


20.01.2021

Appellant present through counsel.

Kabir Ullah Khattak learned Additional Advocate General alongwith Hamid Salim Law Officer, Hayat Khan Assistant Director and Abdul Wahid ADEO for respondents present.

Vide detailed judgment of today of this Tribunal placed on file of connected service appeal No.1014/2019 tilted Mst. Ishrat Vs. Education Department, the impugned orders stand set aside and the appellant is reinstated in service with direction to the Department to conduct proper inquiry. They shall investigate the issue through a proper inquiry reaching to a logical conclusion to find out the real culprits who maneuvered to make it possible and thereafter, the fate of appellant be decided in the light of the said inquiry. The respondents shall conclude the proceedings within 90 days after receipt of this judgment. The issue of back benefits shall be subject to the outcome of inquiry. With no order as to costs. File be consigned to the record room.

Announced.
20.01.2021


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


(Rozina Rehman)
Member (J)

09.12.2020

Appellant present through counsel.

Muhammad Jan, learned Deputy District Attorney alongwith Hamid Salim Law Officer, Fahim Ullah Law Officer and Murtaza Superintendent for respondents present.

File to come up alongwith connected appeal No.1014/2019, on 12.01.2021 for before D.B.



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

12.01.2021

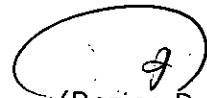
Appellant with counsel present.

Kabir Ullah Khattak learned Additional Advocate General alongwith Hamid Salim Law Officer for respondents present.

File to come up alongwith connected appeal No.1014/2019 on 20.01.2021 before D.B.



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

21.08.2020


Due to COVID-19 the case is adjourned for the same on 15.10.2020 before D.B.



READER

15.10.2020

Mr. Khalid Khan Mohmand, Advocate, for appellant is present. Mr. Muhammad Jan, Deputy District Attorney alongwith representative of the department Mr. Hazrat Shah, Section Officer, are also present.

Learned counsel submitted that his senior has proceeded to Dar-ul-Qaza Mingora bench of the Hon'ble Peshawar High Court, Peshawar, and cannot attend the Tribunal today. Requested for adjournment. Adjourned to 17.11.2020 on which to come up for arguments before D.B.


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

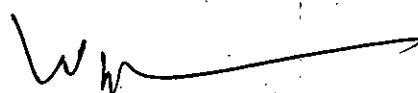

(Muhammad Jamal Khan)
Member (Judicial)

17.11.2020

Appellant present through counsel.

Muhammad Jan, learned Deputy District Attorney alongwith Hamid Saleem Law Officer for respondents present.

To come up alongwith connected file No.1014/2019, on 09.12.2020 before D.B.


(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

12.08.2020

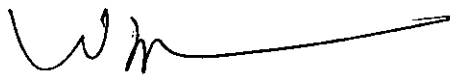
Due to summer vacations case to come up for the same on
~~15.08.2020~~ before D.B.

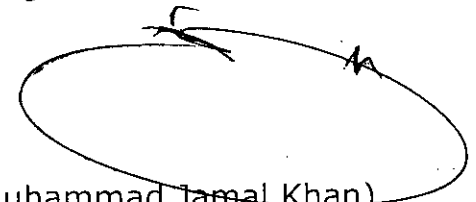

Reader

15.10.2020

Mr. Khalid Khan Mohmand, Advocate, for appellant is present. Mr. Muhammad Jan, Deputy District Attorney alongwith representative of the department Mr. Hazrat Shah, Section Officer, are also present.

Learned counsel submitted that his senior has proceeded to Dar-ul-Qaza Mingora bench of the Hon'ble Peshawar High Court, Peshawar, and cannot attend the Tribunal today. Requested for adjournment. Adjourned to 17.11.2020 on which to come up for arguments before D.B.


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



(Muhammad Jamal Khan)
Member (Judicial)

17.11.2020

Appellant present through counsel.

Muhammad Jan, learned Deputy District Attorney alongwith Hamid Saleem Law Officer for respondents present.

To come up alongwith connected file No.1014/2019, on 09.12.2020 before D.B.


(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

31.03.2020

Due to public holiday on account of COVID-19, the case is adjourned to 23.06.2020 for the same. To come up for the same as before S.B.


Reader

23.06.2020

Counsel for the appellant present. Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Mr. Muhammad Irfan Assistant, representative of respondents No.1 & 2 present and submitted reply on behalf of the said respondents.


Muhsin Hassan Khan present and submitted authority letter on behalf of respondent No.3 with a request for another adjournment; adjourned but on cost of Rs.2000/-. To come up for written reply/comments of respondent No.3, on 22.07.2020 before S.B


Member

22.07.2020

Appellant himself is present. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Mohsin, Litigation Officer on behalf of respondent No. 3 are also present.

Joint para-wise comments on behalf of respondents No. 1 & 2 have already been submitted while representative of respondent No. 3 submitted written reply today which is placed on record. Representative of respondent No. 3 also paid Rs. 2000/- as per previous order sheet dated 23.06.2020 which is handed over to appellant and receipt thereof also obtained from the appellant, which is placed on record. File to come up for arguments on 12.08.2020 before D.B. The appellant may submit rejoinder within a fortnight, if so advised.


(MUHAMMAD JAMAL KHAN)
MEMBER

31.03.2020

Due to public holiday on account of COVID-19, the case is adjourned to 23.06.2020 for the same. To come up for the same as before S.B.


Reader

23.06.2020

Counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith representatives M/S Irfan Ullah Assistant and Mohsin Hassan Khan for the respondents present.

Representatives of the respondents submitted written reply which is placed on record. To come up for rejoinder, if any, and arguments on 21.08.2020 before D.B.


Member

10.02.2020

Learned counsel for the appellant present. Written reply not submitted. M/S Irfan Ali Assistant (for respondents No.1 & 2) and Mehtab Gul Law Officer (for respondent No.3) present. Representatives of respondents requested for a short adjournment to furnish reply. Granted. To come up for written reply/comments on 24.02.2020 before S.B.


Member

24.02.2020

Junior to counsel for the appellant present. Mr. Kabirullah Khattak, Addl. AG alongwith Hayat Khan, AD and Mehtab Gul, Law Officer for the respondents present. Respondents still seek time to submit reply/comments. Last chance is granted. To come up for written reply/comments on 12.03.2020.


(Hussain Shah)
Member

12.03.2020

Counsel for the appellant and Mr. Kabirullah Khattak, Additional AG alongwith M/S Hayat, Assistant Director on behalf of respondents No. 1 & 2 and Iftikhar Bangash on behalf of respondent No. 3 present. Written reply on behalf of respondents not submitted despite last chance. Both the representatives of the department seek further time to furnish written reply/comments. Last chance is extended to 31.03.2020 for written reply/comments before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

19.12.2019

Junior to counsel for the appellant and Addl. AG alongwith Hayat Khan, A.D for the respondents present.

Representative of respondents seeks further time to furnish reply/comments. Adjourned to 08.01.2020 on which date the requisite reply/comments shall positively be submitted.


Chairman

08.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Irfanullah, Assistant for respondents No. 1 & 2 present. Nemo for respondent No. 3.

Representative of respondents No. 1 & 2 seeks time. Fresh notice be issued to respondent No. 3. To come up for written reply/comments on 24.01.2020 before S.B.

Chairman 

24.01.2020

Junior to counsel for the appellant and Addl. AG alongwith Hayat Khan, A.D for the respondents present.

Representative of the respondents seeks short adjournment for submission of reply/comments. Adjourned to 10.02.2020 on which date the requisite reply/comments shall positively be furnished.


Chairman

06.09.2019

Counsel for the appellant present.

Contends that through notification dated 04.04.2019 the respondent No. 2/Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar "disowned" the appointment/adjustment notification of the appellant ostensibly on the ground that at the time of initial appointment the appellant had provided fake/bogus documents. Even the appointment order itself was not genuine. It was argued that while dispensing with the service of appellant the respondents did not resort to mandatory departmental proceedings and the appellant was not provided with any opportunity of putting forth his defence. The respondents did not care to issue any show cause notice nor a proper/regular enquiry was conducted before issuing of impugned notification.

In view of available record and arguments of learned counsel, instant appeal is admitted for regular hearing subject to all just exceptions. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 18.11.2019 before S.B.

Appellant Deposited
Security & Process Fee


Chairman

18.11.2019

Junior to counsel for the appellant and Addl. AG alongwith Hamid Saleem Law Officer for the respondents present.

Representative of the respondents seeks time to furnish written reply/comments. Adjourned to 19.12.2019 on which date the requisite reply/comments shall positively be submitted.

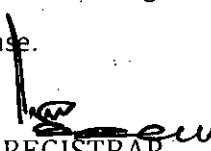


Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - _____ :974/2019

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|---|
| 1 | 2 | 3 |
| 1- | 25/07/2019 | <p>The appeal of Mst. Asma presented today by Mr. Amin-ur-Rehman Yousafzai Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 25/7/19</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>06/09/19</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p style="text-align: right;">Page 005 000004</p> |
| 2- | | |

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,
PESHAWAR

Service Appeal No. ⁹⁷⁴ /2019

Mst. Asma Appellant

....VERSUS....

Govt of Khyber Pakhtunkhwa & 02 others Respondents

I N D E X

| S.No. | Description of documents | Annex | Pages |
|-------|--|-------|-------|
| 1. | Service Appeal | | 1-4 |
| 2. | Application for Grant of Status Quo alongwith Affidavit | | 5-6 |
| 3. | Addresses of the parties | | 7 |
| 4. | CNIC | "A" | 8 |
| 5. | CV | "B" | 9 |
| 6. | Educational Testimonials | "C" | 10-14 |
| 7. | Advertisement dated: 26.01.2009 | "D" | 15-19 |
| 8. | Appointment Notification dated: 06.08.2012 alongwith Medical Certificate dated: 25.07.2012 | "E" | 20-21 |
| 9. | Adjustment order dated: 15.08.2012 alongwith charge report dated: 16.08.2012 | "F" | 22-23 |
| 10. | Impugned Notification dated: 05.04.2019 | "G" | 24 |
| 11. | Departmental Appeal dated: 16.04.2019 alongwith diary/dispatch number | "H" | 25-26 |
| 12. | Wakalatnama | | 27 |


Appellant

Through

Amin ur Rehman Yusufzai


Sajjad Mehsud

&


Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar
Cell No.0321-9022964, 0333-9981464

Dated: 22.07.2019

1

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

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 974/2019 1043
Diary No. 1043

Mst. Asma D/O Muhammad Ismail, Ex-SST (Gen),
R/o Post Office Prang, Mohalla Shaheed Bazar, District Charsadda.

Dated 25/7/19

..... Appellant

....VERSUS....

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort Road, Peshawar Cantt. Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974, READ WITH ALL ENABLING PROVISIONS OF LAW, GOVERNING THE SUBJECT, AGAINST:

NOTIFICATION ENDORSEMENT NO.5883-87, DATED: 05.04.2019 OF RESPONDENT NO.2, VIDE WHICH APPOINTMENT NOTIFICATION DATED: 06.08.2012 ALONGWITH ADJUSTMENT ORDER DATED: 15.08.2012, OF THE APPELLANT, HAS UNILATERALLY BEEN DISOWNED.

Filed to-day
25/7/19
Registrar

PRAYER-IN-APPEAL:

On Acceptance of Instant Appeal, the Impugned Notification dated 05.04.2019 of Respondent No.2 alongwith Pre & Post Proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-ab-initio and of no legal effect, Hence, be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Respectfully Sheweth:

1. That appellant is law abiding peaceful citizen of Pakistan and permanent resident of District Charsadda.
(Copy of CNIC, is attached as Annexure "A")
2. That appellant obtained Master degree, in the year 2013, from University of Peshawar and having passed C.T, B.Ed & M.Ed Degree Course from Sarhad University Peshawar.
(Copies of CV and Educational Testimonials, are attached as Annexure "B" & "C", respectively)
3. That respondent No.3, invited applications for numerous vacant positions of SETs/SSTs (BPS-16), vide Advertisement No.01/2009, dated: 26.01.2009.
(Copy of Advertisement dated: 26.01.2009, is attached as Annexure "D")

- 4. That appellant, being qualified, applied for one of the aforementioned advertised posts of SST(Gen) (BPS-16) and gone through the entire process of selection successfully, eventually he, on the recommendation of KP PSC, was appointed as SST (Gen) BPS-16, on regular basis, vide Notification Endorsement No.453-60/File No.2/A-14/SST(F) Gen/PSC/Apptt: dated: 06.08.2012.
(Copy of Appointment Notification dated: 06.08.2012 alongwith Medical Certificate dated: 25.07.2012, is attached as Annexure "E")
- 5. That appellant was subsequently adjusted in Govt Girls High School, Malkana Tribal District Bajour i.e. against vacant Post, vide Order dated: 15.08.2012.
(Copy of Adjustment order dated: 15.08.2012 alongwith charge report dated: 16.08.2012, is attached as Annexure "F")
- 6. That appellant was performing duty with zeal, devotion and outmost satisfaction of the superiors, however he has unilaterally been shunt-out from service, vide impugned Notification dated: 05.04.2019 by respondent No.2, without due process and following the law/rules governing the subject.
(Copies of Impugned Notification dated: 05.04.2019, is attached as Annexure "G")
- 7. That appellant preferred departmental appeal dated: 16.04.2019 to respondent No.1 which was received vide Diary No. 1001 dated: 16.04.2019, though the statutory period of 03 months has been elapsed, but the authority did not consider the same, one way or the other.
(Copies of Departmental Appeal dated: 16.04.2019 alongwith diary/dispatch number with date, is attached as Annexure "H")
- 8. That appellant, being aggrieved of impugned notification dated: 05.04.2019 and not considering her departmental appeal by respondent No.1, approaches this Hon'ble Tribunal, inter-alia, on the following grounds:

GROUND S:

- A. That impugned Notification dated: 05.04.2019 of respondent No.2 is against the law and facts available on file, hence, untenable.
- B. That the appellant has neither been treated in accordance with law nor he has been provided equal protection of law, rather he has not been provided fair opportunity to defend himself, as enshrined in Article-10A of the Constitution of Islamic Republic of Pakistan 1973, hence the respondent department acted without jurisdiction.
- C. That neither regular enquiry was conducted into the guilt of the appellant nor he has been served with mandatory Show Cause Notice, hence, condemned unheard, which attracts doctrine of audi-alterm-partem.

- D. That appellant being qualified was appointed after due process of law and fulfilment of all legal/codal formalities, however shunt-out from service with a single stroke of pen, without care and caution of its legal consequences, which has caused grave miscarriage of justice.
- E. That appellant has served the department with zeal, devotion and to the best of his abilities, without affording a single opportunity of complaint, either to the students or their parents or to the superiors, regarding performance of official duties, therefore, the following amongst plethora of Judgments of the apex Court will be attracted.

I. 2011 SCMR 1581

“Appointment order found to be bogus/fake/irregular Validity Such charge was vague, nonspecific and did not show any lapse on part of employee or commission of any fraud by him or non-possessing of requisite qualification by him or his appointment to be made by an incompetent officer Department had not found performance of employee to be unsatisfactory Impugned order was set aside in circumstances”

II. 2004 SCMR 303

“Appointment of Civil Servants were made by Competent Authority. If prescribed procedure was not followed by the Concerned Authority the Civil Servants could not be blamed for what was to be performed and done by the Competent Authority. Supreme Court noted it with concern that in case the Civil Servants were to be removed then the same would amount to hitting them hard creating problems for the society at large considering each of the Civil Servants being the bread earner of his family. Appointing authorities had been acting mechanically without application of mind, therefore, the Civil Servant could not be made to suffer for whimsical and mechanical acts of the authorities.”

