

20.01.2021

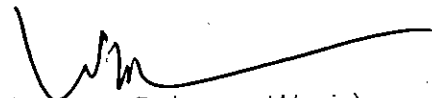
Appellant present through counsel.

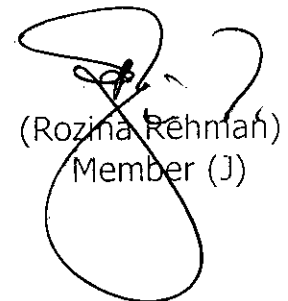
Kabir Ullah Khattak learned Additional Advocate General alongwith Hamid Salim Law Officer, Hayat Khan Assistant Director and Abdul Wahid ADEO for respondents present.

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

Announced.

20.01.2021


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

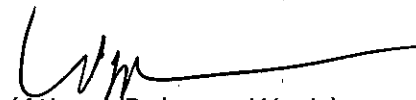

(Rozina Rehman)
Member (J)


09.12.2020

Appellant present through counsel.

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

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


(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

12.01.2021

Appellant with counsel present.

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

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


(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

12.08.2020

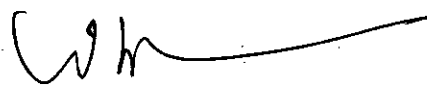
Due to summer vacations case to come up for the same on
~~25.08~~ 2020 before D.B.

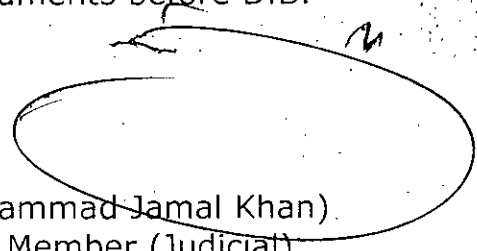

Reader

15.10.2020

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

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


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



(Muhammad Jamal Khan)
Member (Judicial)


17.11.2020

Appellant present through counsel.

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

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


(Atiq ur Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

31.03.2020

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


Reader

23.06.2020

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

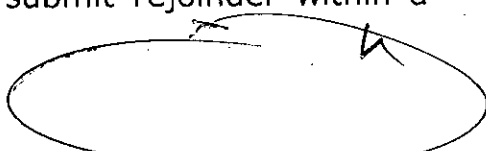
Muhsin Hassan Khan present and submitted authority letter on behalf of respondent No.3 with a request for another adjournment; adjourned but on cost of Rs.2000/-. To come up for written reply/comments of respondent No.3, on 22.07.2020 before S.B


Member

22.07.2020

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

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


(MUHAMMAD JAMAL KHAN)
MEMBER

10.02.2020

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



Member

24.02.2020

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



(Hussain Shah)

Member

12.03.2020

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



(MUHAMMAD AMIN KHAN KUNDI)

MEMBER

19.12.2019

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

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


Chairman

08.01.2020

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

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


Chairman

24.01.2020

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

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


Chairman

06.09.2019

Counsel for the appellant present.

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

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

Appellant Deposited
Security & Process Fee


Chairman

18.11.2019

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

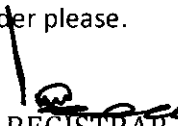

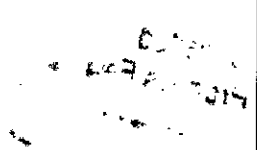
Representative of the respondents seeks time to furnish written reply/comments. Adjourned to 19.12.2019 on which date the requisite reply/comments shall positively be submitted.

Chairman 

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.- 975/2019

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

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

Service Appeal No. 975/2019

Mst. SeemaAppellant

....VERSUS....

Govt of Khyber Pakhtunkhwa & 02 othersRespondents

I N D E X

S.No.	Description of documents	Annex	Pages
1.	Service Appeal		1-4
2.	Application for Grant of Status Quo alongwith Affidavit		5-6
3.	Addresses of the parties		7
4.	CNIC	"A"	8
5.	CV	"B"	9
6.	Educational Testimonials	"C"	10-12
7.	Advertisement dated: 26.01.2009	"D"	11-15
8.	Appointment Notification dated: 19.03.2013	"E"	16-18
9.	Adjustment order dated: 30.04.2013 alongwith charge report dated: 01.05.2013	"F"	19-20
10.	Impugned Notification dated: 05.04.2019	"G"	21
11.	Departmental Appeal dated: 19.04.2019 alongwith diary/dispatch number with date	"H"	22-23
12.	Wakalatnama		24

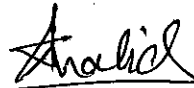

Appellant

Through

Amin ur Rehman Yusufzai


Sajjad Mehsud

&


Khalid Khan

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

Cell No.0321-9022964, 0333-9981464

Dated: 20.07.2019

1

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

Khyber Pakhtunkhwa
Service Tribunal
Service Appeal No. 975/2019

Diary No. 1057

Dated 25/7/19

Mst. Seema D/O Ikram-Ud-din, Ex-SST (Gen),
R/O Nihar Ghara, Jamal Ghari, Tehsil & District Mardan.

..... Appellant

....VERSUS....

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

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

Filed to-day
Registrar
25/7/19

NOTIFICATION ENDORSEMENT NO.5878-82, DATED: 05.04.2019 OF RESPONDENT NO.2, VIDE WHICH APPOINTMENT NOTIFICATION DATED: 19.03.2013 ALONGWITH ADJUSTMENT ORDER OF THE APPELLANT Dated: 30.04.2013, HAS UNILATERALLY BEEN DISOWNED.

