11476 dated 17/08/2022.

Her Gestation is 32 weeks 05 days and Estimated Date of Delivery is 30.08.2022
She is advised Antenatal Leave for a period of 45 days w.e.f. 17/08/2022 to 30/08/2022

Signature [Signature]
Name of Doctor [Signature]
Designation Women Medical Officer
PM&DC No. DMAH Kohat
Official Seal WOMEN MEDICAL OFFICER
DHQ HOSPITAL KOHAT

COUNTERSIGNED

[Signature]
MEDICAL SUPERINTENDENT
Medical Superintendent
DHQ Teaching Hospital
Kohat

TRUE COPY

GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT

E,
16

BABY BIRTH CERTIFICATE

Name	Muhammad
Mother Name	Amtul Mateen
Father Name	Syed Zulfiqar Ali Shah
Address	Kohat
Date of Birth	30/09/2022
Sex of Baby	Male

Signature _____

Name of the Doctor _____

Designation _____

PM&DC No _____

Official Stamp _____

COUNTERSIGNED

MEDICAL SUPERINTENDANT

Medical Superintendent
DHO Kohat
Kohat
01/10/2022

GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT

POST-NATAL MATERNITY LEAVE CERTIFICATE

Signature of the Government servant

Jawid Malleer

Certified that I have examined Mrs.

Amdul Mateen

Wife of

Syed Zulfikar Ali Shah

Her CNIC No.

14301-1338810-7

She has

Delivered a Baby on

30/08/2022

She is advised

45 days

Post-Natal Maternity leave with effect from

01/10/2022

onwards.

Signature _____

Name of the Doctor _____

Designation _____

PM&DC No _____

Official Stamp _____

COUNTERSIGNED

MEDICAL SUPERINTENDANT
Medical Superintendent
DHQ Teaching Hospital
Kohat

TRUE COPY

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GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient

[Handwritten Signature]

Certified that Mr./Ms. Muhammad Majeed S/D/W/O Kulfaqar

resident of Kohat City

Designation Associate Professor Department Education/H.A.D.

having CNIC No. 14301-1272315-6 has been examined in this hospital vide

Emergency / O.P.D / Admission No. SHC (N/Shift) dated 15/11/2022.

He / She is suffering from Ch. UTI

and is advised bed / home rest alongwith the medications prescribed for a period of 16 days

w.e.f. 15/11/2022 to 30/11/2022 for the restoration of his / her health.

[Handwritten Signature]
[Handwritten Signature]

Signature

Name of Doctor

Designation

PM&DC No.

Official Seal

[Handwritten Signature]
[Handwritten Signature]
[Handwritten Signature]
D.H.O. HOSPITAL KOHAT

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GOVERNMENT OF KHYBER PAKHTUNKHWA
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient *Amatul Mateen*

Certified that Mr./Ms. Amatul Mateen S/O/W/O Zaid Fiaz
resident of Kohat City
Designation Associate Professor Department Education / HED
having CNIC No. 14301-1872315-6 has been examined in this hospital vide
Emergency / O.P.D / Admission No. 46 dated 6-12-2022.

He / She is suffering from Urinary Tract Infection (UTI)
and is advised bed / home rest along with the medications prescribed for a period of Twenty days
w.e.f. 1/12/2022 to 20/12/2022 for the restoration of his / her health.

Handwritten initials
District Headquarters Teaching Hospital Kohat

Signature _____
Name of Doctor _____
Designation _____
PM&DC No. _____
Official Seal _____
Dr. Amjad Ghani
MEDICAL OFFICER
D.H.Q. Hospital, Kohat

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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT

DATED PESHAWAR, THE JUNE 10, 2022

NOTIFICATION

NO.SO(E-I)E&AD/9-88/HED/2022. Consequent upon their promotion from BS-13 to BS-20 on regular basis, as notified by this Department notification of even No. dated 17.01.2022, postings/transfers and adjustments of the following Female Professors/Principals of Higher Education Department are hereby ordered, in the public interest, with immediate effect:-