III. 2016 SCMR 1299

“The solution we have come out is simple, let them continue, if they besides the certificates or diplomas, issued by the council, possesses the requisite or equivalent qualification. Let them all also continue who improve their qualification even thereafter. Those who could not improve their qualification up till now should improve it within a period of one year, which could be reckoned from the date of commencement of the next available academic session of the respective program.”

IV. 2010 PLD SC 483

“Principle of Audi-alterm-Partem was always deemed to be imbedded in the statute and even if there was no such express provision, it would be deemed to be one of the parts of the statute, because no adverse action can be taken against a person without providing right of hearing to him”

- F. That any other grounds, with the permission of this Hon'ble Tribunal, will be taken at the time of arguments.

It is, therefore, most humbly prayed that on acceptance of Instant Appeal, the Impugned Notification dated 05.04.2019 of respondent No.2 alongwith Pre and Post proceedings thereto, may be declared as Illegal, Unlawful, without Lawful Authority, void-ab-initio and of no legal effect, hence be set at naught and appellant may be reinstated in service with all back benefits, in the best interest of justice and equity.

Any other relief, not specifically prayed for and deemed appropriate by this Honourable Tribunal in circumstances of the case may also be granted.

[Handwritten Signature]

Appellant

Through

Amin ur Rehman Yusufzai

[Handwritten Signature]

[Handwritten Signature]

Sajjad Mehsud

&

[Handwritten Signature]

Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

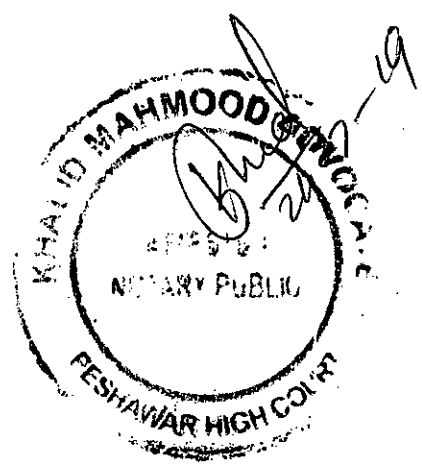
Cell No.0321-9022964, 0333-9981464

Dated: 22.07.2019

VERIFICATION:

Verified on oath that the content of the instant Service Appeal is true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.

[Handwritten Signature]
Deponent



5

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

C.M No.____/2019.

In

Service Appeal No.____/2019

Mst. AsmaAppellant

....VERSUS....

Govt of Khyber Pakhtunkhwa & 02 othersRespondents

**APPLICATION FOR STATUS-QUO TILL FINAL DECISION OF THE
TITLED SERVICE APPEAL**

Respectfully Sheweth:-

1. That the titled appeal has been filed today wherein no date has yet been fixed for hearing.
2. That facts and grounds of the titled appeal may please be considered as integral part and parcel of instant applicant.
3. That valuable rights of applicant are involved into the matter and if the subject relief has not been granted she will suffer irreparable loss.
4. That applicant has got good prima facie case in her favour and is very much sanguine of its success. Moreover, balance of convenience also lies in her favor.
5. That there is no legal bar to grant the subject relief, rather grant of status quo will prevent miscarriage of justice to be occasioned.

It is therefore, most humbly prayed that on acceptance of instant application, Status-quo may please be ordered to be maintained till final decision of the titled appeal, so as to secure the ends of justice.


Appellant

Through

Amin ur Rehman Yusufzai


Sajjad Mehsud

&


Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 22.07.2019

6

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

C.M No.____/2019

In

Service Appeal No.____/2019

Mst. Asma.....Appellant

....VERSUS....

Govt of Khyber Pakhtukhwa & 02 others.....Respondents

AFFIDAVIT

I, Mst. Asma D/O Muhammad Ismail, Ex-SST (Gen), R/o Post Office Prang, Mohalla Shaheed Bazar, District Charsadda, do hereby solemnly affirm declare on oath that the contents of the accompanying '**Petition**' are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

Identified By:

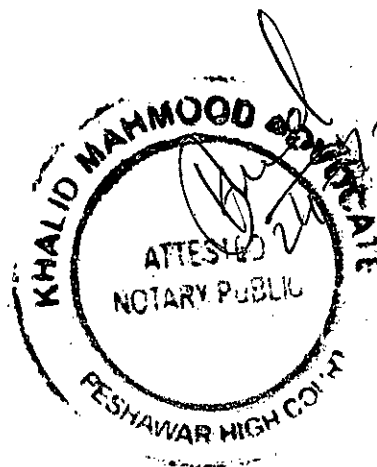
[Signature]

DEPONENT

CNIC #: 17101-3970614-4

Amin-ur-Rehman Yusufzai
Advocate, Peshawar

[Signature]



⑦

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

Service Appeal No._____/2019

Mst. Asma **Appellant**

....VERSUS....

Govt of Khyber Pakhtunkhwa & 02 others **Respondents**

ADDRESSES OF THE PARTIES

APPELLANT:

Mst. Asma D/O Muhammad Ismail, Ex-SST (Gen),
R/o Post Office Prang, Mohalla Shaheed Bazar, District Charsadda.

RESPONDENTS:

1. Govt of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Civil Secretariat Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
3. Khyber Pakhtunkhwa Public Service Commission through Chairman, Fort Road, Peshawar Cantt


Appellant

Through

Amin ur Rehman Yusufzai


Sajjad Mehsud

&


Khalid Khan

Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar

Cell No.0321-9022964, 0333-9981464

Dated: 22.07.2019

ANNEX 13 A 4

(8)



حکومت پاکستان

قومی شناختی کارڈ

17101-3270614-4

نام: آسماء

جنس: عورت

شوہر کا نام: محمد اسماعیل

شناختی علامت: ندارد

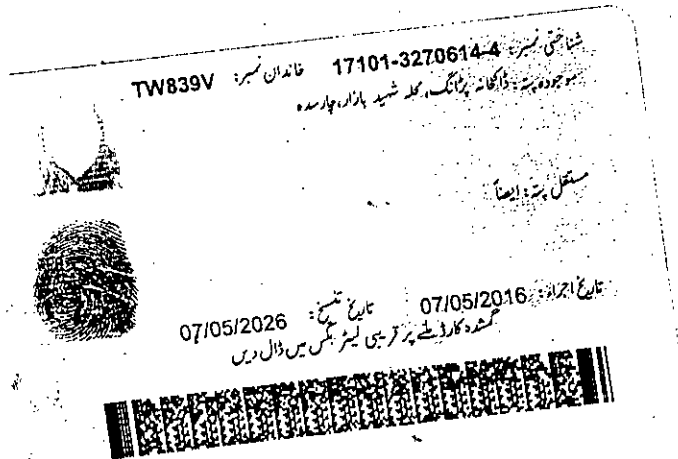
تاریخ پیدائش: 19/02/1986



عثمان یوسف مین

دستخط چھٹرا جنرل

دستخط مال کارڈ



قائدان نمبر: TW839V

17101-3270614-4

شناختی نمبر: 17101-3270614-4

مستقل پتہ: العنا

تاریخ: 07/05/2026

07/05/2016

تاریخ اجراء: 07/05/2016

ATTESTED

BIO DATA

ANNEX B
9

ASMA D/O MUHAMMAD AKBAR**CNIC NO. 17101-3270614-4****Domicile. Charsadda.****Postal add: village and P/O Utmanzai Tahsil & District Charsadda.****Personal No. 50154594****Cell No. 03419522170****Service info:**

| Post | BPS | D.O 1 st app: | School Name |
|------------------------|-----|--------------------------|---|
| SST | 16 | 15/08/2012 | GGHS Malkana nawagai bajawar agency |
| DDO | 16 | 11/04/2013 | GGHS Malkana nawagai bajawar agency |
| SST | 16 | 22/11/2013 | GGMS sabzali kile barokhel mohamand agency. |
| SST/ cluster in charge | 16 | 2014 | GGMS sabzali kile barokhel mohamand agency. |

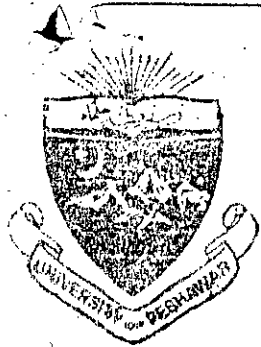
Academic Qualification.

| S. No | Degree/ Certificate | Session | Board/University |
|-------|---------------------|---------|------------------|
| 1 | M.A | 2013 | U/O Peshawar |
| 2 | B.A | 2006 | U/O Peshawar |
| 3 | F.A | 2004 | BISE Peshawar |
| 4 | S.S.C | 2002 | BISE Peshawar |

Professional Qualification:

| S.No | Degree/ Certificate | Session | Board /Univ: |
|------|---------------------|---------|-------------------------------------|
| 1 | M.Ed | 2012 | AIOU Islamabad |
| 2 | B.Ed | 2009 | Peshawar Uni: |
| 3 | C.T | 2010 | AIOU Islamabad |
| 4 | JDPE | 2011 | Teaching institute Rajar Charsadda. |

ATTESTED



University of Peshawar

PAKISTAN

Detailed Marks Certificate

ANNEX 2nd
 (10)

Master of Arts in Islamiyat
 Final
 Annual Examination 2012
 District Charsadda



Private

Name: ASMA ✓

Gender: Female

Roll No: 31610

Father's Name: AKBAR KHAN

Registration No: 2004-GCH-1128

Division: 2nd

| Papers | Max Marks | Marks Obtained | |
|--|-----------|----------------|----------------------------|
| | | In Figures | In Words |
| Al Quraan Translation 2nd Half & Com with Grammar-VI | 100 | 63 ✓ | Sixty Three |
| Principles of Islamic Jurisprudence-VII | 100 | 63 ✓ | Sixty Three |
| Islam & Other World Religions-VIII | 100 | 41 ✓ | Forty One |
| Islam & Contemporary Muslim World-IX | 100 | 49 ✓ | Forty Nine |
| Islam, Modren Thought & Islamic Law of Inheritance-X | 100 | 54 ✓ | Fifty Four |
| Viva Voce | 100 | 50 ✓ | Fifty Only |
| Checked with record & found correct. DMC Asstt: Countersigned Programmer Secrecy Controller of Examinations University of Peshawar | | | |
| Previous 17677: Annual-2010 | 500 | 281 ✓ | Two Hundred and Eighty One |
| Final | 1100 | 601 ✓ | Six Hundred and One |

Errors & omissions are subject to subsequent rectification

Chances Availed: 2

The Examination was taken in Parts

Examination held From 29-Aug-2012 to 05-Oct-2012

Result Declared on Tuesday, February 5, 2013

Issue Date: 07-Feb-2013

9:05 am

ATTESTED

(Prof. Dr. Rashid Khan)
 CONTROLLER OF EXAMINATIONS
 UNIVERSITY OF PESHAWAR

11

S.No. 0064

Departmental Examinations Education Department



NWFP DETAILED MARKS CERTIFICATE PHYSICAL EDUCATION TRAINING EXAMINATION, 200

Name Asma Session 2011
Father's Name Akbar Khan Roll No. 55

| Subject | Maximum Marks | Marks obtained | |
|---------------------------------------|---------------|----------------|----------|
| | | In figures | In words |
| 1. Prol. Organization and Admn. | 100 | 61 | 61 |
| 2. Se. of Movement | 100 | 64 | 64 |
| 3. Theory of Games | 100 | 60 | 60 |
| 4. Olym. and Recreative Games | 100 | 69 | 69 |
| 5. Anotomy and Physiology | 100 | 56 | 56 |
| 6. Health Education | 100 | 77 | 77 |
| 7. Teaching & Skill of Edg. Gym | 100 | 84 | 84 |
| 8. Teaching & Skill of Athel. | 100 | 87 | 87 |
| 9. Teaching & Skill of Major Games | 100 | 86 | 86 |
| 10. Physical Efficiency Test | 40 | 18 | 18 |
| 11. Practical Note Book | 20 | 20 | 20 |
| 12. Co-curriculum Activities | 20 | 30 | 30 |
| 13. Morning Assembly/Riffes Drill etc | 70 | 55 | 55 |
| Total | 1050 | 767 | |

Note: Errors/omissions excepted.

Failed/Passed Division Passed Division

Prepared by _____

Checked by Department _____

Date of Declaration of Result 22/12/2011

Deputy Director (Examination),
Schools & Literacy Department,
N.W.F.P., Peshawar.

ATTACHED

Prepared by Asmatullah

Charsadda

12

46

UNIVERSITY OF PESHAWAR

Detailed Marks Certificate Bachelor of Education (B.Ed)

Annual Examination 2009
Charsadda College of Education



Regular

Name: ASMA

Gender: Female Roll No: 93

Father's Name: MUHAMMAD AKBAR Khan

Registration No: 2004-GCH-1128

Div: 2nd

| Papers | Max Marks | Marks Obtained | |
|---|-----------|----------------|-----------------------------|
| | | In Figures | In Words |
| Persp: of Edu: & Cont Social Issues | 100 | 60 | Sixty |
| School Org: & Classroom Manag: (New) | 100 | 56 | Fifty Six |
| Edu: Psychology, Guidance & Counseling | 100 | 44 | Forty Four |
| Evaluation Techniques | 50 | 32 | Thirty Two |
| Curriculum & Instruction | 100 | 46 | Forty Six |
| Islamiat/I.History(for non-muslim)(New) | 100 | 70 | Seventy |
| Functional English | 50 | 21 | Twenty One |
| Method of Teaching of English | 100 | 45 | Forty Five |
| Method of Teaching of Urdu | 100 | 61 | Sixty One |
| Elec: Foundation of Education | 100 | 50 | Fifty |
| Practice of Teaching: | 200 | 140 | One Hundred and Forty |
| | 1100 | 625 | Six Hundred and Twenty Five |

Checked with record & found correct

DMC Asstt:

Counter signed

Controller of Examinations
University of Peshawar

5-9-12

Errors & omissions are subject to subsequent rectification

Chances Availed: 2

The Examination was taken in Parts
Examination held From 15-Jul-2009 to 10-Sep-2009
Result Declared on Thursday, January 14, 2010
Issue Date: 13-Jan-2010
8:36 am

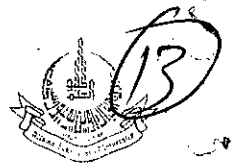
ATTESTED
Prepared by Computer Cell

(Dr. Mohammed Sharif)
ADDITIONAL CONTROLLER OF EXAMINATIONS
UNIVERSITY OF PESHAWAR

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD

Serial No. B5255

PROVISIONAL RESULT CARD



Name ASMA MUHAMMAD AKBAR
 Father's Name MUHAMMAD AKBAR
 Address MOH. SANAM GHARI VILL. UTMANZAI