PRAYER-IN-APPEAL:

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

Respectfully Sheweth:

1. That appellant is law abiding peaceful citizen of Pakistan and permanent resident of District Mardan.
(Copy of CNIC, is attached as Annexure "A")
2. That appellant obtained Master degree, in the year 2012, from University of Mardan and having passed PST, DP.Ed, B.Ed Degree courses from Allama Iqbal Open University and University of Mardan.
(Copies of CV and Educational Testimonials, are attached as Annexure "B" & "C", respectively)
3. That respondent No.3, invited applications for numerous vacant positions of SETs/SSTs (BPS-16), vide Advertisement No.01/2009, dated: 26.01.2009.
(Copy of Advertisement dated: 26.01.2009, is attached as Annexure "D")

4. That appellant, being qualified, applied for one of the aforementioned advertised posts of SST(Gen) (BPS-16) and gone through the entire process of selection successfully, eventually he, on the recommendation of KP PSC, was appointed as SST (Gen) BPS-16, on regular basis, vide Notification Endorsement No.1762-70/File No.2/A-14/SST(F)/(PSC)/Apptt: dated: 19.03.2013.
(Copy of Appointment Notification dated: 19.03.2013, is attached as Annexure "E")
5. That appellant was subsequently adjusted in Govt Girls Middle School, Janat Mir Kor North Wazirstan, Triabl District Wazirstsan i.e. against vacant Post, vide order dated: 30.04.2013.
(Copy of Adjustment order dated: 30.04.2013 alongwith charge report dated: 01.05.2013, is attached as Annexure "F")
6. That appellant was performing duty with zeal, devotion and outmost satisfaction of the superiors, however he has unilaterally been shunt-out from service, vide impugned Notification dated: 05.04.2019 by respondent No.2, without due process and following the law/rules governing the subject.
(Copies of Impugned Notification dated: 05.04.2019, is attached as Annexure "G")
7. That appellant preferred departmental appeal dated: 19.04.2019 to respondent No.1 which was received vide Diary No. 1257 dated: 19.04.2019, though the statutory period of 03 months has been elapsed, but the authority did not consider the same, one way or the other.
(Copies of Departmental Appeal dated: 19.04.2019 alongwith diary/dispatch number with date, is attached as Annexure "H")
8. That appellant, being aggrieved of impugned notification dated: 05.04.2019 and not considering his departmental appeal by respondent No.1, approaches this Hon'ble Tribunal, inter-alia, on the following grounds:

GROUND S:

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

D. That appellant being qualified was appointed after due process of law and fulfilment of all legal/codal formalities, however shunt-out from service with a single stroke of pen, without care and caution of its legal consequences, which has caused grave miscarriage of justice.

E. That appellant has served the department with zeal, devotion and to the best of his abilities, without affording a single opportunity of complaint, either to the students or their parents or to the superiors, regarding performance of official duties, therefore, the following amongst plethora of Judgments of the apex Court will be attracted.

I. 2011 SCMR 1581

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

II. 2004 SCMR 303

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

III. 2016 SCMR 1299

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

IV. 2010 PLD SC 483

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

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

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

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

Siam
Appellant
Through

Amin ur Rehman Yusufzai

(S)
Sajjad Mehsud
&

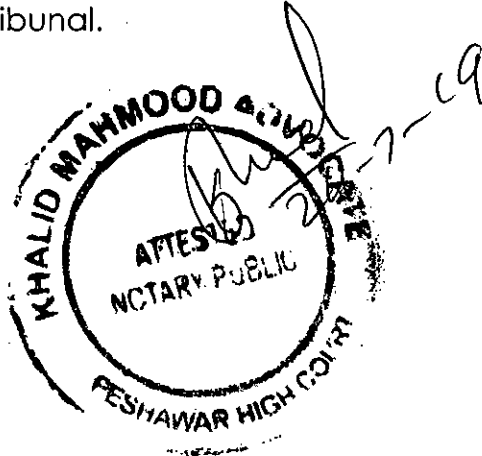
Khalid
Khalid Khan
Advocates, Peshawar,
3-A, Park Avenue, Bhattani Plaza,
University Town, Peshawar
Cell No.0321-9022964, 0333-9981464

Dated: 20.07.2019

VERIFICATION:

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

Siam
Deponent



5

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

C.M No.____/2019

In

Service Appeal No.____/2019

Mst. SeemaAppellant

....VERSUS....

Govt of Khyber Pakhtunkhwa & 02 othersRespondents

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

Respectfully Sheweth:-

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

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


Appellant

Through

Amin ur Rehman Yusufzai


Sajjad Mehsud

&


Khalid Khan

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

Cell No.0321-9022964, 0333-9981464

Dated: 20.07.2019

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

C.M No.____/2019
In
Service Appeal No.____/2019

Mst. SeemaAppellant
.....**V E R S U S**.....

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

AFFIDAVIT

I, Mst. Seema D/O Ikram-Ud-din, Ex-SST (Gen), R/O Nihar Ghara, Jamal Ghari, Tehsil & District Mardan, do hereby solemnly affirm declare on oath that the contents of the accompanying '**Petition**' are true and correct to the best of my knowledge and belief, and that nothing has been kept concealed from this Hon'ble Tribunal.

Identified By:

Seema
DEPONENT
CNIC #: 16/01-6334870-8

Amin-ur-Rehman Yusufzai
Advocate, Peshawar

[Handwritten signature]

[Handwritten signature]
KHALID MAHMOOD
ATTESSED
NOTARY PUBLIC
PESHAWAR HIGH COURT
7-19

①

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

Service Appeal No. /2019

Mst. Seema Appellant

....VERSUS....

