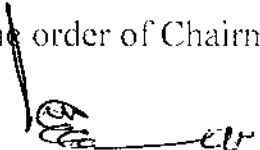


FORM OF ORDER SHEET

Court of _____

Case No.- 241/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	27/1/2023	<p>The appeal of Miss. Rooma Khan presented today by Mr. Noor Muhammad Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ .Parcha Peshi is given to appellant/counsel.</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR.

SERVICE APPEAL NO. 2411 /2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 3209

MISS ROOMA KHAN

VS

EDUCATION DEPTT.

Dated 27-1-2023

APPLICATION FOR FIXATION OF THE ABOVE TITLED APPEAL AT
PRINCIPAL SEAT, PESHAWAR

Respectfully Sheweth:

1. That the above mentioned appeal is pending adjudication before this Hon'ble Tribunal in which no date has been fixed so far.
2. That according to Rule 5 of the Khyber Pakhtunkhwa Service Tribunal Rules 1974, a Tribunal may hold its sittings at any place in Khyber Pakhtunkhwa which would be convenient to the parties whose matters are to be heard.
3. That it is worth mentioning that the offices of all the respondents concerned are at Peshawar and Peshawar is also convenient to the appellant/applicant meaning thereby that Principal Seat would be convenient to the parties concerned.
4. That any other ground will be raised at the time of arguments with the permission of this Hon'ble tribunal.

It is therefore prayed that on acceptance of this application the appeal may please be fixed at Principal Seat, Peshawar for the Convenience of parties and best interest of justice.

Appellant/Applicant

Dated: 27-01-2023

Through


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

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

APPEAL NO. 241 /2023

MISS ROOMA KHAN VS EDUCATION DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal with Affidavit	1-3
2.	Copy of the retirement order dated 07.03.2014	A	4
3.	Copy of the appointment order dated 26.10.2022	B	5-6
4.	Copies of the Medical Certificate, list of family members and charge assumption report	C, D & E	7-10
5.	Copy of daily attendance register	F	11-13
6.	Copy of the impugned notification dated 10.11.2022	G	14-
7.	Copies of departmental appeal and appellate notification dated 04.01.2023	H & I	15-17
8.	Vakalatnama		18

APPELLANT

THROUGH:

**NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. _____ /2023

Miss Rooma Khan, Ex-PST (BPS-12),
GGPS Garang, District Battagram.

..... **APPELLANT**

VERSUS

- 1- The Secretary Elementary & Secondary Education, Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education, Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (F), District Battagram.

..... **RESPONDENTS**

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 10.11.2022 WHERRBY THE APPOINTMENT ORDER DATED 26.10.2022 HAS BEEN WITHDRAWN AND AGAINST THE APPELLATE ORDER/NOTIFICATION DATED 04.01.2023 WHEREBY THE DEPARTMENTAL APPEAL HAS BEEN REJECTED ON NO GOOD GROUNDS.

PRAYER:-

That on acceptance of the instant service appeal the impugned notification dated 10.11.2022 and 04.01.2023 may very kindly be set aside and the appellant may please be re-instated with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

Respectfully Sheweth:

- 1. That mother of the appellant was and employee of the respondent department and was retired on medical ground from service w-e-f 26.02.2014 vide order dated 07.03.2014. Copy of the retirement order dated 07.03.2014 is attached as Annexure**A.**
- 2. That in pursuance to the application for appointment under the Rule 10 (4) of (APT) Rules, 1989 the appellant was appointed as PST (BPS-12) in GGPS Garang, District Battagram vide order dated 26.10.2022. Copy of the appointment order dated 26.10.2022 is attached as Annexure**B.**

- 2-
3. That in pursuance to the appointment order mentioned above the appellant after medically examination and she submitted her arrival report and took over the charge of her post on 27.10.2022. Copies of the Medical Certificate, list of family members, and charge assumption report are attached as Annexure **C, D & E.**
 4. That the appellant started performing her duty regularly, punctually and to the entire satisfaction of her high ups. Copy of daily attendance register is attached as Annexure **F.**
 5. That during service without any prior intimation and notice the appointment of the appellant was withdrawn vide impugned notification dated 10.11.2022. Copy of the impugned notification dated 10.11.2022 is attached as Annexure **G.**
 6. That appellant feeling aggrieved from the impugned notification preferred departmental appeal before the appellate authority on 21.11.2022. That the said departmental appeal was rejected vide appellate notification dated 04.01.2023 with no good grounds. Copies of departmental appeal and appellate notification dated 04.01.2023 are attached as Annexure **H & I.**
 7. That having no other remedy the appellant file the instant service appeal on the grounds inter alia.