Roll No. AA692947
 Registration No. 08NCA00704
 Final Semester SPR- 2009

Tehsil CHARSADA
 District CHARSADA

has successfully completed **CERTIFICATE OF TEACHING**

The detail of **passed** courses are as under:

| Semester | Course Code | Title of Course | Marks | |
|----------|-------------|--|---------|----------|
| | | | Maximum | Obtained |
| AUT- 08 | 0638 | TEACHING STRATEGIES & EVALUATION | 100 | 58 |
| AUT- 08 | 0633 | SCHOOL ORGANIZATION | 100 | 57 |
| AUT- 08 | 0632 | EDUCATIONAL PSYCHOLOGY | 100 | 56 |
| AUT- 08 | 0631 | DIMENSIONS IN EDUCATION | 100 | 59 |
| SPR- 09 | 0634 | ENGLISH AND ITS TEACHING | 100 | 64 |
| SPR- 09 | 0612 | PRACTICAL WORKSHOP & TEACHING PRACTICE | 100 | 89 |
| SPR- 09 | 0605 | SOCIAL STUDIES & ITS TEACHING | 100 | 61 |
| SPR- 09 | 0635 | ISLAMIAT AND ITS TEACHING | 100 | 65 |
| SPR- 09 | 0604 | URDU LANGUAGE AND ITS TEACHING | 100 | 56 |

CREDITS: 5

Total Marks / Obtained 900 / 565

Result Declared on MARCH 30, 2010

Percentage / Grade 63 B

Date of issue APRIL 05, 2010

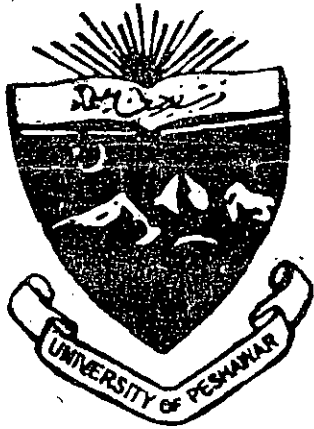
ATTESTED

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

14



UNIVERSITY OF PESHAWAR
(Pakistan)

Detailed Marks Certificate

Bachelor of Arts (Part-II)
Supplementary Examination, 2006

Govt. Girls Degree College, Charsadda

Name: ASMA
Father's Name: AKBAR KHAN

Gender: Female Roll No. 7912
Registration No. 2004-GCII-1128

| Papers / Subjects | Marks Obtained | | |
|---|----------------|------------|-------------------------------|
| | Maximum Marks | in Figures | in Words |
| English (Compulsory) | 75 | 24 | Twenty Four |
| Pakistan Studies | 40 | 20 | Twenty Only |
| Islamic Studies | 75 | 45 | Forty Five |
| Law | 75 | 27 | Twenty Seven |
| B.A Part-I Marks Part-I Roll No. 4533-S-2005 | 285 | 157 | One Hundred and Fifty Seven |
| Total: | 550 | 273 | Two Hundred and Seventy Three |

Checked with record & found correct

DMC Asstt: Programmer
Counter signed

Controller of Examinations
University of Peshawar

The examination was passed In Parts in Second division.

Examination Held in Jan 24 - Feb 27, 2007
Result Declared on May 03, 2007

Dated:- 30/07/07

Designed &
Prepared by: Ahmad Jan

ATTESTED

Controller of Examinations
University of Peshawar

No: 012557

ri, Annexure: D (15)

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

Dated: 26-01-2009

ADVERTISEMENT No. 01 / 2009.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P/F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

(S.No. 01) One (01) Post of assistant Botanist. In Livestock Research & Dev: Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Both Sexes. **ALLOCATION:** Merit.

(S.No. 02) Two (2) Posts of Research officers Fodder. In L&DD Deptt:

QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs..

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male. **ALLOCATION:**

| | |
|-------|--------|
| Merit | Zone-1 |
| 01 | 01 |

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

(S.No. 03) Five (05) Posts of Data Entry Operators:

QUALIFICATION: (i) 2nd Division FA/FSc with one year Diploma in Computer Science from the recognized Institute. (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification.

AGE LIMIT: 18 to 30 years. **PAY SCALE:** BPS-11. **ELIGIBILITY:** Both Sexes. **ALLOCATION:**

| | | | | |
|--------|--------|--------|--------|--------|
| Zone-1 | Zone-2 | Zone-3 | Zone-4 | Zone-5 |
| 01 | 01 | 01 | 01 | 01 |

ATTESTED

DIRECTORATE OF INDUSTRIES COMMERCE MINERAL DEV: LABOUR & TECHNICAL EDUCATION DEPARTMENT.

(S.No. 04) One (01) Post of Male Inspector Mines

QUALIFICATION: (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1st Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt: or Semi-Government Mining Industries registered under the Mines Act, 1923.

AGE LIMIT: 21 to 33 years. **PAY SCALE:** BPS-17. **ELIGIBILITY:** Male. **ALLOCATION:** NOTE: In case of non- availability of candidates possessing the

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www.40012018.Abdul malik vs Govt USB 403 pags

provisions of the rules for the time being in force.

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.

For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

ALLOCATION:

| S.No | Subject | No. of Posts | Allocation |
|------|--------------------|--------------|-------------|
| 5. | Islamiyat | 02 | Merit Quota |
| 6. | Pak: Study | 03 | Merit Quota |
| 7. | History-Cum-Civics | 02 | Merit Quota |
| 8. | Economics | 02 | Merit Quota |
| 9. | English | 02 | Merit Quota |
| 10. | Statistics | 02 | Merit Quota |
| 11. | Maths | 02 | Merit Quota |
| 12. | Biology | 02 | Merit Quota |
| 13. | Chemistry | 02 | Merit Quota |
| 14. | Physics | 02 | Merit Quota |

(S.No. 52) Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Phisic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION:

| Merit | Zone-1 | Zone-2 | Zone-3 | Zone-4 | Zone-5 |
|-------|--------|--------|--------|--------|--------|
| 420 | 280 | 281 | 280 | 210 | 210 |

(S.No. 53) Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Phisic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No. 54) Ninety Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram , Mansehra , Shangla , Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Phisic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

ATTESTED

ATTESTED

(S.No. 55) Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION:

| Merit | Zone-1 | Zone-2 | Zone-3 | Zone-4 | Zone-5 |
|-------|--------|--------|--------|--------|--------|
| 243 | 162 | 162 | 162 | 122 | 122 |

(S.No. 56) Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. years (10 years age relaxation)

PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

(S.No. 57) Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla , Kohistan, Abbottabad, (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

TECHNICAL EDUATION AND MAN POWER TRAINING DEPARTMENT.

(S.No. 58) Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.

QUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.

OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-18. ELIGIBILITY: Male.

ALLOCATION: Merit.

ATTESTED

(S.No. 59) Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institure.

QUALIFICATION: (a) Ph. D in Engineering from a recognized University / Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such: OR (c)

ATTESTED

| | | | | | |
|------------|---|--------|--------|--------|--------|
| (S.No. 66) | Ten (10) Posts of Male office Assistant. | | | | |
| | <u>QUALIFICATION:</u> Bachelor degree from recognized University. | | | | |
| | <u>AGE LIMIT:</u> 18 to 30 years. <u>PAY SCALE:</u> BPS-14. <u>ELIGIBILITY:</u> Male. | | | | |
| | <u>ALLOCATION:</u> | | | | |
| | Zone-1 | Zone-2 | Zone-3 | Zone-4 | Zone-5 |
| | 02 | 02 | 02 | 02 | 02 |

| | | | | | |
|------------|---|--|--|--|--|
| (S.No. 67) | One (01) Post of Female office Assistant. | | | | |
| | <u>QUALIFICATION:</u> Bachelor degree from recognized University. | | | | |
| | <u>AGE LIMIT:</u> 18 to 30 years. <u>PAY SCALE:</u> BPS-14. <u>ELIGIBILITY:</u> Female. | | | | |
| | <u>ALLOCATION:</u> Merit. | | | | |

CORRIGENDUM

1. The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt: No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.
2. The Post of Reader Advertised in Advtt: No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

GENERAL CONDITIONS.

- (i) Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and uper Tanawal; Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhaka Area, Kohistan District, Shangla, Gadoon Area in Swabi, Backward areas of Mansehra and Batagram, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- (ii) Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- (iii) ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- (iv) The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

ATTESTED

ATTESTED

- (19)
- (v) Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.
- (vi) Applications should be on the prescribed application form obtainable from the listed below branches of the NATIONAL BANK. Application Fee is Rs. 285/- (Rupees Two Hundred Eight Five only) for all the candidates. In addition to the application fee, the candidates will have to pay Rs. 15/- (rupees fifteen only) on account of Bank Charges. Separate application form will be required for each advertised category of posts. Application forms obtained other than the specified branches of the National Bank will be considered invalid and such applications will not be entertained. The applications on plain paper or Photostat shall not be accepted. Incomplete and late applications shall also be ignored.
- (vii) Application must be submitted within time as no extra time is allowed for postal transit. The applications if submitted on the last date for receipt of applications must reach the Commission's office by the closing hours.
- (viii) Applicants married to Foreigners are considered only on production of the Govt. Relaxation Orders.
- (ix) No applicant shall be considered in absentia on paper qualifications unless, he/she possesses exceptionally higher qualifications than the minimum prescribed qualification for a particular post(s).
- (x) Govt. reserves the right not to fill any or fill more or less than the advertised post(s).
- (xi) Candidates who have already availed three chances by physical appearance before the Commission and have failed for the post(s) having one and the same qualifications and scale of pay shall be ineligible.
- (xii) Experience wherever prescribed shall be counted after the minimum qualifications for the post(s), if not specifically provided otherwise against the advertised post(s).
- (xiii) In cases where the number of applications received for post(s) are disproportionately higher than the number of available vacancies, shortlisting of the candidates may be done in any one of the following manner:
- (a) Written Test in the Subject.
- (b) General Knowledge or Psychological General Ability Test.
- (c) Academic and / or Professional record as the Commission may decide.

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of:

- (i) Parachinar, Mardan, Swabi, Malakand, Shangla, Chitral, Timargara, Daggar, D.I.Khan, Bannu, Karak, Kohat, Hangu, Lakki Marwat, Abbottabad, Haripur, and Mansehra.
- (ii) Saddar Road Branch, Tehkal Payan Branch, and G.T Road (Nishtar Abad) Branch Peshawar.
- (iii) Tehsil Bazar Branch Charsadda, Nowshera Cantt: Branch, Bank Square Branch Mingora and city Branch Tank.

ATTESTED

(Atta Ur Rehman)

Secretary

NWFP Public Service Commission
2-Fort Road Peshawar Cantt: Ph: 9212962

ATTESTED

**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**



PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936
E-mail desekpk@yahoo.com

Notification.

Consequent upon the recommendation of the Khyber Pakhtunkhwa Public Service Commission, appointment of the following candidates is hereby ordered against the post of Secondary School Teacher (SST General) in BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further his Services placed at the disposal of Director Education FATA for further posting against vacant SST Genral posts:-

| SNO | Name | Father's Name | Domicile | Zone | Permanent Address | Place of Posting |
|-----|---------------|-----------------|-----------------|------|--|--|
| 1. | Asma | Muhammad Akbar | Bajur Agency | 1 | Village & P.O Utmanzai Distt: Charsadda | Services placed at the disposal of Director of Education FATA for further posting against vacant SST General Post. |
| 2. | Zubaida Begum | Gul Akbar | Khyber Agency | 1 | Village & P.O Manga Tehsil & Distt: Mardan |Do..... |
| 3. | Aliya Taj | Taj ud Din | Mohamand Agency | 1 | Mohallah Haider Abda, Bari Cham Tehsil & Distt: Mardan |Do..... |
| 4. | Ghazala Sana | Sanaullah | Mohmand Agency | 1 | Wacha Jawara, Khadi Khel Khuwezai Mohmand Agency |Do..... |
| 5. | Hira Shams | Shams ur Rehman | Mohmand Agency | 1 | Village Malkana Musa Khel Metai Dara Mohamand Agency |Do..... |

Terms and conditions:-

- Her services will be considered regular but without pension & Gratuity in terms of section 19 of the NWFP civil Servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. She will however be entitled to Contributory provident fund in such a manner and at such rates as per prescribed by the Govt.
- In case, she is already in Government service and working against pensionable post on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa Public service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to her under her previous terms of appointment or to avail the benefit of contributory provident fund allowed to her under new appointment.

(Signature)

ATTESTED

Her services are liable to termination on one months notice from either side. In case of resignation with out notice her one-month pay/allowances shall be forfeited to the Government.

4. She should join her post within 30 days of the issuance of this notification. In case of failure to join there post within one month of issuance of this notification her appointment will expire automatically and no subsequent appeal etc shall be entertained.
5. She would be on probation for a period of one year extendable for another one year.
6. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
7. Her Services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, she shall be proceeded under the rules framed from time to time.
8. Charge report should be submitted to all concerned
9. The EDOs concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders.
10. The EDOs concerned will verify their documents before release of pay.
11. Her seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
12. No TA/DA will be allowed to the appointee for joining his duty.

(Muhammad Rafiq Khattak)

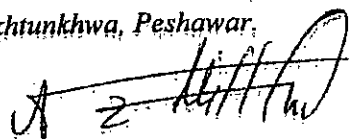
Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. 453-60 /File No. 2/A-14/SST(F) Gen/PSC/Apptt; Dated Peshawar the 06/08/2012

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. Director of Education FATA Warsak road Peshawar.
4. All Agency Accounts Officers in FATA.
5. Official Concerned
6. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
7. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
8. M/File



Dy: Directoeress (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

6/8/12


ATTESTED

21A


MEDICAL CERTIFICATE

Name of Official ASMA
 Caste or race MOHAMMAD
 Father's name MOHAMMAD AKBAR
 Residence VILLAGE and P.O utman fair
DURST Charsader
 Date of birth 19-02-1986
 Exact height by measurement 5-6"
 Personal mark of identification NIL
 Signature of the Official _____
 Signature of head office _____

Seal of Office _____

I do hereby certify that I have examined Mr. ASMA candidate for
 employment in the Office of the Education DEPT S.S.T (G)
 and can not discover that he had any disease communicable or other constitutional affection or bodily
 infirmity except NIL


I do not consider this as disqualification for employment in the office of the _____
 His age according to his own statement 26 year and by
 appearance about Twenty six years.


 Medical Superintendent
 Police Service Hospital
 Peshawar

Medical Superintendent
 MEDICAL SUPERINTENDENT,
 Police Service Hospital
 Peshawar
25-7-2012
 Civil Hospital _____

LEFT HAND THUMB AND FINGER

IMPRESSION _____

ATTESTED

 Attesting Medical Board
 Police Service Hospital
 Peshawar



ANNEX F

FATA SECRETARIAT
DIRECTORATE OF EDUCATION

WARSAK ROAD PESHAWAR, PAKISTAN
PHONE: 091-9210169 FAX 091-9210216

NO. / DATED
A-1/PSC/SET/GENERAL/ITEMAL/17/2017

92

ADJUSTMENT

Consequent upon their appointment as SST in BPS-16 on the basis of recommendation of Khyber Pakhtunkhwa Public Service Commission and placement of their services at the disposal of Director Education, FATA vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa's Notification No. 453-60/File No.2/A-14/SST(F)Gen/PSC/Apptt. dated 6-8-2012, the following SSTs are hereby adjusted in the schools noted against each with immediate effect:-

| S/# | Name/Father's Name/Domicile/Address | Posted at | Remarks |
|-----|---|-------------------------------------|------------------------|
| 1 | Ms. Asma D/O Muhammad Akbar (Bajour) Vill: & PO: Utmanzai Dist: Charsadda | GGHS Malkana Bajour Agency | Against vacant post |
| 2 | Ms. Zubaida Begum D/O Gul Akbar (Khyber) Vill: & PO: Manga Tehsil & Distt: Mardan | GGMS Kota Trap Mohmand Agency | -do- |
| 3 | Ms. Aliya Taj D/O Taj Ud Din (Mohmand) Mohallah Haider Abda, Bari Cham Tehsil & Distt: Mardan | GGMS Chapoor Kili Mohmand Agency | -do- |
| 4 | Ms. Ghazala Sana D/O Sanullah (Mohmand) Wacha Jawara Khadi Khel Khuwezai Mohmand Agency | GGMS Azeem Kor Mohmand Agency | -do- |
| 5 | Mrs. Nura Shams D/O Shams Ullah (Mohmand) Vill: Malkana Musa Khel Metaj Dara Mohmand Agency | GGHS Mian Mandi Mohmand Agency | -do- |

Note:-

The terms & conditions of their posting will be the same as already prescribed in the above mentioned Notification of Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar. However the Agency Education Officers concerned will verify their documents before release of pay.

