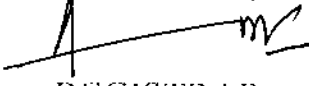


## FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ **148/2023**

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge   |
|-------|---------------------------|--|
| 1     | 2                         | 3  |
| 1-    | 17/1/2023                 | <p>The appeal of Mst. Faiza Rafique presented today by Mr. Muhammad Arshad Khan Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Parcha Peshi is given to appellant/counsel.</p> <p>By the order of Chairman</p> <p><br/>REGISTRAR</p> |

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

Service Appeal No. 148 /2023

Faiza Rafique (Lab Attendant), Government Girls High School, Salhad,  
Tehsil and District, Abbottabad.

....APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director Secondary & Elementary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Abbottabad.

....RESPONDENTS

**SERVICE APPEAL**

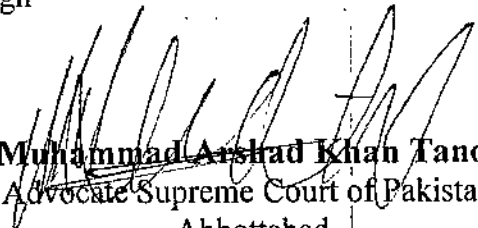
**INDEX**

| S.# | Description   | Page No. | Annexure |
|-----|---|----------|----------|
| 1.  | Service appeal along with affidavit                 | 1 to 7   |          |
| 2.  | Copy of appointment order 20.05.2020                | 8 to 17  | "A"      |
| 3.  | Copy of removal from service order dated 18.10.2021 | 18 to 19 | "B"      |
| 4.  | Copy of re-instatement order dated 01.07.2022       | 20 to 21 | "C"      |
| 5.  | Copy of Departmental Appeal                         | 22 to 26 | "D"      |
| 6.  | Wakalatnama.  | 27       |          |

Faiza  
....APPELLANT

Through

Dated: \_\_\_\_\_/2023

  
(Muhammad Arshad Khan Tanoli)  
Advocate Supreme Court of Pakistan,  
Abbottabad

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

Service Appeal No. 1148 /2023

Faiza Rafique (Lab Attendant), Government Girls High School, Salhad,  
Tehsil and District, Abbottabad.

....APPELLANT

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director Secondary & Elementary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Abbottabad.

....RESPONDENTS

**SERVICE APPEAL UNDER SECTION 4 OF KPK  
SERVICE TRIBUNAL ACT 1974, FOR  
DECLARATION TO THE EFFECT THAT THE  
APPELLANT WAS REMOVED FROM SERVICE  
ON 18.10.2021 AND THEREAFTER, INQUIRY  
WAS CONDUCTED BY THE RESPONDENT  
DEPARTMENT AND FINALLY, THE  
APPELLANT HAS BEEN RE-INSTATED IN  
SERVICE VIDE ORDER DATED 01.07.2022 AND  
INTERVENING PERIOD W.E.F. 19.10.2021 TO**

30.06.2022 I.E. 8 MONTHS AND 11 DAYS HAVE BEEN CONVERTED INTO EXTRA ORDINARY LEAVE, WHICH IS ILLEGAL AND AGAINST THE LAW, AS THE APPELLANT HAS BEEN EXONERATED BY THE INQUIRY OFFICER. THEREFORE, CONVERTING OF PERIOD OF 08 MONTHS AND 11 DAYS INTO EXTRA ORDINARY LEAVE IS NOT MAINTAINABLE AT LAW.

---

**PRAYER:** ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, IMPUGNED RE-INSTATEMENT ORDER DATED 01.07.2022 TO THE EXTENT OF CONVERSION OF PERIOD OF EXTRA ORDINARY LEAVE W.E.F. 19.10.2021 TO 30.06.2022 MAY GRACIOUSLY BE SET-ASIDE AND RESPONDENTS' DEPARTMENT MAY BE DIRECTED TO MAKE PAYMENT OF SALARY FOR THE SAID PERIOD TO THE APPELLANT. ANY OTHER RELIEF WHICH THE HON'BLE TRIBUNAL DEEM APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

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Respectfully Sheweth: -

Following are the facts, giving rise to the instant service appeal;-

1. That, appellant is serving in the respondents' department as Lab Attendant w.e.f. 20.05.2020. Copy of appointment order 20.05.2020 of the appellant is attached as Annexure "A".
2. That the appellant was removed from service on 18.10.2021 on the so-called charges of video viral on social media against the Head Mistress and Junior Clerk of the Government Girls School, Dheri Maira. The removal from service of the appellant was the result of an ex-parte proceedings. Copy of the impugned removal from service order dated 18.10.2021 of the appellant is attached as Annexure "B".
3. That, thereafter appellant filed Departmental Appeal on the basis of which an inquiry was conducted by the respondents and ultimately on the basis of inquiry report, the appellant has been re-instated in service w.e.f. 01.07.2022 with

further direction that intervening period w.e.f. removal from service to re-instatement has been converted into extra ordinary leave. Copy of re-instatement order dated 01.07.2022 is attached as Annexure "C".

4. That again, the appellant filed Departmental Appeal against the impugned order to the extent of Extra Ordinary Leave vide Departmental Appeal dated 18.10.2022. Copy of Departmental Appeal is attached as Annexure "D".

### GROUNDS

1. That, the re-instatement order to the extent of conversion of period of service w.e.f. 19.10.2021 to 30.06.2022 into Extra Ordinary Leave is illegal, perverse, discriminatory and to the extent of the same is liable to be set-aside.
2. That, the appellant has been exonerated from so-called charges and has been declared innocent. Therefore, period of Extra Ordinary Leave is to be converted into regular service.

3. That, the appellant was illegally removed from service due to mala-fide on the part of the concerned Head Mistress as well as Junior Clerk of the school. When an employee is illegally removed from service then, all the benefits which are admissible during the period of removal to the period of re-instatement is to be counted towards the service. Therefore, the appellant is eligible to receive payment for the period which has been converted into Extra Ordinary Leave.
4. That, the matter relates to the terms and condition of service. Therefore, the Hon'ble Service Tribunal has jurisdiction to entertain the instant Service Appeal under Article 212 of the Constitution of Islamic Republic of Pakistan 1973.

### **PRAYER**

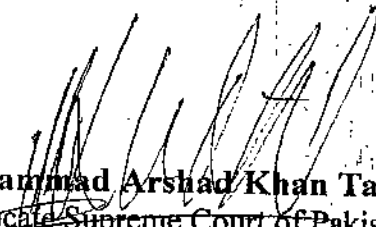
On acceptance of the instant service appeal, impugned re-instatement order dated 01.07.2022 to the extent of conversion of period of Extra Ordinary Leave w.e.f. 19.10.2021 to 30.06.2022 may graciously be set-aside and respondents' department may be directed to make payment of salary for the

said period to the appellant. Any other relief which the Hon'ble tribunal deem appropriate in the circumstances of the case may also be granted to the appellant.

