

Appeal No. 135/2013
Mst. Saira Gul.

3.
4.2.2013

Counsel for the appellant present and heard.

Contended that the appellant was appointed as SST vide order dated 28.12.2011 but the same was withdrawn on 17.12.2012. Hence, her services were terminated vide order dated 19.12.2012. The appellant went in Writ Petition No. 3655/2012, which has been sent to this Tribunal vide order dated 4.1.2013. Hence, the instant appeal has been filed on 16.1.2013.



It is observed that the present appeal is premature. The appellant is advised to wait for the statutory period and then come to this Tribunal for the redressal of her grievance. Since then the case is adjourned sine die.


Member.

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 135/2013

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	16/01/2013	<p>The present appellant initially went in Writ Petition before the Hon'ble Peshawar High Court and the Hon'ble High Court vide its order dated 04.01.2013 while treating the Writ Petition as representation and petitioner was directed to appear before the Service Tribunal for redressal of her grievance. Today the counsel for the appellant submitted the instant appeal, now as per above direction of the Hon'ble High Court the same may be entered the Institution register and put up to the Worthy Chairman for further order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to primary Bench for preliminary hearing to be put up there on <u>4-2-2013</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
2-	18-1-2013	

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No. 135/2013

Mst. Saira Gul(Appellant)

V E R S U S

Government of Khyber Pakhtunkhwa through Chief Secretary,
Peshawar and others.....(Respondents)

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Service Appeal		1-6
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3.	Application for interim relief		8-9
4.	Affidavit		10
5.	Addresses of the Parties		11
6.	Copy of the recommendation	A	12
7.	Copy of notification dated 28/12/2011	B	13-16
8.	Copy of letter KPK/PSC/RS- 11 53758	C	17
9.	Copy of notification dated 17/12/2012	D	18
10.	Copy of order dated 19/12/2012	E	19
11.	Copy of W.P. No. 3655/2012 and order dated 04/01/2013	F	20-23
12.	Wakalat Nama		24

Through Appellant

Dated: 16/01/2013

Sahibzada Asadullah
Advocate
Supreme Court of
Pakistan.

& **Muhammad Ishaq**
Advocate, Peshawar.
Bangash Plaza, 2nd Floor
Khyber Super Market
Peshawar Cantt.
Cell No. 0313-9772262

(Copies for all respondents are attached)

①

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No. 135/2013

K.W.F. Province
146
16-1-13

Mst. Saira Gul D/o Gul Nawaz Khan Village Singoor
Shamirandah Tehsil and District Chitral.....(Appellant)

V E R S U S

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar.
2. Chairman Public Service Commission Khyber Pakhtunkhwa.
3. Director Recruitment Public Service Commission, Khyber Pakhtunkhwa Peshawar.
4. Director Elementary and Secondary Education Khyber Pakhtunkhwa Small Industrial Estate, Kohat Road, Peshawar.
5. Executive District Officer (E&S) Education Chitral.
6. Mst. Suriya D/o Abdul Saleem R/o P.O Nawagai, Tehsil Dagar, District Buner.
7. Mst. Gul Andama D/o Noor Alam Khan R/o Dokandeh Booni, P.O Booni, Tehsil Mastuj, District Chitral.....(Respondents)

[Signature]
16/1/13

(2)

**APPEAL UNDER SECTION 4 OF KHYBER
PUKHTUNKHWA SERVICE TRIBUNAL ACT
1974.**

Respectfully Sheweth:

Brief Facts grieving rise to the instant Appeal are as under:

1. That the Appellant hails from a backward area of District Chitral and completed her education through the meager resources of her parents with hopes of a bright future.
2. That the Appellant applied through Public Service Commission for the post of Secondary School Teacher Female (SST Sc) PBS-16 and after tough competition the Appellant stood successful. Finally the Appellant got a letter of recommendation where the Appellant was recommended to the government for appointment. (Copy of the recommendation is annexure "A").

3. That at last the Director Elementary and Secondary Education Khyber Pakhtunkhwa (Respondent No. 4) vide notification dated 28/12/2011 issued the appointment order of the Appellant along with others, hence the Appellant was appointed. (Copy of notification dated 28/12/2011 is annexure "B").
4. That the Appellant joined the post and worked from the date of her appointment with punctuality and devotion with full satisfaction of the high-up's as well as taughts.
5. That the respondent No. 2 on 13/12/2012 vide letter No. 53758 issued the recommendation of the respondent No. 6 and 7 to the provincial Government and also the recommendation of the Appellant along with one Nilofar Begum was withdrawn declaring it an official mistake. (Copy of letter KPK/PSC/RS-11 53758 is annexure "C").
6. That the respondent No. 4 issued the notification dated 17/12/2012 regarding the withdrawal of the notification dated 28/12/2011 on the basis of which the Appellant was appointed. (Copy of notification dated 17/12/2012 is annexure "D").

7. That on the basis of the withdrawal order dated 17/12/2012 the respondent No. 5 terminated the services of the Appellant vide order dated 19/12/2012. (Copy of order dated 19/12/2012 is annexure "E").

8. That the Appellant went in W.P. No. 3655/2012 before the august Peshawar High Court where the august Court treated the Writ Petition as representation vide order dated 04/01/2013 and directed the appellant to appear before this worthy Tribunal, hence this appeal on the following grounds amongst others, inter alia. (Copy of W.P. No. 3655/2012 and order dated 04/01/2013 is annexure "F").

GROUND:

- A. That the impugned order dated 17/12/2012 and the recommendation dated 13/12/2012 alongwith notification of termination dated 19/12/2012 are arbitrary, mechanical and based on malafide as well as ulterior motives.

- B. That the petition applied for the post after fulfillment of all the legal requirements and was recommended and appointed against the post on merit.
- C. That the Appellant since the date of her appointment is working against the post and as such valuable rights have accrued to her and should not be punished for wrongs of the other.
- D. That the future of the Appellant has been ruined with the words "official mistake" that too after one year, when a responsible office deals the future of the deserving people in such a casual way it brings nothing but disappointment to the youth of the country, hence this act and conduct needs interference of this august Court.
- E. That the order of withdrawal after the lapse of one year is only to accommodate the nears and dears is without lawful authority and without the rules and regulations heaving no backing of law.
- F. That the impugned orders that is the recommendation , withdrawal order and notification dated 19/12/2012 are

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arbitrary, mechanical and without the application of judicial mind to the facts and circumstances of the case.

It is, therefore, humbly prayed that on acceptance of this Appeal the recommendation dated 13/12/2012, notification dated 17/12/2012 and order dated 19/12/2012 may kindly be set aside and notification dated 28/12/2011 may kindly be restored.

OR

Any other relief which this august Court deems appropriate may kindly be awarded to meet the ends of justice.