(FAZLI MANAN)
DIRECTOR EDUCATION (FATA)

Encls: No. 11174-86 /A-1/Gen Apptt. of SST(F) (PSC) 2012 Dated Resh: the 15/8 2012

Copy forwarded to the:-

- 1 Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
w/r to his Notification cited above.
- 2 Agency Education Officers concerned
- 3 Agency Account Officers concerned
- 4 Headmistress concerned
- 5 Candidate concerned
- 6 P.A to Director Education FATA

ATTESTED

ADMT: DIRECTOR (ESTAB)

CERTIFICATE OF TRANSFER OF CHARGE

1- Certified that we have on the fore/after noon of this day.....

respectively made over and receive charge of this office of the Head Mistress

94HS Malakana Bajaur Agency, vide Fata secretariat
Directorate of Education Peshawar. Endst. No. 11174-86du

2- Particulars of case and important secret and confidential documents handed over are noted on the reverse.

15/8/2012

Signature

Signature of relieved

Govt Servant

Designation SBT vacant post

Station.....

Signature of relieving

Govt Servant

Designation SBT

Station 94HS Malakana
Bajaur Agency.

Dated 16-8-2012

Endst No. 105 Dated 16-08-2012

Copy to the:

1. DE (FATA) Peshawar
2. AEO Bajaur Agency
3. Agency Account officer's Bajaur
4. Manager NB Timergara

Rashid

ATTESTED



ANNEX 3

DATED

24

NOTIFICATION

1. WHERE AS: one Mst. Asma D/O Muhammad Akbar who herself appointed/adjusted as SST (G) in GGHSS Ghallanai District Mohmand vide Notification No. 453-60/File No. 2/A-14/SST(F)/Gen/PSC/Apptt: dated 06/8/2012 and No. 11174-86/A-1 (General) /Apptt: of SST (F) (PSC)2012 dated 15/08/2012 upon the production of fake/bogus appointment/adjustment order not issued by the Directorate of Education erstwhile FATA Nor by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.
2. AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but she failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
4. AND WHERE AS, it has come to the notice of the competent authority that Mst. Asma D/O Muhammad Akbar, having no legal status of the said appointment/adjustment order.
5. NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus her appointment/adjustment Notification No. 453-60/File No. 2/A-14/SST(F)/Gen/PSC/Apptt: dated 06/8/2012 and No. 11174-86/A-1 (General) /Apptt: of SST (F) (PSC)2012 dated 15/08/2012 is hereby "**DISOWNED**" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mst. Asma D/O Muhammad Akbar in the interest of Public Service.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

5883-87

Endst: No. _____ dated 5/9 2019

Copy forwarded with the request to take legal action and recover the outstanding amount from the aforesaid person/individual to the:-

1. Deputy Commissioner, Tribal District Mohmand.
2. District Education Officer Tribal District Mohmand with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
3. District Account Officer Tribal District Mohmand to co-operate in the matter.
4. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
5. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.

ATTESTED

Deputy Director (Estab)
Merged Districts

05/09/19

ANNEX "H"

25

To

Secretary of Education
KPK Peshawar

Subject: Appeal against disowned order sst

Dear Sir,

I am working at GHSS Ghallanai
Machonwal Distt: as SST (R) since 2009.

But after 09 years service I have been
disowned of service it is why? The said
Director of FATA was blind in the time
of joining. The said Director my all
documents have sent to Board University
and order to Director R(S) KPK for verification.
After verification I started payment.

Sir, I am qualified MA-MED Teacher
and have a long service and qualification
already.

Therefore I may please be adjusted
on my own post due to my qualification -
long service and ~~on~~ my discretion age,

ATTESTED

Your obedient,
MST ASMA SST GHSS Ghallanai
Machonwal Distt:

وکالت نامہ

بعدالت دیکر حضور سروس ٹریڈنگ کمپنی کی طرف

صاحب محترم آسمان نام گورنمنٹ آف پی

منجانب ریٹائرمنٹ دعویٰ اجرم سروس ہیرا پیل

تھانہ ایف آئی آر تاریخ

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام

امین الرحمن یوسفزئی ایڈووکیٹ ہائی کورٹ، فیڈرل شریعت کورٹ آف پاکستان اینڈ سجاد احمد محسود ایڈووکیٹ ہائی کورٹ،

کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا اگر پیشی پر من مظهر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا پیچھے یا بزور تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ علاوہ صدر مقام کچہری کے کسی اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر من مظهر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرہ اخت صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرانے اور ہر قسم کا رویہ وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد دہائی و راضی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا طرفہ درخواست حکم امتناعی یا ترقی یا گرفتاری قبل از اجراء ڈگری یا اس کے کسی جزو کی کاروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں۔ اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا۔ وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا یہ مختار نامہ لکھ دیا کہ سندس ہے مورخہ _____ مضمون مختار نامہ من لیا ہے اور

اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ATTESTED & ACCEPTED:

Amin ur Rehman Yousafzai
Advocate High Court,
& Federal Shariat Court
of Pakistan.

Now
Khushal
Khan
DC-18/11/15
Khan

Sajjad Ahmad Mehsud
Advocate High Court
Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 974/2019

Mst. Asma.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others.....Respondents

INDEX

| S.NO. | PARTICULARS | ANNEXURE | PAGE NO |
|-------|-------------------------------------|----------|---------|
| 1. | Parawise Comments of the Commission | | 1-3 |
| 2. | Copy of PSC Advertisement 01/2009 | "A" | 4 |
| 3. | Copy of PSC Merit list | "B" | 5-15 |



Senior Law Officer
Khyber Pakhtunkhwa
Public Service Commission Peshawar

UMS88642462

Date: 19/03/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 974/2019

Mst. Asma.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others.....Respondents

PARAWISE COMMENTS ON BEHALF OF (RESPONDENT NO. 03)

PRELIMINARY OBJECTIONS:

1. The appellant neither applied nor was recommended against any of the advertised posts. She is not a genuine recommendee / selectee of the Public Service Commission in respect of the post.
2. That the instant Service Appeal is not maintainable against the replying Respondent No.3.
3. That the appellant has malafidely dragged Khyber Pakhtunkhwa Public Service Commission in the instant case.
4. That the appellant is misleading this Honorable Service Tribunal.
5. That instant Service Appeal is liable to be dismissed with special cost as the same is based on ulterior motives of the appellant.
6. Instant service appeal is based on misrepresentation.

ON FACTS:

- 1-2. Pertains to personal information of the appellant, no comments.
3. That the Khyber Pakhtunkhwa Public Service Commission advertised 973 posts of SETs/SSTs vide Advertisement No. 01/2009 S.No. 55 dated 26.01.2009 with the following qualifications:

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION:

| Merit | Zone-1 | Zone-2 | Zone-3 | Zone-4 | Zone-5 |
|-------|--------|--------|--------|--------|--------|
| 243 | 162 | 162 | 162 | 122 | 122 |

(Annex-A)

Furthermore recommendation and list of candidates who were recommended to Government for appointment is **(Annex-B)**.

R-SBT (S) Annex-B / 15/9
MERIT LIST of Female SSI (Science) (S)

| S. No | Total Marks | Interview Marks | D/O Birth | Name with Father's Name | District |
|-------|-------------|-----------------|-----------|---|----------------|
| 1. | 71 | 46 | 16/9/81 | Salma Raqib D/O Raqib Baz Khan | Bannu/4 |
| 2. | 70 | 46 | 17/11/85 | Majhalarah D/O Mahboob ur Rahman | Karak/4 |
| 3. | 69 | 46 | 25/2/83 | Rafia Tareen D/O Munir Ahmad Tareen | D.I Khan/4 |
| 4. | 69 | 46 | 12/4/83 | Afshan Ali D/O Muhammad Ali | Karak/4 |
| 5. | 69 | 45 | 7/12/78 | Safia Jabeen D/O Haris Maqbool Khan | D.I Khan/4 |
| 6. | 69 | 45 | 30/3/80 | Zakia Mehboob D/O Mian Mehboob Ullah | Nowshera/2 |
| 7. | 69 | 45 | 4/5/83 | Fatima Anwar D/O Muhammad Anwar | D.I Khan/4 |
| 8. | 69 | 45 | 7/4/84 | Nasima Akhtar D/O Umer Khan | Tank/4 |
| 9. | 68 | 46 | 22/8/81 | Sajida Syed D/O Kachkol Shah | Kohat/4 |
| 10. | 68 | 46 | 14/3/84 | Nabeela D/O Sarfaraz Khan | Swabi/2 |
| 11. | 68 | 46 | 8/9/85 | Nabeela Gul D/O Faizullah Khan | Kohat/4 |
| 12. | 68 | 45 | 9/10/81 | Nazia Nasreen D/O Zurlat Khan | Karak/4 |
| 13. | 68 | 45 | 5/11/33 | Sahira Fatima D/O Muhammad Usman | Karak/4 |
| 14. | 68 | 45 | 1/5/84 | Sumera Abdus Sattar D/O Adus Sattar | D.I Khan/4 |
| 15. | 68 | 44 | 18/9/83 | Irum Nigah D/O Nizab Hussain | Peshawar/2 |
| 16. | 67 | 45 | 20/2/80 | Safia Zaman D/O Muhammad Zaman Khan | D.I Khan/4 |
| 17. | 67 | 45 | 15/5/83 | Jameela Bano D/O Muhammad Aslam Azad | Lakki Marwat/4 |
| 18. | 67 | 45 | 10/4/84 | Salma Mehnaz D/O Rahmat Ali Khan | Karak/4 |
| 19. | 67 | 45 | 19/5/84 | Nadia Begum D/O Kamil Khan | Kohat/4 |
| 20. | 67 | 45 | 27/4/85 | Nasrah Rubah D/O Zawar Hussain | D.I Khan/4 |
| 21. | 67 | 45 | 10/8/85 | Miss Riya Bibi D/O Attaullah Khan | D.I Khan/4 |
| 22. | 67 | 44 | 1/4/84 | Shahnaz Gul D/O Musafir Gul | Peshawar/2 |
| 23. | 67 | 44 | 15/6/84 | Sadia Ibad D/O Ibadullah | Nowshera/2 |
| 24. | 67 | 44 | 5/1/85 | Shaista Khan D/O Farhad Khan | Mardan/2 |
| 25. | 66 | 46 | 13/11/71 | Syeda Salma Anjum D/O Syed Hashim Ali Shah | Bannu/4 |
| 26. | 66 | 45 | 31/3/81 | Shohla Gul Siddiqi D/O Muhammad Jayod Siddiqi | Nowshera/2 |
| 27. | 66 | 45 | 23/11/81 | Sanobar Khan D/O Sohrab Khan | Kohat/4 |
| 28. | 66 | 45 | 10/3/86 | Nazia Qayyum D/O Abdil Qayyum | D.I Khan/4 |
| 29. | 66 | 44 | 17/5/78 | Mehreen Fida D/O Fida Muhammad | Peshawar/2 |
| 30. | 66 | 44 | 11/4/83 | Iram Khan D/O Sher Dil Khan | Swabi/2 |
| 31. | 66 | 44 | 4/10/83 | Beenish Gul Bangash D/O Naseer Ahmad Bangash | Kohat/4 |
| 32. | 66 | 44 | 10/10/84 | Tabassum Rana D/O Aftab Khan | Bannu/4 |
| 33. | 66 | 44 | 1/5/85 | Tahira Javed Malik D/O Malik Javed Hussain | D.I Khan/4 |

Handwritten marks along the left margin of the table, including 'X' marks and '4' characters, indicating a review or selection process.

Handwritten notes and initials to the right of the table, including 'M', '15/9', '20/9', '22/9', '27/9', '28/9', '29/9', and circled numbers '1', '2', '3', '4', '5', '6', '7', '8', '9'.