SR.#	NAME OF THE OFFICER	FROM	TO
1.	Ms. Noor Us Saba, (BS-20)	Associate Professor, GCGC, Peshawar.	Professor of Home Economics, GGDC No 1, Hayatabad, Peshawar, against the vacant post.
2.	Ms. Sadia Afzal, (BS-20)	Associate Professor, GGDC, Battagram	Professor of Botany, GGPGC No 1, Abbottabad vice Sr No 19
3.	Ms. Salara Aman, (BS-20)	Associate Professor, GGDC, Chagharmatti, Peshawar.	Professor of Physics, GCGC, Peshawar, against the vacant post
4.	Ms. Farzana Hilal, (BS-20)	Associate Professor, GGPGC, Saidu Sharif, Swat	Professor/Principal, GGPGC, Saidu Sharif, Swat, against the vacant post.
5.	Ms. Shakila Begum, (BS-20)	Associate Professor, GCGC, Peshawar	Professor/Principal, GGDC, Gulshan Rehman, Peshawar, vice S.No 20
6.	Ms. Amina Begum, (BS-20)	Associate Professor, GGDC, Takhtbhai, Mardan	Professor/Principal, GGDC, Parnoti Mardan against the vacant post.
7.	Ms. Narmeen Zainab, (BS-20)	Associate Professor, GGPGC, Haripur.	Professor of English, GGPGC, Haripur, against the vacant post.
8.	Ms. Farah Saeed, (BS-20)	Associate Professor, GGDC No. 1, Mansehra.	Professor of English, GGDC No 1 Mansehra against the vacant post.
9.	Ms. Ghazala Shaheen, (BS-20)	Associate Professor, GGDC, KDA, Kohat.	Professor/Principal, GGDC, Thall Hangu, against the vacant post
10.	Ms. Riffat Naz, (BS-20)	Associate Professor, GGDC, Nowshera.	Professor of Law GGDC, Nowshera, against the vacant post
11.	Ms. Shazia Gul, (BS-20)	Associate Professor, GGDC, Sarai Saleh, Haripur.	Professor/Principal, GGDC, Sarai Saleh, Haripur, against the vacant post.
12.	Ms. Tehmina Naz, (BS-20)	Associate Professor, GGDC No.2, Chitti Dheri, Mansehra.	Professor/Principal, GGDC no.2, Chitti Dheri, Mansehra, against the vacant post
13.	Ms. Yasmin Akhtar, (BS-20)	Associate Professor, GHEC, Nowshera.	Professor of Urdu, GFC (W), Peshawar, against the vacant post
14.	Ms. Shabnam Rani, (BS-20)	Associate Professor, GFC (W), Peshawar.	Professor of History, GFC (W), Peshawar, against the vacant post.

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**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ESTABLISHMENT DEPARTMENT**

15.	Ms. Nafeesa Nasir Ud Din, (BS-20)	Associate Professor, GGDC, Shiekh Maltoon, Mardan	Professor of Mathematics, GGDC, Shiekh Maltoon, against the vacant post.
16.	Ms. Musarrat Shaheen (BS-20)	Associate Professor, GGDC Mandan, Bannu.	Professor/Principal, GGDC Starsam, Orakzai, against the vacant post.
17.	Ms. Gul Bano, (BS-20)	Associate Professor, GFCW, Peshawar	Professor of Urdu, GFCW Peshawar, against the vacant post.
18.	Ms. Ayesha Saddiqa, (BS-20)	Associate Professor GGDC Zubaida Aman College, Ghazi Haripur.	Professor of English, GGDC No 1, Hayatabad Peshawar vice Sr No 21
ADJUSTMENT			
19.	Ms. Farhat Jabeen, (BS-20)	Professor of Economics, GGPGC No 1 Abbottabad	Professor/Principal, GGDC, Nefor Saidan Abbottabad, against the vacant post.
20.	Ms. Tanzeen BiBi, (BS-20)	Professor of Maths / Principal, GGDC, Gulshan Rehman, Peshawar.	Professor, GGDC, Gulshan Rehman Peshawar against the vacant post.
21.	Dr. Safia Gul, (BS-20)	Professor of Economics, GGDC, No 1 Hayatabad, Peshawar.	Professor, GGDC, Mathra Peshawar, against the vacant post
22.	Ms. Shagufta Sardar, (BS-19)	Associate Professor, GGPGC Saidu Sharif, Swat.	Associate Professor of English/Principal, GGDC Madayn Swat against the vacant post
23.	Ms. Shabnam Tabinda (BPS-20)	Professor of Statistics GCGC Peshawar	Professor, GGPGC No 1 Abbottabad, against the vacant post.
24.	Ms. Bibi, Rubina Shaheen, (BPS-20)	Professor of Economics, GGPGC No 1, Abbottabad.	Professor, GGPGC, Mandian, Abbottabad, against the vacant post.
25.	Ms. Amina Akhtar, (BPS-19)	Associate professor of Political Science GGDC, Tank.	Principal GGDC, Tajo Bibi Charsadda, vice Sr. No. 26.
26.	Ms. Anila Ghani, (BPS-19)	Associate Professor of Botany/Principal GGDC, Tajo Bibi Charsadda.	Principal, at GGDC, No 2 Hayatabad Peshawar, against the vacant post.
27.	Ms. Shireen Amir, (BS-20)	Professor of Psychology GGPGC, Lund - Khwar, Mardan.	Professor, GPGC Haripur against the vacant post

**CHIEF SECRETARY
GOVERNMENT OF KHYBER PAKHTUNKHWA**

Endst. No. and date even.