*Faiz*  
... APPELLANT

Dated: \_\_\_\_\_/2023

Through

  
(Muhammad Arshad Khan Tanoli)  
Advocate Supreme Court of Pakistan,  
Abbottabad.

**VERIFICATION:-**

*Verified on oath that the contents of forgoing comments are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court*

*Faiz*  
...APPELLANT



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

Service Appeal No. \_\_\_\_\_/2023

Faiza Rafique (Lab Attendant), Government Girls High School, Salhad,  
Tehsil and District, Abbottabad.

....APPELLANT

VERSUS

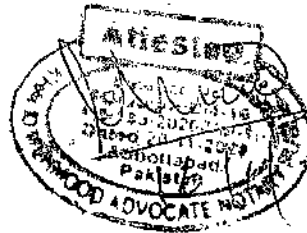
1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director Secondary & Elementary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Abbottabad.

....RESPONDENTS

**SERVICE APPEAL**

**AFFIDAVIT**

I, Faiza Rafique daughter of Mushtaq Ahmad, resident of Dheri Maira, Tehsil and District, Abbottabad, presently, Lab Attendant, Government Girls High School, Salhad, Tehsil and District, Abbottabad, do hereby solemnly affirm and declare that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



*Faiza*  
DEPONENT

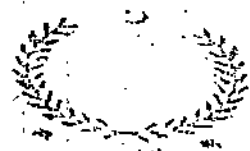
OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)



ABBOTTABAD

No. 2502-04 Dated 30-05-2020

Ph. No. 0992-342533, 342314



NOTIFICATION

Consequent upon the recommendation on the District Selection Committee & under the provision of sub rule (4) of rule 10 of the Khyber Pakhtunkhwa Civil Servant (appointment Promotion & Transfer) Rules 1989. The following candidates in in 70% open Merit 25% Employee Son Quota 02% Disable Quota 03 % Minority Quota are hereby appointed in BPS BPS-03 @- Rs.9610-390-21310 plus usual allowance as admissible under the rules against vacant post noted against each in the interest of Public Service with the following terms & conditions with immediate effect.

| S. No | Name of Applicant       | Father Name            | D.O.B      | Name of Post | Name of School where appointed | Remarks |
|-------|-------------------------|------------------------|------------|--------------|--------------------------------|---------|
| 1     | Muhammad Nawaz          | Muhammad Iqbal         | 01.7.1982  | Chowkidar    | GGPS Grang                     | A.V.P   |
| 2     | Muhammad Munawar Abbasi | Muhammad Abbas Khan    | 8.5.1990   | N/Qasid      | GGHSS Lora                     | A.V.P   |
| 3     | Manzoor Ahmed           | Pir Muhammad           | 01.7.1983  | N/Qasid      | GGMS Upper Kurli               | A.V.P   |
| 4     | Naeem Bibi              | Wajid Ai               | 01.01.1986 | Sweeper      | GGMS Upper Kurli               | A.V.P   |
| 5     | Noman Ali Abbasi        | Ali Asghar             | 20.11.1991 | N/Qasid      | GGMS Bassain                   | A.V.P   |
| 6     | Zain ul Abidin          | Abdul Rashid           | 23.3.1995  | Chowkidar    | GGPS Da No, 1                  | A.V.P   |
| 7     | Zain ul Abidin          | Mujeeb ur Rehman       | 6.9.1998   | Chowkidar    | GGPS Birote                    | A.V.P   |
| 8     | Bilal Ahmed             | Muhammad Naeem         | 7.4.1991   | Chowkidar    | GGHS Barbeen                   | A.V.P   |
| 9     | Mumtaz Ahmed            | Iltaf Hussain          | 9.5.1980   | Chowkidar    | GGPS Kiyani Bakote             | A.V.P   |
| 10    | Nasir Rashid Abbasi     | Muhammad Rashid        | 26.01.1980 | Chowkidar    | GGPS Ali Abad                  | A.V.P   |
| 11    | Muhammad Shoaib         | Abdul Qayyum           | 20.4.1997  | Chowkidar    | GGPS Lower Kurli               | A.V.P   |
| 12    | Humaira Ghulam          | Ghulam Qadir           | 13.01.1984 | N/Qasid      | SDEO (F) Lora                  | A.V.P   |
| 13    | Shazad Sohail           | Muhammad Sohail        | 15.3.1987  | Chowkidar    | GGPS Zirat Bakote              | A.V.P   |
| 14    | Mohsin Abbasi           | Muhammad Mumtaz Abbasi | 4.3.1990   | Chowkidar    | GGPS Bhattian                  | A.V.P   |
| 15    | Asad Saleem             | Muhammad Saleem        | 13.01.1999 | Sweeper      | GGMS Pattan Khurd              | A.V.P   |

Advocate Anshul Kumar  
Advocate Supriya  
Office # 30, Jinnah Road, Abbottabad  
District Office, Abbottabad

