

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1080/2020

Date of institution ..... 23.01.2020

Shaista Begum (Lab Assistant) Education Department,  
R/O Peer Qila Shabqadar, District Charsadda.

VERSUS

Secretary Education, Khyber Pakhtunkhwa, Peshawar and four others.

ORDER

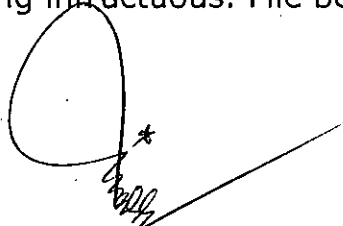
26.10.2021

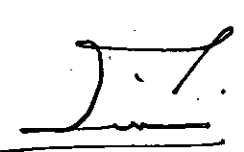
Mr. Manzoor Alam, Advocate, for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present and stated at the bar that the appellant has been removed from service. In this respect, he produced copy of notification bearing Endorsement No. 1733-40 dated 03.09.2021, which is placed on file

Learned counsel for the appellant stated at the bar that the appeal in hand has been filed by the appellant for release of her salary, however it came in the knowledge of the appellant today that she has been removed from service, therefore, the appellant wants to withdraw the instant appeal as the same has become infructuous. In this respect, he submitted written application, which is placed on file.

In view of the above, the appeal in hand stands dismissed as withdrawn being infructuous. File be consigned to the record room.

ANNOUNCED  
26.10.2021

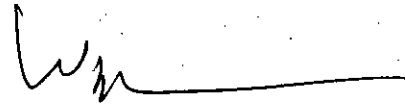
  
(MIAN MUHAMMAD)  
MEMBER (EXECUTIVE)

  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)

30.03.2021

Appellant in person and Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Neither written reply on behalf of respondents submitted nor any representative on their behalf is present, therefore, notices be issued to them for submission of written reply/comments for 09.06.2021 before S.B.



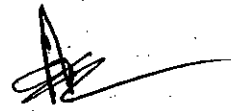
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)

09.06.2021

Junior to counsel for the appellant and Mr. Kabirullah Khattak, Addl. AG for the respondents present.

Written reply has not been submitted by the respondents. Learned AAG is required to contact the respondents for submission of reply/comments within 10 days in office, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 26.10.2021.

*Stipulated period has passed and reply has not been submitted.*



Chairman

P.S

22.06.2021

Learned Addl. A.G be reminded about the omission and for submission of Reply/comments within extended time of 10 days.



Chairman



18.11.2020

Counsel for appellant is present and submitted an application for allowing the appellant to submit security and process fee.

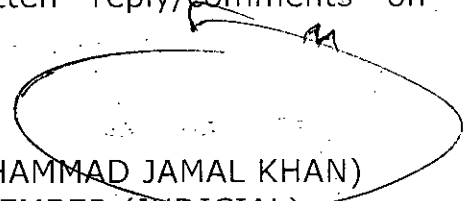
Application is accepted. The appellant is allowed to deposit the security and process fee within three working days. Counsel for appellant also submitted copies of appeal the same be <sup>provided</sup> ~~noted~~ to respondents, after the requisite deposit. To come up for written reply/comments on 07.01.2021 before S.B.

  
Chairman

07.01.2021

Counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General, for the respondents is also present.

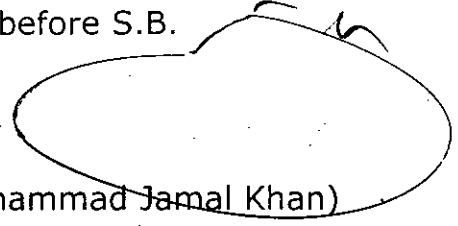
Written reply on behalf of respondents not submitted. Learned Additional Advocate General is directed to contact the respondents for submission of written reply/comments on the next date. File come up for written reply/comments on 25.02.2021 before S.B.

  
(MUHAMMAD JAMAL KHAN)  
MEMBER (JUDICIAL)

25.02.2021

Junior to senior counsel for appellant is present. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Abdul Sattar, ADEO, for the respondents are also present.

Written reply on behalf of respondents not submitted. Representative of the department is seeking further time for submission of written reply/comments. File to come up for written reply/comments on 30.03.2021 before S.B.

  
(Muhammad Jamal Khan)  
Member

04.08.2020

Junior counsel for the appellant and Mr. Kabirullah Khattak,  
Additional AG for the respondents present.

Learned Additional AG seeks time to contact the  
respondents and furnish the requisite reply/comments.  
Adjourned to 28.09.2020 on which date reply/comments shall  
positively be furnished.

  
(MIAN MUHAMMAD )  
MEMBER (E)

28.09.2020

Counsel for the appellant and Addl. AG for the  
respondents present.

An application for correction of name and addresses of  
the respondents, besides inclusion of Accounts Officer  
Ghalanai, District Mohmand has been submitted.

Since the proceedings are at initial stage, therefore,  
the application is allowed. Office shall endorse the  
respondents enumerated in the application as parties in  
the panel of respondents. The appellant shall deposit the  
process fee within 10 days. Where-after, notices be issued  
to respondents for submission of reply/comments on  
18.11.2020 before S.B.

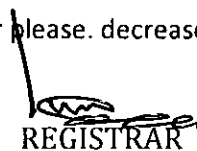


  
Chairman

Form- A

# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 1080 /2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/02/2020	<p>The appeal of Mst. Shaista Begum resubmitted today by Mr. Kunwar Kamal Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please. decrease</p> <p style="text-align: right;"> REGISTRAR 18/2/2020</p> <p>2-</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>27/03/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> <p>27.03.2020</p> <p>Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 18.06.2020 before S.B.</p> <p style="text-align: right;"> Reader</p>

18.06.2020

Counsel for the appellant present. Preliminary arguments heard and case file perused. The appellant was appointed as Lab Attendant vide office order dated 29.10.2009 and posted at GGHS Ghalani, District Mohmand. That the appellant was transferred from GGHS Ghalani to GGHS, Dab Kor, District Mohmand vide order dated 19.02.2013. That due to insurgency in the area, the said school was closed and the appellant did not assume the charge. Thereafter the appellant file departmental appeal for release of salary and adjustment on 27.09.2019 which was not responded within the stipulated period of ninety days, hence the present service appeal on 23.01.2020. The learned counsel further contended that the Appellant has not been treated according to law and rules and her legal rights have been impringed upon without any reason. It was further contended that the appellant has been without monthly <sup>salary</sup> despite the fact that she has performed duties in pursuance of the transfer orders.

Points urged need consideration. Service appeal is admitted subject to all legal objections. Appellant is directed to deposit security and process fee within 10 days, thereafter, notices be issued to the respondents for written reply/comments for 04.08.2020 before S.B.

Appellant Deposited  
SSA Process Fee  
27/6/2020



(MAIN MUHAMMAD)  
MEMBER


R

The appeal of Mst. Shaista Begum Lab Assistant Education Department received today i.e. on 23.01.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of impugned order is not attached with the appeal which may be placed on it.
- 2- Copy of departmental appeal against the impugned order and its rejection order are not attached with the appeal which may be placed on it.
- 3- Necessary party may be made in heading of the appeal.
- 4- Address of respondent No.2 is incorrect which may be corrected.
- 5- Annexures of the appeal may be attested.

No. 230 /S.T,

Dt. 24-01-2020.

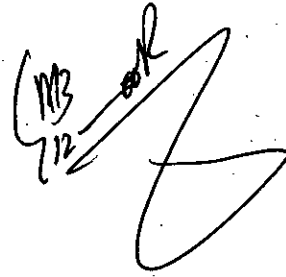
  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Kanwar Kamal Adv. Pesh.

Note:

Respected Sir,

with due reverence, the file is resubmitted after completion of the above mentioned deficiencies.