Govt of Khyber Pakhtunkhwa & 02 others Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

Mst. Seema D/O Ikram-Ud-din, Ex-SST (Gen),
R/O Nihar Ghara, Jamal Ghari, Tehsil & District Mardan.

RESPONDENTS:

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


Appellant

Through

Amin ur Rehman Yusufzai


Sajjad Mehsood

&


Khalid Khan

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

Dated: 20.07.2019

ANNEX "A"

(8)




حکومت پاکستان
قومی شناختی کارڈ
16101-6334870-8



نام: عیسا
جنس: عورت
شہر کا نام: ضلع رحمان
شناختی علامت: کوئی نہیں
عثمان یوسف حسین
تاریخ پیدائش: 12/04/1985
دستخط رجسٹرار جنرل

دستخط مال کارڈ

شناختی نمبر: 16101-6334870-8
قائدان نمبر: S4942L
موجودہ پتہ: محلہ نیرنگاڑہ، جمال گوٹھی، تحصیل و ضلع مردان
13285043077
سنگل پتہ: ایسا
تاریخ اجراء: 16/04/2015
تاریخ تسخیر: 16/04/2025
گمشدہ کارڈ سے پر فریبی لیکچر بکس میں ڈال دیں




ATTESTED

ANNEX "B"

9

Bio Data

SEEMA

PERSONAL INFORMATION

F/ Name : Ikramuddin
Date Of Birth : 12-04-1985
CNIC : 16101-6334870-8
Domicile : Mohmand Distt
Personal : 502158650
Cell # No : 03479304035

SERVICE INFORMATION

Post	BPS	D.O.1 st Appointment	School
SST	16	30-04-2013	GGMS Sahib dad Nahqi Mohmand Agency

ACADEMIC QUALIFICATION

S.No	Degree /Certificate	Session	Board / University
1	M.A	2012	University Of Mardan
2	B.A	2008	AIOU Islamabad
3	F.A	2005	BISE Mardan
4	SSC	2003	BISE Mardan

PROFESSIONAL QUALIFICATION

S. No	Degree / Certificate	Session	Board / University
1	M.Ed	2013	AIOU Islamabad
2	B.Ed	2009	AIOU Islamabad
3	DP.ED	2013	Mardan University
4	PST	2007	AIOU Islamabad

TOTAL LENGTH OF SERVICE

06 Years 01 Month

ATTESTED

ANNEX 204

10

No. 22502
Roll No. 35630
Group. Humanities



VERIFIED & CORRECTED
Superintendent
(CERTIFICATES)
DIEB, Mardan.
Asst. Secretary
(CERTIFICATES)
DIEB, Mardan.

Board of Intermediate and Secondary Education Mardan P.W.S.P. Pakistan INTERMEDIATE EXAMINATION SESSION. 2005 - ANNUAL

This is to certify that STESHA Daughter of IMRANUL DIN
and a resident of District Mardan Registered No. 511-5/IMP-04 has passed the
Intermediate Examination of the Board of Intermediate & Secondary Education Mardan held in
May/June - 2005 as a Private candidate who obtained 60% Marks out of 100
and has been placed in Grade 2 Representing Govt

[Signature]
Asstt. Secretary
[Signature]

Secretary

This certificate is issued without alteration or emendation.

ATTESTED

Annexure : ¹D

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

11

Dated: 26-01-2009

ADVERTISEMENT No. 01 / 2009.

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

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

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

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

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

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

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

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

Merit	Zone-1
01	01

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

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

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

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

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

ATTESTED

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

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

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

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

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provisions of the rules for the time being in force.

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

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

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

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

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

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

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

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

ALLOCATION:

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

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

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

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

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

ALLOCATION: Merit.

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

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

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

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

ALLOCATION: Merit.

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13 17

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

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

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

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

ALLOCATION:

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

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

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

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

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

PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

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

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

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

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

ALLOCATION: Merit.

TECHNICAL EDUATION AND MAN POWER TRAINING DEPARTMENT.

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

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

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

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

ALLOCATION: Merit.

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

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

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

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

CORRIGENDUM

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

GENERAL CONDITIONS

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

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Ex-armed Forces Personnel must send copy of Discharge Certificate with their applications. Govt. / Semi Govt. / Autonomous / Semi Autonomous Bodies employees may apply direct but their Departmental Permission Certificates should reach within 30 days of the closing date.

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

SPECIFIED BRANCHES OF THE NATIONAL BANK OF PAKISTAN.

Main Branches of:

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

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(Atta Ur Rehman)
Secretary

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

ATTESTED



Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar
 PH No. 091-9210389, 9210938,
 9210437, 9210957, 9210468
 Fax 091-9210936
 E-mail desekpk@yahoo.com

Notification.

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

S. #	Name	Father Name	Domicile	Zone	Permanent Address	Place of Posting
1.	Seema	Ikram ul Din	Mohmand Agency	1	Vill: Muttai Doro Musu Khel Rahmat Kor Upper Mohmand District Mohmand Agency	Service placed at the disposal of Director of Education FATA for further posting against vacant SST General Post.

Terms and conditions:-

1. 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.
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 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 months notice from either side. In case of resignation with out notice her one-month pay/allowances shall be forfeited to the Government.
4. She should join her post within 30 days of the issuance of this notification. In case of failure to join there post within one month of issuance of this notification her appointment will expire automatically and 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.

[Handwritten signature]

Appointment Order No. 43 SST(G) FATA Advt No. 1/2009

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.