SOHAIL  
BOOKS & PHOTOSTATE  
Jinnah Road, Abbottabad

|    |                      |                      |            |            |                         |       |
|----|----------------------|----------------------|------------|------------|-------------------------|-------|
| 16 | Waqar Gohar          | Gohar Rehman         | 01.6.1997  | Chowkidar  | GGHS Phallah            | A.V.P |
| 17 | Haris Mujeeb         | Mujeeb ur Rehman     | 14.8.1996  | Chowkidar  | SDEO(F) Lora            | A.V.P |
| 18 | Ammar Ali Khan       | Gohar Habib          | 8.9.1989   | N/Qasid    | GGHS Phallah            | A.V.P |
| 19 | Zahid Bashir         | Muhammad Bashir      | 01.01.1980 | Chowkidar  | GGPS Seri Khan          | A.V.P |
| 20 | Muhammad Umer        | Ghulam Safder        | 22.12.1995 | Chowkidar  | GGHSS Lora              | A.V.P |
| 21 | Ayesha Jamshed       | Jamshed Abbasi       | 25.12.1979 | L/Attend:  | GGHS Phallah            | A.V.P |
| 22 | Faisal Khan          | Sakhi Zaman          | 03.4.1987  | Chowkidar  | GGPS Jansa              | A.V.P |
| 23 | Zahid Hussain        | Mirdad               | 11.3.1990  | Chowkidar  | GGPS Narrian            | A.V.P |
| 24 | Azmat Khan           | Daryafat Khan        | 10.5.1993  | N/Qasid    | GGHSS Ghari Phugran     | A.V.P |
| 25 | Shazada Fahad        | Syed Ali Haider      | 4.8.1980   | Chowkidar  | GGHS Rajoya             | A.V.P |
| 26 | Rab Nawaz Khan       | Khan Muhammad        | 20.4.1983  | Naib Qasid | GGMS Langrial           | A.V.P |
| 27 | Muhammad Jamil       | Aurangzeb            | 01.7.1981  | Chowkidar  | GGPS Uper Beran Gali    | A.V.P |
| 28 | Muhammad Asif        | Sardar Muhammad Ayub | 25.3.1988  | Chowkidar  | GGPS Jastar             | A.V.P |
| 29 | Muhammad Rashid Khan | Rustam Khan          | 14.4.1989  | N/Qasid    | GGMS Akhreela           | A.V.P |
| 30 | Gul Khan             | Chanon               | 20.02.1999 | Chowkidar  | GGPS Kangar Wali Masjid | A.V.P |
| 31 | Shahzad Ahmed        | Lal Khan             | 03.3.1987  | Chowkidar  | GGPS Phalkot            | A.V.P |
| 32 | Waqas Javed          | Muhammad Javed       | 10.02.1994 | Chowkidar  | GC Mallach              | A.V.P |
| 33 | Yasir Khan           | Sarwar Khan          | 01.10.1981 | N/Qasid    | GGHSS Dhamtour          | A.V.P |
| 34 | Saima Naz            | Iftikhar Ahmed Khan  | 03.5.1983  | Sweeper    | GGMS Sarbana            | A.V.P |
| 35 | Mahaz Ali Jadoon     | Riaz Khan            | 03.02.1996 | N/Qasid    | GGHSS Dhamtour          | A.V.P |
| 36 | Ghozala Bibi         | Imtiaz Ahmed         | 11.4.1995  | L/Attend   | GGHSS Keri Raiki        | A.V.P |
| 37 | Abdul Khaliq         | Muso Khan            | 23.3.1982  | Chowkidar  | GGPS Kassian            | A.V.P |
| 38 | Nuheed Gul           | Muhammad Nazir       | 12.5.1987  | N/Qasid    | GGHS Rajoya             | A.V.P |
| 39 | Sardar Sajjad        | Sardar Chan Muhammad | 08-08-1985 | Chowkidar  | GGPS Chehr              | A.V.P |
| 40 | Agho Hafiz           | Hafiz ur Rehman      | 01.01.2000 | Chowkidar  | GGPS Keri Raiki         | A.V.P |
| 41 | Surat Jan            | Shoukat Khan         | 02.02.1982 | Sweeper    | GGMS Langiral           | A.V.P |
| 42 | Jhamshed Khan        | Ali Ashgar           | 7.4.1984   | Chowkidar  | GGPS Aziz Bang          | A.V.P |
| 43 | Abdul Waheed         | Bin Yamin            | 02.02.1981 | Chowkidar  | GGPS Riyala             | A.V.P |

15/2020

Attest

Advocate Arshad Khan  
Office: Minah Plaza Adjacent to  
District Bar, Abbottabad

|    |                 |                      |            |           |                       |       |
|----|-----------------|----------------------|------------|-----------|-----------------------|-------|
| 44 | Zahid           | Juma Khan            | 25.02.1984 | N/Qasid   | GGMS Desal            | A.V.P |
| 45 | Sadia Gul       | Muhammad Arshad Khan | 10.7.1994  | Sweeper   | GGMS Akhreeela        | A.V.P |
| 46 | Muhammad Saeed  | Muhammad Shazad      | 15.02.1996 | Chowkidar | GGPS                  | A.V.P |
| 47 | Nadeela Begum   | Abdul Rashid         | 16.4.1986  | N/Qasid   | GGHS Ghari Phulgran   | A.V.P |
| 48 | Noman Salah     | Muhammad Salah       | 10.3.1984  | N/Qasid   | GGMS Hirlian          | A.V.P |
| 49 | Niaz            | Zain Muhammad        | 03.4.1986  | Chowkidar | GGPS Chattri          | A.V.P |
| 50 | Malik Sajid     | Maqsood ur Rehman    | 5.4.1979   | N/Qasid   | GGMS Tatreela         | A.V.P |
| 51 | Sulman Khan     | Sharfat Khan         | 9.01.1999  | N/Qasid   | GGHS Havelian Village | A.V.P |
| 52 | Bilal           | Khanwaiz             | 21.4.1994  | Chowkidar | GGPS Salwala          | A.V.P |
| 53 | Tahir Shafiq    | Muhammad Shafiq      | 12-05-1992 | Chowkidar | GGPS Manjia           | A.V.P |
| 54 | Wajid Ali       | Abdul Rehman         | 18.4.1993  | Chowkidar | GGHS Panjgran         | A.V.P |
| 55 | Qaiser Ali      | Sarwar Khan          | 01.4.1985  | Chowkidar | GGPS Ghari Phulgran   | A.V.P |
| 56 | Chaman Bibi     | Malik Mehban         | 03.04.1985 | Chowkidar | GGPS Mangal           | A.V.P |
| 57 | Faiza Rafeq     | Muhammad Rafeq       | 15.5.1980  | L/Attend  | GGHS Dheri Maira      | A.V.P |
| 58 | Nazakat Ali     | Muhammad Yaqoob      | 01.01.1989 | Chowkidar | GGPS Jandaka          | A.V.P |
| 59 | Mazhar Jadoor   | Sarwar Khan          | 01.10.1987 | Chowkidar | GGPS Tannan           | A.V.P |
| 60 | Muhammad Fiyaz  | Abdur Rehman         | 01.5.1983  | Chowkidar | GGHS Dheri Malra      | A.V.P |
| 61 | Abdul Rauf      | Abdul Wahid          | 02.01.1989 | Chowkidar | GGPS Juna Chamati     | A.V.P |
| 62 | Aurangzab       | Chand Muhammad       | 4.02.1989  | N/Qasid   | GGMS Thati Ahmed Khan | A.V.P |
| 63 | Noreen Bibi     | Muhammad Aftab       | 25.10.1982 | Sweeper   | GGHS Bandi Phullah    | A.V.P |
| 64 | Muhammad Atlas  | Muhammad Hanif       | 15.01.1998 | Chowkidar | GGPS Fathe Bandi      | A.V.P |
| 65 | Fawad Umer Khan | Sher Afzal Khan      | 6.6.1992   | Chowkidar | GGPS Gandian          | A.V.P |
| 66 | Fozia Bibi      | Jahanzeb Khan        | 30.01.1989 | Sweeper   | GGMS Thati Ahmed Khan | A.V.P |
| 67 | Alamger Afsar   | Lal Afsar            | 11.12.1988 | N/Qasid   | GGMS (Lower)          | A.V.P |
| 68 | Muhammad Nisar  | Dost Muhammad        | 01.01.1980 | L/Attend  | GGHS Bandi Dhundan    | A.V.P |
| 69 | Aamir Hanif     | Muhammad Hanif       | 3.10.1993  | N/Qasid   | GGHS Bandi Phullah    | A.V.P |
| 70 | Rehana Iqbal    | Muhammad Iqbal       | 15.3.1983  | L/Attend  | GGCHSS Atd            | A.V.P |
|    | Khuram Shazad   | Sikandar Khan        | 15.02.1981 | Chowkidar | GGPS Banda Dilzak     | A.V.P |
| 72 | Arbaz Khan      | Shamraiz Khan        | 9.10.2000  | N/Qasid   | GGHS Mir Pur          | A.V.P |