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

Service Appeal No. 1080 /2020

Shaista Begum

(Petitioner)

**V E R S U S**

Secretary Education Department and other

(Respondents)

**Application for correction of names and  
addresses of the respondents in the instant  
service appeal.**

**Respectfully Sheweth,**

1. That the above titled service appeal is being filed before this hon'ble court in which no date of hearing has yet been fixed.
2. That correct names and addresses of the respondents are as under:
  - i. Secretary Education, Khyber Pakhtunkhwa,  
Peshawar
  - ii. Director Education, Khyber Pakhtunkhwa,



Peshawar

- iii. District Education Officer (DEO) Female,  
Ghalanai District Mohmand
- iv. Assistant District Education Officer (ADEO)  
Female, Ghalanai District Mohmand
- v. Accounts Officer, Education Department,  
Ghalanai District Mohmand

**It is, therefore, most humbly prayed that on acceptance of the instant application, the correct names and address may kindly be accepted.**

*Shaisha Begum*

Petitioner

Through

*Kanwar*  
**Kanwar Kamal Khan  
& Manzoor Alam Khan  
Advocates High Court,  
Peshawar**

*[Signature]*

Date: 10.02.2020

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

Service Appeal No. 1080 /2020

Shaista Begum

(Petitioner)

**VERSUS**

Secretary Education KP and others

(Respondents)

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4	Copy of Transfer Order a/w Better Copy	B	7

	Dated: 19-02-2013		
5	Appeal to the DEO (Female) Distt. Mohmand for the Release of Salaries and Adjustment Dated: 27-09-2019	C	8-9
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*Shaista Begum*

Petitioner

Dated: 21-01-2020

Through

*Manzoor Alam Khan*

Manzoor Alam Khan

&

Kanwar Kamal Khan

*Kanwar*

Advocates High Court

①

BEFORE THE HON'BLE  
SERVICE TRIBUNAL KHYBER PAKHTUNKHWA  
PESHAWAR

Service Appeal No. 1080 /2020

Khyber Pakhtunkhwa  
Service Tribunal

Slary No. 688

Dated 23/01/2020

Shaista Begum (Lab Assistant) Education Department,  
R/o Peer Qila Shabqadar, District Charsadda

(Petitioner)

VERSUS

- 1) Secretary Education, Khyber Pakhtunkhwa, Peshawar
  - ~~1) Secretary Education Department, Warska Road, Peshawar~~
  - ~~2) Director Education, Khyber Pakhtunkhwa, Peshawar~~
  - ~~2) Director Education (Female) District Mohmand at Ghalani~~
  - ~~3) District Education officer (Female) Ghalanai, District Mohmand~~
  - ~~3) Assistant Education Officer, District Mohmand at Ghalani~~
  - ~~4) Assistant District Education officer (Female) Ghalanai, District Mohmand.~~
  - ~~4) Account Officer, Education Officer, District Mohmand at Ghalani~~
  - 5) Accounts Officer, Education Office Department, Ghalanai, District Mohmand
- (Respondents)

order sheet  
28/09/20

Filed to day  
Registrar 23/1/20

Appeal Under Section 4 of the KPK Service Tribunal Act, 1973 the respondents may kindly be directed to release the salaries of the petitioner.

submitted to -  
filed.

Registrar

Respectfully Sheweth,

The petitioner most humbly submits as under:

(2)

1. That the petitioner belongs to respectable family and law abiding citizen of Pakistan.
2. That the petitioner was appointed as Lab Assistant on 29.10.2009 at Govt. Girls High School Ghalani, the then upper Mohmand Agency. (Copy of service book <sup>appointment Order</sup> is attached as Annexure A)
3. That the petitioner performed her duties to the best of her abilities till 19.02.2013 on which she was transferred from Govt. Girls High School Ghalani to Govt. Girls High School Dab Kor Lower Mohmand. (*Transfer Order is attached as Anex. "B"*)
4. That it is pertinent to mention here that it was the peak time of insurgency, lawless and unruly element, were governing the area of Dab Kor and its surrounding area the said school was closed due to the uncertain situation, as no government writ was then in the area.
5. That it is worth mention here that in Govt. Girls High School Dab Kor, a Lab Assistant namely Mst. Qurat-ul-Ain was already on duty, when, the petitioner inquired from respondent.
6. That petitioner, made various applications to the respondent to adjust the petitioner on her own seat, i.e. Govt. Girls High School Ghalani and

3

release the monthly pay, but till now neither the petitioner is adjusted to her own seat nor the monthly pay is released since 2013. So the instant service appeal on the following among other grounds. *(Applications are attached here)*

**Grounds:**

- a) That the act, of the respondent are against the law and basic human right guaranteed by the constitution of Islamic Republic of Pakistan.
- b) That the post of petitioner is still lying vacant and the respondent are not adjusting the petitioner, on her own seat, neither releasing her salaries, these acts of the respondent are against the law.
- c) That the respondents should not be allowed to be wiser, then law and in the garb of colorful exercise of power, they cannot be allowed to deprive the petitioner from her vested and basic rights.
- d) That any other ground will be raised at the time of arguments with prior permission of this hon'ble court.

**It is, therefore, most humbly prayed that on acceptance of the instant service appeal, an**

(4)

appropriate order may be issued, directing the respondents to release the salaries of petitioner from February 2013 till now.

*Shaista Begum*  
Petitioner

Through

*Kanwar*

**Kanwar Kamal  
& Manzoor Alam Khan  
& Malik Ihsan Ullah**  
Advocates High Court,  
Peshawar

*MB*  
*MB*

Date: 21.01.2020

**Note:** No such service appeal on the same subject matter has earlier been filed before this hon'ble court.

Advocate

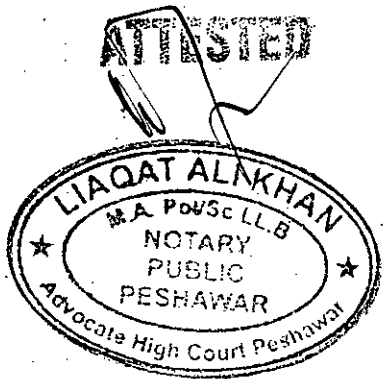
*MB*  
*MB*

**AFFIDAVIT**

I, Shaista Begum W/o Essa Khan R/o Haleemzai, P.O. Shabqadar, District Charsadda, do hereby solemnly affirm and declare on Oath that the contents of the instant service appeal are true and correct to the best of my knowledge and belief and nothing has been conceal from this hon'ble court.

*Shaista Begum*  
DEPONENT

Shaista Begum  
CNIC No. 17103-0586463-2  
Cell No. 0333-9000723



12 2 JAN 2020



(5)

(7)

جمہوریہ پاکستان  
 17103-0580463-2  
 عثمان یوسف مین  
 03/03/1990  
 سندھ ہائیڈرو پاور

UR1651  
 7103-0586463-2  
 25/02/2025  
 25/02/2015

Attested to be true copy

(MB) [Signature]

OFFICE OF THE AGENCY EDUCATION OFFICER, MOHMANDS AT GHALLANAI

(B) (6)  
Area (A)

APPOINTMENT ORDER:-

Consequent upon the recommendations of the Recruitment Committee the appointment of the following named candidates are made against Lab:Asstt. (Female) posts in BPS No.07 plus usual allowances in the schools noted against their names from the dates of their taking over charge.

S.No	Name with parentage	Tehsil	Merit Marks	Place of Posting	Remarks
01	Aisha Taurat D/O Taurat Khan	F/Ghundi	61.32	GGHS Ghallanai	Vacant Post
02	Saira Arshad D/O Arshad Khan	F/Ghundi	61.18	do	do
03	Farida Begum D/O Badshah Khan	Halimzai	37.09	do	do
04	Shaista Begum D/O Rehan	Halimzai	20.39	do	do

TERMS/CONDITIONS

- The appointments of the candidates are purely made on temporary basis and are liable to termination at any time without assigning any reason.
- They are entitled to avail all kinds of benefits specified for Govt servants, including CP Fund, except Pension, gratuity and GP Fund.
- They will produce Health and Age certificate issued by the Agency Surgeon Mohmand Agency.
- A Candidate will not be handed over the charge of her post if she is below 18 Years and above 40 Years on 16.5.2009.
- If any certificate i.e. SSC Certificate, F.A, BA, MA, Service Certificate OR Domicile Certificate of any candidate proves fake bogus at any stage, the appointment of the particular candidate will be considered as cancelled.
- The verifications of the Documents will be made through the office of the undersigned.
- No payment will be made to any candidate till the verification of her all documents from the institution concerned.
- If a candidate fails to report his arrival for duty at her particular station, within 15 days, her appointment will be deemed as cancelled.
- If the appointment of a particular candidate is made against a situation where the required vacancy is not available, then the appointment of the candidate with the lowest merit in the Particular Tehsil will be withdrawn.
- If a candidate wishes to resign the post, she will have to give one month prior notice or pay for the one month will be forfeited in lieu thereof.
- The service Books of the candidates must be prepared when they are given the charge of their duties.
- Charge Reports should be submitted to all concerned.

(MOHAMMAD YOUSAF)  
Agency Education Officer,  
Mohmand Agency at Ghallanai.

Order No. 1817-27 dated 29/10/2009.

Copy to:-

- Director of Education, FATA, NWFP, Peshawar
- Political Agent Mohmand Agency at Ghallanai
- Head Masters Concerned.
- Agency Accounts Officer, Mohmand Agency at Ghallanai.
- Agency Surgeon Mohmand at Ghallanai.
- Candidates concerned.
- IC EMIS local office.
- AAEO, concerned local office.
- Cashier local office.
- Notice Board local office.
- Dealing Asstt. F-I local office.