Sahibzada Asadullah

Appellant

Through

Sahibzada Asadullah

Dated: 16/01/2013

Sahibzada Asadullah
Advocate
Supreme Court of
Pakistan.

Muhammad Ishaq

& **Muhammad Ishaq**
Advocate, Peshawar.

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No. _____/2013

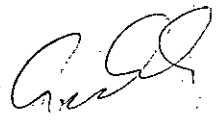
Mst. Saira Gul(Appellant)

V E R S U S

Government of Khyber Pakhtunkhwa through Chief Secretary,
Peshawar and others.....(Respondents)

AFFIDAVIT

I, **Sahibzada Asadullah** Advocate, as per instruction of my client, do hereby solemnly affirm and declare that the contents of the accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



A D V O C A T E



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**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

C.M. No. ____/2013

In

Service Appeal No. ____/2013

Mst. Saira Gul(Applicant/Appellant)

V E R S U S

Government of Khyber Pakhtunkhwa through Chief Secretary,

Peshawar and others.....(Respondents)

APPLICATION FOR INTERIM RELIEF
SUSPENSION OF THE IMPUGNED ORDER
DATED 19/12/2012.

1. That the captioned Appeal is pending before this Hon'bel Tribunal in which no date of hearing has yet been fixed.
2. That on the fact of it, the applicant/ appellant has got a strong arguable case and is sanguine about its success.
3. That the balance of convenience tilts in favour of grant of interim relief.

4. That if the interim relief is not allowed, applicant/ appellants would sustain an irreparable loss.

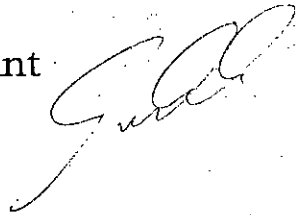
5. That the operation of the impugned recommendation dated 13/12/2012, Notification dated 17/12/2012 and order dated 19/12/2012 may kindly be suspended and the petitioner may be permitted to work against the post till final decision of the Writ Petition.

It is, therefore prayed that on acceptance of this petition the interim relief as prayed for in the heading of the petition may be granted to the petitioner till the final disposal of the case.

Appellant

Through

Dated: 16/01/2013


Sahibzada Asadullah
Advocate
Supreme Court of
Pakistan.


& **Muhammad Ishaq**
Advocate, Peshawar.

(10)

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

C.M. No. _____/2013

In

Service Appeal No. _____/2013

Mst. Saira Gul(Applicant/Appellant)

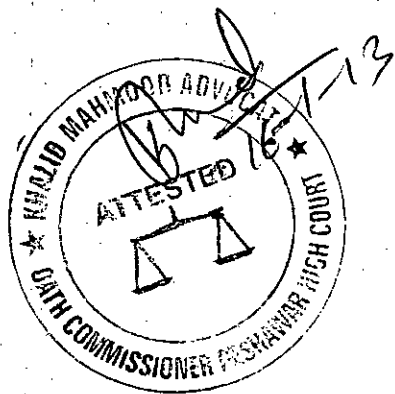
V E R S U S

Government of Khyber Pakhtunkhwa through Chief Secretary,

Peshawar and others.....(Respondents)

AFFIDAVIT

I, **Sahibzada Asadullah** Advocate, as per instruction of my client, do hereby solemnly affirm and declare that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



ADVOCATE

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**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR.**

Service Appeal No. _____/2013

Mst. Saira Gul(Appellant)

V E R S U S

Government of Khyber Pakhtunkhwa through Chief Secretary,
Peshawar and others.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANTS:

Mst. Saira Gul D/o Gul Nawaz Khan Village Singoor
Shamirandah Tehsil and District Chitral.

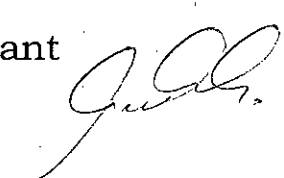
RESPONDENTS:

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar.
2. Chairman Public Service Commission Khyber Pakhtunkhwa.
3. Director Recruitment Public Service Commission, Khyber Pakhtunkhwa Peshawar.
4. Director Elementary and Secondary Education Khyber Pakhtunkhwa Small Industrial Estate, Kohat Road, Peshawar.
5. Executive District Officer (E&S) Education Chitral.
6. Mst. Suriya D/o Abdul Saleem R/o P.O Nawagai, Tehsil Dagar, District Buner.
7. Mst. Gul Andama D/o Noor Alam Khan R/o Dokandeh Booni, P.O Booni, Tehsil Mastuj, District Chitral

Appellant

Through

Dated: 16/01/2013


Sahibzada Asadullah
Advocate
Supreme Court of
Pakistan.


& **Muhammad Ishaq**
Advocate, Peshawar.

Annexure - A (12)

059171

KHYBER PUKHTOONKIWA
PUBLIC SERVICE COMMISSION
2 Fort Road, Peshawar Cantt. (Near Governor
House)
PH No. 9213563
Fax No. 9211795



No.K.P-PSC-DS/

Dated: 1/1/2012

20/12

To

Saira Gul D/O Gul Nawaz Khan
Abdul Basit Jans shopping Arcade cosmetic Section Islamia Road
Peshawar

Subject: RECT: OF FEMALE SET (Science) (B-16).

c.t.c
9

The Commission has recommended you to the Government for appointment, but please do not treat this as a letter of appointment for which Government is the Final Authority. The Commission cannot entertain any correspondence from this regard.


Superintendent
K.P.K, P.S.C


ATTESTED

Director of Elementary 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 Pukhtunkhuwa Public service commission, appointment of following candidates is hereby ordered against the post of secondary school School teacher female (SST Sc) in BPS-16 (Rs. 1000-800-34000) 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 their services are placed at the disposal of EDO (E & SE) concerned for further posting against vacant SST-sc Post.

