


13.12.2022


Counsel for the appellant was informed telephonically on 4/01/2023
SCANNED
KPST
Peshawar

Nemo for appellant.

Muhammad Jan learned District Attorney for the respondents present.

Notice be issued to appellant and her counsel for arguments on 12/01/2023 before D.B.


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

12.01.2023

Husband of the petitioner present on behalf of the petitioner.

Muhammad Adeel Butt learned Additional Advocate General for the respondents present.


Husband of the petitioner requested for withdrawal of the instant service appeal on the ground that grievances of the petitioner has been redressed. In this regard, his signature was obtained on the margin of the order sheet.

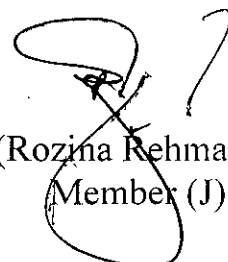
In view of the above, instant service appeal is hereby dismissed as withdrawn. Parties are left to bear their own costs.

File be consigned to the record room.

ANNOUNCED

12.01.2023


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

As grievances of the appellant has been redressed, therefore, I want to withdraw the instant appeal.
12/11/23
Appellant

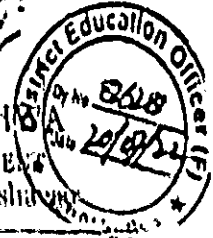
SCANNED
KPST
Peshawar



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar

Phone No. 091-9221902

28/7/22



Dated Peshawar the July 06th, 2022

NOTIFICATION

NO. SOIMCIE&SED/4-16/POSTING/TRANSFER/MC: In compliance with the Orders of the Khyber Pakhtunkhwa Service Tribunal Peshawar dated 13-06-2022 in Service Appeal No 911/2022, titled "Mst. Shahida Parveen, SDEO (Female) VS Govt. of Khyber Pakhtunkhwa & Others", this Department's Notification of even number dated 19-04-2022 regarding posting/transfer of Mst. Shahida Parveen (MC BS-17) from the post of SDEO (Female) Tangi Charsadda, is hereby suspended till the date fixed.

2- Consequent upon the above, Mst. Sabreena Fayaz (MC BS-17) SDEO (Female) Tangi Charsadda is hereby transferred and posted as SDEO (Female) Lower Mohmand, against the vacant post, in the best public interest.

SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of even No. & date:

Copy forwarded for information to the:-

1. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
4. District Education Officers (Female) Charsadda and Mohmand.
5. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
6. District Accounts Officers Charsadda and Mohmand.
7. Section Officer (Litigation-II) E&SE Department with the direction, to pursue the case in KP Service Tribunal Peshawar till final decision.
8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
9. Officers concerned.
10. Master file.


28/07/22
(NASEER ABBAS KHALIL)
SECTION OFFICER (Management Cadre)

9
Mubon

04.11.2022

Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments before the D.B on 21.11.2022.



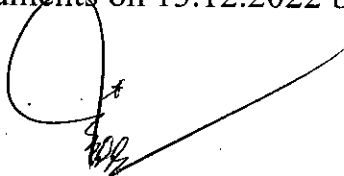
(Mian Muhammad)
Member (E)

(Salah-ud-Din)
Member (J)

21.11.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 13.12.2022 before the D.B.



(Mian Muhammad)
Member (E)



(Salah-Ud-Din)
Member (J)

SCANNED
KPET
Peshawar

13th June, 2022

Appellant in person present and on her application for early hearing alongwith notification No. SO(MC) E&SED/4-16/2022/PT/D-Appeal dated 09.06.2022 whereby her departmental appeal has been rejected by the appellate authority, the matter was fixed for today. Appellant is directed to furnish copies for the spare sets of appeal.

Appellant argued the case by herself and submitted that vide impugned notification bearing Endorsement No. SO(MC) E&SED/4-16/2022/Posting/Transfer/MC dated 19.04.2022 she was transferred from the post of SDEO (F) Tangi Charsadda and was directed to report to the office of the Directorate of E&SE, Khyber Pakhtunkhwa. Against the said order she filed departmental appeal on 27.04.2022, which was rejected on 09.06.2022. She contended that the impugned transfer order was pre-mature and against the posting transfer policy of the Provincial Government. Since the departmental representation submitted by the appellant has been rejected, therefore, this appeal is admitted to full hearing subject to all just and legal objections by the other side. The appellant is directed to deposit security and process fee and security within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 29.06.2022 before S.B.

Alongwith the appeal, the appellant has also submitted an application for temporary injunction/suspension of operation of the impugned notification. Notice of application be issued to the respondents for the date fixed. As the appellant has been transferred without completion of her normal tenure, therefore, the operation of the impugned transfer notification bearing Endorsement No. SO(MC) E&SED/4-16/2022/Posting/Transfer/MC dated 19.04.2022 is suspended till the date fixed subject to notice.



(Kalim Arshad Khan)
Chairman

Rs-500/-
Appellate Deposited
Security & Process Fee
A. H. Khan
13/6/22

30.05.2022

Learned counsel for the appellant present and heard.

Against the impugned order dated 30.05.2022, the appellant preferred departmental appeal/representation on 27.04.2022. There is no order of departmental appellate authority on the departmental appeal nor ninety days statutory period has elapsed. Learned counsel for the appellant requests for some time to get order on the departmental appeal or ninety days period elapsed to pursue the appeal before this Tribunal. Adjourned. To come up for further proceedings on 29.06.2020 before this S.B.



Chairman


This is an appeal filed by Mst. Shahida perveen today on 30/05/2022 against the order dated 19.04.2022 against which she preferred/made departmental appeal/representation on 27.04.2022 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority report as 2005-SCMR-890.

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

1- Copy of order dated 26.10.2021 mentioned in para-1 of the memo of appeal(Annexure-A) is not attached with the appeal which may be placed on

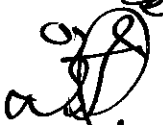
it.
No. 1195/ST,

Dt. 30/5/2022.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Zamir Muhammad Khan Adv.