GROUNDS:

- A-** That the impugned notification dated 10.11.2022 and appellate order dated 04.01.2023 are against the law, facts, norms of natural justice and materials on the record.
- B-** That the appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C-** That no charge sheet and statement of allegations what so ever have been served upon the appellant.
- D-** That no show cause notice has been issued to the appellant by the respondent department.
- E-** That no right of personal hearing and personal defense was given to the appellant.
- F-** That no regular inquiry has been conducted into the matter which is as per Supreme Court judgments is necessary in punitive actions against civil servants.

- G- That the respondents acted in arbitrary and mala fide manner while issuing the impugned notification dated 10.11.2022 and appellate order dated 04.01.2023
- H- That the appellant has been discriminated on the subject noted above and as such the respondents violated the principle of natural justice.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that the instant service appeal may kindly be accepted as prayed for.

Dated 26-01-2023

Roona
APPELLANT
MISS ROOMA KHAN

Through:
NOOR MUHAMMD KHATTAK
ADVOCATE SUPREME COURT
Kamran Khan
KAMRAN KHAN
Waleed Adnan
WALEED ADNAN
Umar Farooq
UMAR FAROOQ
Muhammad Ayub
MUHAMMAD AYUB
& Khanzad Gul
KHANZAD GUL
ADVOCATE

AFFIDAVIT

I, Miss Rooma Khan D/o Muhammad Siraj, Ex-PST (BPS-12), GGPS Garang, District Battagram, do hereby solemnly affirm and declare on oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble tribunal.

Roona
DEPONENT

"A"

-4-

(A)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PHT: BATTAGRAM.

SANCTION OF RETIREMENT.

Sanction is hereby accorded to the grant of retirement from the service on Medical ground w.e.f. 26.02.2014. Alongwith L.P.R Encashment w.e.f 01.03.2013 to 20.11.2013 (294 days) on full pay in respect of Lal Eaha Bibi P.S.T Govt; Girls Primary School Jalalkot as due and admissible to him under the rules.

Note; Necessary entry should be made in his original service book.

(REHANA YASMIN.)

DISTRICT EDUCATION OFFICER(FEMALE)
PRIMARY BATTAGRAM.

Endstc; No. 1196-98 / Dated: B/Gram the. 7/3 /2014

Copy to the;

- 1- District Account office Battagram.
- 2- Sub-Divisional Educa; officer(F) Battagram.
- 3- Office copy,

verified from
Person file 837 Bin
12/

DISTRICT EDUCATION OFFICER(F)
PRIMARY BATTAGRAM.

Muhammad
74/2/18
DISTRICT EDUCATION OFFICER
PRIMARY BATTAGRAM

Du for No 755
29/3/14



"B"
-5-

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM**
(Phone # 0997-310460) E-mail: demisbattagram@yahoo.com

APPOINTMENT ORDER.

Under the provision contained in sub Rules-(4) of Rules-10 of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules-1989, and as amended vide Notification No, (SOR-VI/E&AD)/1-3/2011/Vol:-III dated 31/8/2012 & amended vide Establishment Department regulation wing KP Notification No. (R-VI)E&AD/1-3/2015 Dated 19-04-2016, the following Candidates are hereby appointed as Primary School Teacher (PST) (Under Deceased son quota) as mentioned against their name against vacant posts in BPS-12 Rs:(19770-1430-62670) PM plus usual allowances as admissible to them under the rules in the interest of public service with effect from the date of taking over charge on the following terms and conditions:

S.No	Name	Father Name	Union Council	Date of Birth	Designation	Place of posting
1	Hunzala Rustam	Muhammad Rustam	Banian	08/08/1997	PST BPS-12	GGPS Zareen Abad Trand
2	Rooma Khan	Muhammad Siraj	Banian	07/12/1999	PST BPS-12	GGPS Garang