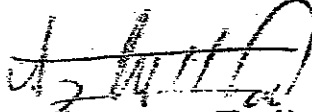
8. Charge report should be submitted to all concerned
9. The DEO (F) concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of his posting orders.
10. The DEO(F) concerned will verify their documents before release of pay.
11. Her seniority will be maintained as determined by the Khyber Pakhtunkhwa Public Service Commission.
12. No TA/DA will be allowed to the appointee for joining his duty.

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

Endst: No. /File No.2/A-14/SST(F) Gen/PSC/Apptt: Dated Peshawar the _____/2013

Copy forwarded for information and necessary action to the:-

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


Dy. Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Name of Official

Caste or race

Father's name

Residence

Date of birth

Exact height by measurement

Personal mark of identification

Signature of the Official

Signature of head office

Seal of Office

I do hereby certify that I have examined Mr. Selma candidate for employment in the Office of the Education Deptt

and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except Nil

I do not consider this as disqualification for employment in the office of the

His age according to his own statement 29 year and by appearance about Twenty nine years.

Secretary
Serving Medical Board
Medical Service

MEDICAL SUPERINTENDENT
Standing Medical Officer
Civil Hospital

ATTESTED

LEFT HAND THUMB AND FINGER

IMPRESSION

[Signature]

ADJUSTMENT

Consequent upon their appointment as SST (General) in BPS-16 on the basis of recommendation of Khyber Pakhtunkhwa Public service Commission and placement of their services at the disposal of Director Education, FATA vide Director, Elementary & Secondary Education Khyber Pakhtunkhwa's Notification No. 1762-70/File No. 2/A-14/SST(FY)Gen/PSC/Apptt. dated 19-03-2013, the following SSTs are hereby adjusted in the schools noted against each with immediate effect: -

S/#	Name/Father's Name/Domicile/Address	Posted at	Remarks
1	Seema D/o Ikram ud Din (Mohmand) Vilalge Mattai Dara khel Rahmat Kor Upper Mohmand Dist: Mohmand Agency	GGMS Janat Mir Kor North Waziristan Agency	Against vacant post

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

(ROZ WALI KHAN)
DIRECTOR EDUCATION (FATA)

Endst. No. 3247-51 /A-1/Apptt. of SST (General) (PSC) 2013 Dated Pesh: the 30-4-2013

Copy forwarded to the: -

- 1 Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
- 2 w/r to his Notification cited above.
- 3 Agency Education Officer North Waziristan Agency.
- 4 Agency Account Officer North Waziristan Agency
- 5 Candidate Concerned
- 5 P.A to Director Education FATA

ADD. DIRECTOR (ESTAB)

ATTESTED

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CHARGE REPORT

I Seema D/o Ikram ud Din took over charge against vacant SST post at GGMS Janat Mir Kot North Waziristan Agency on the Fore Noon 01-05-2013 Vide Director Elementary & Secondary Education Khyber Pakhtunkhwa Notification No. 1762-70 File No. 2/A-14/SST (F) Gen PSC Apptt dated 19-03-2013 and D.E FATA Peshawar Endstt: No:3247-51 Apptt: of SST (General) (PSC) 2012 dated Peshawar 30-04-2013.

Signature of taken over Charge _____
Name of Govt. Servant: Mst. Seema
Designation: SST (Gen.)
Station: GGMS Janat Mir Kot, NWA

Signature of taken over Charge _____
Name of Govt. Servant: Vacant
Designation:
Station:

Endstt: No 531-36.1

Dated NWA the 1-5 /2013.

- 1- Director Elementary & Secondary Education Khyber Pakhtunkhwa.
- 2- Director of Education FATA Secretariat Peshawar.
- 3- Agency Accounts Officer North Waziristan Agency.
- 4- Agency Education Office North Waziristan Agency.
- 5- Officer concerned.

Charge Date
W. Zahid
Agency Accounts Officer
North Waziristan Agency

ATTESTED

TRANSFERS REPORT

1. Transfer of Mr. [Name] from [Current Station] to [New Station] on the basis of the following details: [Details of transfer, including dates and reasons].

Signature of taken over Charge: _____
Name of Govt. Servant: Mr. [Name]
Designation: [Designation]
Station: [Station]

Signature of taken over Charge: _____
Name of Govt. Servant: [Name]
Designation: [Designation]
Station: [Station]

Dated NWA the 1-2-2013

Order No. 231-261

- 1- Director Elementary & Secondary Education Khyber Pakhtunkhwa
- 2- Director of Education FATA Secretariat Peshawar
- 3- Agency Accounts Officer North West Frontier Agency
- 4- Agency Education Officer North West Frontier Agency
- 5- Officer concerned

[Handwritten signatures and stamps]



ANNEX

21

NOTIFICATION

1. WHERE AS: one Mst. Seema D/O Ikram Ud Din who herself appointed/adjusted as SST (G) in GGMS Nahaqi Sahid Abad District Mohmand vide Notification No. E&SE No. 1762-70 dated 19/03/2013 upon the production of fake/bogus appointment/adjustment order not issued by the Directorate of Education erstwhile FATA Nor by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa.
2. AND WHERE AS, the competent authority has directed the above said accused SST to produce authentic and verified service record from the concerned authorities, but she failed to comply with the legitimate directions of high ups regarding production of requisite authentic documents/record.
3. AND WHERE AS, further an inquiry committee was constituted by the competent authority vide Notification No. 8154-63 dated 04/8/2016 who have gone through the entire case record and it has been proved that the said appointment/adjustment order for the aforesaid post advertised by Public Service Commission Khyber Pakhtunkhwa was turned out fake/bogus
4. AND WHERE AS, it has come to the notice of the competent authority that Mst. Seema D/O Ikram Ud Din, having no legal status of the said appointment/adjustment order.
5. NOW THEREFORE, under the mandatory provision and power conferred under Section-20 & 21 for General clauses Act-1897 as amended in 1956 and in pursuance of the scrutiny of selection/appointment record in r/o the above mentioned SST which was found fake/bogus, thus her appointment/adjustment Notification No. E&SE No. 1762-70 dated 19/03/2013 is hereby "DISOWNED" ab initio and with the direction to District Education Officer (concerned) to recover salaries and other allied benefits drawn by Mst. Seema D/O Ikram Ud Din in the interest of Public Service.