Attested to be true copy  
[Signature]

Manzoor Alam Khan Safi  
Advocate Peshawar High Court  
and Federal Shariat Court  
Mob: 0300-5730524

**BETTER COPY OF THE PAGE NO.8**  
**OFFICE OF THE AGENCY EDUCATION OFFICER MOHMANDS AT**  
**GHALLANAI**

**APPOINTMENT ORDER:-**

Consequent upon the recommendation of the Recruitment Committee the appointment of the following named candidates are made against Lab: Asstt: (Female) posts in BPS No. 07 plus usual allowances in the schools noted against their names from the dates of their taking over charge.

S.No	Name with percentage	Tehsil	Merit Marks	Place of Posting	Remarks
01	Aisha Taurat D/o Taurat Khan	E/Ghund	61.32	GGUS Ghallanai	Vacant Post
02	Saira Arshad D/o Arshad Khan	E/Ghund	61.18	do	do
03	Farida Begum D/o Badshah Khan	Halimzai	37.09	do	do
04	Shaista Bdegum D/o Rehan	Halimzai	20.39	do	do

**TERMS/CONDITIONS**

1. The appointments of the candidates are purely made on temporary basis and are liable to termination any time without assigning any reason.
2. They are entitled to avail all kinds of benefits specified for Govt: servants including CP Fund, except Pension, gratuity and GP Fund.
3. They will produce Health and Age certificate is issued by the Agency Surgeon Mohmand Agency.
4. A Candidate will not be handed over the charge of her post if she is below 18 Years and above 10 Years on 16.5.2009.
5. If any certificate i.e. SSC Certificate FA, BA, MA, Service Certificate OR Domicile Certificate of any candidate proves fake bogus at any stage, the appointment of the particular candidate will be considered as cancelled.
6. That verifications of the Documents will be made through the office of the undersigned.
7. No payment will be made to any candidate till the verification of her all documents from the institution concerned.
8. If a candidate fails to report his arrival for duty at particular station within 15 days her appointment will be deemed as cancelled.
9. If the appointment of a particular candidate is made against a situation where the required vacancy is not available, then the appointment of the candidate with the lowest merit in the particular Tehsil, will be withdrawn.
10. If a candidate wishes to resign the post, she will have to give one month prior notice or pay for the one month will e forfeited in lieu then of.
11. The service Books of the candidates must be prepared when they are given the charge of their duties.
12. Charge Reports should be submitted to all concerned.

(MOHAMMAD YOUSAF)

Agency Education Officer,  
Mohmand Agency at Ghallanai.

Endst: No. 1817-27/ dated 29/10/2009.

Copy to:-

1. Director of Education, FATA, NWFP, Peshawar.
2. Political Agent Mohmand Agency at Ghallani.
3. Head Masters Concerned.
4. Agency Accounts Officer, Mohmand Agency at Ghallani.
5. Agency Surgeon Mohmand at Ghallani.
6. Candidates concerned.
7. I/C EMIS local office.
8. AAEO, concerned local office.
9. Cashier local office.
10. Notice Board local office.
11. Dealing Asstt: E-I local office.

*Attest to be  
true copy  
(MB)*

(7A) - Better copy

**BETTER COPY OF THE PAGE NO.9**  
**OFFICE OF THE AGENCY EDUCATION OFFICER MOHMANDS**  
**AT GHALLANAI**  
**NO. 1070/DATED 19/02/2013**

Subject: **TRANSFER/POSTING**

Memo:

Following Transfer/Posting of Female L/Asstt is hereby ordered to the School noted against her name on her own pay and scale in the interest of public Service.

S.No.	Name & Desig	Present Posting	Transferred to	Remarks
1.	Shaista Bibi L/Asstt	GGHSS Ghallani	GGHS Bad Kor.	against vacant Post.

Note

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.

Agency Education Officer  
Mohmand Agency at Ghallani

Endst No. \_\_\_\_\_/Dated \_\_\_\_\_/2013  
Copy to.

1. Principal GGHSS Challani
2. Head Mistress GGHS Bad Kor.
3. AAO at Ghallani
4. Applicant Concerned.

Agency Education Officer  
Mohmand Agency at Ghallani

(8)

Anex. "C"

To

The District Education Officer (Female), District Mohmand.

**APPEAL FOR THE RELEASE OF SALARIES FROM FEB. 2013 TILL DATE AND ADJUSTMENT OF THE APPELLANT ON HER OWN SEAT i.e LAB ASSISTANT AT GGHS GHALANI, DISTRICT MOHMAND.**

Respected Sir/Madam,

The appellant humbly submits as under:

1. That the appellant belongs to a respectable family and law abiding citizen of Tehsil Halimzai, District Mohmand.
2. That the appellant was appointed as Lab Assistant (Female Post) in (BPS-7) on dated: 29-10-2009 at Govt Girls High School Ghalani, the then Upper Mohmand Agency.

(Copy of Appointment Order is attached as annexure 'A')

3. That the appellant performed her duties to the best of her abilities. On dated: 19-02-1013, the Appellant was transferred from Govt Girls High School Ghalani to Govt Girls High School Dab Kor, Lower Mohmand.

(Copy of Transfer Order is attached as annexure 'B')

4. That it was the peak time of insurgency, lawless and unruly element, were governing the area of Dab Kor and its surrounding. The said school was closed due to the uncertain situations, as no government writ was then in the area. Furthermore, that appellant was threatened by anti-state element not to carry out the government job otherwise the appellant will pay the consequences and this matter was duly reported to your good self as well as to high-ups of law enforcing agencies but no step was taken and no shelter was provided to appellant and the school was closed. Your good self not issued proper order either to adjust the appellant on her own seat or to ask the Principal of GGHS Dab Kor to accept the arrival report.

(Copies of Applications to AEO (Agency Education Officer), PA Mohmand and Commandant Mohmand Rifles are respectively annexed as 'C' and 'D')

- 5. That in GGHS Dab-Kor, a Lab Assistant namely Mst. Qurat-ul-Ain was already on duty. Hence on this score arrival report of the appellant was not accepted when the appellant honored the transfer order.
- 6. That the Appellant made various applications to adjust the Appellant on her own seat, i.e at GGHS Ghalani and release the monthly pay, but till now neither the appellant is adjusted to her own seat nor is her monthly pay released since 2013.

(Copies of Applications are annexed herewith)

- 7. That since February 2013, the Appellant seat is in vacum, roaming from one office to another but so far, no new order of her transfer is made neither the Appellant adjusted to her own seat nor her salaries released till now.

It is therefore, the Appellant most humbly requested that on acceptance of the instant appeal, the salaries from February 2013 till date be released and the Appellant may be adjusted on her own seat i.e Lab Assistant at GGHS Ghalani, Mohmand.

Dated: 27/09/2019

*Shaista Begum*

Yours Sincerely,

**Shaista Begum (Lab Assistant),  
Education Department**

CNIC No: 17103-0586463-2

Cell No: 0333-9000723

*Attested to be  
True copy*

*[Signature]*

کہ متصفا - اجیسی اجیسی امیر صہب (پہلی) علیہ

ایسے ہر ایک انٹرنیشنل اور پبلک  
سٹیوٹوں اور سال 2013ء تا 2019ء تک

قائم ہونے سے قبل کے تمام ریکارڈ

دائریہ میں سالہ عبورہ 27<sup>10</sup> / 2009 کو لغویہ ایسٹ علیہ تصدیق سے ہوئی

ہوئی تھی۔ لیکن سائیکل کے بارے میں ڈیٹا کے مطابق ایسٹ میں انجام دیا ہے۔

اور تصدیق سے اس دوران میں سائیکل کے ڈیٹا کے مطابق ایسٹ میں انجام دیا ہے۔

انٹرنیشنل سرانجام کے بارے میں سائیکل کے ڈیٹا کے مطابق ایسٹ میں انجام دیا ہے۔

کے بارے میں سائیکل کے ڈیٹا کے مطابق ایسٹ میں انجام دیا ہے۔

یہ تھا۔ حکومت اور کابینہ کے درمیان میں اس دوران میں سائیکل کے ڈیٹا کے مطابق ایسٹ میں انجام دیا ہے۔

حکومت اور کابینہ کے درمیان میں اس دوران میں سائیکل کے ڈیٹا کے مطابق ایسٹ میں انجام دیا ہے۔