TERMS & CONDITIONS:

- 46/10/2017
1. Their services will be considered as regular in term of section 19 of the KP Civil servant act 1973 amended in 2013 issued vide Govt of KP Finance department (Regulation wing) No SOS R-III/FD/12-1/2005 dated 27-02-2013. They will be governed by such rules and regulations as may be prescribed by the Govt from time to time.
 2. The appointees will be on probation for a period of one year in terms of section 6(2) on NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.
 3. Their One month pay will be forfeited to Govt in case of resignation without prior notice. The period of giving notice is one month before the date of resignation.
 4. The appointees should join the post within 30 days failing which the appointment order will be treated cancelled automatically and no subsequent appeal will be entertained in this regard.
 5. The appointment is made subject to the condition that the appointees have domicile of District Battagram.
 6. The appointees are required to produce age & health certificate from the medical superintendent DHQ Hospital Battagram.
 7. The DDO is directed not to release their pay till the verification of all the academic/professional Documents from concerned board/universities, and

- 6 -

- release of pay order will be issued by this office. In case of producing fake/ bogus degrees/certificates and detected latter on, their appointment order will automatically be cancelled from the date of its issuance and will be reported to the law enforcing agencies for further action.
8. Their services shall be terminated at any time , in case their performance is found unsatisfactory at any stage during their service. In case of misconduct, they will be proceeded under the rules.
 9. The competent authority reserves the right to rectify the errors and omissions if pointed out at any stage in the instant order.
 10. Charge report should be submitted to all concerned.
 11. Before handing over charge once again their documents may be checked if they were not the required relevant qualification they may not be handed over charge.
 12. They will have to receive Nine (09) Months mandatory training from DPD/RPD etc as, when and where scheduled.
 13. The appointees will get salary against the sanction post in the budget.
 14. The appointment will be treated as cancelled if the said quota has already been availed by any son/ daughter/widow of the deceased.
- No TA/DA is allowed.

(Rehana Yasmeen)
DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM

Endstt: No: 3088/14 /EB /PST/Deceased/Dated Battagram the 06/10/2022.

Copy to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Battagram.
3. SDEO (F) Battagram.
4. DMO/EMA Battagram.
5. DEMIS Local Office.
6. Official Concerned.
7. Office Copy.-

DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM

06/10/2022

DISTRICT HEAD QUARTER HOSPITAL BATAGRAM

"C"



7-



MEDICAL CERTIFICATE

Name of Official Rooma Khan
Caste of Race Swati
Father Name/D/W Muhammad Siraj
Resident of Village Jalal Kot Bandigo, Tehsil & District Battagram
Exact Height by Measurement 05 ft 03" inch
Date of Birth 07.12.1999
Personal Mark of Identification *Wale on left side of face*
Signature of Official *Rooma*

Signature / Seal of the Office

It is certified that I have examined Ms. Rooma Khan who is the candidate for employment of job/service in the office of Education department Battagram. She has no disease whether communicable or non communicable or other constitutional deformity except Nil

She is medically & physically fit for job in any department. I do not consider this as disqualification for employment in the office of as above. Her age according to her own statement 23 appearance about 23 (Twenty Three years)

CNIC No 13202-5264585-1

Eye Vision 6/6 both without glasses

LEFT HAND THUMB AND FINGER IMPRESSION.....



Medical Superintendent
DHQ Hospital Battagram

27/10

"D"

-8-

LIST OF FAMILY MEMBERS / LEGAL HEIRS OF

Mrs Lal Baha Bibi PST Teacher GGPS Jalal Kot District And Tehsil Battagram

S. No	Name of Heir Member	Relation	CNIC#	AGE	Whether married or unmarried
01	Muhammad Siraj	Husband	13202-3744896-5	30-04-1958	Married
02	Muhammad Meraj	✓ Son	13202-5725699-1	13-04-1984	Married
03	Muhammad Sajjad Khan	✓ Son	13202-9734112-3	03-02-1987	Married
04	Bibi Zainab	✓ Daughter	13202-9933471-6	30-03-1992	Un Married
05	Irfikhar Khan	✓ Son	13202-3399384-3	04-09-1993	Married
06	Wajid Khan	✓ Son	13202-3494289-3	30-06-1996	Un Married
07	Hassan Khan	✓ Son	13202-8219172-9	01-05-1998	Un married
08	Roona Khan	Daughter	13202-5264585-1	07-12-1999	Un married
09	Muhammad Saboor Khan	Son	1322-8304577-9	31-01-2003	Un married

I solemnly declare and affirm that the members / heirs of Mrs Lal Baha PST Teacher GGPS Jalal Kot is correctly as above.