| | | | | | | |
|-----|----|----|----------|--|-------------------|---------|
| 34. | 66 | 44 | 28/3/86 | Nazia Riz D/O Muhammad Riz Akhtar | Haripur/5 | P/440 |
| 35. | 66 | 43 | 4/1/84 | Mamoon Gul D/O Ahmad Khan | Charsadda/2 | 10 |
| 36. | 66 | 43 | 1/8/84 | Rizwana Bibi D/O Sahib Jan | D.I Khan/4 | M 2/19 |
| 37. | 66 | 43 | 27/10/84 | Farah Ayub D/O Muhammad Ayub Khan | FR Tank/1 | |
| 38. | 66 | 43 | 3/4/86 | Sana Jamal D/O Hazrat Jamal | Mardan/2 | 11 |
| 39. | 66 | 42 | 23/12/83 | Shabana D/O Farhad | Swabi/2 | 12 M |
| 40. | 66 | 42 | 24/12/83 | Saba Suleman D/O Muhammad Suleman | Haripur/5 | P/413 |
| 41. | 65 | 46 | 15/3/84 | Sania Nizam D/O Nizam ud Din | Kohat/4 | |
| 42. | 65 | 46 | 16/2/86 | Fatima D/O Abdul Nazeer | Swabi/2 | 15 |
| 43. | 65 | 45 | 31/3/83 | Shahida Mehreen D/O Fazal Haq | Karak/4 | |
| 44. | 65 | 45 | 13/4/84 | Nosheen D/O Khanan Khan | Swabi/2 | 14 |
| 45. | 65 | 44 | 1/3/79 | Amlina Ramzan D/O Muhammad Ramzan | D.I Khan/4 | M. |
| 46. | 65 | 44 | 30/12/80 | Rukhsana Gul D/O Gul Mar Khan | Lakki Marwat/4 | |
| 47. | 65 | 44 | 12/10/81 | Sadia Anwar D/O Prof: Muhammad Anwar Khan | Charsadda/2 | 15 |
| 48. | 65 | 44 | 15/3/82 | Nusrat Begum D/O Mustafa Kamal | Khyber Agy/1 | |
| 49. | 65 | 44 | 14/4/85 | Samreen Noor D/O Noor Muhammad | S.W Agy/1 | |
| 50. | 65 | 43 | 20/3/82 | Shabnam Fatima D/O Ghulam Hassan | D.I Khan/4 | |
| 51. | 65 | 43 | 3/4/83 | Nadia Nooren D/O Muhammad Sherin Khan | Charsadda/2 | 16 M |
| 52. | 65 | 43 | 17/4/85 | Salma Kifayat D/O Kifayat Ullah | Mardan/2 | 17 |
| 53. | 65 | 42 | 1/1/81 | Taskeen Bibi D/O Shamas Khan | Swabi/2 | 18 M |
| 54. | 65 | 42 | 1/5/83 | Marla Khatoon D/O Muhammad Niaz | Abbottabad/5 | P/438 |
| 55. | 65 | 42 | 10/5/83 | Hajra Bibi D/O Fateh Hussain Shah | Haripur/5 | P/400 ✓ |
| 56. | 65 | 42 | 22/11/85 | Irum Naz D/O Mukhtiar Khan | Mardan/2 | 19 M |
| 57. | 64 | 45 | 11/4/73 | Latafat Bibi D/O Mushtaq Hussain Shah | D.I Khan/4 | 13/9 |
| 58. | 64 | 45 | 28/2/82 | Shamshad Bibi D/O Sultan Bakhsh | D.I Khan/4 | M 22/9 |
| 59. | 64 | 44 | 23/3/80 | Umera Nosheen D/O Meher Zaman | Nowshora/2 | 20 |
| 60. | 64 | 44 | 4/12/83 | Farla Inayat D/O Inayat Ullah Khan | Charsadda/2 | 21 M |
| 61. | 64 | 44 | 1/11/86 | Sajda Noorin D/O Abdul Wasea | Lakki Marwat/4 | M 22/9 |
| 62. | 64 | 43 | 27/3/85 | Sajma D/O Zubair Shah | Mohmand Agy/1 | |
| 63. | 64 | 42 | 4/4/79 | Naila Nooren D/O Muhammad Anwar | Peshawar/2 | 22 |
| 64. | 64 | 42 | 28/8/83 | Nazia Shaheen D/O Muhammad Miskeen | Mansohra/5 | P/445 |
| 65. | 64 | 42 | 14/4/85 | Hadia Naz D/O Jan Muhammad | Mardan/2 | 23 M |
| 66. | 64 | 41 | 10/2/82 | Naveeda Tariq D/O Malik Muhammad Tariq | Peshawar/2 | 24 M |
| 67. | 64 | 41 | 16/4/83 | Nadia Malik D/O Abdul Malik | Mardan/2 | 25 M |
| 68. | 64 | 41 | 9/8/83 | Huma Akram Khan D/O Akram Khan | Mardan/2 | 26 |
| 69. | 64 | 41 | 21/3/85 | Kaloom Mumtaz D/O Mumtaz Hussain | Peshawar/2 | 27 M |
| 70. | 64 | 41 | 29/3/86 | Arj Naseer D/O Muhammad Naseer Joya | D.I Khan/4 | 15/9 |

| | | | | | | |
|------|----|----|----------|--|----------------|-------|
| 71. | 63 | 45 | 7/11/80 | Safia Naz D/O Habib Ullah | Charsadda/2 | 28 |
| 72. | 63 | 44 | 6/8/78 | Noshaba Cocab D/O Hameed Ullah | D.I Khan/4 | 20/9 |
| 73. | 63 | 44 | 10/2/86 | Noureen Nazir D/O Nazir Muhammad | Charsadda/2 | 27 |
| 74. | 63 | 43 | 27/4/78 | Shafida Begum D/O Andaz Ali Khan | Bannu/4 | |
| 75. | 63 | 43 | 8/1/80 | Nazia Begum D/O Wali Jan | Mardan/2 | 30 M |
| 76. | 63 | 43 | 8/9/82 | Shumalla Hussain D/O Muhammad Hussain | Hangu/4 | M ✓ |
| 77. | 63 | 43 | 25/9/82 | Aasma Qureshi D/O M. Rehman | Lakki Marwat/4 | 12/9 |
| 78. | 63 | 43 | 5/4/86 | Nadia Nosheen D/O Ghulam Rasool | Bannu/4 | M |
| 79. | 63 | 42 | 3/4/77 | Safia Irshad D/O Muhammad Shabih Ul Hassan | Peshawar/2 | 31 |
| 80. | 63 | 42 | 12/9/82 | Lubna Saraj D/O Saraj Muhammad | Swabi/2 | 32 M |
| 81. | 63 | 42 | 13/9/82 | Neelam Taj D/O Taj Muhammad | Dir Lower/3 | ✓ ✓ |
| 82. | 63 | 42 | 1/1/83 | Shoraz Begum D/O Afrald Khan | Swat/3 | ✓ |
| 83. | 63 | 42 | 22/6/83 | Asha Bano D/O Muhammad Ashraf | Mansehra/5 | P/395 |
| 84. | 63 | 42 | 11/7/83 | Zahida Sharif D/O Sahrif Ullah Khan | Bannu/4 | |
| 85. | 63 | 42 | 23/11/83 | Razia Perveen D/O Hajit Bad Shah | Karak/4 | M 2/9 |
| 86. | 63 | 42 | 1/1/84 | Sadia Bibi D/O Fazal Ghani | Dir Lower/3 | ✓ |
| 87. | 63 | 42 | 1/2/85 | Robina Naz D/O Wasal Khan | Charsadda/2 | 33 |
| 88. | 63 | 42 | 8/4/85 | Tania Gul D/O Sher Dil Khan | Swabi/2 | 34 M |
| 89. | 63 | 42 | 5/9/85 | Naseem Bano D/O Muhammad Ghulam | Kurram Agy/1 | |
| 90. | 63 | 42 | 30/6/85 | Aqoola Bibi D/O Abdur Razaq | Abbottabad/5 | P/385 |
| 91. | 63 | 41 | 11/4/82 | Farzana Bibi D/O Muhammad Jan | Tank/4 | 13/9 |
| 92. | 63 | 41 | 28/2/83 | Nuzhat Bibi D/O Abdul Malik | Swabi/2 | 35 M |
| 93. | 63 | 41 | 15/10/84 | Nazia Tabassum D/O Muhammad Qasim | Mardan/2 | 36 |
| 94. | 63 | 41 | 5/3/85 | Kalsoom Azam D/O Sher Azam Khan | Peshawar/2 | 37 |
| 95. | 63 | 40 | 1/1/79 | Nazra Shaheen D/O Shahzada Khan | Haripur/5 | P/408 |
| 96. | 63 | 40 | 9/8/83 | Beena Akram Khan D/O Akram Khan | Mardan/2 | 38 M |
| 97. | 63 | 40 | 21/11/83 | Farhat Naz D/O Aurang Zeb | Mansehra/5 | P/387 |
| 98. | 63 | 40 | 4/8/84 | Mamona Imtiaz D/O Malik Imtiaz Ahmad | Charsadda/2 | 39 M |
| 99. | 63 | 40 | 2/3/85 | Fouzia Amin D/O Muhammad Amin | Mardan/2 | M |
| 100. | 63 | 40 | 8/8/85 | Shahzina D/O Mahabat Khan | F.R Bannu/1 | |
| 101. | 63 | 40 | 1/11/85 | Bushra Saleem D/O Muhammad Saleem | Haripur/5 | P/393 |
| 102. | 63 | 40 | 26/3/86 | Irum Naz D/O Behram Khan | Mkd Agy/3 | ✓ |
| 103. | 62 | 43 | 21/8/79 | Nagina Rehman D/O Gul Rehman | Peshawar/2 | 40 |
| 104. | 62 | 42 | 29/1/85 | Alla Bibi D/O Sher Ali | Swabi/2 | 41 M |
| 105. | 62 | 42 | 12/3/85 | Asma Yaqoob D/O Muhammad Yaqoob | D.I Khan/4 | 12/9 |
| 106. | 62 | 42 | 4/9/85 | Mahwash Zahoor D/O Zahoor ul Han | Mardan/2 | 42 |

(7)

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Handwritten notes and marks on the right margin, including dates like '20/9', '12/9', '2/9', 'P/395', 'P/385', 'P/408', 'P/387', 'P/393', and various checkmarks and initials.

| | | | | | |
|------|----|----|----------|------------------------------------|---------------|
| 107. | 62 | 42 | 30/11/85 | Sarwat Iftikhar D/O Iftikhar Ahmad | Mansehra/5 |
| 108. | 62 | 42 | 22/9/86 | Amira Jadoon D/O Hamid All Khan | Abbottabad/5 |
| 109. | 62 | 41 | 1/3/87 | Shazia Naeem D/O Shaukat All | Swabi/2 |
| 110. | 62 | 40 | 2/7/78 | Rubina Shaheen D/O Manzoor | Haripur/5 |
| 111. | 62 | 40 | 1/3/81 | Saira Bano D/O Mira Khan | Mohmand Agy/1 |
| 112. | 62 | 40 | 1/1/82 | Hashmat D/O Samand Khan | Swabi/2 |
| 113. | 62 | 40 | 16/4/83 | Falza Hamid D/O Hamid Ullah Khan | Charsadda/2 |
| 114. | 62 | 40 | 10/5/83 | Minhas Aman D/O Aman Sher | Mardan/2 |
| 115. | 62 | 40 | 12/4/84 | Sara Ihsan D/O Ihsan Ullah | Charsadda/2 |
| 116. | 62 | 40 | 12/4/84 | Saira Falz D/O Falz Muhammad | Charsadda/2 |
| 117. | 62 | 40 | 1/6/84 | Nasira Begum D/O Muhammad Zubair | Dir Lower/3 |
| 118. | 62 | 40 | 1/9/84 | Gul Rukh D/O Nurul Qudus | Peshawar/2 |
| 119. | 62 | 40 | 1/1/86 | Nousheen Raziq D/O S.Fazle Raziq | Abbottabad/5 |
| 120. | 62 | 40 | 11/1/86 | Rubika Naeem D/O Naeem Akhtar | Abbottabad/5 |
| 121. | 62 | 39 | 16/3/85 | Shahia Jan D/O Jan Nisar | Charsadda/2 |
| 122. | 61 | 43 | 11/4/34 | Salma Ayaz D/O Mir Ayaz Khan | F.R Bannu/1 |
| 123. | 61 | 43 | 21/4/84 | Humera Shamsad D/O Shamsad Khan | Nowshera/2 |
| 124. | 61 | 42 | 1/9/82 | Aisha Qazi D/O Qazi Abdul Wahab | Peshawar/2 |
| 125. | 61 | 42 | 5/2/85 | Shazia Ayub D/O Ayub Khan | Khyber Agy/1 |
| 126. | 61 | 42 | 28/2/85 | Sheeba Wadud D/O Abdul Wadud | Swabi/2 |
| 127. | 61 | 42 | 5/1/87 | Naila Yahya D/O Yahya Gul | Charsadda/2 |
| 128. | 61 | 41 | 11/7/80 | Asmat Bibi D/O Ghulam Sarwar | Swabi/2 |
| 129. | 61 | 41 | 1/11/80 | Safia Naz D/O Zardullah Khan | Mardan/2 |
| 130. | 61 | 40 | 19/12/77 | Shazia Afridi D/O M.Akram Afridi | Khyber Agy/1 |
| 131. | 61 | 40 | 11/11/79 | Sara Falz D/O Falz ul Hassan | Charsadda/2 |
| 132. | 61 | 40 | 22/2/80 | Sarwat Jabeen D/O Muhammad Zaheer | Mardan/2 |
| 133. | 61 | 40 | 28/4/81 | Saira Rafiq D/O Muhammad Rafiq | Haripur/5 |
| 134. | 61 | 40 | 4/11/82 | Sadia Rauf D/O Abdur Rauf | Mardan/2 |
| 135. | 61 | 40 | 14/3/83 | Mehwish Ibrar D/O Muhammad Ibrar | Haripur/5 |
| 136. | 61 | 40 | 20/4/83 | Nazla Begum D/O Muhammad Nishat | Swabi/2 |
| 137. | 61 | 40 | 1/7/83 | Anila Khan D/O Rasool Khan (Late) | Peshawar/2 |
| 138. | 61 | 40 | 1/2/84 | Nadla Gul D/O Risaal Khan | Nowshera/2 |
| 139. | 61 | 40 | 1/2/84 | Salma Bibi D/O Abdul Salam | Haripur/5 |
| 140. | 61 | 40 | 2/3/84 | Misbah Wadud D/O Abdul Wadud | Swabi/2 |
| 141. | 61 | 40 | 7/2/85 | Salqa Rahoom D/O Abdul Rahim | Karak/4 |
| 142. | 61 | 40 | 1/4/85 | Salma D/O Muhammad Younas | Mardan/2 |
| 143. | 61 | 40 | 21/6/85 | Sumera Asma D/O Inam | Peshawar/2 |

(8)

P/438
P/385
43
P/401
P/406 ✓
P/400 ✓
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P/420
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P/426
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P/425
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64

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(9)

| | | | | Ullah | |
|------|----|----|----------|--|---------------|
| 144. | 61 | 40 | 1/10/86 | Shazma D/O Mir Hassan | Mardan/2 |
| 145. | 61 | 39 | 14/7/83 | Angeela Rehman D/O Rehman Shah | Peshawar/2 |
| 146. | 61 | 39 | 2/12/83 | Saba Gul D/O Ashraf Iqbal | Haripur/5 |
| 147. | 61 | 39 | 29/2/84 | Aaila Farid D/O Farid Gul | Charsadda/2 |
| 148. | 61 | 39 | 13/4/84 | Nayab D/O Allah Dad | Mardan/2 |
| 149. | 61 | 39 | 12/2/85 | Raheela Naz D.O Muhammad Rasheed | Swabi/2 |
| 50. | 61 | 39 | 22/2/85 | Shumaila Alam D/O Sher Alam Khan | Mardan/2 |
| 151. | 61 | 39 | 29/3/85 | Sadla Noreen D/O Tariq Bahar | Nowshera/2 |
| 152. | 61 | 39 | 3/4/86 | Tabassum Gohar D/O Syed Gauhar Shah | Mardan/2 |
| 153. | 61 | 39 | 6/2/87 | Rahat Begum D/O Bahadar Sher | Mardan/2 |
| 154. | 61 | 38 | 15/4/80 | Allya Firdos D/O Muhammad Ashiq | Bannu/4 |
| 155. | 61 | 38 | 14/12/81 | Kausar Parvalz D/O Muhammad Parvalz | Mkd Agy/3 |
| 156. | 61 | 38 | 9/10/84 | Lubna Shafiq D/O Shafiq ur Rehman | Karak/4 |
| 157. | 61 | 38 | 17/1/85 | Nazish Iftikhar D/O Iftikhar Ahmad | Haripur/5 |
| 158. | 61 | 38 | 28/2/85 | Sadaf Ambreen D/O Muhammad Aslam | D.I Khan/4 |
| 159. | 60 | 41 | 14/10/82 | Amreena D/O Mir Ahmed Shah | Nowshera/2 |
| 160. | 60 | 41 | 13/2/84 | Badar Samina D/O Syed Sardar Shah | Mardan/2 |
| 161. | 60 | 41 | 1/1/85 | Sameena Naz D/O Sultan | Bajaur Agy/1 |
| 162. | 60 | 40 | 2/2/80 | Nighat Parveen D/O Muhammad Aslam | Haripur/5 |
| 163. | 60 | 40 | 2/2/82 | Farzana Bibi D/O Muhammad Siddique | Haripur/5 |
| 164. | 60 | 40 | 13/10/82 | Nazish Bano D/O Sardar Muhammad | Swabi/2 |
| 165. | 60 | 40 | 3/11/82 | Nosheen Khan D/O Muhammad Ajmal Khan | Swat/3 |
| 166. | 60 | 40 | 22/11/82 | Shalsta Jabeen D/O Fazal Ilahi | Mardan/2 |
| 167. | 60 | 40 | 26/12/83 | Neelam Azra Khattak D/O Muhammad Zarin Khattak | Nowshera/2 |
| 168. | 60 | 40 | 21/3/84 | Irrum Manzoor D/O Manzoor Ahmad | Mansehra/5 |
| 169. | 60 | 40 | 12/4/84 | Nazia Begum D/O Yar Muhammad | Mardan/2 |
| 170. | 60 | 40 | 1/1/85 | Sakeena Afridi D/O Muhammad Nawaz | Peshawar/2 |
| 171. | 60 | 40 | 8/5/85 | Humaira Pervalz D/O Muhammad Pervalz | Haripur/5 |
| 172. | 60 | 40 | 14/4/86 | Shamida Bibi Bangash D/O Gul Muhammad Bangash | Kurram Agy/1 |
| 173. | 60 | 40 | 17/2/87 | Urooj Salim D/O Salim Fawad Siddique | Peshawar/2 |
| 174. | 60 | 39 | 10/11/76 | Noshaba Malik D/O Muhammad Miskeen | Mansehra/5 |
| 175. | 60 | 39 | 1/1/82 | Fatima Sughra D/O Syed Muhammad Baqir | Orakzal Agy/1 |
| 176. | 60 | 39 | 26/12/82 | Kokab Al Sabah D/O Abdul Rasheed | Abbottabad/1 |
| 177. | 60 | 39 | 5/1/85 | Faiza Rahman D/O Abdul Rahman | Mardan/2 |
| 178. | 60 | 39 | 27/7/86 | Bushra Haider D/O Shaukat Pervez | Abbottabad/5 |