Re Submitted the file in the
Special Request with the reason
that Sectsery education to
Pass order on my Application
which was submitted for
Suspension transfer order
of the petitioner with
this reason I approach
to this honoable court
humble Request for
further "proseces" this case
may please be put up the
honoable chairman.


30/5/2022

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

Case Title: _____ v/s _____

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: _____	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	x	✓
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?	✓	
16	Whether appeal contains cutting/overwriting?	x	✓
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On _____	✓	
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	✓	
26	Whether copies of comments/reply/rejoinder submitted? On _____	✓	
27	Whether copies of comments/reply/rejoinder provided to opposite party? On _____	✓	

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

Name: Zamir Muhammad

Signature: [Signature]

Dated: _____

Kamal Khan
Attorney

BEFORE THE COURT OF SERVICE TRIBUNAL KHYBER
PUKHTUNKHWA PESHAWAR.

Appeal No: 911 /2022.

Shahida Parveen {Appellant}

VERSUS

Secretary Education Khyber Pukhtunkhwa and others.

..... {Respondents}

WRIT PETITION

INDEX OF DOCUMENTS

S. No	Description of Documents	Annexure	Pages
01	Civil Service Appeal		1-4
02	Application for temporary injunction		5
03	Addresses of parties		6
04	Affidavit		7
05	Copy of Notification	"A"	8-9
06	Copy of Notification dated 07-10-2021	"B"	10
07	Copy of Notification dated 19-04-2022	"C"	11
08	Copy of Departmental Appeal	"D"	12
09	Wakalat Nama		13

APPELLANT

Dated:- 30/5 /2022. Through Counsel:-

(ZAMIR MUHAMMAD KHAN)

Advocate High Court

Dsitt: Courts Nowshera.

B.C No.11-1733

CNIC # 17201-2484735-1

Mobile #:0333-919027

①

**BEFORE THE COURT OF SERVICE TRIBUNAL KHYBER
PUKHTUNKHWA PESHAWAR.**

**Khyber Pakhtunkhwa
Service Tribunal**

Appeal No: 911 /2022.

Diary No. 833

Dated 30/5/2022

Mst. Shahida Parveen W/o Mir Azam Khan

Resident of Nasoo Khel Inziari Nizampur Tehsil

Jehangira Distt: Nowshera Presently Charsadda

.....{Appellant}

VERSUS

1. Secretary Education Khyber Pukhtunkhwa
2. Director E & SE Khyber Pukhtunkhwa Peshawar.
3. District Education Officer for Women District Charsadda.....{Respondents}

**APPEAL U/s 4 KHYBER PUKHTUNKHWA
SERVICE ACT 1974 AGAINST THE ILLEGAL
AND UNLAWFUL ORDERS OF THE
RESPONDENTS NO 1 TO 3 DATED 07-10-2021
AND 19-04-2022 VIDE WHICH PASSING
ORDERS FOR TRANSFER OF THE PETITIONER
BEFORE THE PERIOD OF 3 YEARS OF
POSTING AFTER TRANSFER.**

Filed to-day

Registrar
30/5/2022

PRAYER:-

BY ACCEPTANCE OF THIS INSTANT
PETITION, THE ORDER MENTIONED
ABOVE MAY PLEASE BE SET-ASIDE
AND THE ORDERS PASSED BY THE
RESPONDENTS FOR TRANSFER BE
BEFORE 3 YEARS PERIOD MAY
KINDLY BE REVOKED.

THE PETITIONER REQUESTS THE COURT
TO BE KIND AND GRANT HER
THE SAME AS PRAYERED FOR.

2

Respectfully Sheweth:-

The Appellant submits as under:-

FACTS:-

1. That the Appellant presently SDEO (F) Tangi took over the charge in the office of SDEO (F) Tangi on 26-10-2021 in the light of the orders of transfer issued by the Respondents and the appellant has been settled with her family members at District Charsadda to perform her duties according to the best of her ability. *(Copy of transfer letter is annexed as A).*
2. That the Appellant has joining her duties as per the transferred orders passed by the Respondents being a obedient servant and as a honorable education officer.
3. That the Appellant was transferred vide Notification No. SO(S/F)E&SED/4-16/2021/Posting/Transfer/MC dated 07th Oct' 2021 without any cogent or lawful reason.
(Copy of Transfer letter is Annex "B")
4. That after a lapse of period 6/7 months the orders of Appellant 's transfer in continuation of her duties at SDEO (F) Tangi vide Notification No. SO(MC)E7SED/4-16/2022/Posting/Transfer/MC dated 19-04-2022 was passed without any cogent or lawful reason.
(Copy of Transfer letter is Annex "C")
5. That in the services law there is a specific period of 3 years to perform the duty on the transferring station, but the Appellant was transferred within 6 months from the said post to the Peshawar Directorate or other stations.
6. That after receiving the letter / office order of transfer vide order dated 19th April'2022 filed an application to the Honorable Respondent No 1. But all in vain no fruitful result has been paid to the Appellant. **(Copy of Application is Annex "D")**.
7. That the Appellant approaching this honorable court had submitted a departmental appeal for redressing her grievances, but till today no order has been passed, hence the present appeal, inter alia on the following:-

GROUND:-

1. That the Appellant has just serve for 06 months SDEO(F) Tangi and according the tenure policy the Appellant has the right to continue her services for 2/3 years as per services rules.
2. That the Husband is also serving in the Chasadda District as SDEO(M) and as per spouse policy the appellant have the right to continue service in Charsadda District.
3. That there is no allegation on the Appellant to become ground for the transfer being a Government Servant / Education Officer.
4. That the action and inaction of the respondents regarding the illegal transfer is against the law, facts, norms of natural justice.
5. That the appellant has not been treated by the respondents Department in accordance with law and rules on the subject mentioned above and as such the respondents violated Article 4 and 25 of constitution of Islamic Republic of Pakistan 1973.
6. That the action of the respondents is without any legal authority discriminatory and is clear violation of fundamental rights conferred by the constitution and is liable to be declared as null & void, therefore under the law and Rules the transfer of appellant is against the law.
7. That as the act of the respondents is illegal, unconstitutional, without any authority and not only discriminatory but is also the result of malafide on the part of respondents.