Signature

Attested :

Signature & Stamp

CHARGE ASSUMPTION REPORT

"E"

-10-

Vide appointment order bearing Encl no. 3007-11/ES/PST/Documt dated 26/10/2022 of District Education Officer (Female) Ballariyam.

I Mst. Reema Khan D/o Muhammad Saif bearing CNIC # 13203-5264555-1, R/o village Julakot P/o Barhija Tehsil 2 District, Ballariyam, hereby assumed charge of the post primary School Teacher (PST) at Government Girls primary School (GKPS) Barhija village on 27th October 2022 at (forward)

Dated: 27/10/2022

Mst. Reema Khan D/o
Muhammad Saif
PST (Kps-11) GKPS Barhija

S
27/10



BETTER COPY

CHARGE ASSUMPTION REPORT

Vide appointment order bearing Endst No.
3088/94/EB/PST/Deceased/Dated 26-10-2020 of District Education Officer
(Female) Battagram.

I Mst Rooma Khan D/o Muhammad Siraj bearing CNIC 13202-5264585-1, R/o
Village Jalal Kot P/O Bandigo Tehsil & District Battagram, hereby assumed
charge of the post Primary School Teacher (PST) at Government Girls
Primary School (GGPS) Garang today on 27th October 2022 at (forenoon).

Dated 27/10/2022

Mst Rooma Khan D/o Muhammad Siraj
PST (BPS-12) GGPS Garang.

روز	ساعت	مکان	ساعت	مکان	ساعت	مکان	ساعت	مکان	ساعت	مکان	روز	ساعت	مکان	ساعت	مکان	ساعت	مکان	روز	ساعت	مکان	ساعت	مکان		
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12	8:30	P	11:30	S	8:30	P	11:30	S	8:30	P	12	8:30	P	11:30	S	8:30	P	12	8:30	P	11:30	S	8:30	P
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14	8:30	P	11:30	S	8:30	P	11:30	S	8:30	P	14	8:30	P	11:30	S	8:30	P	14	8:30	P	11:30	S	8:30	P
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مجموعه اول

مجموعه اول
مجموعه دوم
مجموعه سوم
مجموعه چهارم
مجموعه پنجم

گورنمنٹ گرلز رجسٹر حاضری مدرسین پرائمری سکول گرلز

ابتداء نومبر November 2022
نمبر نمبر نمبر نمبر
نمبر نمبر نمبر نمبر
P.S.H.T چور پیدار
P.T.C لچکی سگلی
P.S.T

روز	آمد	دکھا	رواگی	آمد	دکھا	رواگی	آمد	دکھا	رواگی	آمد	دکھا	رواگی	آمد	دکھا	رواگی
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-14-

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM**
(Phone # 0997-310460) E-mail: demisfbattagram@yahoo.com

NOTIFICATION

Whereas Mstt: Rooma Khan D/O Muhammad Siraj Khan applied to this office for appointment against the post of PST BPS-12 under deceased quota on the basis of her mother's retirement on medical ground as PST from GGPS Jalalkot issued vide this office Endstt: No.1196-98 Dated 07.03.2014.

And whereas her application was processed in the light of required documents provided by her.

And whereas she provided non marriage certificates from NADRA office Battagram and secretary of concerned union council.

And whereas she was appointed against the post of PST BPS-12 under the said quota vide serial No. 02 of the appointment order issued vide this office order No. 3084-94 Dated 26.10.2022.

And whereas after the issuance of her appointment order the SDEO (F) Battagram reported that she is married and the non-marriage certificates provided by her are fake and bogus.