Director

Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

ATTESTED

5878-82

Encst. No. _____ dated 5/9/2019

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

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

To

ANNEX H (99)

The Secretary EES
of Education U.P.K
PESHAWAR

Subject: Appeal against disallowed letter No 5878/82 dated 5/4-19

Dear Sir,

Due to my disallowed letter No 5878/82
dated 05-04-2019 I request you for adjustment
on my own post SST (R) because I am qualified
MAMET Teacher and have (09) years service on
this post. After the long service with punctuality and
honesty was disallowed by Director of PATA Distt.
Look to my future - Qualification and long service
and I may please adjusted on my own post
and oblige.

I have already appointed under the rule and
gave me a post of SST at GEMS Nahqi Sahib
abad (Mehmand Agency now Distt)

After verification of all documents and order
I issued pay release and start my pay regularly
I hope you will be take action in my right

ATTESTED

Yours Obediently,

MST. Seema Ikramud Din

SST (R) GEMS Nahqi Sahib Abad

Mehmand Distt.

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
No. SO(PE)/9-4/SST//NMTD/Re-Instatement2019
Dated Peshawar the 26.04.2019

To,

1. The Director,
Elementary & Secondary Education
Khyber Pakhtunkhwa,
Peshawar.
2. The Director Education,
Newly Merged Tribal Districts,
Warsak Road,
Peshawar.

Subject: APPEAL FOR RE-INSTATEMENT

Dear Sir,

I am directed to refer to the subject noted above and to enclose herewith a copy of list bearing No. 1257 dated 19.04.2019 alongwith connected documents in respect of the following female Secondary School Teachers (SST's) General of merged tribal districts, for further necessary action as per rules/policy. please.

S.No.	Name / F. Name	Address
1.	Mst. Seema D/O Ikramud Din	GGMS Nahqi, Tribal District Mohmand
2.	Mst. Ghazala Sana D/O Sana ullah	GGHS, Azeem Kor, Tribal District Mohmand
3.	Mst. Ishrat D/O Bahadar Sher	GGMS Kachkol, Tribal District Mohmand
4.	Mst. Asma D/O Muhammad Akbar	GGMS Sabz Ali, Tribal District Mohmand
5.	Mst. Tahira Shah D/O Fazli Dayan	GGMS Prang Ghar, Tribal District Mohmand
6.	Mst. Sarwat Jehan D/O Gul Rehman	GGHS Sra Shah, Tribal District Mohmand
7.	Mst. Nizaqat D/O Said Ali Shah	GGHS Shalam Salai, Tribal District Mohmand
8.	Mst. Nasrat D/O Hayat Khan	GGHS Badagai, Tribal District Bajaur
9.	Mst. Nargis D/O Bahadar Khan	GGMS Zarif Abad, Tribal District Bajaur
10.	Mst. Basra Begum D/O Fazli Wahab	GGHS Raghagan, Tribal District Bajaur
11.	Mst. Shabana Bibi D/O Abadul Sattar	GGHS Anayat Kaly, Tribal District Bajaur
12.	Mst. Basmina D/O Mir Alam	GGMS Dag Mula, Tribal District Mohmand

Yours Faithfully,

SECTION OFFICER (PRIMARY)

Encl: as above.

Endstt: of even Number & Date:

Copy to the:-

PS to Secretary, E&SE Department, Peshawar.

ATTESTED

SECTION OFFICER (PRIMARY)

وکالت نامہ

بعدالت محکمہ قانونی امور سروس ٹریڈنگ کمپنی

صحاہ سہما بنام گورنمنٹ آف پی

منجانب ریٹائرمنٹ دعویٰ اجرم سروس اینڈ

تھانہ / ایف آئی آر / تاریخ

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام محکمہ قانونی امور کے لئے

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

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

ATTESTED & ACCEPTED:

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

APW
Khalid Khan
Dec-18-1115
Amirial

Sajjad Ahmad Mehsud
Advocate High Court
Peshawar



BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No:975/201
Mst; Seema Ex SST (G) B-16 District MardanAppellant.

VERSUS

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

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

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Service Appeal No: 974/2019

Mst; Seema, Ex SST (G) B-16 District Mardan.....Appellant.

VERSUS

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

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

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary Objections.

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

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

ON FACTS.