S No	Name	Father Name	Domicile	Zone	Permanent Address	Place of Posting
1	2	3	4	5	6	7
1	Faria Inayat	Inayat Ullah Khan	Charsada	II	68/5 Zaryab Colony P/o Afghan Colony Peshawar.	Services placed at the disposal of EDO (E & Se) Charsadda for Further Posting Against Vacant SST Sc posts.
2	Irum Khan	Sherdil Khan	Charsada	II	Moh: Mazeed Khail Maneri Payan, P/O Tehsil and Distt Swabi.	Services placed at the disposal of EDO (E & Se) Charsadda for Further Posting Against Vacant SST Sc posts.
3	Maimoona Imtiaz	Malik Imtiaz Ahmad	Charsada	II	Village and P/O Manga Dargai Tehsil and Distt Charsada	Services placed at the disposal of EDO (E & Se) Charsadda for Further Posting Against Vacant SST Sc posts
4	Noreen Nazir	Nazir Muhammad	Charsada	II	Village and P/O Katozai Tehsil Shab qadar Distt Charsada.	Services placed at the disposal of EDO (E & Se) Charsadda for Further Posting Against Vacant SST Sc posts
5	Robina Naz	Wesal Khan	Charsada	II	Nasaar Abad Tangi Road Tehsil Bazar Charsada.	Services placed at the disposal of EDO (E & Se) Charsadda for Further Posting Against Vacant SST Sc posts
6	Sofia Naz	Habibullah	Charsada	II	Mohalla Gandbana Village and P/O Unanzai Tehsil and Distt Charsad	Services placed at the disposal of EDO (E & Se) Charsadda for Further Posting Against Vacant SST Sc posts
7	Saira Faiz	Faiz Muhammad	Charsada	II	Tesil and Distt Charsada village and P/o Utmanzai Mohalla Mian ban baba.	Services placed at the disposal of EDO (E & Se) Charsadda for Further Posting Against Vacant SST Sc posts
8	Nazia Begum	Wali Jan	Charsada	II	The and Distt Charsada Rajjar, village anggar Korona Rajjar Charsada	Services placed at the disposal of EDO (E & Se) Charsadda for Further Posting Against Vacant SST Sc posts
9	Huma Akram Khan	Akram Khan	Mardan	II	House No.425 Mohalla Kachi Allaqa Hashnagari Inside lahori gate	Services placed at the disposal of EDO (E & Se) Mardan for Further Posting Against Vacant SST Sc posts
10	Beena Akram Khan	Akram Khan	Mardan	II	House No. 404 Sector A, Sheikh Malton Town Mardan	Services placed at the disposal of EDO (E & Se) Mardan for Further Posting Against Vacant SST Sc posts
11	Fouzia Amin	Muhammad Amin	Mardan	II	New Bagh Colony Mohalla Sadat, Sadat House Canal road Mard.	Services placed at the disposal of EDO (E & Se) Mardan for Further Posting Against Vacant SST Sc pos

Annexure - B

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

PIF No. 091-0210389, 0210938,
0210937, 0210957, 0210938
Fax 091-0210936
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 Female (SST Sc) 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 their services are placed at the disposal of DDO (E&SE) concerned for further posting against vacant SST Sc posts.

Sl. No.	Name	Father Name	Domicile	Zone	Permanent Address	Place of Posting
1	Faria Inayat	Inayat Khalid Inayat	Charsadda	II	63/5 Zaryab Colony, P/O Afghan Colony Peshawar	Services placed at the disposal of DDO (E&SE) Charsadda for further posting against vacant SST Sc posts
2	Iram Khan	Shkr Dil Khan	Charsadda	II	Moh: Maseed Khel, Manari Payan, P/O Tehsil & Distt: Swabi	Services placed at the disposal of DDO (E&SE) Charsadda for further posting against vacant SST Sc posts
3	Maimoona Imtiaz	Malik Imtiaz Ahmad	Charsadda	II	Vill: & P/O Manga Dargai Tehsil & Distt: Charsadda	Services placed at the disposal of DDO (E&SE) Charsadda for further posting against vacant SST Sc posts
4	Nurshah Nazar	Nuzir Muhammad	Charsadda	II	Vill: & P/O Katozai, Tehsil Subyadar, Distt: Charsadda	Services placed at the disposal of DDO (E&SE) Charsadda for further posting against vacant SST Sc posts
5	Reema Naz	Masal Khan	Charsadda	II	Vill: Kousar Abad Tanyal Road, Tehsil Bazar, Charsadda	Services placed at the disposal of DDO (E&SE) Charsadda for further posting against vacant SST Sc posts
6	Sajida Naz	Habib Ullah	Charsadda	II	Moh: Gadbana, Vill: & P/O Umanzai, Tehsil & Distt: Charsadda	Services placed at the disposal of DDO (E&SE) Charsadda for further posting against vacant SST Sc posts
7	Sahra Faiz	Faiz Muhammad	Charsadda	II	Distt: & Tehsil Charsadda, Vill: & P/O Umanzai, Moh: Mian Bibi Baba	Services placed at the disposal of DDO (E&SE) Charsadda for further posting against vacant SST Sc posts
8	Nadia Begum	Wali Jan	Charsadda	II	Tehsil & Distt: Charsadda, P/O Rajjar Vill: Angar Korona Rajjar Charsadda	Services placed at the disposal of DDO (E&SE) Charsadda for further posting against vacant SST Sc posts
9	Huma Akram Khan	Akram Khan	Mardan	II	H/No. 425, Moh: Kachi Ilaqa, Hashmagri, Inside Lahori Gate	Services placed at the disposal of DDO (E&SE) Mardan for further posting against vacant SST Sc posts
10	Beena Akram Khan	Akram Khan	Mardan	II	H/No. 404, Sector-R Sheikh Maltoon Town Mardan	Services placed at the disposal of DDO (E&SE) Mardan for further posting against vacant SST Sc posts
11	Fozia Amin	Muhammad Amin	Mardan	II	New Bakh Colony, Moh: Sudat, Sadat House, Canal Road Mardan	Services placed at the disposal of DDO (E&SE) Mardan for further posting against vacant SST Sc posts