And whereas Mstt: Sajida ASDEO Circle Battagram was appointed as inquiry officer vide this office notification No. 3221 Dated 05.11.2022 to probe in to the matter and submit detail report within two days for further proceedings.

And whereas Mstt: Sajida ASDEO Circle Battagram in compliance with the order of this office conducted proper inquiry and submitted detail report alongwith documentary proof and confirmed that she has got married on 03.01.2022 and also born a baby few days before the issuance of her appointment order.

Now therefore I Mstt: Rehana Yasmin Abbasi, the District Education Officer (F) Battagram being competent authority withdraw serial No. 02 of the appointment order issued vide this office Endstt: No. 3088-94 Dated 26.10.2022 from the date of its issuance as per serial No. 07 of its terms and conditions and Mstt: Rooma Khan D/O Muhammad Siraj Khan is no longer PST at the strength of this office as she has concealed the facts and provided bogus documents with regard to her marital status as she being married is not eligible for appointment under the said quota as per policy of the government issued by Section Officer (Policy) Establishment and administration Department vide her office letter No. SO(Policy)/E&AD/1-3/2015/APT Rules Dated 07.06.2018.

The rest of the order will remain intact.

**DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM**
Battagram the 10 / 11.2022

Endstt: No. 3268-73

A copy of the above is forwarded for information and n/a to the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar
2. District Accounts Officer Battagram.
3. DMO EMA Battagram.
4. SDEO (F) Battagram.
5. EMIS Local Office.
6. Rooma Khan D/O Siraj Khan.

DISTRICT EDUCATION OFFICER

"H" "Q"

APPEAL/PRESENTATION BEFORE THE WORTHY DIRECTOR
ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, U/S
22(2) OF KHYBER PAKHTUNKHWA ESTA CODE WITH SERVICE LAWS,
AGAINST THE NOTIFICATION OF DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM;

-15-

Respected Sir,

1. That, my mother namely Mst. Lal Baha Bibi was working in Education Department, Battagram as a Primary School Teacher PST (BPS-12), who got retired from her service on medical ground from GGPS Jalalkot, vide departmental order bearing Endstr: No. 1196-98 dated: 07-03-2014. Copy of the same is attached herewith as *(Annexure-A)*.
2. That, I did Matric in the year, 2015, from Board of Intermediate & Secondary Education (BISE), Abbottabad under Roll No. 166192 and secured 807 Marks out of 1100. Copy of DMC attached as *(Annexure-B)*.
3. That, in the year, 2017, I completed my FSC (Pre-Medical) from Board of Intermediate & Secondary Education (BISE), Abbottabad under Roll No. 86731 and secured 715 Marks out of 1100. Copy of DMC attached as *(Annexure-C)*.
4. That, I have completed my BSC major in Botany & Zoology from Hazara University Manshra under Roll No. 6021 and secured 326 Marks out of 550. Copy of DMC attached as *(Annexure-D)*.
5. That, on 17-03-2022, I moved an application to District Education Officer (Female), Battagram for appointment as PST (BPS-12) under Deceased quota on the strength of my mother retirement on medical ground. Copy of Application is attached as *(Annexure-E)*.
6. That, along with application, I submitted following documents:
 - i. Copy of CNIC. Attached as *(Annexure-F)*.
 - ii. Domicile Certificate. Attached as *(Annexure-G)*.
 - iii. Affidavit from legal heirs in favour of me. Attached as *(Annexure-H)*.
 - iv. List of Family Members/Legal heirs, duly attested from Secretary Village Council concerned. Attached as *(Annexure-I)*.
 - v. Pension slip of my mother Mst. Lal Baha Bibi. Attached as *(Annexure-J)*.
 - vi. Educational documents as stated above.

After, complete and lengthy scrutiny process done by Female Education Department Battagram, The Hon'ble District Education Officer (Female), Battagram issued an appointment order bearing Endstr: No. 3088-94/EB/PST/Deceased/Dated Battagram the 26/10/2022, wherein, the competent authority appointed me as a Primary School Teacher PST (BPS-12) under deceased son quota at GGPS Garang. Copy of order attached as *(Annexure-K)*.