8. That the Appellant seeks permission of this honorable court to raise any other grounds available at the time of arguments.

IT IS THEREFORE, PRAYED THAT BY ACCEPTANCE OF THIS INSTANT PEITION, THE ORDER MENTIONED ABOVE MAY PLEASE BE SET-ASIDE AND THE ORDERS PASSED BY THE RESPONDENTS FOR THE TRANSFER BEFORE 3 YEARS PERIOD MAY KINDLY BE SUSPENDED.

APPELLANT

Dated:- 30 / 11 / 2022. Through Counsel:-

(ZAMIR MUHAMMAD KHAN)

Advocate High Court

Dsitt: Courts Nowshera.

0333 9109027

CERTIFICATE:

It is certified that there is no other appeal pending before Hon'ble Court except this one nor decided. The contents of this petition is true and correct to the best of my knowledge and belief.

M.

Advocate

(3)

BEFORE THE COURT OF SPECIAL JUDGE SERVICE
TRIBUNAL PESHAWAR.

Appeal No: _____/2022.

Shahida Parveen {Appellant}

VERSUS

Secretary Education Khyber Pukhtunkhwa and others.

..... {Respondents}

APPLICATION FOR THE TEMPORARY INJUNCTION /
SUSPENSION OF THE NOTIFICATION ORDER OF THE
RESPONDENTS AND THE APPELLANT MAY PLEASE BE NOT
TRANSFER TILL THE FINAL DISPOAL OF THIS APPEAL.

Respected Sir,

- 1- That the Appellant moved the appeal which is not yet fixed for hearing.
- 2- That prima facie strong arguable case exists in favour of Appellant against Respondents.
- 3- That the balance of convenience lies in favour of the Appellant and aforesaid notification order may be suspended till the final disposal of the instant appeal.
- 4- That if the aforesaid notification is not suspended it will frustrate the aim and purpose of appeal in hand on account of all this the Appellant will face an irreparable loss.

IT IS THEREFORE, HUMBL Y PRAYED THAT IN VIEW OF AFORESAID FACTS THE TEMPORARY INJUNCTION MAY BE GRANTED / NOTIFICATION ORDER OF RESPONDENTS MAY KINDLY BE SUSPENDED AND THE APPELLANT MAY PLEASE BE NOT TRANSFERRED TILL THE FINAL DISPOSAL OF APPEAL.

ANY OTHER RELIEF DEEMS APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE GRANTED IN FAVOUR OF APPELLANT AGAINST RESPONDENTS.

APPELLANT

Dated:- 26 / 15 /2022. Through Counsel:-

(ZAMIR MUHAMMAD KHAN)

Advocate High Court

Dsitt: Courts Nowshera.

M. Kamal Khan

6

BEFORE THE COURT OF SERVICE TRIBUNAL KHYBER
PUKHTUNKHWA PESHAWAR.

Appeal No: _____/2022.

Shahida Parveen {Appellant}

VERSUS

Secretary Education Khyber Pukhtunkhwa and others.

..... {Respondents}

ADDRESSES OF PARTIES

APPELLANT

Mst. Shahida Parveen W/o Mir Azam Khan

Resident of Nasoo Khel Inziari Nizampur Tehsil

Jehangira Distt: Nowshera..... {Appellant}

VERSUS

RESPONDENT

1. Secretary Education Khyber Pukhtunkhwa
2. Director Education Khyber Pukhtunkhwa Peshawar.
3. District Education Officer for Women District Nowshera: *Chrsada*

{Respondents}

[Signature]
APPELLANT

Dated:- ³⁰/₁₀/2022. Through Counsel:-

[Signature]
(ZAMIR MUHAMMAD KHAN)
Advocate High Court
Dsitt: Courts Nowshera.

**BEFORE THE COURT OF SERVICE TRIBUNAL KHYBER
PUKHTUNKHWA PESHAWAR.**

Appeal No: _____/2022.
Shahida Parveen{Appellant}

VERSUS

Secretary Education Khyber Pukhtunkhwa and others.
.....{Respondents}

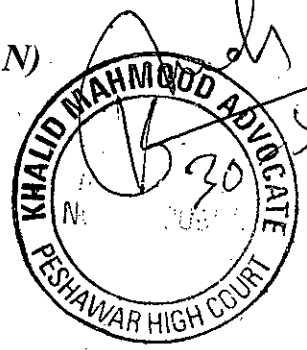
**WRIT PETITION
AFFIDAVIT**

I, *Mst. Shahida Parveen* ~~w/o~~ *Mir Azam Khan* Resident of Nasoo
Khel Inziari Nizampur Tehsil Jehangira Distt: Nowshera, do hereby
solemnly affirms and declare on oath that the contents of the
accompanying *APPEAL* are true and correct to the best of my
knowledge and belief and nothing has been concealed from this August
court.

DEPONENT

(Signature)
(SHAHIDA PARVEEN)
CNIC # 17301-1380372-4

(Signature)
IDENTIFIED BY:
(ZAMIR MUHAMAMD KHAN)
Advocate High Court
Dsitt: Courts Nowshera.