Handwritten signature/initials

ATK
SECRETARY
S.E.T/SS.T BPS-17
G.C.M.S (Boys) Chitral

ATK

30	Nabeela	Sarfaraz Khan	Swabi	II	Mohalla Shagai Village & P/O Anbar Tehsil Lahore Distt Swabi.	Services placed at the disposal of EDO (E & Se) Swabi for Further Posting Against Vacant SST Sc posts
31	Nosheen	Khanan Khan	Swabi	II	Moh: Mazid Khel Maneri Payan P/O Tehsil and Distt Swabi.	Services placed at the disposal of EDO (E & Se) Swabi for Further Posting Against Vacant SST Sc posts
32	Shabana	Farhad	Swabi	II	Village and P/O Shewa Tehsil and Distt Swabi.	Services placed at the disposal of EDO (E & Se) Swabi for Further Posting Against Vacant SST Sc posts
33	Sheeba Wadud	Abdul Wadud	Swabi	II	Abdul Wadud Moh Ghali Khel village and P/O Panjpir tehsil and Distt Swabi.	Services placed at the disposal of EDO (E & Se) Swabi for Further Posting Against Vacant SST Sc posts
34	Fauzi Tabbusum	Israr Ahmad Khan	Chitral	III	Village Mirgram No 1 Tehsil Mastuj and Distt Chitral	Services placed at the disposal of EDO (E & Se) Chitral for Further Posting Against Vacant SST Sc posts
35	Ghazala Saleem	Muhammad Saleem	Chitral	III		
36	Parveen Baig	Sher Baig	Chitral	III		
37	Zeb Faryal	Iqbal Shaheen	Chitral	III		
38	Saira Gul	Gul Nawaz Khan	Chitral	III	Tehsil and Distt Chitral Village Singore Shahmirandeh	Services placed at the disposal of EDO (E & Se) Dir Upper for Further Posting Against Vacant SST Sc posts
39	Rashida Bibi	Muhammad Qadir Khan	Chitral	III	VIII: Dakandeh Booni P/O Booni The Tehsil Mastuj and District Chitral	Services placed at the disposal of EDO (E & Se) Dir Upper for Further Posting Against Vacant SST Sc posts
40	Tahira Jabeen	Muhammad Naji Ullah	Chitral	III	VIII: Sigore Lotdeh Tehsil Chitral P/O Chitral	Services placed at the disposal of EDO (E & Se) Dir Upper for Further Posting Against Vacant SST Sc posts
41	Neelam Taj	Taj Muhammad	Dir Lower	III	Village Babagan, Tehsil, Lalqila Lower Dir	Services placed at the disposal of EDO (E & Se) Dir Lower for Further Posting Against Vacant SST Sc posts
42	Sadia Bibi	Fasal Ghani	Dir Lower	III	VIII: P/O Ouch Shergai, Tehsil Andenzai Distt, Dir Lower, Balapatu.	Services placed at the disposal of EDO (E & Se) Dir Lower for Further Posting Against Vacant SST Sc posts
43	Anisa Wali	Shah wali Khan	Mkd Agy	III	P/O & Tehsil Dargai, Villg: Rahimabad Meherdi Malakand	Services placed at the disposal of EDO (E & Se) Malakand for Further Posting Against Vacant SST Sc posts
44	Mehreen Riaz	Riaz Muhammad	Mkd Agy	III	D/O Riaz Muhammad, Senior Auditor office of Accountant officer Malakand	Services placed at the disposal of EDO (E & Se) Malakand for Further Posting Against Vacant SST Sc posts
45	Nadia Afzal Khan	Fida Muhammad	Mkd Agy	III	VIII: & P/O Thana (Mayzara) Malakand Agency	Services placed at the disposal of EDO (E & Se) Malakand for Further Posting Against Vacant SST Sc posts
46	Nilofar Begum	Bakht Foor	Mkd Agy	III	O/O Jawad Pharmacy Main Bazar Batkhela Malakand Agency.	Services placed at the disposal of EDO (E & Se) Malakand for Further Posting Against Vacant SST Sc posts

etc
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ATTACHED

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30	Nabeela	Sarjara Khan	Swabi	II	Moh: Shagan, Vill: & P/O Anbar Tehsil Lahor Dist: Swabi	Services placed at the disposal of EDO (E&SE) Swabi for further posting against vacant SST Sc posts
31	Noshara	Khanan Khan	Swabi	II	Moh: Masjid Jhal Vill: Maneri Payah P/O, Tehsil & Dist: Swabi	Services placed at the disposal of EDO (E&SE) Swabi for further posting against vacant SST Sc posts
32	Shabana	Farnad	Swabi	II	Vill: & P/O Shawa, Tehsil & Dist: Swabi	Services placed at the disposal of EDO (E&SE) Swabi for further posting against vacant SST Sc posts
33	Sheeba Wadud	Abdul Wadud	Swabi	II	Abdul Wadud, Moh: Ghali Khail, Vill: & P/O Panjpir, Tehsil & Dist: Swabi	Services placed at the disposal of EDO (E&SE) Swabi for further posting against vacant SST Sc posts
34	Fauzia Tabbasum	Israr Ahmad Khan	Chitral	III	Vill: Maragram No.1, Tehsil Mastuj, Dist: Chitral	Services placed at the disposal of EDO (E&SE) Chitral for further posting against vacant SST Sc posts
35	Onazula Saleem	Muhammad Saleem	Chitral			
36	Parveen Baig	Sher Baig	Chitral			
37	Zeb Faryal Mir	Iqbal Shaheen	Chitral			
	Sarfaraz Gul	Gul Nairaz Khan	Chitral	III	Vill: Singoor, Tehsil Mastuj, Dist: Chitral	Services placed at the disposal of EDO (E&SE) Chitral for further posting against vacant SST Sc posts
38	Rashida Bibi	Muhammad Qadir Khan	Chitral	III	Vill: Dakandah Booni, P/O Booni, Tehsil Mastuj, Dist: Chitral	Services placed at the disposal of EDO (E&SE) Dir Upper for further posting against vacant SST Sc posts
39	Tahira Jabeen	Muhammad Noji Ullah	Chitral	III	Vill: Singoor (Lotah) Tehsil Chitral, P/O Chitral	Services placed at the disposal of EDO (E&SE) Dir Upper for further posting against vacant SST Sc posts
40	Neelam Taj	Taj Muhammad	Dir Lower	III	Vill: Babagan, Tehsil Lal Qilla, Lower Dir	Services placed at the disposal of EDO (E&SE) Dir Lower for further posting against vacant SST Sc posts
41	Sadia Bibi	Fazal Ghani	Dir Lower	III	Vill: & P/O Ouch Slergi Tehsil Adanzai, Dist: Dir Lower, Moh: Balaparu	Services placed at the disposal of EDO (E&SE) Dir Lower for further posting against vacant SST Sc posts
42	Anisa Wali	Shah Wali Khan	Mkd Agy	III	P/O & Tehsil Darga, Vill: Rahim Abad, Maherdi Malakand	Services placed at the disposal of EDO (E&SE) Malakand for further posting against vacant SST Sc posts
43	Mehreen Riaz	Riaz Mohammad	Mkd Agy	III	D/O Riaz Mohammad, Senior Auditor Office of Account Officer, Malakand	Services placed at the disposal of EDO (E&SE) Malakand for further posting against vacant SST Sc posts
44	Nadia Afzal Khan	Fida Muhammad	Mkd Agy	III	Vill: & P/O Thana (Mayzara) Malakand Agency	Services placed at the disposal of EDO (E&SE) Malakand for further posting against vacant SST Sc posts
45	Nilofar Begum	Bakhat Foor	Mkd Agy	III	C/O Jawad Pharmacy, Main Bazar, Bathkha, Malakand Agency	Services placed at the disposal of EDO (E&SE) Malakand for further posting against vacant SST Sc posts
46	Syada	Ahmad Jari	Mkd Agy	III	Vill: Mulamusray, Area & P/O Hero Shah, Tehsil Darga, Malakand	Services placed at the disposal of EDO (E&SE) Malakand for further posting against vacant SST Sc posts