- 1 That Para-1 needs no comments, being pertains to the Service Record of the Appellant against the SST (G) B-16 post which has been declared fake & bogus and even disowned by the Respondent Department vide Notification dated 5/4/2019. In view of the recommendations of the inquiry committee which was constituted vide Notification No. 8154-63 dated 4/8/2016, who submitted its report that the afore said order & Appointment Notification dated 19/03/2013 of the appellant is fake & bogus with no cogent record in the Respondents No.2 & 3 offices.
2. That Para-2 also needs no comments being pertains to the academic & professional qualification of the appellant.
- 3 That Para-3 is correct, hence, needs no comments.
- 4 That para-4 is correct to the extent of Advertisement dated 26/01/2009 by the Respondent No.03, wherein, the appellant did not apply for the said post nor appeared in the interview before the Respondent No.3 for the appointment against SST (G) Male B-16 post, hence, the claim of the appellant regarding his appointment vide Notification dated 19/03/2013 is baseless & liable to be rejected in favor of the Respondents. **(Copy of the Ad; dated 26/01/2009 is Annexure-A).**
- 5 That Para-5 is incorrect & denied on the grounds that no cogent proof & legal justification has been annexed by the appellant in support of his stand regarding his recommendations against the SST (G) B-16 post by the KPK PSC & his further adjustment vide Notification dated 19/03/2013 against the said post in the Respondent Department are fake & bogus as the entire service record of the appellant has been found fake & bogus, hence, his services against the SST (G) B-16 post has been disowned & even null & void ab-initio having no legal effect in the eyes of law & rules vide Notification dated 05/04/2019 by the competent authority **(Copy of the said Notification dated 05/04/2019 is Annexure-B).**

- 6 That Para-6 is incorrect & denied on the grounds that the services of the appellant against the SST (G) B-16 post have been disowned vide Notification dated 5/4/2019 by the Respondent No.2 after observing all legal formalities under the rules & the claim of the appellant regarding his recommendations by the KPK PSC against the SST(G) B-16 & his adjustment as SST vide Notification dated 19/03/2013 are fake & bogus having no record in the Respondent Department.
- 7 That Para-6 is incorrect on the grounds that the Services of the appellant has been placed against the SST (G) B-16 at GGMS Jannat Mir Kor North Waziristan vide order dated 30/04/2013 as per claim of the appellant is also fake & Bogus, hence, disowned by the Respondent Department by the competent authority & where against no Departmental appeal against the Notification dated 5/4/2019 has been filled by the appellant to the competent authority nor any such record is available in the Respondent Department till date, hence, got finality under the Law & rules against the appellant
- 8 That para-7 is incorrect & denied on the grounds that the Services of the appellant against the SST (GP) B-16 has been disowned by the competent authority & where against no Departmental appeal against the Notification dated 5/4/2019 has been filled by the appellant to the competent authority nor any such record is available in the Respondent Department till date, hence, got finality under the Law & rules against the appellant, however, the Respondents further submit on the following grounds inter alia:-

ON GROUNDS.

- A **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy vide the above said Notification dated 5/4/2019 by the Respondent Department in the instant case, hence, the stance of the appellant is baseless & liable to be rejected.
- B **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy vide the above said Notification dated 5/4/2019 by the Respondent Department in the instant case having no question of violation of Article 10-A of the constitution of 1973, hence, the stance of the appellant is baseless & liable to be rejected.
- C **Incorrect & not admitted.** The statement of the appellant is without any cogent reason & justification on the grounds as agitated in the foregoing paras of the present reply by the Respondents as regular inquiry has been conducted vide Notification bearing endst; No.8154-63 dated 4/8/2019 by the competent authority who declared the documents & 1st appointment as fake & bogus, hence, the plea of the appellant is without any justification.
- D **Incorrect & not admitted.** The stand of the appellant is without any cogent reason & legal justification on the grounds that his 1st appointment Notification dated 19/03/2013 of the appellant have been found fake & bogus by the Respondent Department, hence, his services against the SST (G) B-16 post has been disowned by the competent authority vide Notification

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

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

Dated ___/___/2020



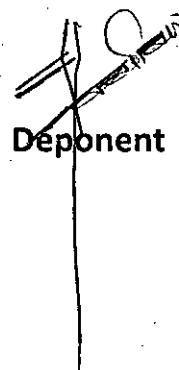
Secretary
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1)



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

AFFIDAVIT

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



Deponent

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 975/2019


Seema.....Appellant

VERSUS

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

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Senior Law Officer
Khyber Pakhtunkhwa
Public Service Commission Peshawar
(Respondent)

UMS88642018

Date: 11/03/2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 975/2019

Seema.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others.....Respondents**PARAWISE COMMENTS ON BEHALF OF (RESPONDENT NO. 03)****PRELIMINARY OBJECTIONS:**

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

ON FACTS:

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

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

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

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

ALLOCATION:

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

Z

4. Incorrect. As per Khyber Pakhtunkhwa Public Service Commission record the appellant neither applied nor she was recommended against any of the said posts. Instead the candidates mentioned in the list annexed as **B** were recommended. The appellant has not pointed out or attached any single document issued by the Public Service Commission in support of her claim that she was a Public Service Commission recommendee.

5-8. Does not pertain to Public Service Commission.

GROUND.

A-C. Does not pertain to Public Service Commission.

D. Incorrect. As far as the recommendation of the appellant is concerned she was not recommended by the Khyber Pakhtunkhwa Public Service Commission as explained in Para 4.

E. Does not pertain to Public Service Commission.

F. The appellant may not be allowed to raise any other grounds during the course of arguments.

It is, therefore, most humbly prayed that in light of above submissions the instant Service Appeal may kindly be dismissed with cost.

Dr. M. M. M.
CHAIRMAN
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.03)
Shahid

FFIDAVIT

Stated on oath that the contents of this Para wise comments are true and correct & nothing has been concealed from this Honorable tribunal.

DEPONENTS

M. M. M. M.

**CHAIRMAN
KHYBER PAKHTUNKHWA
PUBLIC SERVICE COMMISSION
PESHAWAR
(RESPONDENT NO.03)**

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

Dated: 26-01-2009

ADVERTISEMENT No. 01 / 2009.