NOTIFICATION

FOR THE POSTS OF SDEO (Female) BS-17, District Education Officer (Female) Peshawar, District Education Officer (Female) Tangi, District Education Officer (Female) Peshawar, District Education Officer (Female) Lower Charsadda, District Education Officer (Female) Lower Mulkhwa Chitral Upper, District Education Officer (Female) Swabi, District Education Officer (Female) Torikhow, District Education Officer (Female) Topi Swabi, District Education Officer (Female) Haripur, District Education Officer (Female) Pabbi Nowshera, District Education Officer (Female) Balakot Manselhra, District Education Officer (Female) Ghazi Haripur, District Education Officer (Female) Darband Manselhra, District Education Officer (Female) Pattan Kohistan Lower A/P

Sr. No.	Name & Qualification	From	To
1.	Mst. Shahida Begum SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Peshawar Town Zone No-15	Sub Divisional Education Officer (Female) Lower Charsadda
2.	Mst. Zeenat Begum SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Tangi District	Sub Divisional Education Officer (Female) Lower Peshawar
3.	Mst. Maryam Khan SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Lower Peshawar	Sub Divisional Education Officer (Female) Lower Jehangira Nowshera
4.	Mst. Syeda Naira Anjum SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Jehangira Nowshera	Sub Divisional Education Officer (Female) Lower Tanawal Abbottabad
5.	Mst. Nazia Anjum SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Swabi	Sub Divisional Education Officer (Female) Lower Torikhow
6.	Mst. Masarat Zahid SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Chitral Lower	Sub Divisional Education Officer (Female) Torikhow Mulkhwa Chitral Upper
7.	Mst. Aafia Bibi SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Torikhow Mulkhwa Chitral Upper	Sub Divisional Education Officer (Female) Sector Kohistan Lower A/P
8.	Mst. Nancy Begum SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Topi Swabi	Sub Divisional Education Officer (Female) Haripur
9.	Mst. Surriya Taj SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Haripur	Sub Divisional Education Officer (Female) Pabbi Nowshera
10.	Mst. Nazia Anjum SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Pabbi Nowshera	Sub Divisional Education Officer (Female) Balakot Manselhra
11.	Mst. Adeela Rani SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Balakot Manselhra	Sub Divisional Education Officer (Female) Ghazi Haripur
12.	Mst. Saeeda Bariq SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Ghazi Haripur	Sub Divisional Education Officer (Female) Darband Manselhra
13.	Mst. Sajda Sakhi SDEO (Female BS-17)	Sub Divisional Education Officer (Female) Darband Manselhra	Sub Divisional Education Officer (Female) Pattan Kohistan Lower A/P
14.	Mst. Farah Parveen	Sub Divisional Education	Sub Divisional Education

Sub-Divisional Education Officer (Female) Posts

15	Mst. Farhat Begum SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Takhti Naurang Marwat	Sub-Divisional Education Officer (Female) Sera Naurang Lakki Marwat
16	Mst. Saira Awan SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Mandera	Sub-Divisional Education Officer (Female) Sera Naurang Lakki Marwat
17	Mst. Saira Awan SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Sagara Buner	Sub-Divisional Education Officer (Female) Havelian Abbottabad
18	Mst. Farhat Yasmeen SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Karak	Sub-Divisional Education Officer (Female) Takhti Nusrati Karak
19	Mst. SE Azeza Nisr SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Lower Tanawal Abbottabad	Sub-Divisional Education Officer (Female) Karak
20	Mst. Malak Taja SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Mardan	Sub-Divisional Education Officer (Female) Adezai Dir Lower
21	Mst. Shabnam Bibi SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Adezai Dir Lower	Sub-Divisional Education Officer (Female) Turgara Dir Lower
22	Mst. Shaheen Bibi SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Battagram	Sub-Divisional Education Officer (Female) Kalkot Dir Upper AVP
23	Mst. Shamshan Bibi SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Tank	Sub-Divisional Education Officer (Female) Pharpur Di Khan
24	Mst. Sobia Nawaz SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Pharpur Di Khan	Sub-Divisional Education Officer (Female) Tank
25	Mst. Naheed Fazal SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Abbottabad	Sub-Divisional Education Officer (Female) Sheringale Dir Upper AVP
26	Mst. An'isa Jamshed SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Lora Abbottabad	Sub-Divisional Education Officer (Female) Kumbar Dir Lower
27	Mst. Nageena Bibi SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Havelian Abbottabad	Sub-Divisional Education Officer (Female) Kundai Kohistan Upper AVP
28	Mst. Zahida Khanum SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Lakki Marwat	Sub-Divisional Education Officer (Female) Alai, Battagram AVP
29	Mst. Nazma Shameen SDEO (Female BS-17)	Sub-Divisional Education Officer (Female) Khanpur Haripur	Sub-Divisional Education Officer (Female) Barawat Dir Upper AVP
30	Mst. Sobia Tabassum (MC BS-17)	Sub-Divisional Education Officer (Female) Di Khan	Sub-Divisional Education Officer (Female) Domel Bannu
31	Mst. Farhat Yasmeen (MC BS-17)	Sub-Divisional Education Officer (Female) Domel Bannu	Sub-Divisional Education Officer (Female) Di Khan

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block "A" Opposite MPA's Hostel, Civil Secretariat Peshawar
 Phone: 351431111

23	Mrs Shagufta Noorin (MC BS-17)	Assistant Director, Directorate of E&SE KP	Sub Divisional Education Officer (Female) Gorta Kangroo, Mardan AVP
24	Mrs Naseem Uskhan (MC BS-17)	Waiting for posting in Directorate of E&SE KP	Sub Divisional Education Officer (Female) Khyber AVP
25	Mrs Azra Afsar, ASDO (BS-10)	Assistant Sub-Divisional Education Officer (Female) Daggar (Buner)	Sub Divisional Education Officer (Female) Dagga Buner in OPS
26	Mrs Salma ASDO (BS-10)	Assistant Sub-Divisional Education Officer (Female) Dalkhola	Sub Divisional Education Officer (Female) Thana Dalkhola in OPS

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Ends of Even No. & date

Copy forwarded for information to the:-

- 1 Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2 Director E&SE Khyber Pakhtunkhwa, Peshawar
- 3 District Education Officers (Female) concerned.
- 4 District Accounts Officers concerned.
- 5 Director EMIB, E&SE Department with the request to upload the posting/transfer notification on the official website of the department.
- 6 PS to Chief Secretary, Khyber Pakhtunkhwa,
- 7 PS to Minister for E&SE Department, Khyber Pakhtunkhwa,
- 8 PS to Secretary, E&SE Department, Khyber Pakhtunkhwa,
- 9 Officers concerned
- 10 Master file

(Signature)
(RAFIQUE REHMAN SHAH)
SECTION OFFICER (SCHOOLS FEMALE)



(11)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Ph. No. 091-3221553

Dated Peshawar (15) April 19 2022

NOTIFICATION

NO.SO(MC)E&SED/4-16/2022/POSTING/TRANSFER/MC: The following posting / transfers of officers of Elementary & Secondary Education are hereby ordered with immediate effect, in the best public interest: -

Sr. No	Name & designation	From	To
1	Mst. Shahida Parveen (MC BS-17)	SDEO (Female), Tangi Charsadda	Report to Directorate of E&SE Khyber Pakhtunkhwa
2	Mst. Maryum Aman (MC BS-17)	Assistant Director, Directorate of E&SE	SDEO (Female), Tangi Charsadda (Vice Sr. No-1)

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endst: of even No.& date:

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. District Education Officer (Female) Charsadda.
5. District Accounts Officer Charsadda.
6. PS to Minister E&SE Khyber Pakhtunkhwa
7. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.
8. Officers concerned.
9. Master file.