Attested
[Signature]
ZIA-UD-DIN
 SGT / S.S.T P PS-11
 Q.C.M.H.S (Boys) Chitral

[Signature]
ATT

Better copy (15)

c.t.c
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47	Sapada	Ahmad Jan	Mkd Agy	III	Vill: Mulamurray, Area & P/O Hero shah tehsil Dargai Malakand Agency	Services placed at the disposal of EDO (E & Se) Malakand for Further Posting Against Vacant SST Sc posts
66	Saiqa Rahim	Abdul Rahim	Karak	IV	Vill: P/O Khurram Muhammad zai Tehsil Barida Daud Shah Dis	Services placed at the disposal of EDO (E & Se) Karak for Further Posting Against Vacant SST Sc pos
67	Naheeda Gul	Fateullah Khan	Kohat	IV	Banker's Street H/No, T-3558, New Gulgasht Colony Multani Baba Road Peshawar	Services placed at the disposal of EDO (E & Se) Kohat for Further Posting Against Vacant SST Sc pos
68	Nadia Begum	Kamil khan	Kohat	IV	Vill: Lachi Bala, P/O Lachi Moh: Qureshan Tehsil and Distt Karak	Services placed at the disposal of EDO (E & Se) Kohat for Further Posting Against Vacant SST Sc pos
69	Sania Nizam	Nizam Uddin	Kohat	IV	Moh GulKheh Bahzadi Chker Kot Kohat	Services placed at the disposal of EDO (E & Se) Kohat for Further Posting Against Vacant SST Sc pos
70	Sanobar Khan	Sohrab Khan	Kohat	IV	St. joseh's convent high school Baru Road kohat	Services placed at the disposal of EDO (E & Se) Kohat for Further Posting Against Vacant SST Sc pos
71	Asma Qureshi	M Rehman	Laki Marwat	IV	Vill: P/O Shor Kor Near Airport DI Khan	Services placed at the disposal of EDO (E & Se) D.I Khan for Further Posting Against Vacant SST Sc pos
72	Farzana Bibi	Muhammad Jan	Tank	IV	Haji AKram Khan Ghla Mandi Tank	Services placed at the disposal of EDO (E & Se) Tank for Further Posting Against Vacant SST Sc pos
73	Bushra Saleem	Muhammad Saleem	Haripure	V	Vill: Ali Khan P/O Sirai Saleh Tehsil and Distt Haripure	Services placed at the disposal of EDO (E & Se) Haripure for Further Posting Against Vacant SST Sc pos
74	Nazra Shaheen	Shahzada Khan	Haripur	V	Vill: Kohan Bala P/O Baldher Tehsil and Distt Hazara Division	Services placed at the disposal of EDO (E & Se) Haripure for Further Posting Against Vacant SST Sc pos
75	Nighat Parveen	Muhammad Aslam	Haripur	V	Village Kamal P/O Kot Najeebullah Tehsil and Distt Haripure	Services placed at the disposal of EDO (E & Se) Haripure for Further Posting Against Vacant SST Sc pos
76	Saba Suleman	Muhammad Suleman	Haripur	V	Oppst Girls College West Circular Road Gah Masjid Bilal Haripur	Services placed at the disposal of EDO (E & Se) Haripure for Further Posting Against Vacant SST Sc pos
77	Atsha Bano	Muhammad Ashraf	Mansehra	V	Near Tameer Nou Public School Dub #2 Mansehra	Services placed at the disposal of EDO (E & Se) Mansehra for Further Posting Against Vacant SST Sc pos
78	Irrum Manzoor	Manzoor Ahmad	Mansehra	V	Vill: & P/O Chakai Tehsil and Distt Mansehra	Services placed at the disposal of EDO (E & Se) Mansehra for Further Posting Against Vacant SST Sc pos
79	Nazia Shaheen	Muhammad Miskeen	Mansehra	v	House No. 140/7 Road# 7 New housing Colony (T&P)Haripure city	Services placed at the disposal of EDO (E & Se) Mansehra for Further Posting Against Vacant SST Sc pos

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66	Sajida Raheem	Abdul Rahim	Karak	IV	Vill: & P/O Khurram Muhammad Zai Tehsil Banda Daud Shah, Distt: Karak	Services placed at the disposal of EDO (E&SE) Karak for further posting against vacant SST Sc posts
67	Naimela Qum	Fazillah Khan	Kohat	IV	Bankler's Street, H/No. T-3558, New Gulgasht Colony Multani Baba Road Peshawar	Services placed at the disposal of EDO (E&SE) Kohat for further posting against vacant SST Sc posts
68	Nadia Begum	Kamil Khan	Kohat	IV	Vill: Lachi Bala, P/O Lachi, Moh: Qureshan, Tehsil & Distt: Karak	Services placed at the disposal of EDO (E&SE) Kohat for further posting against vacant SST Sc posts
69	Sana Nizam	Nizam ud Din	Kohat	IV	Moh: Gula Khail Bahzadi Chker Kot Kohat	Services placed at the disposal of EDO (E&SE) Kohat for further posting against vacant SST Sc posts
70	Sanober Khan	Sohrab Khan	Kohat	IV	St. Joseph's Convent High School Bannu Road Kohat	Services placed at the disposal of EDO (E&SE) Kohat for further posting against vacant SST Sc posts
71	Aasma Qureshi	M. Rehman	Lakki Marwat	IV	Vill: & P/O Shor Kar Near Airport DI. Khan	Services placed at the disposal of EDO (E&SE) DI Khan for further posting against vacant SST Sc posts
72	Farzana Bibi	Muhammad Jan	Tank	IV	Haji Akram Khan Ghallah Mandi Tank	Services placed at the disposal of EDO (E&SE) Tank for further posting against vacant SST Sc posts
73	Eshra Saleem	Muhammad Saleem	Haripur	V	Vill: Ali Khan P/O Seral Saleh Tehsil & Distt: Haripur	Services placed at the disposal of EDO (E&SE) Haripur for further posting against vacant SST Sc posts
74	Nozra Shaheen	Shahzada Khan	Haripur	V	Vill: Kohan Bala P/O Balduhr Tehsil & Distt: Hazara Division	Services placed at the disposal of EDO (E&SE) Haripur for further posting against vacant SST Sc posts
75	Nighat Parveen	Muhammad Aslam	Haripur	V	Vill: Kamal, P/O Kot Najibullah Tehsil & Distt: Haripur	Services placed at the disposal of EDO (E&SE) Haripur for further posting against vacant SST Sc posts
76	Saba Suleman	Muhammad Suleman	Haripur	V	Opp: Girls College, West (Oraylar Road Gali Masjid Bilal, Haripur	Services placed at the disposal of EDO (E&SE) Haripur for further posting against vacant SST Sc posts
77	Aisha Banu	Muhammad Ashraf	Manshera	V	Near Tameer-i-Nou Public School Dub#2, Manshera	Services placed at the disposal of EDO (E&SE) Manshera for further posting against vacant SST Sc posts
78	Irram Mahzoor	Mansoor Ahmad	Manshera	V	Vill: & P/O Chakia, Tehsil & Distt: Manshera	Services placed at the disposal of EDO (E&SE) Manshera for further posting against vacant SST Sc posts
79	Nazir Shaheen	Muhammad Miskeen	Manshera	V	H/NO. 140/7, Raod#7, New Housing Colony (TYP) Haripur City	Services placed at the disposal of EDO (E&SE) Manshera for further posting against vacant SST Sc posts
80	Sarwat Iftikhar	Iftikhar Ahmad	Manshera	V	C/O Ansa Kham Moh: Saina Abad Near CNN Colony Manshera	Services placed at the disposal of EDO (E&SE) Manshera for further posting against vacant SST Sc posts

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

[Handwritten signature]

ATTACHED

[Handwritten signature]

ZIA-UD-DIN
S.E.T/S.S.T P.P.S-17
M.A.S (Boys) College

80	Sarwat Iftikhar	Iftikhar Ahmad	Mansehra	V	C/O Anse Khan Moh: Sania Atiad Near CMM Colony Mansehra.	Services placed at the disposal of EDO (E & Se) Mansehra for Further Posting Against Vacant SST Sc pos
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TERMS AND CONDITION.