Attested  
 Advocate Supreme Court of Pakistan  
 Office: 53 Union Plaza Adhama Road  
 Abbottabad

(10)

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|    |               |                  |            |           |                 |       |
|----|---------------|------------------|------------|-----------|-----------------|-------|
| 73 | Abid Ali Khan | Khan Afsar Khan  | 7.8.1985   | N/Qasid   | GGHS Ghumawan   | A.V.P |
| 74 | Ch: Wasif Ali | Muhammad Shoukat | 25.2.2000  | Chowkidar | GGPS Maira Tall | A.V.P |
| 75 | Anas          | Sageer Ahmed     | 29.01.1997 | Sweeper   | GGPS Samisar    | A.V.P |
| 76 | Naveed Hameed | Abdul Hamid Khan | 10.8.1982  | Chowkidar | GGPS City Atd   | A.V.P |

Employee Son Quota

| S. No | Name of Applicant      | Father Name              | D.O.B      | Name of Post | Name of School where appointed | Remarks |
|-------|------------------------|--------------------------|------------|--------------|--------------------------------|---------|
| 1     | Shaheen Akhter         | Muhammad Yousaf          | 12.01.1981 | Sweeper      | GGMS Desal                     | A.V.P   |
| 2     | Lubna Bibi             | Babar Shahzid            | 24.11.1991 | Sweeper      | GGMS Bassiar                   | A.V.P   |
| 3     | Yasir Muzzamal         | Muzzamal Din             | 10.04.1984 | Chowkidar    | GGPS Maira Madroch             | A.V.P   |
| 4     | Malik Abdul Qadir      | Abdur Rashid             | 30.12.1989 | N/Qasid      | SDEO (F) Havelian              | A.V.P   |
| 5     | Ghazala Bibi           | Muhammad Saleem Khan     | 08.07.1985 | Sweeper      | GGHS Chamhad                   | A.V.P   |
| 6     | Wasim Akhtar           | Gul Muhammad             | 15.05.1980 | Chowkidar    | GGPS Banota                    | A.V.P   |
| 7     | Adil Shahzad           | Abdur Rashid Abasi       | 12.02.1980 | N/Qasid      | GGMS Pattan Khurd              | A.V.P   |
| 8     | Abid Ali               | Jehandad Khan            | 03.03.1984 | Chowkidar    | GGPS Gambeer                   | A.V.P   |
| 9     | Nasir Ahmed            | Abdur Rashid             | 07.09.1997 | Chowkidar    | GGPS Gali Bonnion              | A.V.P   |
| 10    | Nazish Bibi            | Munsif Khan              | 01.03.1992 | Sweeper      | GGHS Bandi Maira               | A.V.P   |
| 11    | Tousef Hussain Shah    | Syed Shorab Hussain Shah | 17.04.1987 | Chowkidar    | GGPS Beerot                    | A.V.P   |
| 12    | Muhammad Ishtiaq       | Muhammad Zaman           | 01.01.1993 | Chowkidar    | GGPS Kagion                    | A.V.P   |
| 13    | Muhammad Naseer        | Abdullah Jan             | 25.3.1993  | Chowkidar    | SDEO (F) Lower Tanawal         | A.V.P   |
| 14    | Sardar Muhammad Fiaz   | Aurangzib                | 17.01.1989 | Chowkidar    | GGPS Havelian Station          | A.V.P   |
| 15    | Syed Shujahat Ali Shah | Chan Pir Shah            | 12.12.1980 | Chowkidar    | GGPS Jhangi                    | A.V.P   |
| 16    | Sagheer Ahmed          | Nazar Muhammad           | 03.03.1982 | Chowkidar    | GGPS Mangion                   | A.V.P   |
| 17    | Sadia Bibi             | Muhammad Sultan          | 13.03.1990 | N/Qasid      | SDEO (F) Atd                   | A.V.P   |

Attested

Muhammad Arshad Khan  
 Assistant Systems Officer of Pakistan  
 Office No. 10, Main Plaza, Abbottabad  
 District Bar, Abbottabad

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|    |               |                  |            |           |                 |       |
|----|---------------|------------------|------------|-----------|-----------------|-------|
| 73 | Abid Ali Khan | Khan Afsar Khan  | 7.8.1985   | N/Qasid   | GGHS Ghumawan   | A.V.P |
| 74 | Ch: Wasif Ali | Muhammad Shoukat | 25.2.2000  | Chowkidar | GGPS Maira Tall | A.V.P |
| 75 | Anas          | Sageer Ahmed     | 29.01.1997 | Sweeper   | GGPS Samisar    | A.V.P |
| 76 | Naveed Hameed | Abdul Hamid Khan | 10.8.1982  | Chowkidar | GGPS City Atd   | A.V.P |

Employee Son Quota

| S. No | Name of Applicant      | Father Name              | D.O.B      | Name of Post | Name of School where appointed | Remarks |
|-------|------------------------|--------------------------|------------|--------------|--------------------------------|---------|
| 1     | Shaheen Akhter         | Muhammad Yousaf          | 12.01.1981 | Sweeper      | GGMS Desal                     | A.V.P   |
| 2     | Lubna Bibi             | Babar Shahzid            | 24.11.1991 | Sweeper      | GGMS Bassian                   | A.V.P   |
| 3     | Yasir Muzzamal         | Muzzamal Din             | 10.04.1984 | Chowkidar    | GGPS Maira Madrach             | A.V.P   |
| 4     | Malik Abdul Qadir      | Abdur Rashid             | 30.12.1989 | N/Qasid      | SDEO (F)Havelian               | A.V.P   |
| 5     | Ghazala Bibi           | Muhammad Saleem Khan     | 08.07.1985 | Sweeper      | GGHS Chomhad                   | A.V.P   |
| 6     | Wasim Akhtar           | Gul Muhammad             | 15.05.1980 | Chowkidar    | GGPS Banota                    | A.V.P   |
| 7     | Adil Shahzad           | Abdur Rashid Abasi       | 12.02.1980 | N/Qasid      | GGMS Pattan Khurd              | A.V.P   |
| 8     | Abid Ali               | Jehondad Khan            | 03.03.1984 | Chowkidar    | GGPS Gambeer                   | A.V.P   |
| 9     | Nasir Ahmed            | Abdur Rashid             | 07.09.1997 | Chowkidar    | GGPS Gall Bannan               | A.V.P   |
| 10    | Nazish Bibi            | Munsif Khan              | 01.03.1992 | Sweeper      | GGHS Bandi Maira               | A.V.P   |
| 11    | Tousef Hussain Shah    | Syed Shorab Hussain Shah | 17.04.1987 | Chowkidar    | GGPS Beerot                    | A.V.P   |
| 12    | Muhammad Ishtiaq       | Muhammad Zaman           | 01.01.1992 | Chowkidar    | GGPS Kagian                    | A.V.P   |
| 13    | Muhammad Naseer        | Abdullah Jan             | 25.3.1993  | Chowkidar    | SDEO (F) Lower Tanawal         | A.V.P   |
| 14    | Sardar Muhammad Fiaz   | Aurangzib                | 17.01.1989 | Chowkidar    | GGPS Havelian Station          | A.V.P   |
| 15    | Syed Shujahat Ali Shah | Chan Pir Shah            | 12.12.1980 | Chowkidar    | GGPS Jhangi                    | A.V.P   |
| 16    | Sagheer Ahmed          | Nazar Muhammad           | 03.03.1982 | Chowkidar    | GGPS Mangian                   | A.V.P   |
| 17    | Sadia Bibi             | Muhammad Sultan          | 13.03.1990 | N/Qasid      | SDEO (F)Atd                    | A.V.P   |