8. That, after receiving appointment order, my medical was conducted in DHQ Hospital, Battagram and thereafter, I assumed the charge of Primary School Teacher PST (BPS-12), in GGPS Garang on 27-10-2022. The charge report is duly signed and stamped by Head Teacher of GGPS Garang. Copy of Charge Assumption report is *(Annexure-K)*.

Appeal/Presentation before:
The Worthy Director Elementary & Secondary Education,
Khyber Pakhtunkhwa

9. That, after assuming charge, I regular attended my school and taught the students without a single leave. Copy of the attendance register is (Annexure-L).
10. That, SDEO (Female), verbally reported the matter to the Hon'ble District Education Officer (Female) that, I am married and non-marriage certificate provided by me along with my record is fake and bogus. To this effect that Hon'ble District Education Officer (Female) Battagram conduct an Inquiry and Mst. Sajida ASDEO Circle Battagram was appointed as Inquiry Officer.
11. That, after submission of Inquiry report by the Inquiry Officer, the Hon'ble District Education Officer (Female) Battagram, withdraw my appointment order vide notification bearing No. 3268-73 dated: 10-11-2022. Copy of the said notification is attached as (Annexure-M).
12. That, the said withdrawal notification handed over to me on 15-11-2022, and till 15-11-2022, I regularly attend my school, which is reflected from the presented copy of attendance register before your Honour.
13. The allegations levelled against me that, I concealed the facts and provided bogus documents regarding to my marital status, is against law and withdrawal notification of DEO(F) Battagram is baseless, which effects my rights because:
- I provided CNIC, which bearing my father name.
 - I provided list of family members/legal heirs, duly attested from Secretary Village Council Concerned, wherein, my status shows as un-married.
 - I provided Family Tree from NADRA (Annexure-N), wherein, my marital status clearly mentioned.
14. Despite the facts stated above, the Hon'ble District Education Officer (Female) illegally and without any registered documentary proof withdraw my appointment order.
15. Your good self is humbly requested that, the Notification of the Hon'ble District Education Officer (Female) Battagram bearing Endstt: No. 3268-73 dated: 10-11-2022 may kindly be set-aside and reinstate my appointment order from its original date.

Thanks

Dated: 11/11/2022

Your's Sincerely;



Roona Khan

CNIC No. 13202-5264585-1

Mlal Kot, P.O. Bandigo

U.C. Baria, District Battagram



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**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

NOTIFICATION

Consequent upon the approval of the Appellant Authority, the appeal of Mrs. Roona Khan Ex-PST, GGPS Garang District Battagram is hereby rejected, under rules 17 (2), of L.A.D Rules 2011.

DIRECTOR

Elementary & Secondary
Education Khyber Pakhtunkhwa

4933-35
Instt.No. /F.No. 327/appeal/Battagram

Dated Peshawar the 04-1-2023

Copy forwarded for information to the:-

1. District Education Officer (Female) Battagram, with the direction to inform the teacher concerned accordingly.
2. Appellant concerned.
3. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa

Assistant Director (Female)
Elementary & Secondary Education
Khyber Pakhtunkhwa

04/01/2023

BETTER COPY

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION, KHYBER
PAKHTUNKHWA PESHAWAR.

NOTIFICATION

Consequent upon the approval of the Appellant Authority, the appeal of Mst Rooma Khan Ex-PST, GGPS Garang District Battagram is hereby rejected, under the rules 17 (2)(a) of E & D Rules 2011.

DIRECTOR

Elementary & Secondary Education

Khyber Pakhtunkhwa

Endst:No 4933-35/F.No327/appeal/Battagram

Dated Peshawar the 04-01-2023

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 2023

Roqina Khan

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt

(RESPONDENT)
(DEFENDANT)

I/we Appellant

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 28/6 /2023

CLIENT Roqina

ACCEPTED

**NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

(BC-10-0853)

(15401-0705985-5)

Kamran
KAMRAN KHAN

Umar
UMAR FAROOQ MOHMAND

Waleed
WALEED ADNAN

&

Ayub
**MUHAMMAD AYUB
ADVOCATES**

OFFICE:

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Deans Trade Centre, Peshawar Cantt.
(0311-9314232)