1. Her service 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 as such rates as per prescribed by the Govt.
2. 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 opened 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.
3. Her service are liable to termination on one notice month notice from either side. In case of resignation without notice her one month pay/allowance shall be forfeited to the Govt.
4. She should join her post within 30 days of the issuance of this notification. In case of failure to join her post within one of the 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 service can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct she shall be preceded under the rules framed from time to time.
8. Charge report should be submitted to all concerned.
9. The EDO's concerned would furnish a certificate to the effect that the candidate has joined the post, or otherwise after one month of the issue of her posting order.
10. The EDO's 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 TADA will be allowed to the appointee for joining her duty.

(
Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. 4485-92 /File No.2/A-14/SST(F)/PSC/Appt: Dated Peshawar the 28/12/2011

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. Executive District Officer (E&SE) Concerned.
4. District Account Officer concerned.
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: Director (Estab)

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

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.

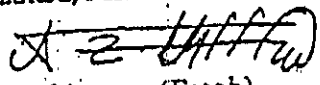
- 3 Her services are liable to termination on one month's notice from either side. In case of resignation without notice her one-month pay/allowances shall be forfeited to the Government.
- 4 She should join her post within 30 days of the issuance of this notification. In case of failure to join her post within one month of the 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 her 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 her duty.

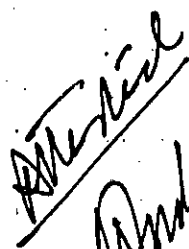
(Muhammad Rafiq Khattak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

4485-92
Endst: No. / File No.2/A-14/SST(F)/PSC/Appt: Dated Peshawar the 28/12/2011.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
3. Executive District Officer (E&SE) Concerned
4. District Accounts Officer Concerned
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: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.



11/12/2011
DIN
P.S-11
Chitral

Confidential

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Khyber Pakhtunkhwa Public Service Commission
Peshawar.
2-Fort Road Near Governor House Peshawar Cantt.

No. KPK /PSC/ SR-11 63768
SDate 13/12/2012

To

The Secretary to Govt. of Khyber Pakhtunkhwa
Elementary & Secondary Education
Department Peshawar.

c.t.c
9

Subject:- Reett of Female SET/SST Science Group B-16 in
Elementary & Secondary Education Deptt Peshawar.

Dear Sir,

In continuation to this office letter No. KPK/PS/SR-11 013131 dated 29-02-2012 on the subject noted above and to state that the commission recommends the following to the government for appointment.

S.No	Description of documents	Pages
1.	Suriya D/o Abdul Salam	Buner/3
2.	Gul Andama D/o Noor Alam Khan	Chitral/3

2. Recommendation in favour of the recommendees are provisional subject to their medical fitness and verification of documents / domicile by Education Deptt.
3. The Inter-se-Merit of the recommendees will be communicated on finalization of all the pending cases. The serial Chronological will not confer any right of seniority.
4. Recommendation in favour of 03 Pending Cases shall be conveyed after clearance of their vital deficiencies.
5. Original application (with enclosures) of the above 02 recommendees are enclosed herewith for your record.
Please acknowledge receipt.
6. Over and above the recommendation of the following two recommendees already conveyed vide this office letter No KP-PSC-SR-1 /059039 dated 19-12-2011 is hereby withdrawn due to some official mistake and as such their application may be returned to this office please.

S.No	Description of documents	Pages
1.	Saira Gul D/o Gul Nawaz Khan	Chitral/3
2.	Nilofar Begum D/o Bakht Foor	Malakand Agy/3

Your Faithfully

ATTIESTED

(Ghulam Dastagir Ahmad)

Director Recruitment

Ends: No KPK-PSC-SR-11/_____ dated _____
Copy to: Director Elementary and secondary Education Peshawar.
For Information

~~Confidential~~

Telephone: 9213563



Khyber Pakhtunkhwa Public Service Commission,
Peshawar
2-Port Road Near Governor House Peshawar Cantt

No. KPK/PSC/SR-II 53758

Date 13/12/2012

17
AS
c.t.c
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To

Annexure - C

The Secretary to Govt. of Khyber Pakhtunkhwa,
Elementary & Secondary Education
Department Peshawar.

Subject: - Rec't of Female SET/SST Science Group B-16 in
Elementary & Secondary Education Deptt Peshawar.

Dear Sir,

In continuation to this office letter No KPK/PSC/SR-II 013131 dated 29.02.2012 on the subject noted above and to state that the Commission recommends the following to the government for appointment:-

S.No	Name of Candidate	Domicile
01	Suriya D/o Abdul Salam ✓	Buner /3
02	Gul Andama D/o Noor Alam Khan ✓	Chitral/3

- Recommendation in favour of the recommendees are provisional subject to their medical fitness and verification of documents / domicile by the Education Deptt.
- The inter-se-Merit of the recommendees will be communicated on finalization of all the pending cases. The serial chronological order will not confer any right of seniority.
- Recommendation in favour of 03 Pending Cases shall be conveyed after clearance of their vitals deficiencies.
- Original applications (with enclosures) of the above 02 recommendees are enclosed herewith, for your record. Please acknowledge receipt.
- Over and above the recommendation of the following two recommendees already conveyed vide this office letter No KP-PSC-SR-I /059039 dated 19.12.2011 is here by withdrawn due to some official mistake and as such their applications may be returned to this office please.

S.No	Name of Candidate	Domicile
01	Saira Gul D/o Gul Nawaz Khan	Chitral/3
02	Nilofar Begum D/o Bakhat Foor	Malakand Agy/3

AS
13/12/12

SACP
13/12/12

Your Faithfully

(Ghulam Distagir Ahmad)
Director Recruitment

Ends: No KPK-PSC-SR-II/_____ dated _____

Copy to: Director Elementary & Secondary Education Peshawar.
For information

ATTESTED

(Ghulam Distagir Ahmad)
Director Recruitment

AS & SE
D. No. 809
Dated 13/12/12

26/12
11/12/12

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Director of Elementary Education
Khyber Pakhtunkhwa Peshawar
Ph No: 091-9210389, 9210938
9210437, 9210957, 9210468
Fax 091-9210936
E-mail desekpk@yahoo.com

c.t.c
9

Notification.