میں سائیکل کے ڈیٹا کے مطابق ایسٹ میں انجام دیا ہے۔

تو اس بارے میں سائیکل کے ڈیٹا کے مطابق ایسٹ میں انجام دیا ہے۔

سائیکل کے ڈیٹا کے مطابق ایسٹ میں انجام دیا ہے۔

سائیکل کے ڈیٹا کے مطابق ایسٹ میں انجام دیا ہے۔

سائیکل کے ڈیٹا کے مطابق ایسٹ میں انجام دیا ہے۔

سائیکل کے ڈیٹا کے مطابق ایسٹ میں انجام دیا ہے۔

3-12-2018

سائیکل

Attested to be  
true copy

Shauke Megam

گرفتہ وقت AEO کے لئے (زبان)

درخواست گزار کی جانب سے  
اور Adjust

کاپی

سائنس کی کمیٹی CAB اسٹڈی ڈیویژن کے ذریعہ  
سائنس کا سرٹیفکیٹ دینے کے لئے درخواست دی گئی ہے۔  
مستندہ سائنس کا سرٹیفکیٹ دینے کے لئے درخواست دی گئی ہے۔  
انفارمیشن اور کیا کہ بیان ہے اس کے لئے درخواست دی گئی ہے۔

سائنس کی کمیٹی کے ذریعہ  
اور اس کے لئے درخواست دی گئی ہے۔

9-9-2014

Attested to be true copy

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Handwritten signature: Shaukat Begum



AAEC میں (طبی، زنا) -

درخواست گزار کی رپورٹ

فروری 2013ء

4- علی

مقامی کمیٹی کی رپورٹ

سراہم کے رپورٹ

فروری 2013ء سے

2013

اور کامیابیوں سے

مقامی کمیٹی کی رپورٹ

فروری 2013ء سے

مقامی کمیٹی کی رپورٹ

فروری 2013ء سے

مقامی کمیٹی کی رپورٹ

Attested to be true copy

[Signature]

7-4-2014

Shant Begam

گورنمنٹ آف پاکستان AEO کے تحت (پرائیویسیٹی) کے تحت

# درخواست - Release کے خواہ

ان ضروری 2013 تا حال اور نظر ثانی کے لئے درخواستیں

جی - عالی

سائنس کے شعبہ کے تحت

1- یہ درخواستیں کے لئے درخواستیں (پرائیویسیٹی) کے تحت (Lab Assn)  
 کے تحت درخواستیں کے لئے درخواستیں (پرائیویسیٹی) کے تحت  
 کے لئے درخواستیں کے لئے درخواستیں (پرائیویسیٹی) کے تحت  
 کے لئے درخواستیں کے لئے درخواستیں (پرائیویسیٹی) کے تحت  
 کے لئے درخواستیں کے لئے درخواستیں (پرائیویسیٹی) کے تحت

کے لئے درخواستیں کے لئے درخواستیں (پرائیویسیٹی) کے تحت  
 کے لئے درخواستیں کے لئے درخواستیں (پرائیویسیٹی) کے تحت  
 کے لئے درخواستیں کے لئے درخواستیں (پرائیویسیٹی) کے تحت

11-12-2013

Stalin Begum  
 کے لئے درخواستیں کے لئے درخواستیں (پرائیویسیٹی) کے تحت  
 کے لئے درخواستیں کے لئے درخواستیں (پرائیویسیٹی) کے تحت

Attest to be true copy

محمد من عدنان الحسن، گواہی، آفر صہ

(15)

Anex. "H"

درخواست سہ ماہی کے لئے منظور ہو

عدنان علی کا سفر مختلف در خواہ میں

کہ ڈن دور میں جوتہ موصت اور طالبان کے درمیان لڑائی

ہوئی ہے اور اسلحوں ڈن کے درمیں جاری ہو سکتی ہے

اسلحوں کے لئے سہ ماہی یا تو ایسے ہو سکتے ہیں

میں اور اسلحوں کیا جائے

اور میری درخواست بھی دیکھی جائے

کیونکہ میرے بچے میں اور نہ لائے اپنے اسلحوں میں

میں ایسے نہ ہی ڈن کے لئے میں اور نہ ہی درخواست

ہے

شکر

25-11-2013

Shauko Begam

Attested to be  
true copy

Signature

حکومت عدالت انجمن ایجوکیشن امرتسر

درخواست نرائے والین نرے شرا سفر اردو  
پائیس جی دبیر سکول میں نرے سفر لیا جائے

عدالت عالیٰ

میں 20 درخواست مورخہ 2013-3-6 نو

آپ عدالت نودی ہے جس میں التیامی ٹی ہے نہ

یا تو مجھے اپنے پوسٹ پر ~~پوسٹ~~ والی کھینچا جائے یا پائیس

دبیر سکول پر ایڈمیشن لیا جائے کیونکہ اس سکول

ڈن نور میں فرتہ الفتن صافہ اس پوسٹ پر لے لے ہے

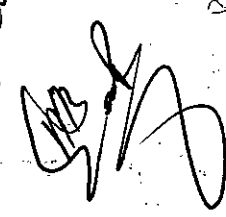
معاذ کری ہے اور صبری شجولہ جی بند ہے

اس نو جی حکم لیا جائے نہ مجھے ادائے

9.7.2013

Attested to be  
true copy

Shauka Begum



خدمت ص - ڈسٹریکٹ ایجنٹ (P.A) صاحب محمد اجسی

درخواست برائے تحفظ فراہم کرنے

صاحب عالی -


میں بدرالہم درخواست کانڈنٹ صاحب اور  
 AEO محمد اجسی سے تحفظ فراہم کرنے کی درخواست کی تھی۔  
 میں گورنمنٹ گریڈر تعلیمی سکول علیہ میں بطور "کلب اسٹ" کا  
 کام کرتی ہوں۔ مجھے مسلسل دھمکیاں مل رہی ہیں کہ سکول  
 کو آنا جانا چھوڑ دو ورنہ ہم جیسا مار دیں گے۔ اور سکول  
 کو بھی ختم کر دیں گے۔

میرا بانی و مالک مجھے اور سکول سے کالوں کو فراہم کرتا ہے۔  
 تحفظ فراہم کیا جائے۔

شکریہ

تاریخ 9-4-2013

فقط ذمہ دارہ ادا -

Attested to be  
 true copy  


Shaiqa Begum

(مستند)

آئی کی بی بی

شائشا بیگم

رائٹر فون - 0333-9000723

خدمتِ جناب کمانڈنٹ صاحب نمبر رائفلز

(18)

Amek. "K"

صاحب عالی

وَدیانہ گزارش ہے کہ

میں ڈرامنٹ گورنر چھائی سکول علی، مہمند ایجنسی  
 میں بطور Lab Assistant اپنی ذمہ داریاں پوری سنری  
 سے سرانجام دے رہی ہوں۔ کہ گزشتہ ایک مہینے سے  
 مسلسل جمعے دھکیاں مل رہی ہے کہ خواتین گھروں  
 سے باہر نہیں نکلتی اور نوکریاں نہیں کرتی۔ لہذا  
 سکول کی نوکری چھوڑ دو اور طالبات کو بھی اطلاع  
 دو کہ وہ بھی سکول نہ آئے۔ اگر تم نے ہماری  
 حکم نہ مانی تو ہم تمہیں جانا سے مار دیں گے۔

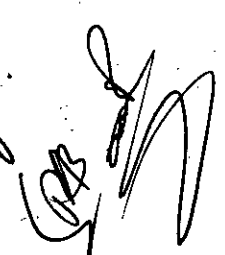
صاحب عالی

آپ کی خدمت میں التماس ہے کہ مجھے محفوظ فرم

کیا جائے۔  
Shaukha Begum

المقوم 29-3-2013

آپ کی خدمت  
شائشا بیگم (Lab Assistant)

Attest to be  
copy  


فون = 9000723-0333

درخواست مراد فرقا (protection) رضوف طالب

صاحب عالی

کہ میری گورنمنٹ گزٹری ہائی سکول ڈسٹریکٹ  
میری گورنمنٹ ہوائی ہے۔ تو اس مسئلے میں جب میں نے  
صاحب کو ملے جاری تھی۔ تو چند مہینے افراد نے مجھے روک  
دیا اور کہا کہ ہم آپ کو جان سے مار دیں گے اور سکول  
کو کم سے اٹھا دینگے اگر تمہیں کوئی نہیں چھوڑی تو تمہاری  
خیر نہیں ہے۔ دہائیوں میں بھی بس سٹاپ جاری تھی تو صحت  
لوگوں نے مجھے روکا اور کہا کہ ہم جان سے ڈر رہے تھے اور  
گورنمنٹ ہوائیوں۔ ورنہ ہمیں آپ کا کام کرنا پڑتا ہے۔ صحت  
مجھے ڈر محسوس ہوا اور میں کل گھر سے نہیں نکلتی ہوں۔  
برائے میری تھی فقط فراموش ہوا۔