Attested

Office of the  
District Bar, Abbottabad

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|    |               |                  |            |           |                 |       |
|----|---------------|------------------|------------|-----------|-----------------|-------|
| 73 | Abid Ali Khan | Khan Afsar Khan  | 7.8.1985   | N/Qasid   | GGHS Ghumawan   | A.V.P |
| 74 | Ch: Wasif Ali | Muhammad Shoukat | 25.2.2000  | Chowkidar | GGPS Maira Tall | A.V.P |
| 75 | Anas          | Sageer Ahmed     | 29.01.1997 | Sweeper   | GGPS Samisar    | A.V.P |
| 76 | Naveed Hameed | Abdul Hamid Khan | 10.8.1982  | Chowkidar | GGPS City Atd   | A.V.P |

Employee Son Quota

| S. No. | Name of Applicant      | Father Name              | D.O.B      | Name of Post | Name of School where appointed | Remarks |
|--------|------------------------|--------------------------|------------|--------------|--------------------------------|---------|
| 1      | Shaheen Akhter         | Muhammad Yousaf          | 12.01.1981 | Sweeper      | GGMS Desal                     | A.V.P   |
| 2      | Lubna Bibi             | Babar Shahzid            | 24.11.1991 | Sweeper      | GGMS Bassian                   | A.V.P   |
| 3      | Yasir Muzzamal         | Muzzamal Din             | 10.04.1984 | Chowkidar    | GGPS Maira Madroch             | A.V.P   |
| 4      | Malik Abdul Qadir      | Abdur Rashid             | 30.12.1989 | N/Qasid      | SDEO (F) Havelian              | A.V.P   |
| 5      | Ghazala Bibi           | Muhammad Saleem Khan     | 08.07.1985 | Sweeper      | GGHS Chamhad                   | A.V.P   |
| 6      | Wasim Akhtar           | Gul Muhammad             | 15.05.1980 | Chowkidar    | GGPS Banota                    | A.V.P   |
| 7      | Adil Shahzad           | Abdur Rashid Abasi       | 12.02.1980 | N/Qasid      | GGMS Patton Khurd              | A.V.P   |
| 8      | Abid Ali               | Jehandad Khan            | 03.03.1984 | Chowkidar    | GGPS Gamber                    | A.V.P   |
| 9      | Nasir Ahmed            | Abdur Rashid             | 07.09.1997 | Chowkidar    | GGPS Gali Bannian              | A.V.P   |
| 10     | Nazish Bibi            | Munsif Khan              | 01.03.1992 | Sweeper      | GGHS Bandi Mairo               | A.V.P   |
| 11     | Tousef Hussain Shah    | Syed Shorob Hussain Shah | 17.04.1987 | Chowkidar    | GGPS Be...                     | A.V.P   |
| 12     | Muhammad Ishtiaq       | Muhammad Zaman           | 01.01.1993 | Chowkidar    | GGPS Kagian                    | A.V.P   |
| 13     | Muhammad Naseer        | Abdullah Jan             | 25.3.1993  | Chowkidar    | SDEO (F) Lower Tanawal         | A.V.P   |
| 14     | Sardar Muhammad Fiaz   | Aurangzib                | 17.01.1989 | Chowkidar    | GGPS Havelian Station          | A.V.P   |
| 15     | Syed Shujahot Ali Shah | Chan Pir Shah            | 12.12.1980 | Chowkidar    | GGPS Jhangi                    | A.V.P   |
| 16     | Sagheer Ahmed          | Nazar Muhammad           | 03.03.1982 | Chowkidar    | GGPS Mangian                   | A.V.P   |
| 17     | Sadia Bibi             | Muhammad Sultan          | 13.03.1990 | N/Qasid      | SDEO (F) Atd                   | A.V.P   |

Attested

Muhammad Arshad Khan  
Advocate Supreme Court of Pakistan  
Office # 13, Avenue Plaza Adjacent to  
District Bar, Abbottabad

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|    |                |                      |            |           |                        |       |
|----|----------------|----------------------|------------|-----------|------------------------|-------|
| 18 | Tahir Mehmood  | Muhammad Ramzan      | 8.10.1992  | Chowkidar | GGPS Batkanala         | A.V.P |
| 19 | Rahees Loadi   | Muhammad Bashir Khan | 10.1.1999  | Sweeper   | GGMS Pawa              | A.V.P |
| 20 | Wajid Hussain  | Muhammad Akram       | 01.09.1998 | Chowkidar | GGPS Lakhla            | A.V.P |
| 21 | Rafaqat Ali    | Abdul Shakoar        | 15.08.1987 | N/Qasid   | GGMS Narhoo            | A.V.P |
| 22 | Niaz Muhammad  | Shahia               | 13.12.1981 | Chowkidar | GGPS S...              | A.V.P |
| 23 | Ahmed Ali      | Roshan Din           | 01.02.1981 | Chowkidar | GGPS Bandi Maira       | A.V.P |
| 24 | Awais Alimed   | Ahmed Hussain        | 29.12.1994 | Chowkidar | GGPS Langrial          | A.V.P |
| 25 | Abdul Satar    | Muhammad Rafique     | 12.04.1989 | Sweeper   | GGHS Khanis Pur Ayudal | A.V.P |
| 27 | Khayam Asif    | Muhammad Asif Abasi  | 02.12.1991 | N/Qasid   | GGMS Kalas             | A.V.P |
| 28 | Muhammad Sadan | Muhammad Ilyas       | 01.04.1996 | Chowkidar | GGHS Sумандар Kotha    | A.V.P |

**Minority 03% Quota**

| S. No | Name of Applicant | Father /Husband Name | D.O.B     | Name of Post | Name of School where appointed | Remarks |
|-------|-------------------|----------------------|-----------|--------------|--------------------------------|---------|
| 1     | Irfan Gil         | Bashir Gil           | 15.5.1999 | Chowkidar    | GGMS Battian                   | A.V.P   |
| 2     | Ehtisham Dilawar  | Dilawar Mashi        | 23.9.1996 | Chowkidar    | GGPS Bandi Mansoor             | A.V.P   |