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88

89

90

91

92

93

94

95

96

97

98

99

100

P/443

P/407

22/9

P/445

P/400

P/402

P/419

P/418

P/412

P/420

P/392

| | | | | | |
|------|----|----|----------|---|----------------|
| 79. | 60 | 38 | 15/2/78 | Farsat Begum D/O Azim Khan | Swabi/2 |
| 180. | 60 | 38 | 11/1/80 | Khadija Shakir D/O Muhammad Shakir | Mansehra/5 |
| 181. | 60 | 38 | 13/4/82 | Misbah Akram D/O Muhammad Akram | Abbottabad/5 |
| 182. | 60 | 38 | 3/10/85 | Shazia Rafiq D/O Syed Rafiq Shah | Charsadda/2 |
| 183. | 60 | 37 | 18/3/78 | Javeria Hussain D/O Khadim Hussain | Peshawar/2 |
| 184. | 60 | 37 | 6/12/81 | Sarah Mazhar D/O Mazhar ul Haq | Mardan/2 |
| 185. | 60 | 37 | 19/8/84 | Adeela Hakeem D/O Hakim Ullah Qazi | Dir Lower/3 |
| 186. | 60 | 37 | 5/1/85 | Sumaira Noor D/O Syed Noor ul Basar | Mardan/2 |
| 187. | 60 | 36 | 26/12/80 | Zilja Huma D/O Muhammad Jehangir Khan | D.I Khan/4 |
| 188. | 60 | 36 | 12/4/85 | Nadla Bibi D/O Zar Wali Khan | Bannu/4 |
| 189. | 60 | 36 | 15/3/86 | Tahira Jabeen D/O Muhammad Najib Ullah | Chitral/3 |
| 190. | 59 | 41 | 15/9/83 | Zahida D/O Hazrat Bilal | Peshawar/2 |
| 191. | 59 | 41 | 1/1/86 | Huma Gul D/O Muhammad Younas | Charsadda/2 |
| 192. | 59 | 40 | 20/3/79 | Fazilat Khattak D/O Sarfaraz Khattak | Nowshera/2 |
| 193. | 59 | 40 | 25/4/82 | Shahzadi Seema D/O Ahmad Shah | Swabi/2 |
| 194. | 59 | 40 | 9/4/83 | Sohaila Rani D/O Sald Muhammad Shah | Chitral/3 |
| 195. | 59 | 40 | 1/4/84 | Yasmeen Habib D/O Habib ur Rehman | Lakki Marwat/4 |
| 196. | 59 | 40 | 1/1/85 | Marifat Jahan D/O Aurang Zeb | Nowshera/2 |
| 197. | 59 | 40 | 23/3/86 | Nazish Ali D/O Irshad Ali | Nowshera/2 |
| 198. | 59 | 39 | 15/11/78 | Shahab Afroz D/O Hashmat Ullah Khan | Charsadda/2 |
| 199. | 59 | 39 | 23/3/80 | Sarwat Sohrab D/O Sohrab Ali Khan | Mardan/2 |
| 200. | 59 | 39 | 4/2/82 | Sajma Bibi D/O Muhammad Ashraf | Mansehra/5 |
| 201. | 59 | 39 | 1/4/82 | Hameeda Naz D/O Abdur Rauf Khan | Swabi/2 |
| 202. | 59 | 39 | 6/1/84 | Nazla Sultana D/O Zardad Khan | Karak/4 |
| 203. | 59 | 39 | 20/8/85 | Saeeda D/O Ahmed Jan | Mkd Agy/3 |
| 204. | 59 | 39 | 19/7/87 | Neelam Asad D/O Asad Khan | Peshawar/2 |
| 205. | 59 | 38 | 1/5/78 | Shazia Norin D/O Athar Din | Abbottabad/5 |
| 206. | 59 | 38 | 15/8/80 | Farhana Sadiq D/O Muhammad Sadiq | Abbottabad/5 |
| 207. | 59 | 38 | 6/11/80 | Hajra Bibi D/O Bakht Elland | Mardan/2 |
| 208. | 59 | 38 | 4/6/81 | Sajida D/O Haider Zaman Khan | Swabi/2 |
| 209. | 59 | 38 | 9/3/83 | Safia Shams D/O Shams ur Rehman | Charsadda/2 |
| 210. | 59 | 38 | 9/3/83 | Shehla Shafique D/O Shafique ur Rehman | Mansehra/5 |
| 211. | 59 | 38 | 21/10/83 | Shagufta Naz D/O Zahir Zaman | Swabi/2 |
| 212. | 59 | 38 | 1/3/85 | Gul Sheereen D/O Aziz ur Rehman | Haripur/5 |
| 213. | 59 | 37 | 6/7/82 | Sobia Mashkooor D/O Mashkooor Ahmad Sabar | Mansehra/5 |
| 214. | 59 | 37 | 26/8/82 | Rahat Un Nisa D/O Raees Khan | Abbottabad/5 |

10

P/443
P/425

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P/387

P/386

P/401

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|------|----|----|----------|--|--------------|
| 215. | 59 | 37 | 25/2/83 | Rashida Bibi D/O | Chitral/3 |
| 216. | 59 | 37 | 3/4/83 | Nazish Raees D/O Raees Khan | Swabi/2 |
| 217. | 59 | 37 | 10/2/84 | Sajma Saleem D/O Muhammad Saleem | Haripur/5 |
| 218. | 59 | 37 | 25/3/84 | Bibi Aisha Gul D/O Muhammad Bahader | Swabi/2 |
| 219. | 59 | 37 | 13/1/85 | Bushra Noreen D/O Shams ur Rehman | Abbottabad/5 |
| 220. | 59 | 36 | 1/2/77 | Adeela Rani D/O Muhammad Nawaz Khan | Mansehra/5 |
| 221. | 59 | 36 | 21/3/84 | Maryam Rauf D/O Rauf Khan | Kohat/4 |
| 222. | 59 | 36 | 13/9/84 | Parveen Balg D/O Sher Balg | Chitral/3 |
| 223. | 59 | 36 | 4/4/85 | Ashraf Bibi D/O Anwar Khan Anwar | Charsadda/2 |
| 224. | 58 | 40 | 2/3/81 | Huma Rashid D/O Abdur Rashid | Mardan/2 |
| 225. | 58 | 40 | 5/10/81 | Abida Shaheen D/O Abdul Hakeem | Abbottabad/5 |
| 226. | 58 | 40 | 2/5/83 | Sajma Riaz D/O Muhammad Riaz Khan | Mardan/2 |
| 227. | 58 | 39 | 2/4/81 | Sajma Begum D/O Muhammad Ghulam | Nowshera/2 |
| 228. | 58 | 39 | 1/4/83 | Naila Akbar D/O Fazal Akbar | Swabi/2 |
| 229. | 58 | 39 | 22/5/85 | Nabila Norin D/O Farhad Javed | Mardan/2 |
| 230. | 58 | 39 | 1/9/85 | Sobia Saeed D/O Muhammad Saeed | Haripur/5 |
| 231. | 58 | 39 | 5/2/86 | Farmina Tabassum D/O Wali Rahmat | Chitral/3 |
| 232. | 58 | 39 | 15/3/86 | Saira Sardar D/O Sardar Ud Din | Peshawar/2 |
| 233. | 58 | 39 | 1/1/87 | Safia Zaibi D/O Ghani ur Rehman | Peshawar/2 |
| 234. | 58 | 38 | 2/3/72 | Fozia Shaheen D/O Pir Muhammad | Haripur/5 |
| 235. | 58 | 38 | 13/4/79 | Shazia Naz D/O Hidayat Ullah | Nowshera/2 |
| 236. | 58 | 38 | 24/10/80 | Sadia Amin D/O Bin Yamin | Swabi/2 |
| 237. | 58 | 38 | 10/12/81 | Sadia Kullsoom D/O Syed Ahmed Shah | Swabi/2 |
| 238. | 58 | 38 | 1/5/83 | Samaira Saleh D/O Saleh Muhammad | Charsadda/2 |
| 239. | 58 | 38 | 13/3/84 | Shahzadi Noreen D/O Mir Zaman Shah | Mardan/2 |
| 240. | 58 | 38 | 20/3/86 | Haqia Sahar D/O Mir Azam Shah | Chitral/3 |
| 241. | 58 | 38 | 15/10/87 | Sobia Hashmi D/O Khurshid Alam Hashmi | Haripur/5 |
| 242. | 58 | 37 | 1/9/75 | Shahnaz Begum D/O Gul Daraz Khan | Karak/4 |
| 243. | 58 | 37 | 1/4/80 | Robina Taslim D/O Muhammad Hashim | Chitral/3 |
| 244. | 58 | 37 | 30/6/81 | Ghazala Yasmeen D/O Satiullah | Charsadda/2 |
| 245. | 58 | 37 | 29/3/82 | Shereen Kifayat D/O Mian Kifayat Ullah | Nowshera/2 |
| 246. | 58 | 37 | 6/6/82 | Zubaida Khatoon D/O Taj Muhammad Khan | Karak/4 |
| 247. | 58 | 37 | 6/6/82 | Bibi Zahra D/O Gohar Rehman | Abbottabad/5 |
| 248. | 58 | 37 | 15/6/82 | Safia Shahzad D/O Shahzad Gul | Peshawar/2 |
| 249. | 58 | 37 | 10/5/84 | Nosheen Ramzan D/O Muhammad Ramzan | Haripur/5 |
| 250. | 58 | 37 | 2/1/84 | Farhana Rehman D/O Peshawar/2 | |

8/384

8/388

8/386

11

12

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|------|----|----|----------|---|----------------|
| 251. | 58 | 37 | 27/8/84 | Nadia Afzal Khan D/O Fida Muhammad | Mkd Agy/3 |
| 252. | 58 | 37 | 13/3/85 | Nosheen Bibi D/O Khan Muhammad | UDA Mansehra/3 |
| 253. | 58 | 37 | 18/4/86 | Sumayya D/O Rahman Ullah | Mardan/2 |
| 254. | 58 | 36 | 2/4/80 | Palwasha D/O Abdur Rahmin | Swabi/2 |
| 255. | 58 | 36 | 1/6/80 | Sabiha Bibi D/O Muhammad Rafiq | Peshawar/2 |
| 256. | 58 | 36 | 1/3/81 | Shabana Gul D/O Gul Zaman | Abbottabad/5 |
| 257. | 58 | 36 | 11/6/81 | Zakia Gul D/O Gul Zaman | Abbottabad/5 |
| 258. | 58 | 36 | 2/1/82 | Anisa Wali D/O Shah Wali Khan | Mkd Agy/3 |
| 259. | 58 | 36 | 11/9/82 | Jawaria Inayat D/O Inayat Ullah Awan | D.I Khan/4 |
| 260. | 58 | 36 | 11/9/82 | Nabeela Naz D/O Ghulam Riaz Khan | Bannu/4 |
| 261. | 58 | 36 | 25/2/83 | Hussan Ara D/O Muhammad Altaf Hussain | Karak/4 |
| 262. | 58 | 36 | 20/3/84 | Aficer Bibi D/O Syed Qasim Shah | Chitral/3 |
| 263. | 58 | 36 | 17/4/84 | Noorin Hikmat D/O Hikmat Ullah | Karak/4 |
| 264. | 58 | 36 | 14/5/84 | Rajwasha Malik D/O Malik Hashmat Ali | Charsadda/2 |
| 265. | 58 | 36 | 5/8/85 | Arshiya Iqbal D/O Muhammad Iqbal | D.I Khan/4 |
| 266. | 58 | 36 | 1/9/86 | Asifa Ashraf D/O Malik Muhammad Ashraf | D.I Khan/4 |
| 267. | 57 | 41 | 21/8/76 | Salma Imran D/O Abdul Qadus | Mohmand Agy/1 |
| 268. | 57 | 40 | 1/12/84 | Sana Muzaffar D/O Muzaffar Khan | Nowshera/2 |
| 269. | 57 | 40 | 8/2/85 | Fozia Sher Jan D/O Sher Jang | Swabi/2 |
| 270. | 57 | 39 | 17/10/81 | Gulnaz D/O Saleem Muhammad | Poshawar/2 |
| 271. | 57 | 39 | 26/11/86 | Fauzia Tabbasum D/O Ierar Ahmad Khan | Chitral/3 |
| 272. | 57 | 38 | 4/4/79 | Sadia Rani D/O Muffarab Shah | Mardan/2 |
| 273. | 57 | 38 | 14/12/79 | Bilqees Bano D/O Muhammad Suleman Abbas | Abbottabad/5 |
| 274. | 57 | 38 | 20/6/80 | Irum Karim D/O Abdul Karim | Abbottabad/5 |
| 275. | 57 | 38 | 26/6/83 | Noreen Bibi D/O Ahmad Khan | Haripur/5 |
| 276. | 57 | 38 | 1/1/86 | Sabahat Gul D/O Gullistan Khan | Charsadda/2 |
| 277. | 57 | 38 | 2/9/86 | Ghazala Saleem D/O Muhammad Saleem | Chitral/3 |
| 278. | 57 | 38 | 29/12/87 | Salma Noor D/O Noor Muhammad | Swabi/2 |
| 279. | 57 | 37 | 15/2/79 | Rabihat Begum D/O Khawaja Muhammad | Charsadda/2 |
| 280. | 57 | 37 | 28/3/83 | Samra Bibi D/O Muhammad Misri Khan | Haripur/5 |
| 281. | 57 | 37 | 23/6/83 | Robina Nazil D/O Jehan Sher Khan | Swat/3 |
| 282. | 57 | 37 | 22/10/83 | Latafat Yasmeen D/O Misal Khan | Karak/4 |
| 283. | 57 | 37 | 26/6/84 | Bushra Bibi D/O Muhammad Ismail | Haripur/5 |
| 284. | 57 | 37 | 15/3/85 | Shalsta Naseer D/O Naseer Ahmad | Charsadda/2 |
| 285. | 57 | 37 | 11/1/86 | Zeb Faryal Mir D/O Iqbal Shaheen | Chitral/3 |
| 286. | 57 | 37 | 13/6/86 | Mehreen Riaz D/O Riaz | Mkd Agy/3 |