تاریخ - 27-3-2013

Attested to be  
the copy  
of the  
original

Shauzia Begum

سائید

سائیدہ بیگم

(Lab Assistant)

محکمات جناب A.E.O پر موصول ہو گئی

درخواستیں اسرار حازی کر کے سکواہ  
واپس کر دی گئی ہیں

جناب علی بی نار اس کی درخواست بھی علی ہے

کہ بائو مجھے ایسے سکول ایسے پوسٹ پر

جو اعلیٰ تہ تک Vacant ہے نہ واپس کر دیا جائے

یا کسی بھی دیگر سکول میں واپس کر دیا جائے

میں چونکہ علی کریم صاحب کی سکول میں

موجود L Asst ملازم برقی علی خرد سے Vacant post ہے

مجھے تو علی کریم صاحب کی سکول ڈس آر

علی کریم صاحب پر لیس اسٹاف فوٹو العین

تعمینات ہے مجھے میری سکواہ بھی دانی جائے

اور میری لیس کا سہلہ بھی دیا جائے

فرم 6-3  
2013

شکر ہے

Attested to be  
true copy

Shaiqa Begum



حکومت خزان A.E.O صاحب علی محمد احمد الحسن

ادنیل سرکار ایڈیشن میں دستخط مرحمت

ڈائریکٹر سائل

خزان مالی ا سائل کو سائل 19<sup>2</sup> 2013 کو نوٹیشن ہائپر

سلیڈرہ سائل ڈن نوٹ نو ہوئی ہے۔ خزان مالی ا سائل

vacant post پر نہیں آیا ہے۔ خزان پر فوری ا سائل خزان پر

سے ڈیوٹی سرایم دینی ہے۔ سبھی نوٹیشن سے آ رہے ہیں

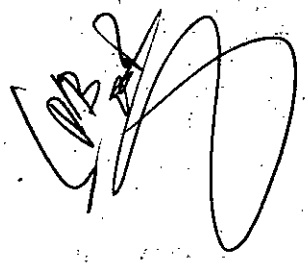
کھینچا جائے۔ یا کسی دیگر سکول نوٹیشن یا دیگر خزان



دیا جائے لیونہ اس علاقہ میں سکول خزان ہو رہی ہے

صدر  
6-3-2013

Shaukat Begum

Attested to be  
True Copy



<p>37755</p> <p>ایڈوکیٹ: <u>Mansoor Alam</u></p> <p>بار کونسل ایسوسی ایشن نمبر: <u>1565-09-60</u></p> <p>رابطہ نمبر: <u>0300-5730524</u></p>	  
<p>پشاور بار ایسوسی ایشن، خیبر پختونخوا</p>	

بعدالت جناب: مہروس ٹریڈنگ اینڈ سٹورس

<p>مخانب: <u>ایڈووکیٹ</u></p> <p><u>سائنسدہ بیگم</u></p> <p>بنام <u>مسٹر مہروس ٹریڈنگ اینڈ سٹورس</u></p>	<p>دعویٰ: <u>Service Appeal</u></p> <p>علت نمبر:</p> <p>مورخہ:</p> <p>جرم:</p> <p>تھانہ:</p>
<p><b>بابت تحریر آگے</b></p>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام سائنسدہ بیگم کے لیے عبدالرحمن اللہ، پتو کمال، منظر عالم کوہیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقررات و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق و زبانی پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یا نظر نہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے یقیناً اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخستہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ اتوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم:

21-01-2020

DESHAWAN DAN KHAYBER DAN TUNKHWA

سائنسدہ بیگم (ایب اسٹیٹ) ایجوکیشن ڈیپارٹمنٹ سالک ایئر ٹولم سیکور

ایب اسٹیٹ

CNIC # 17103-0586463-2

نوٹ: اس وکالت نامہ کی ذمہ داری ناقابل قبول ہوگی۔

مقام لہور

Handwritten signature: Attested & accepted

①

BEFORE THE HON'BLE  
SERVICE TRIBUNAL KHYBER PAKHTUNKHWA  
PESHAWAR

Service Appeal No. 1080 /2020

Khyber Pakhtunkhwa  
Service Tribunal

Slary No. 182

Date 23/01/2020

Shaista Begum (Lab Assistant) Education Department,  
R/o Peer Qila Shabqadar, District Charsadda

(Petitioner)

VERSUS

- 1) Secretary Education, Khyber Pakhtunkhwa, Peshawar
  - ~~1) Secretary Education Department, Warska Road, Peshawar~~
  - ~~2) Director Education, Khyber Pakhtunkhwa, Peshawar~~
  - ~~2) Director Education (Female) District Mohmand at Ghalani~~
  - ~~3) District Education Officer (Female) Ghalani, District Mohmand~~
  - ~~3) Assistant Education Officer, District Mohmand at Ghalani~~
  - ~~4) Assistant District Education Officer (Female) Ghalani, District Mohmand~~
  - ~~4) Account Officer, Education Officer, District Mohmand at Ghalani~~
  - 5) Accounts Officer, Education Office Department, Ghalani, District Mohmand
- (Respondents)

order sheet  
28/09/20

Filed to day  
Registrar 28/1/20

Appeal Under Section 4 of the KPK Service Tribunal Act, 1973, the respondents may kindly be directed to release the salaries of

the petitioner.

Registrar

Respectfully Sheweth,

18/2/20

The petitioner most humbly submits as under:

(2)

1. That the petitioner belongs to respectable family and law abiding citizen of Pakistan.
2. That the petitioner was appointed as Lab Assistant on 27.10.2009 at Govt. Girls High School Ghalani, the then upper Mohmand Agency. (Copy of service book <sup>Appointment Order</sup> is attached as Annexure A)
3. That the petitioner performed her duties to the best of her abilities till 19.02.2013 on which she was transferred from Govt. Girls High School Ghalani to Govt. Girls High School Dab Kor Lower Mohmand. (Transfer Order is attached as Annex. B)
4. That it is pertinent to mention here that it was the peak time of insurgency, lawless and unruly element, were governing the area of Dab Kor and its surrounding area the said school was closed due to the uncertain situation, as no government writ was then in the area.
5. That it is worth mention here that in Govt. Girls High School Dab Kor, a Lab Assistant namely Mst. Qurat-ul-Ain was already on duty, when, the petitioner inquired from respondent.
6. That petitioner, made various applications to the respondent to adjust the petitioner on her own seat, i.e. Govt. Girls High School Ghalani and

3

release the monthly pay, but till now neither the petitioner is adjusted to her own seat nor the monthly pay is released since 2013. So the instant service appeal on the following among other grounds. *(Applications are attached herewith)*

Grounds:

- a) That the act, of the respondent are against the law and basic human right guaranteed by the constitution of Islamic Republic of Pakistan.
- b) That the post of petitioner is still lying vacant and the respondent are not adjusting the petitioner, on her own seat, neither releasing her salaries, these acts of the respondent are against the law.
- c) That the respondents should not be allowed to be wiser, then law and in the garb of colorful exercise of power, they cannot be allowed to deprive the petitioner from her vested and basic rights.
- d) That any other ground will be raised at the time of arguments with prior permission of this hon'ble court.

**It is, therefore, most humbly prayed that on acceptance of the instant service appeal, an**

(4)

appropriate order may be issued, directing the respondents to release the salaries of petitioner from February 2013 till now.

*Shaista Begum*  
Petitioner

Through

*Kanwar*

**Kanwar Kamal  
& Manzoor Alam Khan  
& Malik Ihsan Ullah**  
Advocates High Court,  
Peshawar

*MB*  
*Manzoor*

Date: 21.01.2020

**Note:** No such service appeal on the same subject matter has earlier been filed before this hon'ble court.

Advocate

*MB*  
*Manzoor*

**AFFIDAVIT**

I, Shaista Begum W/o Essa Khan R/o Haleemzai, P.O. Shabqadar, District Charsadda, do hereby solemnly affirm and declare on Oath that the contents of the instant service appeal are true and correct to the best of my knowledge and belief and nothing has been conceal from this hon'ble court.