Copy forwarded to the:-

1. Principal Secretary to Governor, Khyber Pakhtunkhwa.
2. Principal Secretary to Chief Minister, Khyber Pakhtunkhwa.
3. Secretary to Govt. of Khyber Pakhtunkhwa, Higher Education Department.
4. Accountant General, Khyber Pakhtunkhwa.
5. All Divisional Commissioner's in Khyber Pakhtunkhwa.
6. Managing Director, Khyber Pakhtunkhwa IT Board, Peshawar.



GOVERNMENT OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES AND
LIBRARIES DEPARTMENT

DATED PESHAWAR THE 23/02/2019

NOTIFICATION

No.SO(CE&MS)HED/1-2/02/1-25) In continuation of this Department Notification bearing No.SO(CE&MS)HED/1-2/034(1-20) dated 23-01-2019, the competent authority is pleased to order posting/transfer as per details given below in the public interest with immediate effect:-

Sr. No.	Name of incumbent with Designation	Placement	Remarks
1.	Mr. Fazal Hussain, Assistant Professor BPS-18 GCMS, Abbottabad.	Associate Professor BPS-19 GCMS, Talash.	AVP
2.	Muhammad Idrees, Assistant Professor BPS-18 GCMS, Mansehra.	Associate Professor BPS-19 GCMS, Mansehra.	AVP
3.	Mr. Zulfiqar Ali Shah, Assistant Professor BPS-18 GCMS, Kohat.	Associate Professor BPS-19 GCMS, Kohat.	AVP
4.	Mr. Abdur Rashid, Assistant Professor BPS-18 GCMS, Charsadda.	Associate Professor BPS-19 GCMS, Mardan.	AVP
5.	Mr. Matiullah, Assistant Professor BPS-18 GCMS, Bannu.	Associate Professor BPS-19 GCMS, Bannu.	AVP

SECRETARY TO
GOVT. OF KHYBER PAKHTUNKHWA,
HIGHER EDUCATION, DEPARTMENT.

Endst: No. & date even:

Copy of the above is forwarded to the:-

1. Director General, Commerce Education and Management Sciences, Chamkani More, near Govt. Polytechnic Institute, Sardar Ghar Peshawar.
2. Principals, Government Colleges of Commerce/Management Sciences, Abbottabad, Talash, Mansehra, Kohat, Charsadda, Mardan-1, and Bannu.
3. District Accounts Officers, Abbottabad, Dir Lower, Mansehra, Kohat, Charsadda, Mardan and Bannu.
4. Manager, Government Printing Press, Khyber Pakhtunkhwa, Peshawar.
5. Project Director, HEMIS Cell, inside Directorate General of Commerce Education and Management Sciences, Chamkani More, near Govt. Polytechnic Institute, Sardar Ghar Peshawar.
6. PS to Secretary HED.
7. Officers concerned.

M/16-9
SECTION OFFICER (COMMERCE)

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VAKALATNAMA

In the Court of

Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No. _____

B.C No.	10-7764
Advocate	M. Zafar
Cell No.	0300-9597670
CNIC	17301-1639615-3

Petitioner
Plaintiff
Applicant
Appellant
Complainant

Amtul Mateen

Decree-Holder

VERSUS

Respondent
Defendant
Opponent
Accused


Govt of KP etc

Judgment-Debtor

I / We **Amtul Mateen** the above noted Petitioner / Appellant do hereby appointed and constitute, **Muhammad Zafar Khan Tahirkheli, ASC**, to appear, plead, act, compromise, withdraw or refer to arbitration for me / us as my / our counsels / advocates in the above noted matter, without any liability for his default and with the authority to engage any other Advocate / Counsel at my / our cost.

The Client / Litigant will ensure his presence before the Court on each and every date of hearing and the counsel would not be responsible if the case is proceeded ex-parte or is dismissed in default of appearance. All cost awarded in favour shall be the right of Counsel or his nominee, and if awarded against shall be payable by me/us.

I / We authorize the said Advocates to withdraw and receive on my / our behalf all sums and amounts payable or deposited on my / our account in the above noted matter.


Client


M. Zafar Khan Tahirkheli

Attested & Accepted (Advocates)

Dated 13-01-2023

Office **ATIQU LAW ASSOCIATES,**
87, Al-Falah Street, Besides State Life Building,
Peshawar Cantt, Phone: 091-5279529
E-mail : zafark.advocate@gmail.com