**Disable 02% Quota**

| S. No | Name of Applicant | Father /Husband Name | D.O.B     | Name of Post | Name of School where appointed | Remarks |
|-------|-------------------|----------------------|-----------|--------------|--------------------------------|---------|
| 1     | Shabena Bibi      | Sahian Muhammad      | 17.5.1977 | Sweeper      | GGCMS Nawar Sher               | A.V.P   |
| 2     | Shoukat Ali       | Malik Muhammad Akrom | 20.3.1978 | Chowkidar    | GGPS Parangooth                | A.V.P   |
| 3     | Abdul Raheem      | Muhammad Jamil       | 26.3.1989 | L/Attend     | GGHS Barbeer                   | A.V.P   |

*Attested*

Advocate Supreme Court of Pakistan  
Office # 33, Jinnah Plaza Adjacent to  
District Bar, Abbottabad

**SOFATIL**  
BOOKS & PHOTOSTATE  
Link Road Band Kha, Abbottabad  
Cell: 0344-9443494, 0334-8997928



(12)

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TERMS & CONDITIONS

1. Their services will be considered as regular and they will be entitled to contribute towards GPS instead of CPF with reference to Govt. of Khyber Pakhtunkhwa Finance Department Notification No, SOSR-III/FD/12-1/2005 Dated 27-02-2013.
2. Their services are liable to termination on one month notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the government.
3. The appointees should join their posts within 15 days of the issuance of this of the notification. In case of failure to join their posts the appointment will expire automatically and no subsequent appeal etc shall be entertained.
4. They will be on probation for a period of one year extendable for another one year in case their performance found satisfactory.
5. They will be govern by such rules and regulation as may be issued from time to time by the government.
6. The service of appointee can be terminated at any time in case their performance is found unsatisfactory during probationary period. In case of misconduct, they will be preceded under the rules framed from time to time and will be terminated without issuing any notice.
7. Charge report should be submitted to all concerned.
8. The DDO concerned would furnish a certificate to the effect that the candidate has joined the post within the prescribed period 15 days.
9. The candidate concerned will provide age and health certificate from the Medical Superintendent DHQ Abbottabad.
10. The age limit for appointment of C-IV is 18 to 40 years, the DDO/HM concerned is directed that he will not handed over charge of the post if their age limit is less than 18 years or above 40 years.
11. No TA/DA is allowed to them for joining duty.

*Handwritten signature*

*Handwritten signature*

DISTRICT EDUCATION OFFICER  
(Female) ABBOTTABAD.

*Handwritten initials*

Endst: of Even No & Date

Copy for information to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Abbottabad.
3. District Account Office Abbottabad.
4. District Monitoring Office Abbottabad.
5. All Principal/HM/SDEO (F) District Abbottabad.
6. Officials Concerned.
7. Office File.

*Handwritten signature*

*Handwritten signature*

DISTRICT EDUCATION OFFICER  
(Female) ABBOTTABAD.

Arshad Khan  
Advocate Supreme Court of Pakistan  
Office No. 33, Jinnah Plaza Adjacent to  
District Bar Abbottabad

**SOFIA**  
BOOKS & PHOTOSTATE  
Link Road Band Kho Abbottabad  
Cell: 0344-8443984, 0334-9997938

16

5

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**CERTIFICATE OF TRANSFER OF CHARGE**

Certified that we have on the fore-noon of this day i.e. 31-05-2020 respectively made over and received charge of this office of the Head Mistress, Govt Girls High School Dheri Maira Abbottabad for L/Attend. Particulars of cash and important secret and confidential documents handed over are noted on the reverse.

Signature of Relieved: \_\_\_\_\_  
Government Servant: \_\_\_\_\_  
Designation: \_\_\_\_\_  
Post Vacant: \_\_\_\_\_  
L/Attend

**STATION: GGHS Dheri Maira (Abbottabad)**

Signature of: Faiza  
Government Servant: Faiza Rafique  
Designation: L/Attend

Endst: No. \_\_\_\_\_ / Dated GGHS Dheri Maira the \_\_\_\_\_ / \_\_\_\_\_ / 2020.

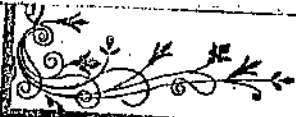
Copy of the above is submitted to the following Officers for information and favour of further necessary action please.

1. District Accounts Officer Abbottabad.
2. District Education Officer (Female) Abbottabad.
3. Official Concerned.
4. Office Record.

*Faiza*  
Headmistress  
GGHS Dheri Maira Atd

*Attested*

Muhammad Ali  
Advocate Supreme Court of Pakistan  
Office # 33 Jinnah Plaza Adjacent to  
District Office Abbottabad



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HEALTH & AGE CERTIFICATE

Name of official... FAIZA RAFIQUE

Caste & Race... 13101-4719803-4

Father's Name... w/o MUHAMMAD RAFIQUE

Residence... DHERI MAIRA P/O MUSLIM ABAD

Date of Birth... 15-03-1980

Exact height by measurement... 5.4

Personal marks of identification... Nil

Signature of the official... Faiza

Signature of head of office

Seal of Office

I do hereby certified that I have examined Mr. Faiza Rafique  
a candidate for employment in the office of the DEB (F) Abbottabad  
and can not discover that had any disease commensurable or other constitutional  
Affection or body infirmity except... Nil

I do not consider this as disqualification for employment in the office of the  
DEB (F) PSM His age according to his own statement... (40) years  
and by Appearance about Forty Years.

*Quicker*

*Chauhan*

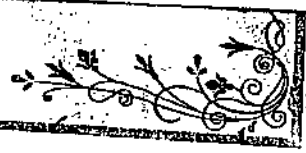
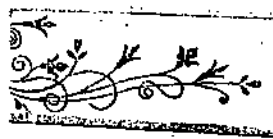
Left hand thumb and  
Fingers Impressions

DATED 11/06/2020

MEADICAL SUPERINTENDENT  
BBS TEACHING HOSPITAL  
ABBOTTABAD  
Med. Teaching Hospital  
Abbottabad

*Attested*

Advocate General of Pakistan  
Office # 23 Jinnah Plaza Adjacent to  
Distt. Bar, Abbottabad



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**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD**



No. 9444-52 / Dated: 18 / 10 / 2021

**ANNEXURE "B"**

☎ 0992-342533, 0992-342314  
✉ Deofemale\_abbottabad@gmail.com

**Notification:**

WHEREAS, Mst. Faiza Rafique (Lab Attendant) GGHS Dheri Maira was proceeded against under the Khyber Pakhtunkhwa Government servant (Efficiency & Disciplinary Rules 2011) for the charge of having willful absent from duty, misconduct, disobedience and inefficiency.

WHEREAS, She was relieved by Head Mistress of GGHS Dheri Maira vide No. 552 Dated 29-07-2021 and placed on the disposal of undersigned, But she failed to join her duty in office of undersigned and remained absent w.e.f 30-07-2021 to 31-08-2021.

WHEREAS, Head Mistress GGHS Dheri Maira submitted report that she locked the door of said school dated 03-08-2021 furthermore, a video viral on social media in which Mst Faiza Rafique (Lab Attendant) is assassinating the characters of Headmistress as well as tarnished the Educational environment of the GGHS Dheri Maira Abbottabad.