P/34

P/393

P/34

13

| | | | | Muhammad | |
|------|----|----|----------|--|----------------|
| 287. | 57 | 37 | 2/8/87 | Saba Naz D/O Muhammad Nawaz Khan | Mansehra/5 |
| 288. | 57 | 37 | 4/11/87 | Shumaila Nisar D/O Nisar Ahmad | Mansehra/5 |
| 289. | 57 | 36 | 16/9/79 | Shumaila Noureen D/O Muhammad Hayat Khan | Bannu/4 |
| 290. | 57 | 36 | 10/4/80 | Suriya Mehnaz D/O Rais Khan | Karak/4 |
| 291. | 57 | 36 | 4/4/82 | Nadla Bibi D/O Manzoor Elahi | Haripur/5 |
| 292. | 57 | 36 | 10/2/83 | Fareena Mahak D/O Abdul Rasheed Khan | D.I Khan/4 |
| 293. | 57 | 36 | 28/2/83 | Samra Tul Ain D/O Haji Mushtaq Ahmad | Peshawar/2 |
| 294. | 57 | 36 | 31/3/83 | Sajma Saeed D/O Khan Saeed | Charsadda/2 |
| 295. | 57 | 36 | 27/3/84 | Sajma Saeed D/O Muhammad Saeed | Kohat/4 |
| 296. | 57 | 36 | 3/1/85 | Rukhsana Zaib D/O Alam Zaib | Mkd Agy/3 |
| 297. | 57 | 36 | 1/3/85 | Rifat Niaz D/O Umar Niaz Khan | Bannu/4 |
| 298. | 57 | 36 | 19/3/85 | Sumeerah Yasmin D/O Ahmad Nawaz | D.I Khan/4 |
| 299. | 57 | 36 | 23/3/85 | Aisha Naz D/O Mirza Ali Khan | Karak/4 |
| 300. | 57 | 36 | 23/2/86 | Zartasha Khan D/O Jehanzeb Khan | Abbottabad/5 |
| 301. | 56 | 39 | 4/2/85 | Shagufta Rehman D/O Muhammad Rehman | Bajaur Agy/1 |
| 302. | 56 | 38 | 20/12/84 | Najmusahar Bibi D/O Sher Zaman Shah | Mardan/2 |
| 303. | 56 | 38 | 19/7/86 | Ayesha Bibi D/O Haq Nawaz | Nowshera/2 |
| 304. | 56 | 37 | 13/4/79 | Raryaan Nisa D/O Sakhawat Shah | Buner/3 |
| 305. | 56 | 37 | 30/3/80 | Musarrat Begum D/O Habib Jan | Dir Lower/3 |
| 306. | 56 | 37 | 12/3/81 | Ulfat Begum D/O Tayyab Jan | Mardan/2 |
| 307. | 56 | 37 | 3/12/81 | Rohi Omar D/O Hazrat Omar | Mkd Agy/3 |
| 308. | 56 | 37 | 1/3/83 | Yasmin Gul D/O Sher Bahadur | Mansehra/5 |
| 309. | 56 | 37 | 11/4/83 | Sabeen Begum D/O Gulzar Muhammad | Nowshera/2 |
| 310. | 56 | 37 | 1/1/84 | Sheema Rehman D/O Yousaf Rehman | Swabi/2 |
| 311. | 56 | 37 | 15/3/85 | Saira Gul D/O Gul Nawaz Khan | Chitral/3 |
| 312. | 56 | 37 | 31/3/86 | Saima Gul D/O Abdul Fateh | Charsadda/2 |
| 313. | 56 | 36 | 25/2/75 | Saira Bibi D/O Gul Payao Khan | Karak/4 |
| 314. | 56 | 36 | 12/11/77 | Gulshan Ara D/O Habib Ullah Khan | Lakki Marwat/4 |
| 315. | 56 | 36 | 4/1/78 | Shabnam Ara Bibi D/O Shah Pasand | Mardan/2 |
| 316. | 56 | 36 | 13/9/79 | Bibi Mahnaz D/O Muhammad Akrem Jadoon | Abbottabad/5 |
| 317. | 56 | 36 | 12/10/80 | Syeda Rabana Bukhari D/O Syed Amanat Ali Bukhari | Abbottabad/5 |
| 318. | 56 | 36 | 30/7/82 | Nilofar Begum D/O Bakht Foor | Mkd Agy/3 |
| 319. | 56 | 36 | 23/11/83 | Rana Pervaiz D/O Muhammad Pervaiz | Haripur/5 |
| 320. | 56 | 36 | 12/12/83 | Sabina Bibi D/O Khan Afsar Khan | Abbottabad/5 |
| 321. | 56 | 36 | 1/3/84 | Shabina D/O Fazal Gul | Swat/3 |

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| 322. | 56 | 36 | 16/3/84 | Noushen Kausar D/O Ghulam Rabbanl | Peshawar/2 |
| 323. | 56 | 36 | 14/6/84 | Irum Nausheen D/O Muhammad Ali Khattak | Karak/4 |
| 324. | 56 | 36 | 1/9/85 | Amlna Haroon D/O Muhammad Haroon | Mansehra/5 |
| 325. | 56 | 36 | 7/10/85 | Surrya Anjum D/O Muhammad Nagin | Dir Lower/3 |
| 326. | 56 | 36 | 25/12/87 | Nosheen Hamayun D/O Syed Hamayun Shah Bacha | Mardan/2 |
| 327. | 55 | 39 | 1/4/82 | Alla Bibi D/O Muhammad Tahirullah | Peshawar/2 |
| 328. | 55 | 39 | 26/3/84 | Sadaf Afreen D/O Abdul Rehman | Haripur/5 |
| 329. | 55 | 38 | 11/7/85 | Jasmeet Kumari D/O Ram Saroop | Swat/3 |
| 330. | 55 | 38 | 2/2/87 | Siyam Akbar D/O Muhammad Akbar | Mohmand Agy/1 |
| 331. | 55 | 37 | 5/2/76 | Raheela Rahman D/O Abdur Rehman | Dir Lower/3 |
| 332. | 55 | 37 | 4/6/77 | Zahida D/O Abdul Hameed Khan | Buner/3 |
| 333. | 55 | 37 | 19/3/80 | Sadaf Saboor D/O Abdus Saboor | Haripur/5 |
| 334. | 55 | 37 | 17/12/82 | Sajra D/O Abdul Ghafoor | Peshawar/2 |
| 335. | 55 | 37 | 1/1/85 | Safeena Akhtar D/O Missal Khan | Nowshera/2 |
| 336. | 55 | 37 | 30/4/85 | Zainab Begum D/O Muhammad Khurshid | Swabi/2 |
| 337. | 55 | 37 | 14/8/85 | Azra Gul D/O Muhammad Khan | Mardan/2 |
| 338. | 55 | 37 | 14/8/85 | Mehwish Mushtaq D/O Mushtaq Ahmad | Abbottabad/5 |
| 339. | 55 | 37 | 20/7/86 | Aqeela Subhan D/O Fazli Subhan | Charsadda/2 |
| 340. | 55 | 36 | 16/8/73 | Aqeela Naz D/O Ghulam Muhammad | Mardan/2 |
| 341. | 55 | 36 | 14/8/76 | Salma Iqbal D/O Muhammad Iqbal | Kohat/4 |
| 342. | 55 | 36 | 1/1/80 | Shahida Bibi D/O Muhammad Hashim Khan | Chitral/3 |
| 343. | 55 | 36 | 1/2/80 | Aneela Begum D/O Wasil Khan | Swabi/2 |
| 344. | 55 | 36 | 1/2/80 | Mumilkat D/O Faiz ur Rehman | Swat/3 |
| 345. | 55 | 36 | 15/10/80 | Ishrat Begum D/O Wahab Gul | Mardan/2 |
| 346. | 55 | 36 | 4/2/81 | Samina Akhtar D/O Akhtar Shah | Gadoon Swabi/3 |
| 347. | 55 | 36 | 22/2/81 | Safia Bibi D/O Iqbal Hussain | Nowshera/2 |
| 348. | 55 | 36 | 2/4/81 | Sadia Gul D/O ZainUllah Khan | Nowshera/2 |
| 349. | 55 | 36 | 27/10/81 | Shabnum Bahar D/O Ali Damsaz Khan | D.I Khan/4 |
| 350. | 55 | 36 | 1/12/81 | Fuqrat Begum D/O Muhammad Amin | Swabi/2 |
| 351. | 55 | 36 | 1/1/82 | Asmat Begum D/O Yar Muhammad | Dir Lower/3 |
| 352. | 55 | 36 | 2/2/82 | Fehmeeda Naz D/O Sher Din | Nowshera/2 |
| 353. | 55 | 36 | 3/3/82 | Javida D/O Fazali Rahim | Swat/3 |
| 354. | 55 | 36 | 1/12/82 | Farkhanda Hayat D/O Hayat Khan | Swabi/2 |
| 355. | 55 | 36 | 1/5/83 | Farhana Naz D/O Lal Muhammad | Mkd Agy/3 |
| 356. | 55 | 36 | 28/2/84 | Almas Malik D/O Muhammad Ilyas | Haripur/5 |
| 357. | 55 | 36 | 20/3/84 | Bilqies Begum D/O Mir Alam Khan | Charsadda/2 |

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B/385

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| 358. | 55 | 36 | 15/2/85 | Hasina D/O Niamat Ullah | Mkd Agy/3 |
| 359. | 55 | 36 | 18/7/85 | Zubairia Ibadat D/O Syed Ibadat Shah | Abbottabad/5 |
| 360. | 55 | 36 | 29/9/85 | Lubna Begum D/O Farid Ullah Khan | Mkd Agy/3 |
| 361. | 55 | 36 | 6/3/86 | Asma Ghazala D/O Nisar Muhammad | Mkd Agy/3 |
| 362. | 55 | 36 | 1/4/86 | Sheraz Bano D/O Haklm Jan | Karak/4 |
| 363. | 55 | 36 | 8/9/86 | Rizwana Habib D/O Habib Ullah | D.I Khan/4 |
| 364. | 55 | 36 | 20/12/87 | Sundas Ali D/O Amjad Ali | Charsadda/2 |
| 365. | 54 | 38 | 9/11/83 | Fozia Tabassum Afridi D/O Aqil Khan | FR Kohat/1 |
| 366. | 54 | 38 | 10/10/86 | Nazira Jalal D/O Syed Jalal ud Din | Chitral/3 |
| 367. | 54 | 37 | 18/4/74 | Nabila Gul D/O Sabir Khan | Haripur/5 |
| 368. | 54 | 37 | 1/8/80 | Sarwar Parveen D/O Muhammad Sarwar | Chitral/3 |
| 369. | 54 | 37 | 1/4/83 | Marla Rabani D/O Ghulam Rabani | Haripur/5 |
| 370. | 54 | 36 | 1/4/74 | Huma Nadir D/O Qazi Jamil Ahmad Abbasi | Nowshera/2 |
| 371. | 54 | 36 | 6/3/80 | Fozia D/O Wali Muhammad | Swabi/2 |
| 372. | 54 | 36 | 6/6/80 | Najma Anjum D/O Muhammad Karim | Mardan/2 |
| 373. | 54 | 36 | 1/9/81 | Nighat Seema D/O Fateh Muhammad | Mardan/2 |
| 374. | 54 | 36 | 2/9/81 | Asma Noreen D/O Fazal Nawab | Nowshera/2 |
| 375. | 54 | 36 | 7/3/82 | Sumera Begum D/O Hunar Khan | Nowshera/2 |
| 376. | 54 | 36 | 19/11/82 | Sughra Mumtaz D/O Mumtaz Abbas | Abbottabad/5 |
| 377. | 54 | 36 | 3/2/83 | Naheed Akhtar D/O Muhammad Saleem | Swabi/2 |
| 378. | 54 | 36 | 25/3/84 | Tahira Jabeen D/O Rahmat | Mansehra/5 |
| 379. | 54 | 36 | 6/4/85 | Fareena Halder D/O Halder Zaman | Haripur/5 |
| 380. | 54 | 36 | 2/4/87 | Hasina Khusrav D/O Nasir Khusrav | Chitral/3 |
| 381. | 53 | 36 | 1/3/80 | Uzma Shaheen D/O Fazlur Rehman | Abbottabad/5 |
| 382. | 53 | 36 | 28/2/83 | Laila Khalid D/O Bakhtiar Khan | Charsadda/2 |
| 383. | 53 | 36 | 1/4/83 | Nabeela Kosar D/O Noor Jamal | Mkd Agy/3 |
| 384. | 52 | 36 | 5/9/83 | Noshad Bangash D/O Mohabbat Khan Bangash | Kurram Agy/1 |
| 385. | 52 | 36 | 5/5/85 | Bibi Zainab D/O Muhammad Rashid | Mansehra/5 |

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BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No:974/201
Mst; Asma, Ex SST (G) B-16 District CharsaddaAppellant.

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others.Respondents

INDEX

| S/# | Description of document | Annexure | Page No. |
|------------|--------------------------------|-----------------|-----------------|
| 1 | | | |
| 2 | | | |
| 3 | | | |
| 4 | | | |

Asstt: Director (Lit: II)
E&SE Department, Khyber
Pakhtunkhwa, Peshawar.

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No: 974/2019

Mst; Asma, Ex SST (G) B-16 District Charsadda.....Appellant.

VERSUS

Secretary (E&SE) Department, Khyber Pakhtunkhwa & others.....Respondents.

JOINT PARAWISE COMMENTS ON & FOR BEHALF OF RESPONDENTS No:1-2.

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary Objections.

- 1 That the Appellant has got no cause of action/locus standi.
- 2 That the instant Service Appeal is badly time barred.
- 3 That the Appellant has concealed material facts from this Honorable Tribunal in the instant service appeal.
- 4 That the instant Service Appeal is based on mala-fide intentions.
- 5 That the Appellant has not come to this Honorable Tribunal with clean hands.
- 6 That the Appellant is not entitled for the relief he has sought from this Honorable Tribunal.
- 7 That the instant Service Appeal is against the prevailing law & rules.
- 8 That the instant Appeal is based on mala fide intentions just to put extra pressure on the Respondents for gaining illegal service benefits.
- 9 That the instant Service Appeal is not maintainable in its present form.
- 10 That the instant Service Appeal is bad for mis-joinder & non-joinder of the necessary parties.
- 11 That the instant Service Appeal is barred by law.

- 12 That the Appellant is not competent to file the instant appeal against the Respondents.
- 13 That the impugned Notification dated 5/4/2019 of the Respondent Department is legally competent & liable to be maintained in favor of the Respondents.
- 14 That no Departmental Appeal has been filed by the appellant to the Respondent Department against the impugned Notification dated 5/4/2019.
- 15 That the appointment letter of the appellant has been declared as fake and bogus by the Respondent Department.
- 16 That the Notification dated 5/4/2019 has correctly been issued by the Respondent Department after observing all the codal formalities.