Consequent upon withdrawal of the recommendation by the Khyber Pakhtunkhwa Public Service Commission in respect of following 2 candidates, conveyed vide Khyber Pakhtunkhwa Public Service Commission letter No. KPK/PSC/SR-11 53578 dated 13-12-2012 appointment of following 2 candidates against the post of Secondary School Teacher Female (SST Sc) in BPS-16 whose services were placed at the disposal of EDO (E&SE) concerned for further posting against SST Sc posts issued Vide this office Endst: No.4485-92/File No.2/A-14/sst(F)/PSC/Apptt: Dated Peshawar the 28/12/2011 is her by withdrawn. Who were on probation for a period of one year:-

Sno in Appointment order	Name	Father Name	Domicile	Zone	Permanent Address	Place of posting
1	2	3	4	5	6	7
38	Saira Gul	Gul Nawaz Khan	Chitral	3	District and Tehsil Chitral Village Singore Shahmirandeh	Service placed at the disposal of EDO (E & SE) Dir Upper for further posting against vacant SST Sc Posts
46	Nilofar Begum	Bakht Foor	Mkd Agy	3	C/o Jawad Pharmacy main Bazar Bathela Malakand Agency.	Service placed at the disposal of EDO (E & SE) Malakand for further posting against vacant SST Sc Posts

(Muhammad Rafiq Khattak)
Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No.1666-74/File No.2/A-14/SST(F)/PSC/Apptt: Dated Peshawar the 17/12/2012.

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 Khyber Pakhtunkhwa Public Service Commission Peshawar with reference to his letter No KPK/PSC/SR-11 53578 dated 13.12.2012 their application forms are returned herewith.
4. Executive District Officer (E&SE) Concerned.
5. District Account Officer concerned.
6. Official Concerned.
7. PS to the secretary to Govt: Khyber Pakhtunkhwa E & SE Department.
8. PA to the Director E & SE Khyber Pakhtunkhwa Peshawar.
9. M/File

Dy: Director (Estab)

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

ATTESTED

Annexure - D

Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

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



Notification.

Consequent upon withdrawal of the recommendation by the Khyber Pakhtunkhwa Public Service Commission, in respect of the following 2 candidates conveyed vide Khyber Pakhtunkhwa Public Service Commission Letter No. KPK/PSC/SR-11 53758 dated 13.12.2012, appointment of the following 2 candidates against the post of Secondary School Teacher Female (SST Sc) in BPS-16 whose services were placed at the disposal of EDO(E&SE) concerned for further posting against vacant SST Sc posts issued vide this office Endst. No. 4485-02/ File No.2/A-14/SST(F)/PSC/Apptt: Dated Peshawar the 28/12/2012 is hereby withdrawn who were on probation for a period of one year:-

SNO in the appointment order	Name	Father Name	Domicile	Zone	Permanent Address	Place of Posting
38	Saira Gul	Gul Nawaz Khan	Chitral	III	District & Tehsil Chitral, Vill: Singoor Shahmirandeh	Services placed at the disposal of EDO(E&SE) Dir Upper for further posting against vacant SST Sc posts
39	Nilojar Begum	Bakhat Foor	Mkd Ayy	III	C/O Jawad Pharmacy, Main Bazar, Bakhela, Malakand Agency	Services placed at the disposal of EDO(E&SE) Malakand for further posting against vacant SST Sc posts

(Muhammad Rafiq Khattak)

Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

1666-74
Endst: No. / File No.2/A-14/SST(F)/PSC/Apptt: Dated Peshawar the 17/12/2012.

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 Khyber Pakhtunkhwa Public Service Commission Peshawar with reference to his Letter No KPK/PSC/SR-11 53758 dated 13.12.2012, their Application forms are returned herewith.
4. Executive District Officer (E&SE) Concerned
5. District Accounts Officer Concerned
6. Official Concerned.
7. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
8. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar
9. M/File

Dy: Director (Esrah)

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

ATTESTED

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19

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION CHITRAL

OFFICE ORDER.

Consequent upon the withdrawal of the recommendation by the Khyber Pakhtunkhwa Public Service Commission vide letter No. KPK/PSC/SR-11 53758 dated 13/12/2012 and Subsequent notification to this effect issued by the worthy Director E & S education Department Khyber Pakhtunkhwa vide No. 1666-74/File No.2/A-14/SST(F)/PSC/Apptt. dated 17/12/2012 Mrs. Saira Gul SST Sc GGHS Singoor is hereby relieved from here service/ duties from this department with immediate effect.

c.t.c
9

Enclosed:-

1- Notification of the worthy Director E & S Education Department Khyber Pakhtunkhwa Peshawar.

(Siraj Muhammad)
Executive District Officer
(E & S Education Chitral.

Endst: No.20570-76 / / EB (F)

Dated Chitral:- the 19/12/2012

Copy of the above is forwarded for information to the.

1. Secretary to the government of khyber pakhtunkhwa, E & S Education department Peshawar for information please.
2. Director E & S Education department Khyber Pakhtunkhwa Peshawar with reference to his Notification No. and dates referred to in the above, please.
3. District Coordination Officer Chitral, for information please.
4. District Account Officer chitral.
5. District Officer (F) E & S Education Chitral.
6. HM GGHS singoor with remarks to stop her pay immediately and relieve her from the school immediately.
7. Concerned.

Executive District Officer
(E & S) Education Chitral.

9
ATTACHED

Annexure - E

19



OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION CHITRAL.

OFFICE ORDER.

Consequent upon the withdrawal of the recommendation by the Khyber Pakhtunkhwa Public Service Commission vide Letter NO.KPK/PSC/SR-II 53758 dated 13/12/2012 and subsequent Notification to this effect issued by the worthy Director E & S Education Department Khyber Pakhtunkhwa vide NO.1666-74/File NO.2/A-14/SST (F)/PSC/Applt: dated 17/12/2012.

Mrs. Saira Gul SST SC GGHS Singoor is hereby relieved from her Services/duties from this department with immediate effect.

c.t.c
9

Enclosed:-

- 1-Notification of the Worthy Director E & S Education Department Khyber Pakhtunkhwa, Peshawar.

SIRAJ MOHAMMAD)
Executive District Officer,
(E & S) Education Chitral.

Endst: No. 2576-76 /EB(F)

Dated Chitral the 17/12/2012.

Copy of the above is forwarded for information to the:-

- 1-Secretary to Government of Khyber Pakhtunkhwa, E & S Education department, Peshawar for information, please.
- 2-Director E & S Education department Khyber Pakhtunkhwa, Peshawar with reference to his Notification NO. and date as referred to in the above, please.
- 3-District Coordination Officer Chitral, for information, please.
- 4-District Accounts Officer Chitral.
- ✓ 5-District Officer (F) E & S Education Chitral.
- 6-HM GGHS Singoor with remarks to stop her pay immediately and relieve her from the school immediately.
- 7-Concerned.