FD:mr

19/4/2022

o/c

(Handwritten signature)
19/4/22

(JUNAID SHAH)
SECTION OFFICER (Management Cadre)

(12)

27/4/22

The Honorable Secretary Education,
Khyber pukhtoon khawa pensawar.

SUBJECT: APPEAL REGARDING TRANSFER CANCELLATION.

Respected Sir

With Great Respect: I Mst; Shahida Parveen SDEO(F) Tangi took over charge in the office of SDEO(F)Tangi on 26/10/2021 in the light of General Transfer order issued vide the worthy Secretary Education Elementary and Secondary , And has been settled with my family at charsadda to perform my duty according to the best of my ability.

Respected Sir,


In continuation of my duty at SDEO(F)Tangi It nas come in the notice that I have been Transferred to the Directorate of Secondary Education Peshawar vide Notification No.SO(MC)E7SED/4-16/2022/Posting/Transfer/MC Dated Peshawar 19/04/2022 w thout any reason which is against the policy as per following grounds.

- 1;. I have served just for 06 Month as SDEO(F)Tangi and according the Tenure Policy I have the right to continue my service for two /three years. .
2. My Husband is also working In Chd; District as SDEO(M) Chd; and as per spouse policy I Have also the right to continue my service in Cnd district.
- 3; It is also necessary to bring in to your notice that there is no allegation on the undersigned to become ground for transfer.

Respected sir,

In view of the above it is therefore requested that My Order may be Cancelled and I may leave to perform my duty as SDEO(F) Tangi in the interest of education Department please.

Thanks.


27-4-2022
(SHAHIDA PARVEEN)
SDEO(F)Tangi.

WAKALAT NAMA

In the Court of Service Tribunal Khyber Pukhtunkhwa
Peshawar

Criminal / Petition Trail
Appeal / Revision.

Case No. Dated

Shahida Parveen

VERSUS

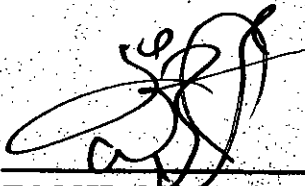
Petition / Accused
Appellant / Complainant

Secretary Education KPK and others

I/We _____

The above noted _____ do hereby appoint and constitute **Mr. ZAMIR MUHAMMAD KHAN** Advocate, High Court Peshawar / Federal Shariat Court Islamabad / District Courts Nowshera, as counsel in subject proceeding and authorize him to appear, plead, act compromise, withdraw or refer to arbitration for me/ us as my / our advocate in the above mentioned matter, without any liability for his default and with the authority to engage / appoint any other advocate / counsel at my / our behalf, to receive all sums and amounts payable or deposited on my / our account in the above noted matter.

Attested & Accepted.



0333 9109027

ZAMIR MUHAMMAD KHAN
Advocate High Court/
Federal Shariat Court Islamabad/
District Courts Nowshera

Dated 30/5/20

M. Kamal Khan
Advocate

OFFICE Rehman Plaza
Near Police Station
Nowshera Kalan.


Client.

B. a. 11/733

گورنمنٹ پبلسٹک سروسز کمیشن

نمبر ۱۵۱۱

درخواست نمبر ۱۱۱۱۱۱۱۱

۱۵۱۱

۱۔ درخواست نمبر ۱۱۱۱۱۱۱۱

۲۔ درخواست نمبر ۱۱۱۱۱۱۱۱

۳۔ درخواست نمبر ۱۱۱۱۱۱۱۱

۴۔ درخواست نمبر ۱۱۱۱۱۱۱۱

۵۔ درخواست نمبر ۱۱۱۱۱۱۱۱

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

In S.A/No.911/2022

Mst . Shahida Parveen SDEO (F) MC BPS 17).....Appellant.

VERSUS

The Secretary E&SE & others..... Respondents.

JOINT PARAWISE COMMENTS ON BEHALF OF THE RESPONDENTS NO 1-3.

Respectfully Sheweth,

Preliminary Objections:

1. That the appellant has got no cause of action/locus standi.
2. That the instant appeal is premature and liable to be dismissed.
3. That the appellant has concealed the material facts from this Hon'ble Tribunal, hence instant appeal is liable to be dismissed on this score.
4. That the present appeal is liable to be dismissed for mis-joinder & non joinder of necessary parties.
5. That the appellant is estopped by her own conduct to file the instant appeal.
6. That the instant appeal is not maintainable in its present form and also in the present circumstances of the issue.
7. That the Notification dated 07-10-2021 and 19.04.2022 of the Respondents is according to law and rules.
8. That the appellant is neither an aggrieved person nor having any locus- standi to file the instant appeal.
9. That with utmost respect this Hon'ble Tribunal lacks jurisdiction to entertain this appeal.

FACTS.