WHEREAS, Mst. Faiza Rafique (Lab Attendant) GGHS Dheri Maira was suspended from duty vide No. 7076 dated 03-08-2021 and Mst. Samina Mushtaq, Principal (BPS-20) GGCHSS Abbottabad was appointed as inquiry officer.

WHEREAS, Inquiry officer after having examined the charges/evidence on record and explanation of the accused official has submitted the report vide No. 956 dated 17-08-2021 that the charges leveled against the accused have been proved.

WHEREAS, Charge sheet and Statement of Allegations has been served upon Mst. Faiza Rafique (Lab Attendant) GGHS Dheri Maira Vide No. 7802 dated 31-08-2021 and regular inquiry against the said accused official was conducted, consisting of following members,

1. Mst. Niama Sabahat, Principal GGHS Mirpur.
2. Mst. Khola Javed vice Principal GGCHSS Abbottabad.

WHEREAS, Inquiry committee after having examined the charges/evidence on record and explanation of the accused official has submitted the report vide No. 987 dated 14-09-2021 that the charges leveled against the accused have been proved.

WHEREAS, Showcause notice was served to Mst. Faiza Rafique (Lab Attendant) GGHS Dheri Maira vide No. 8578-80 dated 23-09-2021.

WHEREAS, In respond to her reply of Showcause notice and in compliance with direction to Honorable High Court Peshawar Abbottabad Bench vide order dated 29-09-2021 in Writ petition No. 624 A/2021 provided fair opportunity to concern, She was called for personal hearing vide No. 8909 dated 02-10-2021 in the office of undersigned but she failed to justify, nor she provided any proof regarding charges leveled against her.

AND WHEREAS, The Competent Authority District Education Officer (Female) Abbottabad after having considered the charges and evidence on record, is of the view that the charges levelled against the accused have been proved.

NOW THEREFOR, in exercise of the power conferred under section 14 Khyber Pakhtunkhwa Govt. Servant (Efficiencies and discipline) rule 2011, the District Education Officer (Female) Abbottabad being the competent authority is pleased to impose major penalty of Removal from Service upon Mst. Faiza Rafique (Lab Attendant) GGHS Dheri Maira from the date of her suspension i.e 03-08-2021.

*Muhammad Arshad Khan*  
Advocate  
Office # 12, Minnah Plaza Adjacent to  
Dist. Bar, Abbottabad

*[Signature]*  
District Education Officer  
(Female) Abbottabad 18/10/2021

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ndst No: 9444-52 dated: 18/10/2021

copy of the above is forwarded to:

1. PS to Secretary, Elementary & Secondary Education KPK Peshawar.
2. PS to Director, Elementary & Secondary Education KPK Peshawar.
3. Deputy Commissioner Abbottabad.
4. District Account Officer Abbottabad.
5. District Monitoring Officer (EMA) Abbottabad.
6. Head Mistress GGHS Dheri Maira Abbottabad.
7. Official Concerned.
8. Office file.

*[Signature]*  
 District Education Officer  
 (Female) Abbottabad

18/10/2021

*Albeeshaed*

Abdullah Arshad Khattak  
 District Account Officer  
 District Court of Peshawar  
 District Abbottabad



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.  
E.No. 72/A-200 (IV) Abbottabad Vol-2  
Dated Peshawar the 29 (Jan) 2022 105  
Phone: 091-9225344 Email: ddadamee@gmail.com

To

The District Education Officer  
(Female) Abbottabad

Subject: INQUIRY REPORT IN R/O MR. FAIZA RAFIQUE LAB ATTENDENT  
GGHS DHERI MAIRA ABBOTTABAD

Memo:

I am directed to refer to the subject noted above and to enclose herewith a copy of Enquiry report in r/o Mst Faiza Rafique Lab Attendant GGHS Dheri Maira Abbottabad and to ask you to implement the enquiry recommendations of the enquiry officer.

Assistant Director (Admn)  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst; No. 3644-45

Copy forwarded to the: -

1. Muhammad Tanveer Inquiry Officer DEO (Male) Mansehra w/r to his letter No. 1052 dated 29.1.2022.
2. Mst Faiza Rafique Lab Attendant GGHS Dheri Maira Abbottabad
3. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
4. Master File

Assistant Director (Admn)  
Directorate E& Secondary Education  
Khyber Pakhtunkhwa, Peshawar

*Advised*  
Muhammad Arshad Khan  
Advocate Supreme Court of Pakistan  
Office # 31/Minan Plaza Abbottabad  
District Abbottabad

*o/c*  
E 9/1/22

P: 21

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD**



No. \_\_\_\_\_ / Dated: \_\_\_\_\_ / 2022

☎ 0992-342533, 0992-342314

✉ Deofemale\_abbottabad@gmail.com

**Notification:**

Reference letter No 3643 F. No 72/A-20 (C-IV) Abbottabad vol-2 dated 09-02-2022 and in the light of inquiry report, Mst Faiza Raffique Lab Attendant is hereby reinstated in the service from the date of her "Removal of Service" and adjusted at GGHS Salhad against the post of Lab Attendant further Intervening period w.e.f Removal from Service to Reinstatement may be considered as Extra Ordinary Leave without pay.

**Note:**

1. Necessary entry to this effect should be made in her service book and other record.
2. Charge report should be submitted to all concerned.

*[Signature]*  
District Education Officer  
(Female) Abbottabad

Endst No: 4358-68 dated: 1-7/2022

Copy of the above is forwarded to:

1. Director, Elementary & Secondary Education KPK Peshawar, with reference to letter No 3643 F. No 72/A-20 (C-IV)
2. District Account Officer Abbottabad.
3. District Monitoring Officer Abbottabad.
4. Headmistress GGHS Salhad Abbottabad.
5. Headmistress GGHS Dohr Mira Abbottabad.
6. Official Concerned.
7. Office file.

*[Signature]*  
Muhammad Arshad Khan Talpuri  
Advocate Supreme Court of Pakistan  
Jinnah Plaza Adjacent to  
Distt Bar Abbottabad

*[Signature]*  
District Education Officer  
(Female) Abbottabad

**BEFORE THE DIRECTOR ELEMENTARY AND SECONDARY  
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

P: 22

IN THE MATTER OF

Mst. Faiza Rafique (Lab Attendant), Government Girls High School Dheri  
Maira Tehsil & District Abbottabad.

...APPELLANT

VERSUS

District Education Officer (Female), Abbottabad.