Applications are invited for the following posts from Pakistani citizens of N.W.F.P./F.A.T.A domicile by 26-02-2009 (13-03-2009 for candidates from abroad). Incomplete applications and applications without supporting documents required to prove the claim of the candidates shall not be rejected without intimation to the candidates.

AGRICULTURE LIVESTOCK & CO-OPERATIVE DEPTT:

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

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

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

ALLOCATION: Merit.

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

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

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

ALLOCATION:

Merit	Zone-1
01	01

CHIEF ENGINEER WORKS & SERVICE DEPARTMENT.

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

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

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

ALLOCATION:

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

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

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

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

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

ALLOCATION: NOTE: In case of non-availability of candidates possessing the

1/1

provisions of the rules for the time being in force.

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

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

ALLOCATION:

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

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

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

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

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

ALLOCATION:

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

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

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

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

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

ALLOCATION: Merit.

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

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

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

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

ALLOCATION: Merit.

TESTED

M

18

No. 55)

Nine Hundred and Seventy Three (973) Posts of Female SETs. /S.S.Ts (Both Science & Arts) (with out graduaty and pension).

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

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

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

ALLOCATION:

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

(S.No. 56)

Twenty One (21) Posts of Female SETs. /S.S.Ts Disabled (with out graduaty and pension).

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

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

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

PAY SCALE: BPS-16 ELIGIBILITY: Female.

ALLOCATION: Merit.

(S.No. 57)

Fifty One (51) Posts of Female SETs. /S.S.Ts For Earth Quake Quota (I.E) Battagram, Mansehra, Shangla , Kohistan, Abbottabad, (with out graduaty and pension).

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

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

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

ALLOCATION: Merit.

TECHNICAL EDUCATION AND MAN POWER TRAINING DEPARTMENT.

(S.No. 58)

Two (02) Posts of Assistant Professor Commerce in Govt: Colleges of Commercial/Govt: Commercial Training Institutes.

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

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

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

ALLOCATION: Merit.

ATTESTED

(S.No. 59)

Two (02) Posts of Assistant Professor in Computer Engineering in Govt: College of Technology & Govt: Polytechnic Institute.

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

19

(S.No. 66)

Ten (10) Posts of Male office Assistant.

QUALIFICATION: Bachelor degree from recognized University.

AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Male.

ALLOCATION:

Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
02	02	02	02	02

(S.No. 67)

One (01) Post of Female office Assistant.

QUALIFICATION: Bachelor degree from recognized University.

AGE LIMIT: 18 to 30 years. PAY SCALE: BPS-14. ELIGIBILITY: Female.

ALLOCATION: Merit.

CORRIGENDUM

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

GENERAL CONDITIONS.

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

ATTESTED

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Annex-A^s

NWFP PUBLIC SERVICE COMMISSION

2- Fort Road Peshawar Cantt:

Website: www.nwfppsc.gov.pk

Dated: 26-01-2009

ADVERTISEMENT No. 01 / 2009.

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

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

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

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

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

ALLOCATION:

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

R-585(S) Amesh-B (5)

MERIT LIST of Female SST (Science)

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

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

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12 M

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19 M

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M 22/9

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21 M

M 20/9

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23 M

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25 M

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27 M

28 M

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

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

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

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

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215.	59	37	25/2/83	Rashida Bibi D/O Muhammad Qadir Khan	Chitral/3
216.	59	37	3/4/83	Nazish Raees D/O Raees Khan	Swabi/2
217.	59	37	10/2/84	Sajma Saleem D/O Muhammad Saleem	Haripur/5
218.	59	37	25/3/84	Bibi Aisha Gul D/O Muhammad Bahader Khan	Swabi/2
219.	59	37	13/1/85	Bushra Noreen D/O Shams ur Rehman	Abbottabad/5
220.	59	36	1/2/77	Adeela Rani D/O Muhammad Nawaz Khan	Mansehra/5
221.	59	36	21/3/84	Maryam Rauf D/O Rauf Khan	Kohat/4
222.	59	36	13/9/84	Parveen Balg D/O Sher Balg	Chitral/3
223.	59	36	4/4/85	Afshan Bibi D/O Anwar Khan Anwar	Charsadda/2
224.	58	40	2/3/81	Huma Rashid D/O Abdur Rashid	Mardan/2
225.	58	40	5/10/81	Abida Shaheen D/O Abdul Hakeem	Abbottabad/5
226.	58	40	2/5/83	Salma Riaz D/O Muhammad Riaz Khan	Mardan/2
227.	58	39	2/4/81	Sajqa Begum D/O Muhammad Ghulam	Nowshera/2
228.	58	39	1/4/83	Naila Akbar D/O Fazal Akbar	Swabi/2
229.	58	39	22/5/85	Nabila Norin D/O Farhad Javed	Mardan/2
230.	58	39	1/9/85	Sobia Saeed D/O Muhammad Saeed	Haripur/5
231.	58	39	5/2/86	Farmina Tabassum D/O Walli Rahmat	Chitral/3
232.	58	39	15/3/86	Saira Sardar D/O Sardar ud Din	Peshawar/2
233.	58	39	1/1/87	Safia Zaibi D/O Ghani ur Rehman	Peshawar/2
234.	58	38	2/3/72	Fozia Shaheen D/O Pir Muhammad	Haripur/5
235.	58	38	13/4/79	Shazia Naz D/O Hidayat Ullah	Nowshera/2
236.	58	38	24/10/80	Sadla Amin D/O Bin Yamin	Swabi/2
237.	58	38	10/12/81	Sadla Kulsoom D/O Syed Ahmed Shah	Swabi/2
238.	58	38	1/5/83	Sameera Saleh D/O Saleh Muhammad	Charsadda/2
239.	58	38	13/3/84	Shahzadi Noreen D/O Mir Zaman Shah	Mardan/2
240.	58	38	20/3/86	Hasin Sahar D/O Mir Azam Shah	Chitral/3
241.	58	38	15/10/87	Sobia Hashmi D/O Khurshid Alam Hashmi	Haripur/5
242.	58	37	1/9/75	Shahnaz Begum D/O Gul Daraz Khan	Karak/4
243.	58	37	1/4/80	Robina Taslim D/O Muhammad Hashim	Chitral/3
244.	58	37	30/6/81	Ghazala Yasmeen D/O Safiullah	Charsadda/2
245.	58	37	29/3/82	Shereen Kifayat D/O Mian Kifayat Ullah	Nowshera/2
246.	58	37	6/6/82	Zubaida Khatoon D/O Taj Muhammad Khan	Karak/4
247.	58	37	6/6/82	Bibi Zainab D/O Gohar Rehman	Abbottabad/5
248.	58	37	15/6/82	Safia Shahzad D/O Shahzad Gul	Peshawar/2
249.	58	37	10/5/84	Nosheen Ramzan D/O Muhammad Ramzan	Haripur/5
250.	58	37	22/8/84	Farhanda Rehman D/O Noor Rehman	Peshawar/2