ON FACTS.

- 1 That Para-1 needs no comments, being pertains to the Service Record of the Appellant against the SST (G) B-16 post which has been declared fake & bogus and even disowned by the Respondent Department vide Notification dated 5/4/2019. In view of the recommendations of the inquiry committee which was constituted vide Notification No. 8154-63 dated 4/8/2016, who submitted its report that the afore said order & Appointment Notification dated 06/08/2012 of the appellant is fake & bogus with no cogent record in the Respondents No.2 & 3 offices.
2. That Para-2 also needs no comments being pertains to the academic & professional qualification of the appellant.
- 3 That Para-3 is correct, hence, needs no comments.
- 4 That para-4 is correct to the extent of Advertisement dated 26/01/2009 by the Respondent No.03, wherein, the appellant did not apply for the said post nor appeared in the interview before the Respondent No.3 for the appointment against SST (G) Male B-16 post, hence, the claim of the appellant regarding his appointment vide Notification dated 06/08/2012 is baseless & liable to be rejected in favor of the Respondents. **(Copy of the Ad; dated 26/01/2009 is Annexure-A).**
- 5 That Para-5 is incorrect & denied on the grounds that no cogent proof & legal justification has been annexed by the appellant in support of his stand regarding his recommendations against the SST (G) B-16 post by the KPK PSC & his further adjustment vide Notification dated 06/08/2012 against the said post in the Respondent Department are fake & bogus as the entire service record of the appellant has been found fake & bogus, hence, his services against the SST (G) B-16 post has been disowned & even null & void ab-initio having no legal effect in the eyes of law & rules vide Notification dated 5/04/2019 by the competent authority **(Copy of the said Notification dated 5/04/2019 is Annexure-B).**

- 6 That Para-6 is incorrect & denied on the grounds that the services of the appellant against the SST (G) B-16 post have been disowned vide Notification dated 5/4/2019 by the Respondent No.2 after observing all legal formalities under the rules & the claim of the appellant regarding his recommendations by the KPK PSC against the SST(G) B-16 & his adjustment as SST vide Notification dated 06/08/2012 are fake & bogus having no record in the Respondent Department.
- 7 That Para-6 is incorrect on the grounds that the Services of the appellant has been placed against the SST (G) B-16 at GGHS Malkana District Bajor vide order dated 15/08/2012 as per claim of the appellant is also fake & Bogus, hence, disowned by the Respondent Department by the competent authority & where against no Departmental appeal against the Notification dated 5/4/2019 has been filled by the appellant to the competent authority nor any such record is available in the Respondent Department till date, hence, got finality under the Law & rules against the appellant
- 8 That para-7 is incorrect & denied on the grounds that the Services of the appellant against the SST (GP) B-16 has been disowned by the competent authority & where against no Departmental appeal against the Notification dated 5/4/2019 has been filled by the appellant to the competent authority nor any such record is available in the Respondent Department till date, hence, got finality under the Law & rules against the appellant, however, the Respondents further submit on the following grounds inter alia:-

ON GROUNDS.

- A **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy vide the above said Notification dated 5/4/2019 by the Respondent Department in the instant case, hence, the stance of the appellant is baseless & liable to be rejected.
- B **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy vide the above said Notification dated 5/4/2019 by the Respondent Department in the instant case having no question of violation of Article 10-A of the constitution of 1973, hence, the stance of the appellant is baseless & liable to be rejected.
- C **Incorrect & not admitted.** The statement of the appellant is without any cogent reason & justification on the grounds as agitated in the foregoing paras of the present reply by the Respondents as regular inquiry has been conducted vide Notification bearing endst; No.8154-63 dated 4/8/2019 by the competent authority who declared the documents & 1st appointment as fake & bogus, hence, the plea of the appellant is without any justification.
- D **Incorrect & not admitted.** The stand of the appellant is without any cogent reason & legal justification on the grounds that his 1st appointment Notification dated 16/9/2012 of the appellant have been found fake & bogus by the Respondent Department, hence, his services against the SST (G) B-16

F Legal. However, the Respondents also seek leave of this Honorable Tribunal to submit additional grounds, record & case law at the time of arguments on the date fixed.

In view of the above made submissions, it is most humbly requested that this Honorable Tribunal may very graciously be pleased to dismiss the instant Service Appeal in favor of the Respondents in the interest of justice.

Dated ___/___/2020



Director

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 2)

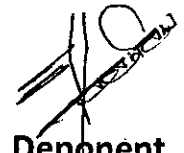


Secretary

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1)

AFFIDAVIT

I, Hayat Khan Asstt: Director (Litigation-II) E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant Parawise Comments are true & correct to the best of my knowledge & belief.



Deponent

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

Dated: 26-01-2009

ADVERTISEMENT No. 01 / 2009.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P./F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall also be rejected without intimation to the candidates.

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

| | |
|------------|--|
| (S.No. 01) | One (01) Post of assistant Botanist. In Livestock Research & Dev; Deptt: |
| | QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -I] to which the Vacancy occurs.. |
| | AGE LIMIT: 21 to 33 years. PAY SCALE: BPS-17. ELIGIBILITY: Both Sexes. |
| | ALLOCATION: Merit. |

| | |
|------------|--|
| (S.No. 02) | Two (2) Posts of Research officers Fodder. In L&DD Deptt: |
| | QUALIFICATION: M.Sc Agriculture or B.Sc (Hons) Agriculture (Obtained) after "4" Years Instructions after F.Sc) from a recognized University under research programme in the subject relating to the subject groups as specified in schedule -II to which the Vacancy occurs.. |
| | AGE LIMIT: 21 to 33 years. PAY SCALE: BPS-17. ELIGIBILITY: Male. |
| | ALLOCATION: |

| | |
|-------|--------|
| Merit | Zone-1 |
| 01 | 01 |

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

| | |
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| (S.No. 03) | Five (05) Posts of Data Entry Operators: |
| | QUALIFICATION: (i) 2 nd Division FA/FSc with one year Diploma in Computer Science from the recognized Institute (ii) Speed of Ten thousand key depression per hour for punching/data entry/verification. |
| | AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-11. ELIGIBILITY: Both Sexes. |
| | ALLOCATION: |

| | | | | |
|--------|--------|--------|--------|--------|
| Zone-1 | Zone-2 | Zone-3 | Zone-4 | Zone-5 |
| 01 | 01 | 01 | 01 | 01 |

DIRECTORATE OF INDUSTRIES COMMERCE MINERAL DEV: LABOUR & TECHNICAL EDUCATION DEPARTMENT.

| | |
|------------|---|
| (S.No. 04) | One (01) Post of Male Inspector Mines |
| | QUALIFICATION: (i) Bachelor Degree in Mining Engineering from recognized University and (ii) 1 st Class Mines Manager's certificate of Competency granted under the provision of Mines Act, 1923 and (iii) Two years experience in Govt. or Semi Government Mining Industries registered under the Mines Act, 1923. |
| | AGE LIMIT: 21 to 33 years. PAY SCALE: BPS-17. ELIGIBILITY: Male. |
| | ALLOCATION: NOTE: In case of non-availability of candidates possessing the |

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provisions of the rules for the time being in force.

NOTE: For History-cum-Civics : The candidates must possess Master's Degree either in History or Political Science provided the other required subjects has studied at B.A level. The other requirement of teaching degree will, however, remain intact.
For Biology: 2nd Class Master Degree in Botany or Zoology provided that other subject have been studied at graduate level.

AGE LIMIT: 25 to 40 years. **PAY SCALE:** BPS-17 **ELIGIBILITY:** Female.

ALLOCATION:

| S.No | Subject | No. of Posts | Allocation |
|------|--------------------|--------------|-------------|
| 5. | Islamiyat | 02 | Merit Quota |
| 6. | Pak: Study | 03 | Merit Quota |
| 7. | History-Cum-Civics | 02 | Merit Quota |
| 8. | Economics | 02 | Merit Quota |
| 9. | English | 02 | Merit Quota |
| 10. | Statistics | 02 | Merit Quota |
| 11. | Maths | 02 | Merit Quota |
| 12. | Biology | 02 | Merit Quota |
| 13. | Chemistry | 02 | Merit Quota |
| 14. | Physics | 02 | Merit Quota |

(S.No. 52) Sixteen Hundred Eighty One (1681) Posts of Male SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION:

| Merit | Zone-1 | Zone-2 | Zone-3 | Zone-4 | Zone-5 |
|-------|--------|--------|--------|--------|--------|
| 420 | 280 | 281 | 280 | 210 | 210 |

(S.No. 53) Thirty Four (34) Posts of Male Disabled SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

(S.No. 54) Ninety Two (92) Posts of Male SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Manshara, Shangla, Kohistan, Abbottabad. (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Male.

ALLOCATION: Merit.

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(S.No. 55) Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION:

| Merit | Zone-1 | Zone-2 | Zone-3 | Zone-4 | Zone-5 |
|-------|--------|--------|--------|--------|--------|
| 243 | 162 | 162 | 162 | 122 | 122 |

(S.No. 56) Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. years (10 years age relaxation)

PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

(S.No. 57) Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla , Kohistan, Abbottabad, (with out graduaty and pension).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physic, Chemistry, Zoology, Botany, and Mathematics -A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 40 years. PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

TECHNICAL EDUATION AND MAN POWER TRAINING DEPARTMENT.

(S.No. 58) Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.

QUALIFICATION: (i) Ph. D in the relevant subject from a recognized University with three year teaching experience in recognized college / Govt: Commercial Institutes/ Govt: Commercial Institutes/ Govt: Commerce College ass Instructor/ Lecturer.

OR (ii) Master's Degree from a recognized University in the relevant subject with Five Years experience of teaching as Lecturer / Junior Instructor in a recognized college / Govt: Commercial Institute/ Govt: Commerce College.

AGE LIMIT: 25 to 40 years. PAY SCALE: BPS-18. ELIGIBILITY: Male.

ALLOCATION: Merit.

ATTESTED

(S.No. 59) Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institute.

QUALIFICATION: (a) - Ph. D. in Engineering from a recognized University / Institute with one years's teaching/ professional experience in the relevant subject as such OR (b) Master's Degree in Engineering from a recognized University/ Institute with five years teaching/ professional experience in the relevant subject as such: OR (c)

19

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|------------|---|--------|--------|--------|--------|
| (S.No: 66) | Ten (10) Posts of Male office Assistant. | | | | |
| | <u>QUALIFICATION:</u> Bachelor degree from recognized University. | | | | |
| | <u>AGE LIMIT:</u> 18 to 30 years. <u>PAY SCALE:</u> BPS-14. <u>ELIGIBILITY:</u> Male. | | | | |
| | <u>ALLOCATION:</u> | | | | |
| | Zone-1 | Zone-2 | Zone-3 | Zone-4 | Zone-5 |
| | 02 | 02 | 02 | 02 | 02 |

| | | | | | |
|------------|---|--|--|--|--|
| (S.No. 67) | One (01) Post of Female office Assistant. | | | | |
| | <u>QUALIFICATION:</u> Bachelor degree from recognized University. | | | | |
| | <u>AGE LIMIT:</u> 18 to 30 years. <u>PAY SCALE:</u> BPS-14. <u>ELIGIBILITY:</u> Female. | | | | |
| | <u>ALLOCATION:</u> Merit. | | | | |

CORRIGENDUM

- The Post of Research Officer for Earth Quake Quota appearing at S.No.2 Advt: No.07/2007 may be read as 02 Post for Chemistry and one for cereal Crops.
- The Post of Reader Advertised in Advtt: No. 07/2008 S.No. 39 may be read as one post instead of Two Posts.

GENERAL CONDITIONS.

- Age, qualification and experience etc shall be reckoned on 26-02-2009 Maximum age limit as prescribed in the recruitment rules shall be relaxed upto 10 years for Govt Servants who have completed 2 years continuous service, upto 10 years for disabled persons and upto 3 years for candidates belonging to backward areas of Zone-1, Zone-3, Merged Areas of Hazara and Mardan Divisions and uper Tanawal, Districts of Swat, Upper Dir, Lower Dir, Chitral, Buner, Kala Dhuka Area, Kohistan District, Shangla, Gadoon Area in Swabi, Backward areas of Mansehra and Batagrami, backward areas of Haripur District i.e., Kalanjar Field Kanungo Circle of Tehsil Haripur and Amazai Field Kanungo Circle of Tehsil Ghazi. However, a candidate shall be allowed relaxation in age in one of the above categories provided that the candidates from backward areas, in addition to automatic relaxation of three years shall be entitled to one of the relaxations available to Govt Servants, general or disabled candidates, whichever is relevant and applicable to them.
- Degrees / Diploma / Experience Certificates / Testimonials of unrecognized Institution are not accepted. Only original Degrees / Certificates are accepted. However, the candidates can apply on provisional certificate signed by the Controller of Examination of the respective Institution but candidates shall produce original degrees / certificates before their selection. Detail Marks Certificate for all the examination shall necessarily be required and these should be attached with the application forms.
- ALLOCATION of vacancies in BPS-17 and below shall be strictly in accordance with the Zonal ALLOCATION as indicated against each post(s). The applications of the candidates other than the specified zone(s) shall be ignored except for posts reserved for Merit quota. No zonal reservation stands for posts allocated to disabled quota and also for the posts in BPS-18 and above. All such posts shall be filled in on Open Merit.
- The candidates applying against disabled posts must attach with their application forms of disability certificate from the Provincial Council for Rehabilitation of Disabled Persons as well as disability certificate from the respective Medical Superintendent / Medical Board showing therein the specific disability.

ATTESTED

111



95

ANNEX

NOTIFICATION

1. WHERE AS: one Mst. Shabana Bibi D/O Abdus Sattar who herself appointed/adjusted as SST (G) in GGMS Inayat Killi District Bajaur now working in settle side vide Notification No. 7223-29/File No. 2/A-14/SST(F)/Gen/PSC/Apptt. dated 27/10/2012 and No. 12414-17/A-1/Apptt. of SST (General) (PSC)2012 dated 02/11/2012 upon the production of fake/bogus appointment/adjustment order not issued by the Directorate of Education erstwhile FATA Nor by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.
2. AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but she failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus.
4. AND WHERE AS, it has come to the notice of the competent authority that Mst. Shabana Bibi D/O Abdus Sattar, having no legal status of the said appointment/adjustment order.
5. NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus her appointment/adjustment Notification No. 7223-29/File No. 2/A-14/SST(F)/Gen/PSC/Apptt. dated 27/10/2012 and No. 12414-17/A-1/Apptt. of SST (General) (PSC)2012 dated 02/11/2012 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mst. Shabana Bibi D/O Abdus Sattar in the interest of Public Service.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

5833-37
Endst. No. _____ dated 5-4-2019

Copy forwarded to the:-

1. Deputy Commissioner, Tribal District Bajaur with the request to take legal action.
2. District Education Officer Tribal District Bajaur with the direction to take necessary steps for the recovery of outstanding amount against fake/bogus SST concerned.
3. District Account Officer Tribal District Bajaur to co-operate in the matter.
4. PS to Secretary Elementary and Secondary Education Khyber Pakhtunkhwa.
5. PA to Director Elementary and Secondary Education Khyber Pakhtunkhwa.

ATTESTED

Deputy Director (Estab)
Merged Districts

05/04/19