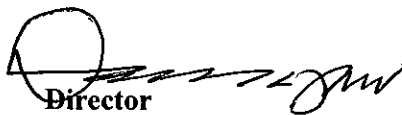
1. That para-1 pertains to service record of the appellant however the remaining para is incorrect on the ground that as per posting/transfer policy i.e. xi-A) officer in BPS-17 and above should not be posted in district of their domicile [Doctors, Lectures, Instructors, Subject Specialists, Principals/Vice Principals and other Teachers in BPS-17 & above working in Health and Education Departments in all the districts of Govt. of KP shall be exempted from the application of the said policy. However the subject policy shall remain applicable on all Administrative/Executive positions in BPS-17 & above across the province] (**Annex-A**).
2. That the appellant working in respondent Department against administrative post (MC) in the respondent department, she is bound to work anywhere in the Province.
3. Each and every civil servant filling under the ambit of section 2(B) of kpk civile servant act 1973 is legal bound to serve in the respondent department to the entire satisfaction of the competent authority, against the post for which she his being paid by the respondent department from the national exchequer.
4. As explained in foregoing para, that Management Cadre employees are bound to work anywhere in the Province irrespective to tenure.

5. **Incorrect Hence Denied** , That the Notification dated 07-10-2021 and 19.04.2022 are within legal sphere and as the appellant being civil servant is required to serve anywhere in the Province under the mandatory provisions of Section 10 of KPK, Civil Servant Act, 1973.
6. That the appellant filed departmental appeal by the appellant against the notification dated 19.04.2022 and the same is in process in the department and the apppellant filed the instant service appeal is pre mature as per Service Tribunal Act, hence the instant service appeal may be dismissed on the score only.
7. That the notifications dated 07-10-2021 and 19.04.2022 of the respondent department is legal and to be maintained in the interest of justice, hence the instant service appeal may be dismiss inter alia on the following grounds.

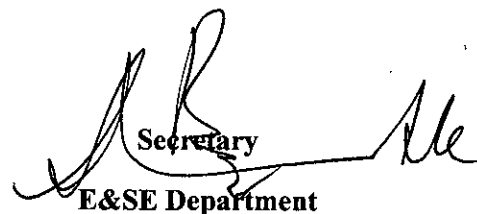
Grounds:

- i. **Incorrect Hence Denied** , That the Notification dated 07-10-2021 and 19.04.2022 is within legal sphere and as the appellant being civil servant is required to serve anywhere in the Province under the mandatory provisions of Section 10 of KPK, Civil Servant Act, 1973.
- ii. **Incorrect Hence Denied** That The stance of the appellant is illegal as the post of SDEO are administrative post in the responded department and the appellant has been treated as per law and rules vide notification dated 07-10-2021 and 19.04.2022 by the respondent department and the spouse policy is not applicable in the instant case.
- iii. **Incorrect Hence Denied** as explained in proceeding paras.
- iv. **Incorrect Hence Denied** That the Notification dated 19-04-2022 is within legal sphere and as the appellant being civil servant is required to serve anywhere in the Province under the mandatory provisions of Section 10 of KPK, Civil Servant Act, 1973..
- v. **Incorrect Hence Denied** as explained in proceeding paras and the appellant has been transferred as per law, rules and policy.
- vi. **Incorrect Hence Denied.** That the statement of the appellant against the facts and circumstances, in fact the appellant was adjusted against his own post of SDEO BPS (17).
- vii. As already explained.
- viii. That with prior permission of this Hon'ble Tribunal the respondents may urged other grounds or proofs if any during the course of arguments.

In view of the above made submissions, it is, therefore, most humbly prayed that this Honorable Tribunal may very graciously be pleased to dismiss the appeal with cost in favor of the Respondents in the interest of justice.


Director

E&SE, KP Peshawar
(Respondent No. 04)


Secretary
E&SE Department

(For Respondents 1 to 3)

BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

Service Appeal # 911/2022

SHAHIDA PERVEEN..... Petitioner

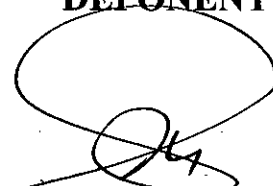
VERSUS

Govt. of Khyber Pakhtunkhwa & others..... Respondents

AFFIDAVIT

I, MUHAMMAD SALEEM, Section Officer (Litigation-II) Elementary & Secondary Education, Department do hereby solemnly affirm and declare that the contents of the accompanying para-wise comments, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

DEPONENT



MUHAMMAD SALEEM
Section Officer (Lit-II)
E&SE PESHAWAR



**UPDATED VERSION OF THE KHYBER PAKHTUNKHWA
POSTING / TRANSFER POLICY
(UPTO 31.1.2018)**

Statutory Provision.

Section 10 of the Khyber Pakhtunkhwa Civil Servants Act,1973.

Posting and Transfer. Every civil servant shall be liable to serve anywhere within or outside the Province, in any post under the Federal Government, or any Provincial Government or Local authority, or a Corporation or body set up or established by any such Government:-

Provided that nothing contained in this section shall apply to a civil servant recruited specifically to serve in a particular area or region;

Provided further that, where a civil servant is required to serve in a post outside a service or cadre, his terms and conditions of service as to his pay shall not be less favourable than those to which he would have been entitled if he had not been so required to serve.

Posting/transfer policy of the Provincial Government.

- i) All the posting/transfers shall be strictly in public interest and shall not be abused/misused to victimize the Government servants
- ii) All Government servants are prohibited to exert political, Administrative or any other pressures upon the posting/transfer authorities for seeking posing/transfers of their choice and against the public interest.
- iii) All contract Government employees appointed against specific posts, can not be posted against any other post.
- iv) Existing tenure of posting/transfer of three (03) years for settled areas and two (02) years for unattractive/hard areas shall be reduced to two (02) years for settled areas, 01½ years for unattractive areas and one year for hard areas.
- v) ⁷¹[]

⁷¹ Para-1(v) regarding months of March and July for posting/transfer and authorities for relaxation of ban deleted vide letter No: SOR-VI (E&AD) 1-4/2008/Vol-VI. dated 3-6-2008. Consequently authorities competent under the NWFP Government Rules of Business,1985, District Government Rules of Business 2001, Posting/Transfer Policy and other rules for the time being in force, allowed to make Posting/Transfer subject to observance of the policy and rules.