[Signature]
17/12/012
Executive District Officer,
(E & S) Education Chitral.

To EB (F) Board

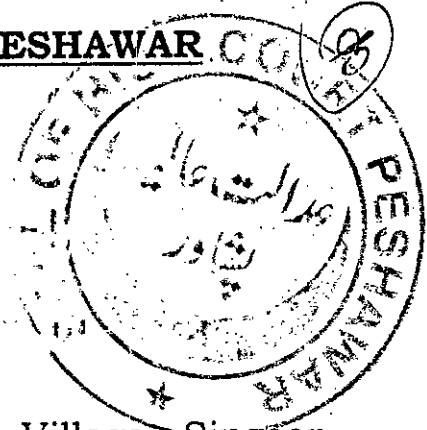
As per the m/o of
[Signature]

19-12-12

9
ATTESTED

Annexure: "F" 20

BEFORE THE PESHAWAR HIGH COURT, PESHAWAR



W.P. No. 3655 /2012

Mst. Saira Gul D/o Gul Nawaz Khan Village Singoor
Shamirandah Tehsil and District Chitral.(Petitioner)

V E R S U S

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar.
2. Chairman Public Service Commission Khyber Pakhtunkhwa.
3. Director Recruitment Public Service Commission, Khyber Pakhtunkhwa Peshawar.
4. Director Elementary and Secondary Education Khyber Pakhtunkhwa Small Industrial Estate, Kohat Road, Peshawar.
5. Executive District Officer (E&S) Education Chitral.
6. Mst. Suriya D/o Abdul Saleem R/o P.O Nawagai, Tehsil Dagar, District Buner.
7. Mst. Gul Andama D/o Noor Alam Khan R/o Dokandeh Booni, P.O Booni, Tehsil Mastuj, District Chitral.....(Respondents)

RE-FILED TODAY

Deputy Registrar

31 DEC 2012

ATTESTED

EXAMINER
Peshawar High Court.

21

(12)


**WRIT PETITION UNDER ARTICLE 199 OF
THE CONSTITUTION OF ISLAMIC REPUBLIC
OF PAKISTAN, 1973.**

Respectfully Sheweth:

Brief Facts grieving rise to the instant Writ Petition are as under:

1. That the petitioner hails from a backward area of District Chitral and completed her education through the meager resources of her parents with hopes of a bright future.
2. That the petitioner applied through Public Service Commission for the post of Secondary School Teacher Female (SST Sc) PBS-16 and after tough competition the petitioner stood successful. Finally the petitioner got a letter of recommendation where the petitioner was recommended to the government for appointment. (Copy of the recommendation is annexure "A").

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Deputy Registrar
24 DEC 2012


Deputy Registrar

3. That at last the Director Elementary and Secondary Education Khyber Pakhtunkhwa (Respondent No. 4) vide notification dated 28/12/2011 issued the appointment order of the petitioner along with others, hence the petitioner was appointed. (Copy of notification dated 28/12/2011 is annexure "B").

4. That the petitioner joined the post and worked from the date of her appointment with punctuality and devotion with full satisfaction of the high-up's as well as taughts.

5. That the respondent No. 2 on 13/12/2012 vide letter No. 53758 issued the recommendation of the respondent No. 6 and 7 to the provincial Government and also the recommendation of the petitioner along with one Nilofar Begum was withdrawn declaring it an official mistake. (Copy of letter KPK/PSC/RS-11 53758 is annexure "C").

6. That the respondent No. 4 issued the notification dated 17/12/2012 regarding the withdrawal of the notification dated 28/12/2011 on the basis of which the petitioner was appointed. (Copy of notification dated 17/12/2012 is annexure "D").

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Deputy Registrar
24 DEC 2012



FORM 'A'
FORM OF ORDER SHEET

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Date of order.	Order or other proceedings with the order of Judge
4.1.2013.	<p><u>Interim relief in W.P. 3655-P of 2012.</u></p> <p>Present: Sahibzada Asadullah, advocate for petitioner.</p> <p><u>KHALID MEHMOOD, J.-</u> Contends that in similar situation in W.P.1527-P of 2012, this court has passed a restraint order on 7.6.2012, therefore, in this case too the petitioner may be treated alike and status quo be maintained. He provided attested copy of the order relied upon.</p> <p>2. Admittedly, the petitioner is a civil servant and under Article 212 of the Constitution, this court has no jurisdiction to entertain instant petition, however, the same is considered as Representation and petitioner is directed to appear before the Services Tribunal of Khyber Pakhtunkhwa for redressal of her grievance on 9.1.2013.</p> <p>Petition disposed of.</p> <p>sd/ Khalid Mehmood</p>

SP

9650

sd/ Khalid Mehmood

[Stamp]

Date of Presentation of Application

12/1/13

No of Pages

4-P

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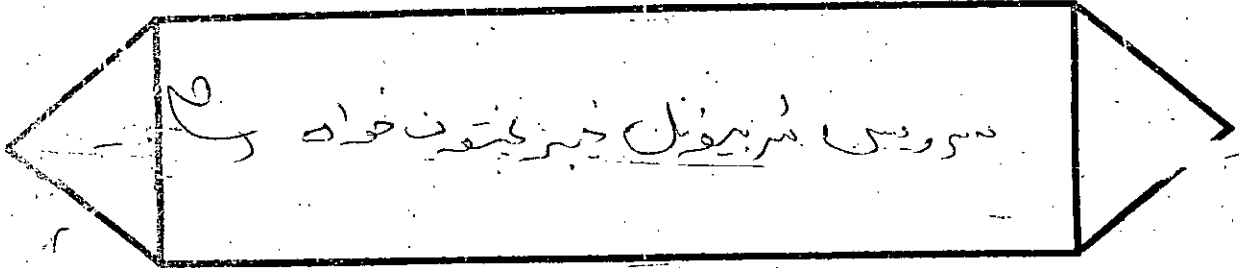
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SP

12-1-13

Approved Under The Qanun-e-Shahadaat Order 1984

بعدالت



31/12/2013

سماة سائبر کالہ نام

مقدمہ

موردی

دعویٰ

مقدمہ

جرم

جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام کے لئے صاحب دادہ اسلام آباد سینڈ گراؤنڈ ایجنسی

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دیئے جیاب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی

نیز دائر کرنے اپیل نگرانی و نظر ثانی و بیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور

کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار

ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ

پرواختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔

کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ بیروی

مذکورہ کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

2013

ماہ جنوری

15

المرقوم

وہ

بمقام

Handwritten signature and notes in the bottom left corner.

کے لئے منظور ہے۔