*Shaista Begum*  
DEPONENT

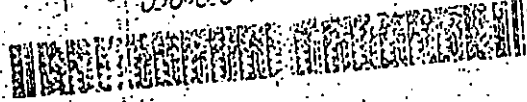
Shaista Begum  
CNIC No. 17103-0586463-2  
Cell No. 0333-9000723



21 JAN 2020

(7)


  
 گورنمنٹ پنجاب  
 گورنمنٹ سروسز  
 لاہور  
 7103-0586463-2  
 عثمان یوسف خان  
 03/03/1990  
 سٹیشننگ آفیسر  
 سٹیٹ ٹرانسپورٹ کورپوریشن  
 لاہور

UR1E5A  
 لاہور  
 7103-0036403-2  
 عثمان یوسف خان  
 25/02/2025  
 20/02/2015  


Anex (A)

**APPOINTMENT ORDER**

Consequent upon the recommendations of the Recruitment Committee the appointment of the following named candidates are made against Lab: Assst. (Female) posts in BPS No. 07 plus usual allowances in the schools noted against their names from the dates of their taking over charge.

S.No	Name with parentage	Tehsil	Merit Marks	Place of Posting	Remarks
01	Aisha Taurat D/O Taurat Khair	12/Chund	61.52	GISHS Ghallanai	Vacant Post
02	Saira Arshad D/O Arshad Khan	12/Chund	61.18	do	do
03	Fariha Begum D/O Badshah Khan	Halimza	57.09	do	do
04	Shaista Bdegom D/O Rehan	Halimza	20.39	do	do

**TERMS/CONDITIONS**

- The appointments of the candidates are purely made on temporary basis and are liable to termination at any time without assigning any reason.
- They are entitled to avail all kinds of benefits specified for Govt. servants, including CP Fund, except Pension, gratuity and GP Fund.
- They will produce Health and Age certificate issued by the Agency Surgeon Mohmand Agency.
- A Candidate will not be handed over the charge of her post if she is below 18 Years and above 40 Years on 16.5.2009.
- If any certificate i.e. SSC Certificate, F.A, B.A, M.A, Service Certificate OR Domestic Certificate of any candidate proves fake bogus at any stage, the appointment of the particular candidate will be considered as cancelled.
- The verifications of the Documents will be made through the office of the undersigned.
- No payment will be made to any candidate till the verification of her all documents from the institution concerned.
- If a candidate fails to report his arrival for duty at her particular station, within 15 days, her appointment will be deemed as cancelled.
- If the appointment of a particular candidate is made against a situation where the required vacancy is not available, then the appointment of the candidate with the lowest merit in the Particular Tehsil will be withdrawn.
- If a candidate wishes to resign the post, she will have to give one month prior notice or pay for the one month will be forfeited in lieu thereof.
- The service Books of the candidates must be prepared when they are given the charge of their duties.
- Charge Reports should be submitted to all concerned.

(MOHAMMAD YOUSAF)  
Agency Education Officer,  
Mohmand Agency at Ghallanai.

Order No. 817-27 dated 29/10/2009.  
Copy to:-

- Director of Education, FATA, NWFP, Peshawar.
- Political Agent, Mohmand Agency at Ghallanai.
- Head Masters Concerned.
- Agency Accounts Officer, Mohmand Agency at Ghallanai.
- Agency Surgeon Mohmand at Ghallanai.
- Candidates concerned.
- IC EMIS local office.
- AAEO, concerned local office.
- Cashier local office.
- Notice Board local office.
- Dealing Assst. F-1 local office.

*Attached to be true copy*  
*[Signature]*

**Manzoor Alam Khan Safi**  
Advocate Peshawar High Court  
and Federal Shariat Court  
Mob: 0300-5730524



**BETTER COPY OF THE PAGE NO.8**  
**OFFICE OF THE AGENCY EDUCATION OFFICER MOHMANDS AT**  
**GHALLANAI**

**APPOINTMENT ORDER:-**

Consequent upon the recommendation of the Recruitment Committee the appointment of the following named candidates are made against Lab: Asstt: (Female) posts in BPS No. 07 plus usual allowances in the schools noted against their names from the dates of their taking over charge.

S.N	Name with percentage	Tehsil	Merit Marks	Place of Posting	Remarks
01	Aisha Taurat D/o Taurat Khan	E/Ghund	61.32	GGUS Ghallanai	Vacant Post
02	Saira Arshad D/o Arshad Khan	E/Ghund	61.18	do	do
03	Farida Begum D/o Badshah Khan	Halimzai	37.09	do	do
04	Shaista Bdegum D/o Rehan	Halimzai	20.39	do	do

**TERMS/CONDITIONS**

- The appointments of the candidates are purely made on temporary basis and are liable to termination any time without assigning any reason.
- They are entitled to avail all kinds of benefits specified for Govt: servants including CP Fund, except Pension, gratuity and GP Fund.
- They will produce Health and Age certificate is issued by the Agency Surgeon Mohmand Agency.
- A Candidate will not be handed over the charge of her post if she is below 18 Years and above 10 Years on 16.5.2009.
- If any certificate i.e. SSC Certificate FA, BA, MA, Service Certificate OR Domicile Certificate of any candidate proves fake bogus at any stage, the appointment of the particular candidate will be considered as cancelled.
- That verifications of the Documents will be made through the office of the undersigned.
- No payment will be made to any candidate till the verification of her all documents from the institution concerned.
- If a candidate fails to report his arrival for duty at particular station within 15 days her appointment will be deemed as cancelled.
- If the appointment of a particular candidate is made against a situation where the required vacancy is not available, then the appointment of the candidate with the lowest merit in the particular Tehsil will be withdrawn.
- If a candidate wishes to resign the post, she will have to give one month prior notice or pay for the one month will e forfeited in lieu then of.
- The service Books of the candidates must be prepared when they are given the charge of their duties.
- Charge Reports should be submitted to all concerned.

(MOHAMMAD YOUSAF)  
 Agency Education Officer,  
 Mohmand Agency at Ghallanai.

Endst: No. 1817-27/ dated 29/10/2009.

- Copy to:-
- Director of Education, FATA, NWFP, Peshawar.
  - Political Agent Mohmand Agency at Ghallani.
  - Head Masters Concerned.
  - Agency Accounts Officer, Mohmand Agency at Ghallani.
  - Agency Surgeon Mohmand at Ghallani.
  - Candidates concerned.
  - I/C EMIS local office.
  - AAEO, concerned local office.
  - Cashier local office.
  - Notice Board local office.
  - Agency Asstt. F.I local office.

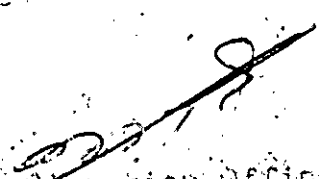
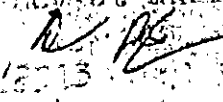
Subject: TRANSFER/POSTING

Nemo,  
Following Transfer/Posting of Female L/Asstt is hereby ordered to the School noted against her name on her own pay and scale in the interest of Public Service:

S. No	Name & Desig	Present Posting	Transferred to	Remarks
1.	Shaista Bibi L/Asstt	GCMSB Chailani	GCMS Dab For.	Assistant vacant lost.

Note:

1. No TA/DA is allowed.
2. Leave reports should be submitted to all concerned.

  
 Agency Officer  
 Chailani Agency at Chailani  
  
 2013

Subject No \_\_\_\_\_ /Date \_\_\_\_\_

Copy to:

1. Principal GCMSB Chailani
2. Head Mistress GCMS Dab For.
3. AAO at Chailani
4. Applicant Concerned

Ali  
 27/11

Manzoor Alam Khan Safi  
 Advocate Peshawar High Court  
 and Federal Shariat Court  
 Mob: 300-573054

**BETTER COPY OF THE PAGE NO.9**  
**OFFICE OF THE AGENCY EDUCATION OFFICER MOHMANDS**  
**AT GHALLANAI**  
**NO. 1070/DATED 19/02/2013**

Subject: TRANSFER/POSTING

Memo:

Following Transfer/Posting of Female L/Asstt is hereby ordered to the School noted against her name on her own pay and scale in the interest of public Service.

S.No.	Name & Desig	Present Posting	Transferred to	Remarks
1.	Shaista Bibi L/Asstt	GGHSS Ghallani	GGHS <u>Bad Kor</u> <i>Dab</i>	against vacant Post.

Note

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.

Agency Education Officer  
Mohmand Agency at Ghallani

Endst No. \_\_\_\_\_ /Dated \_\_\_\_\_ /2013  
Copy to.

1. Principal GGHSS Challani
2. Head Mistress GGHS Bad Kor.
3. AAO at Ghallani
4. Applicant Concerned.

Agency Education Officer  
Mohmand Agency at Ghallani

To

The District Education Officer (Female), District Mohmand.