- vi) ⁷²While making posting/transfers of officers/officials up to BS-17 from settled areas to FATA and vice versa approval of the Chief Secretary, Khyber Pakhtunkhwa needs to be obtained. Save Tehsildars/Naib Tehsildars within a division in respect of whom the concerned Commissioner will exercise the same power. Whereas, in case of posting/transfer of officers in BS-18 and above, from settled areas to FATA and vice versa, specific approval of the Governor, Khyber Pakhtunkhwa shall be obtained.

Provided that the power to transfer Political Tehsildars and Political Naib Tehsildars within FATA between different divisions shall rest in Additional Chief Secretary FATA.

vi (a) ⁷³[]

- vii) Officers may be posted on executive/administrative posts in the Districts of their domicile except District Coordination Officers (D.C.Os) and DPOs/Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where the Police Station (Thaana) of his area/residence is situated.

- viii) No posting/transfers of the officers/officials on detailment basis shall be made.

Viii-A) ⁷⁴The competent authority has been pleased to prescribe the following guideline to facilitate posting of husband and wife at the same station:-

- (a) Where a request is made for posting at a different station in the same department/service/cadre in which an employ is already serving, the request may be accepted subject to the availability of a post in the same BPS.
- (b) If request involves temporary deputation to another department, it may be processed in consultation with the concerned department and may be accepted on prescribed terms of deputation subject to availability of a post in the same BPS.
- (c) If there is a tie between two or more government servants for posting at the same station in the same department/unit of an organization, the government servant with greater length of service may be preferred.
- (d) Request for posting by spouse facing serious medical problems may be accorded highest priority.
- (e) Spouses already posted at one station, including those posted on deputation may normally not be disturbed without compelling reason

⁷² Para-VI added vide circular letter No. SOR-VI/E&AD/1-4/2010/Vol-VIII dated 20th March, 2010

⁷³ Sub-para vi (a) of para I deleted vide Notification No. SO (Policy)/E&AD/1-4/ 2010/Vol:IX dated 24.11. 2017

⁷⁴ Para (viii-A) added vide circular NO. SOR-VI/E&AD/1-4/2010/Vol-VIII dated 07.08.2012

of public interest. Request for extension of deputation period beyond the permissible limit may be considered with compassion if interests of public service would permit.

- ix) Regarding the posting of husband/wife, both in Provincial services, efforts where possible would be made to post such persons at one station subject to the public interest.
- x) All the posting/transferring authorities may facilitate the posting/ transfer of the unmarried female government Servants at the station of the residence of their parents.
- xi) Officers/officials except DCOs and DPOs/SPs who are due to retire within one year may be posted on their option on posts in the Districts of their domicile and be allowed to serve there till the retirement

⁷⁵DCOs and DPOs who are due to retire in the near future may also be posted in the District of their domicile subject to the condition that such posting would be against non-administrative posts of equivalent scales;

✓ xi-A) ⁷⁶Officer in BPS-17 and above should not be posted in district of their domicile. [⁷⁷Doctors, Lecturers, Instructors, Subject Specialists, Principals/Vice Principals and other Teachers in BPS-17 & above working in Health and Education Departments in all the districts of Government of Khyber Pakhtunkhwa shall be exempted from the application of the said policy. However the subject policy shall remain applicable on all Administrative/Executive positions in BPS-17 & above across the province.]

xi-B) ⁷⁸Cancellation of posting transfer order issued with the approval of the competent authority may not be made without seeking formal approval of the competent authority through summary/note.

xii) In terms of Rule 17(1) and (2) read with Schedule-III of the Khyber Pakhtunkhwa Government Rules of Business 1985, transfer of officers shown in column 1 of the following table shall be made by the authorities shown against each officer in column 2 thereof:

⁷⁵ Added vide Urdu circular letter No: SOR-VI (E&AD)/1-4/2005, dated 9-9-2005

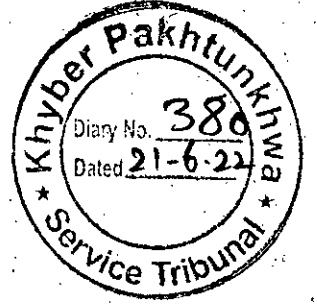
⁷⁶ (xi-A) added vide Circular No. SOR-VI /E&AD/1-4/2010/Vol-VIII dated 11.11.2013.

⁷⁷ Text added vide Circular No. SOR-VI /E&AD/1-4/2010/Vol-VIII dated 21.03.2014.

⁷⁸ (xi-B) added vide Circular No. SOR-VI/E&AD/1-4/2010/Vol-VIII dated 14.02.2014.

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

C.M No _____ 2022
In Re:
Service Appeal No _____/2022



Mst: Shahida Parveen

VERSUS

Secretary E&SE and other

put up to the court with
relevant appeal.

21/6/2022

APPLICATION FOR THE IMPLEADMENT OF (1) MST:
SABREENA FAYYAZ (SDEO) TANGI (2) DISTRICT
ACCOUNT OFFICER CHARSADE AT THE PENAL OF
RESPONDENTS IN THE ABOVE NOTED SERVICE APPEAL


Respectfully Sheweth: -

The Applicant/Appellant humbly submits as under:-

- 1) That the titled case is pending adjudication before this Honourable Tribunal and is fixed for comments, in which next date of hearing 29-06-2022!
- 2) That at the time of filing of service appeal, the above mentioned persons were not mentioned, hence the instant application.
- 3) That now the Applicant/Appellant wants to implead the (1) Mst: Sabreena Fayyaz and District Account Officer as necessary party at the penal of Respondents for the just and fair disposal.

- 4) That this Honourable Tribunal has got ample power to entertain the instant application.
- 5) That there is no legal bar in allowing the instant application and the same shall secure the ends of justice.

It is, therefore, respectfully prayed that on acceptance of this Application, the above mentioned persons as necessary party at the panel of Respondents for just and fair disposal of the instant service appeal in the larger interest of justice.