...RESPONDENT

Subject: **DEPARTMENTAL APPEAL / REPRESENTATION  
AGAINST ORDER BEARING ENDST NO. DATED  
09/08/2021, TO THE EXTENT OF EXTRA ORDINARY  
LEAVE WITHOUT PAY.**

**PRAYER:** ON ACCEPTANCE OF THE INSTANT APPEAL,  
IMPUGNED ORDER DATED 01/07/2022 MAY  
GRACIOUSLY BE MODIFIED TO THE EXTENT OF  
EXTRA ORDINARY LEAVE WITHOUT PAY AND  
RESPONDENT BE DIRECTED TO CONSIDER THE  
INTERVENING PERIOD W.E.F REMOVAL FROM  
SERVICE TO REINSTATEMENT AS EXTRA ORDINARY  
LEAVE WITH PAY. ANY OTHER RELIEF, DEEMED FIT  
AND PROPER IN THE CIRCUMSTANCES OF THE CASE.

Pat. up.  
NO:  
1525  
18/10/22

Allesed  
Mohammad Arshad Khan  
The Court of Pashtun  
Office, Jinnah Road, Adjacent to  
Distt. Bar, Abbottabad



◆ It is respectfully submitted as under:-

1. That the appellant was serving as Lab-Attendant at GGHSS Dheri Maira, Abbottabad.
2. That vide order dated 18/10/2021 while imposing major penalty of removal from service, the services of appellant were terminated.
3. That thereafter an inquiry was conducted and upon conclusion thereof, the appellant was reinstated into service vide order dated 01/07/2022 and adjusted at GGHS Salhad, Abbottabad. However, the intervening period was directed to be considered as *Extra Ordinary Leave without Pay*. Copy of order dated 01/07/2022 is attached herewith.
4. That feeling aggrieved with the afore-stated situation, the appellant seeks modification of order dated 01/07/2022 to the extent of extra ordinary leave without pay being against the law and facts, inter-alia on the following grounds:-

Attested  
 Justice (Retd) Arshad Khan  
 District Judge, District Court of Pakistan  
 Office # 37 Jinnah Plaza Adjacent to  
 District Bar, Abbottabad

**GROUND:-**

a. That the impugned order to the extent of considering the intervening period as extra ordinary leave without pay is against the principle of natural justice and also against the fundamental rights of appellant.

b. That as the appellant has been reinstated in service after finding her innocent, therefore, the appellant is entitled to receive the financial benefits such as extra ordinary leave with pay.

c. That the law and the policy on the subject also supports the contention of appellant that she should have been awarded extra ordinary leave with pay.

d. That there is no lawful justification with the respondent to withheld the benefit of which the appellant is otherwise entitled.

e. That it would be in the interest of justice to modify the order dated 01/07/2022 and the

*Allesia*

*Allesia*  
Advocate Supreme Court of Pakistan  
Office # 32 Jinnah Plaza Adjacent to  
Distt. Bar, Abbottabad

extra ordinary leave be granted in favour of appellant with pay.

f. That valuable rights of appellant are involved.

It is therefore, most humbly prayed that on acceptance of the instant appeal, impugned order dated 01/07/2022 may graciously be modified to the extent of extra ordinary leave without pay and respondent be directed to consider the intervening period w.e.f removal from service to reinstatement as extra ordinary leave with pay. Any other relief, deemed fit and proper in the circumstances of the case.

...APPELLANT

Dated: \_\_\_\_\_/2022

*Faiza*

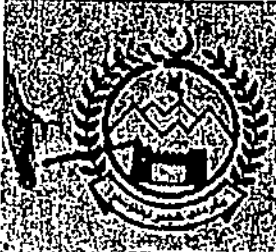
Mst. Faiza Rafique (Lab Attendant),  
Government Girls High School Dheri  
Maira Tehsil & District Abbottabad.

**AFFIDAVIT:-**

I, *Mst. Faiza Rafique (Lab Attendant)*, presently posted at *Government Girls High School, Salhad Tehsil & District Abbottabad*, do hereby declare on oath that the contents of foregoing appeal are true and correct.

DEPONENT

*Attested*  
Muhammad Arshad Khan  
Advocate Supreme Court of Pakistan  
Office # 23 Jinnah Plaza Adjacent to  
District Bar, Abbottabad



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION**  
**KHYBER PAKHTUNKHWA PESHAWAR**  
 No. 2797 / P. No. 72/A-20/C-IV/Abbottabad/Vol. 2  
 Dated: Peshawar, the 25/10/2022  
 Phone: 091-9225344 Email: ddadm.ese@gmail.com

To: The District Education Officer  
 (Female) Abbottabad.

Subject: **DEPARTMENTAL APPEAL/ REPRESENTATION AGAINST ORDER BEARING ENDST: NO. DATED 09/08/2021 TO THE EXTENT OF EXTRA ORDINARY LEAVE WITHOUT PAY.**

Memo: I am directed to refer to the subject noted above and to enclose herewith a copy of an appeal in r/o Mst. Falqa Rafique Lab Attendant GGHS Dheri Maira Tehsil & District Abbottabad for further necessary action.

*[Signature]*  
 24/10/22  
**Assistant Director (Admn)**  
 Directorate E& Secondary Education  
 Khyber Pakhtunkhwa, Peshawar

Endst; No. 2797

Copy forwarded to the: -

1. Mst. Falqa Rafique Lab Attendant GGHS Dheri Maira Tehsil & District Abbottabad.
2. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Master File.

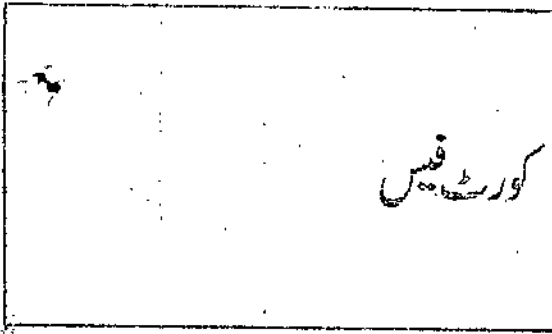
*[Signature]*  
 24/10/22

*[Signature]*  
 24/10/22  
**Assistant Director (Admn)**  
 Directorate E& Secondary Education  
 Khyber Pakhtunkhwa, Peshawar

*[Signature]*  
**Muhammad Arshad Khan**  
 Advocate Supreme Court of Pakistan  
 Office # 32 Jinnah Plaza (Adjacent to  
 Distt. Bar, Abbottabad)

# وکالت نامہ

کورٹ فیس



بعدالت صاحب سروس ٹریڈنگ کمپنی حیدرآباد  
 عنوان: جائزہ ریمونڈ  
 منجانب: امداد  
 نوعیت مقدمہ: سروس ایبل

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آں مقام  
 محمد ارشد خان کی طرف سے درخواست کی گئی ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا نیز وکیل  
 صاحب موصوف کو کرنے والی نامہ و تقریر کا حق حاصل ہے اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت دیگر وکری  
 کرانے اجراء وصولی چیک روپیہ اور اس کی وصولی اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت  
 ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی  
 بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا  
 ساختہ پرداختہ مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے  
 مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا  
 حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں  
 کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بہراد  
 استجارت نالاش بصیغہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ سند رہے۔

Accepted  
 [Signature]

بمقام:

المرقوم:

M. Aslam Khan

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