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

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				Muhammad	
287.	57	37	2/8/87	Saba Naz D/O Muhammad Nawaz Khan	Mansehra/5
288.	57	37	4/11/87	Shumalia Nisar D/O Nisar Ahmad	Mansehra/5
289.	57	36	16/9/79	Shumalla Noureen D/O Muhammad Hayat Khan	Bannu/4
290.	57	36	10/4/80	Suriya Mehnaz D/O Rals Khan	Karak/4
291.	57	36	4/4/82	Nadla Bibi D/O Manzoor Elahl	Haripur/5
292.	57	36	10/2/83	Fareena Mahak D/O Abdul Rasheed Khan	D.I Khan/4
293.	57	36	28/2/83	Samra Tul Ain D/O Haji Mushtaq Ahmad	Peshawar/2
294.	57	36	31/3/83	Salma Saeed D/O Khan Saeed	Charsadda/2
295.	57	36	27/3/84	Salma Saeed D/O Muhammad Saeed	Kohat/4
296.	57	36	3/1/85	Rukhsana Zaib D/O Alam Zaib	Mkd Agy/3
297.	57	36	1/3/85	Rifat Niaz D/O Umar Niaz Khan	Bannu/4
298.	57	36	19/3/85	Sumeerah Yasmin D/O Ahmad Nawaz	D.I Khan/4
299.	57	36	23/3/85	Aisha Naz D/O Mirza Ali Khan	Karak/4
300.	57	36	23/2/86	Zartasha Khan D/O Jehanzeb Khan	Abbottabad/5
301.	56	39	4/2/85	Shagufta Rehman D/O Muhammad Rehman	Bajaur Agy/1
302.	56	38	20/12/84	Najmusahar Bibi D/O Sher Zaman Shah	Mardan/2
303.	56	38	19/7/86	Ayesha Bibi D/O Haq Nawaz	Nowshera/2
304.	56	37	13/4/79	Parveen Nisa D/O Sakhawat Shah	Buner/3
305.	56	37	30/3/80	Musarrat Begum D/O Habib Jan	Dir Lower/3
306.	56	37	12/3/81	Ulfat Begum D/O Tayyab Jan	Mardan/2
307.	56	37	3/12/81	Rohi Omar D/O Hazrat Omar	Mkd Agy/3
308.	56	37	1/3/83	Yasmin Gul D/O Sher Bahadur	Mansehra/5
309.	56	37	11/4/83	Sabeen Begum D/O Gulzar Muhammad	Nowshera/2
310.	56	37	1/1/84	Sheema Rehman D/O Yousaf Rehman	Swabi/2
311.	56	37	15/3/85	Saira Gul D/O Gul Nawaz Khan	Chitral/3
312.	56	37	31/3/86	Salma Gul D/O Abdul Fateh	Charsadda/2
313.	56	36	25/2/76	Saira Bibi D/O Gul Payao Khan	Karak/4
314.	56	36	12/11/77	Gulshan Ara D/O Habib Ullah Khan	Lakki Marwat/4
315.	56	36	4/1/78	Shabnam Ara Bibi D/O Shah Pasand	Mardan/2
316.	56	36	13/9/79	Bibi Mahnaz D/O Muhammad Akram Jadon	Abbottabad/5
317.	56	36	12/10/80	Syeda Rabana Bukhari D/O Syed Amanat Ali Bukhari	Abbottabad/5
318.	56	36	30/7/82	Nilofar Begum D/O Bakht Foor	Mkd Agy/3
319.	56	36	23/11/83	Rana Pervaiz D/O Muhammad Pervaiz	Haripur/5
320.	56	36	12/12/83	Sabina Bibi D/O Khan Afsar Khan	Abbottabad/5
321.	56	36	1/3/84	Shabina D/O Fazal Gul	Swat/3

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

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

[Handwritten signature]

Receipt

Title Seema vs Govt of KPH

Appeal No 975/2019

I have received Rs 2000/-
from the KPPSC Representative as
per court order

Name - Seema

Signature 

Dated - 22/7/19