Applicant/Appellant

Through:


(MUHAMMAD KAMAL KHAN)
&

(ZAMEER MUHAMMAD KHAN)
Advocates,
High Court, Peshawar

Dated:-21-06-2022

AFFIDAVIT:-

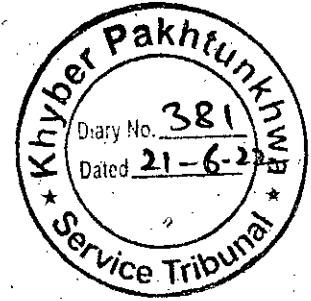
I, Mst: Shahida Parveen D/O Mir Azam Khan R/O Nasoo Khel, Inziari Nizampur Tehsil Jehangira District Nowshera, presently residing at District Charsadda, do hereby solemnly affirm and declare on oath that all the contents of accompanying Application are true and correct to the best of my knowledge and belief and nothing has been concealed OR withheld from this Honourable Court.



DEPONENT 

BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR

C.M No _____ 2022
In Re:
Service Appeal No _____/2022



Mst: Shahida Parveen

VERSUS

Secretary E&SE and other

*Put up to the court with
relevant appeal*

21/6/22

Application for grant of permission to allow amendment/deletion in service appeal i.e. dated 07-10-2021, which was lawful and suspension of order/notification No SO(PE) /E&SED /2-6/DPC-Meeting/ ADEOs (M&F) dated 18-05-2022 and the Account Officer may be directed not to stopped the salary of Appellant/Applicant and also not change the position of Appellant/Applicant of DDO ship of Charsadda

Respectfully Sheweth:-

The Applicant/Appellant humbly submits as under:-

- 1) That the titled case is pending adjudication before this Honourable Tribunal and is fixed for comments, in which next date of hearing 29-06-2022.
- 2) That the required amendment in the service appeal for prayer mentioned in the heading of application is just necessary for delivering of final judgment and disposition of the service.

- 3) That there is no legal bar in allowing the instant application; rather the same shall secure the ends of justice.
- 4) That amendment can be sought and be allowed at any stage of the pendency of the case.
- 5) That this Honourable Court has got ample power to entertain the instant application.
- 6) That any other ground will be raised at the time of arguments with the prior permission of this Honourable Court.

It is, therefore, respectfully prayed that on acceptance of this Application, the Applicant may kindly be permit/allowed to file the amended in the above titled service appeal in the larger interest of justice.


Applicant/Appellant

Through:


(MUHAMMAD KAMAL KHAN)

&

(ZAMEER MUHAMMAD KHAN)

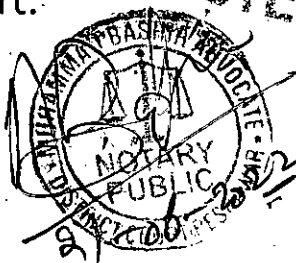
Advocates,

High Court, Peshawar

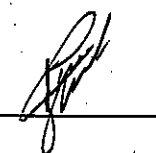
Dated:-21-06-2022

AFFIDAVIT:-

I, Mst: Shahida Parveen D/O Mir Azam Khan R/O Nasoo Khel, Inziari Nizampur Tehsil Jehangira District Nowshera, presently residing at District Charsadda, do hereby solemnly affirm and declare on oath that all the contents of accompanying Application are true and correct to the best of my knowledge and belief and nothing has been concealed OR withheld from this Honourable Court.



DEPONENT



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'A'

To be filled by the Counsel/Applicant

Case Number				
Case Title	SAMIDA Parveen vs Secretary ETC			
Date of Institution	30-5-2022			
Bench	SB	<input checked="" type="checkbox"/>	DB	
Case Status	Fresh	<input checked="" type="checkbox"/>	Pending	
Stage	Notice		Reply	Argument
Urgency to clearly stated.	Transfer matter, relieving the charge from present posting.			
Nature of the relief sought.	Transfer.			
Next date of hearing	29/06/2022			
Alleged Target Date	10-6-2022			
Counsel for	Petitioner	<input checked="" type="checkbox"/>	Respondent	In person


Signature of counsel/party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing 225 -p/2022

In case No. _____ -p/2022

Shahida parveen vs Secretary Education etc

Presented by petitioner on behalf of Self. Entered in the relevant register.

Put up alongwith main case

REGISTRAR

Last date fixed	<u>30-5-2022</u>
Reason(S) for last adjournment, if any by the Branch Incharge.	<u>No order of departmental appellate Authority nor ninety days elapsed.</u>
Date(s) fixed in the similar matter by the Branch Incharge	<u>15 days.</u>
Available dates Readers/Assistant Registrar branch	<u>13/6/2022</u>

Assistant Regi

REGISTRAR

10/6/22

BEFORE THE CHAIRMAN SERVICE TRIBUNAL PESHAWAR

In the matter of
Mst. Shahida Perveen
VS
Secretary E&SE KPK etc.

Chairman Pakhtunkhwa
Service Tribunal

Diary No. 225

Dated 09-6-2022

Subject: **APPLICATION FOR EARLY HEARING.**

Respectfully Sheweth;

1. That the above title case is pending before this Tribunal and next date for hearing and fixed for 29/06/2022.
2. That the petitioner submitted departmental appeal through application before the Secretary Education Respondent No. 1 which was regretted on 09/06/2022. (Copy of regretted order attached)
3. That therefore humbly request that the case may be fixed for today for early hearing.

Dated: 09/06/2022

Applicant



Mst. Shahida Perveen



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223588

No. SO(MC) E&SED/4-16/2022/PT/D-Appeal
Dated Peshawar the June 09th, 2022

To



Mst. Shahida Parveen,
Ex-SDEO (Female) Tangi Charsadda
Now at the disposal of Directorate of E&SE,
Khyber Pakhtunkhwa.

Subject: - **DEPARTMENTAL APPEAL AGAINST POSTING/TRANSFER.**

I am directed to refer to your Departmental Appeal dated 27-04-2022 on the subject noted above and to state that your request for cancellation of posting/transfer notification was examined / processed; however, regretted.

Naseer
9.6.22

(NASEER ABBAS KHALIL)
SECTION OFFICER (Management Cadre)

Cc to the: -

1. Director E&SE Khyber Pakhtunkhwa.
2. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

Naseer
9.6.22

SECTION OFFICER (Management Cadre)