**APPEAL FOR THE RELEASE OF SALARIES FROM FEB. 2013 TILL DATE AND ADJUSTMENT OF THE APPELLANT ON HER OWN SEAT i.e LAB ASSISTANT AT GGHS GHALANI, DISRICT MOHMAND.**

Respected Sir/Madam,

The appellant humbly submits as under:

- 1. That the appellant belongs to a respectable family and law abiding citizen of Tehsil Halimzai, District Mohmand.
- 2. That the appellant was appointed as Lab Assistant (Female Post) in (BPS-7) on dated: 29-10-2009 at Govt Girls High School Ghalani, the then Upper Mohmand Agency.

(Copy of Appointment Order is attached as annexure 'A')

- 3. That the appellant performed her duties to the best of her abilities. On dated: 19-02-1013, the Appellant was transferred from Govt Girls High Shool Ghalani to Govt Girls High School Dab Kor, Lower Mohmand.

(Copy of Transfer Order is attached as annexure 'B')

- 4. That it was the peak time of insurgency; lawless and unruly element, were governing the area of Dab Kor and its surrounding. The said school was closed due to the uncertain situations, as no government writ was then in the area. Furthermore, that appellant was threatened by anti-state element not to carry out the government job otherwise the appellant will pay the consequences and this matter was duly reported to your good self as well as to high-ups of law enforcing agencies but no step was taken and no shelter was provided to appellant and the school was closed. Your good self not issued proper order either to adjust the appellant on her own seat or to ask the Principal of GGHS Dab Kor to accept the arrival report.

(Copies of Applications to AEO (Agency Education Officer), PA Mohmand and Commandant Mohmand Rifles are respectively annexed as 'C' and 'D')

5. That in GGHS Dab Kor, a Lab Assistant namely Mst. Qurat-ul-Ain was already on duty. Hence on this score arrival report of the appellant was not accepted when the appellant honored the transfer order.
6. That the Appellant made various applications to adjust the Appellant on her own seat, i.e at GGHS Ghalani and release the monthly pay, but till now neither the appellant is adjusted to her own seat nor is her monthly pay released since 2013.

(Copies of Applications are annexed herewith)

7. That since February 2013, the Appellant seat is in vacuum, roaming from one office to another but so far, no new order of her transfer is made neither the Appellant adjusted to her own seat nor her salaries released till now.

It is therefore, the Appellant most humbly requested that on acceptance of the instant appeal, the salaries from February 2013 till date be released and the Appellant may be adjusted on her own seat i.e Lab Assistant at GGHS Ghalani, Mohmand.

Dated: 27/09/2019

*Shaista Begum*

Yours Sincerely,

**Shaista Begum (Lab Assistant),  
Education Department**

CNIC No: 17103-0586463-2

Cell No: 0333-9000723

کہ متعلقہ ایجنسیوں کی طرف سے (پہلے) عملی

1۔ اسل سرائے ایئر سٹیشن پر ایئر فیلڈ  
تعمیراتی کاموں کے لیے 19.2.13ء کو

حقا یقیناً اس سائڈ سے زمین لیا گیا ہوگا۔

دعا ہے کہ اس سائڈ پر مورچہ 27<sup>10</sup> کو تعمیر کیا گیا ہے جس میں لوگ

سوئی گئے۔ جبکہ اس سائڈ سے ایئر فیلڈ پر تعمیراتی کاموں کے لیے زمین لیا گیا ہے۔

اگر متعلقہ ایجنسیوں نے اس سائڈ سے زمین لیا ہے تو اس سائڈ سے زمین لیا گیا ہے۔

اس سائڈ سے زمین لیا گیا ہے۔ اس سائڈ سے زمین لیا گیا ہے۔

اس سائڈ سے زمین لیا گیا ہے۔ اس سائڈ سے زمین لیا گیا ہے۔

اس سائڈ سے زمین لیا گیا ہے۔ اس سائڈ سے زمین لیا گیا ہے۔

اس سائڈ سے زمین لیا گیا ہے۔ اس سائڈ سے زمین لیا گیا ہے۔

اس سائڈ سے زمین لیا گیا ہے۔ اس سائڈ سے زمین لیا گیا ہے۔

اس سائڈ سے زمین لیا گیا ہے۔ اس سائڈ سے زمین لیا گیا ہے۔

اس سائڈ سے زمین لیا گیا ہے۔ اس سائڈ سے زمین لیا گیا ہے۔

اس سائڈ سے زمین لیا گیا ہے۔ اس سائڈ سے زمین لیا گیا ہے۔

اس سائڈ سے زمین لیا گیا ہے۔ اس سائڈ سے زمین لیا گیا ہے۔

اس سائڈ سے زمین لیا گیا ہے۔ اس سائڈ سے زمین لیا گیا ہے۔

اس سائڈ سے زمین لیا گیا ہے۔ اس سائڈ سے زمین لیا گیا ہے۔

3-12-2018

سائڈ

Shaukat Mehmood

اگریت سے AEO سے علیحدگی (زبان)

درجہ بندی پر جاری کی گواہ  
اور Adjust

جای

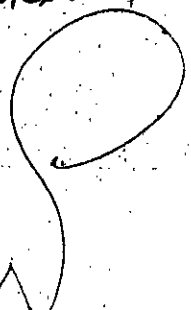
سائنس اکیڈمی CAB اسٹیٹ ڈیپارٹمنٹ آف ایڈیٹری  
سیٹم کا ٹرانسفر ڈیپارٹمنٹ میں کیا گیا ہے جس میں سائنس  
متعلقہ سیکشن میں جانے لگے گا تو متعلقہ ایجنسی  
انفارمیشن اور کیا کہ بیان میں آئی اسٹیٹ میں ہے

پیشہ اسی کے لیے جو ہم سے سائنس کا کورس  
آف ایڈیٹری کے لیے جاننے کے لیے جاننا

9-9-2014

ن نام  
سائنس کے لیے ایڈیٹری

Shahid Beynon



AAEC (پیدا) (طبی) (زبان) -

درخواست نامہ اور درخواست نامہ

از فروری 2013 تا حال

۲  
۴-۱

مہتمم کالج کیمبرج کالج کیمبرج

سرکار کیمبرج کیمبرج کیمبرج

میں سالانہ امتحان 1992 سے لے کر

2013

اور کالج میں کیمبرج کیمبرج

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میں سالانہ امتحان کیمبرج کیمبرج

Shant Begum

7-4-2014



گورنمنٹ آف پاکستان AEO کے تحت جاری کی گئی ہے (پرائیویٹ)

درخواست - Release کے لئے درخواستیں  
11 فروری 2013ء کو قابل اور پھر شمالی ٹریڈ سیکرٹری آف ڈرائیو

ص - 41

سائنس ڈیپارٹمنٹ

1۔ یہ سائنس ڈیپارٹمنٹ کے سائنس دانوں کی (Lab Asstt) کے ساتھ ساتھ ٹریڈ سیکرٹری آف ڈرائیو کے ساتھ ساتھ

دیپارٹمنٹ کے ساتھ ساتھ سائنس ڈیپارٹمنٹ کے ساتھ ساتھ سائنس ڈیپارٹمنٹ کے ساتھ ساتھ سائنس ڈیپارٹمنٹ کے ساتھ ساتھ سائنس ڈیپارٹمنٹ کے ساتھ ساتھ

سائنس ڈیپارٹمنٹ کے ساتھ ساتھ سائنس ڈیپارٹمنٹ کے ساتھ ساتھ سائنس ڈیپارٹمنٹ کے ساتھ ساتھ سائنس ڈیپارٹمنٹ کے ساتھ ساتھ

11-12-2013

سائنس ڈیپارٹمنٹ کے ساتھ ساتھ سائنس ڈیپارٹمنٹ کے ساتھ ساتھ سائنس ڈیپارٹمنٹ کے ساتھ ساتھ سائنس ڈیپارٹمنٹ کے ساتھ ساتھ

شکر میں صبا الحسن، کولتس آفر صبا

Amer.  
"H"

درخواست سرگتہ کے پتہ پر موجود

حدان عالیٰ میں مختلف درخواستیں رہی

کہ ڈن ٹور میں چونکہ ملوث اور طالبان کے درمیان لڑائی  
ہو رہی ہے اور سیکولر ڈن ٹور میں عالی پوسٹ بھی

پہلے سے بھی براہ کرم یا تو ایسے پوسٹ پاسکول

میں ایڈجسٹ کیا جائے

اور میری نخواست بھی ریلیس کی جائے

کیونکہ میرے بچے ہیں اور نہ تو مجھے اپنے سیکول میں جگہ

مل رہی ہے نہ ہی ڈن ٹور میں اور نہ ہی نخواست مل

رہی ہے

شکر

25-11-2013

Shau's Begam

بانی ایف ڈی پبلک سکول میں پرائمری لیا جائے

Anex.  
"I"

جناب عالی!  
میں نے درخواست کو رقم 2013-3-6 کو

آپ جناب کو دی ہے جس میں اتنی ہی ہے کہ

یا تو مجھے اپنے پوسٹ پر ~~پوسٹ~~ والی کھینچا جائے یا اس

پبلک سکول پر ایئر میسٹ لیا جائے کیونکہ اس سکول

ڈان کوڑ میں فریٹ الائن صاف ہے اس پوسٹ پر لیا جائے

مکان پر ہے اور میری تنخواہ بھی بڑھے

اس کو ہی حکم لیا جائے کہ مجھے ادارے

9-7-2013

Shauka Begum

خدمت مند - پولیسنگل ایجنٹ (PA) صاحب محمد اجنبی

درخواست برائے تحفظ فراہم کرنے

صاحب عالی -

میں نذر علیہ دہکوات کمانڈنٹ صاحب اور  
AEO محمد اجنبی سے تحفظ فراہم کرنے کی درخواست کی تھی  
میں گورنمنٹ گورنر عالی سکول علیہ میں بطور الیگ انڈیا  
کام کرتی ہوں۔ مجھے مسلسل دھمکیاں مل رہی ہیں کہ سکول  
کو آنا پانا چھوڑ دو ورنہ ہم تمہیں مار دیں گے۔ اور سکول  
کو بھی ختم کر دیں گے۔

پہلے ہی فرما کر مجھے اور سکول کے طالبانہ کو فراہم کیا گیا۔  
میں نے اس سے انکار کیا۔

شکریہ

9-4-2013

شکریہ

فقط ذمہ دار -

Shaida Begum

آئی ٹی ماہر -

شائستہ بیگم (ایگ ایجنٹ)

رائٹر نمبر - 0333-9000723

حضرت جناب کائنات صاحبہ - محمد رفیق

صاحب عالی

خود جانے گزارش ہے کہ

میں گورنمنٹ گورنر چھائی سکول علی، محمد احمسی

میں بطور Lab Assistant اپنی ذمہ داریاں پوری سنہری  
سے سرانجام دے رہی ہوں۔ کہ گزشتہ ایک مہینے سے

مستقل فوجی دھمکیاں مل رہی ہیں کہ جوائننگوں

سے باہر نہیں نکلتی اور نوکریاں نہیں کرنی! لہذا

سکول کی نوکری چھوڑ دو اور طالبات کو بھی اطلاع

دو کہ وہ بھی سکول نہ آئے۔ اگر تم نے ہماری

حکم نہ مانی تو ہم تمہیں جانا سے مار دیں گے۔

صاحب عالی

آج صبح میں التماس ہے کہ مجھے تحفظ فراہم

کیا جائے -  
Shanisha Begum

المقام 29-3-2013

آپ کی نائبر  
شانیسا بیگم (Lab Assistant)

0333-9000723 = 6

درخواست مراد مراد (protection) بر صاف طالبان

صبا عالی -

کہ میری گونٹ گرنز باغی سکول ڈسٹریکٹ میں  
میری ٹرانسفر ہوئی ہے۔ تو اس سلسلے میں صبا عالی کی  
صاحبہ کو ملنے جا رہی تھی۔ تو چند منہج افراد نے مجھے روک  
دیا اور کہا کہ ہم آپ کو جیل سے خارج کرنے اور سکول  
کو کم سے اٹا دینگے اگر تم نے نوکری نہیں چھوڑی تو تمہاری  
ضیاع نہیں ہے۔ دوسروں کو صبا عالی کی سٹاپ جا رہی تھی تو صبا  
لوگوں نے مجھے روکا اور کہا کہ ہم ہاں سے ڈھکی چھوڑ دوں گا اور  
نگر میں بیٹھ جاؤں۔ ورنہ ہمیں آپ کا کام کرنا پڑتا ہے۔ صبا عالی  
مجھے ڈر محسوس ہوا اور صبا عالی کے گھر سے ہنسی نکلتی ہوں۔  
برائے مہربانی مجھے غلط فہم نہ ہوگا۔

بتاریخ - 27-3-2013

Shahista Begum

سائینس

(Lab Assistant)

عوام کے لئے سہولتوں کی

درخواستوں پر عملدرآمد کے لئے

واپس کرنے کے لئے

حزبان عالی نے بار بار اپنی درخواست کی تھی ہے

کہ بار بار مجھے ایسے سکول ایسے پوسٹ پر

جو ابھی تک Vacant ہے نہ ایڈجسٹ کیا جائے

یہی بھی ڈیپٹی سکول میں ایڈجسٹ کر ڈیپٹی سکول لیا جائے

میں حد تک عملی تر نہ جائے سکول میں

لکچر Asst ملازمہ برقی طور پر Vacant post ہے

مجھے تو نہیں کہ نہ جائے سکول ڈب نہ

فلس ڈیپٹی سکول لیا جائے۔ جہاں پر نہیں اسٹاف میں

تعمیرات ہے مجھے میری نخواستہ بھی ادائیگی جائے

اور میرے پاس کام بند بھی لیا جائے

6<sup>3</sup>/<sub>2013</sub> عوام

شکر

Shaukat Begum

حکومت حیدرآباد A.E.5 صاحب علی محمد احمد

ادنیل سرکار اور سٹیشن وینیل ٹرمینل

ڈرائنگ سائڈ

حضان عالی 1 سائڈ و ٹرانسفر 19<sup>3</sup>/<sub>2013</sub> نو ٹور ٹینٹ ہائپر

سلیڈز کی سکول ڈن نو ہوئی ہے۔ حضان عالی اچھے

Vacant post پر بھی لیا ہے۔ حضان پر فہرہ العین حضانہ ہے

سے ڈیوٹی سر ایچ ایم دیکھی ہے مہتری نر ایش ہے آمد مجھے والیسی

کھپی جائے یا کسی دیگر سکول نوٹر انسٹر یا ایڈ جیسٹ

لنا جائے لیونہ اس علاقہ میں سکھت جیٹ ہو رہی ہے

صدف

6-3-2013

Shahbaz Begum



①

BEFORE THE HON'BLE  
SERVICE TRIBUNAL KHYBER PAKHTUNKHWA  
PESHAWAR

Service Appeal No. 1080 /2020

Khyber Pakhtunkhwa  
Service Tribunal

Slary No. 182

Date 23/01/2020

Shaista Begum (Lab Assistant) Education Department,  
R/o Peer Qila Shabqadar, District Charsadda

(Petitioner)

VERSUS

- 1) Secretary Education, Khyber Pakhtunkhwa, Peshawar
- ~~1) Secretary Education Department, Warska Road, Peshawar~~
- ~~2) Director Education, Khyber Pakhtunkhwa, Peshawar~~
- ~~2) Director Education (Female) District Mohmand at Ghalani~~
- ~~3) District Education Officer (Female) Ghalani, District Mohmand~~
- ~~3) Assistant Education Officer, District Mohmand at Ghalani~~
- ~~4) Assistant District Education Officer (Female) Ghalani, District Mohmand~~
- ~~4) Account Officer, Education Officer, District Mohmand at~~

~~Ghalani~~

~~5) Accounts Officer, Education Office Department, Ghalani, District Mohmand~~  
(Respondents)

Filed on day  
23/01/20  
Registrar

Appeal Under Section 4 of the KPK Service  
Tribunal Act, 1973, the respondents may  
kindly be directed to release the salaries of

Re-submitted to the petitioner.  
and filed.

Respectfully Sheweth,  
Registrar  
18/2/20

The petitioner most humbly submits as under:

1. That the petitioner belongs to respectable family and law abiding citizen of Pakistan.
2. That the petitioner was appointed as Lab Assistant on 27.10.2009 at Govt. Girls High School Ghalani, the then upper Mohmand Agency. (Copy of service book/<sup>Appointment Order</sup> is attached as Annexure A)
3. That the petitioner performed her duties to the best of her abilities till 19.02.2013 on which she was transferred from Govt. Girls High School Ghalani to Govt. Girls High School Dab Kor Lower Mohmand. (Transfer Order is attached as Annex. B)
4. That it is pertinent to mention here that it was the peak time of insurgency, lawless and unruly element, were governing the area of Dab Kor and its surrounding area the said school was closed due to the uncertain situation, as no government writ was then in the area.
5. That it is worth mention here that in Govt. Girls High School Dab Kor, a Lab Assistant namely Mst. Qurat-ul-Ain was already on duty, when, the petitioner inquired from respondent.
6. That petitioner, made various applications to the respondent to adjust the petitioner on her own seat, i.e. Govt. Girls High School Ghalani and

3

release the monthly pay, but till now neither the petitioner is adjusted to her own seat nor the monthly pay is released since 2013. So the instant service appeal on the following among other grounds. *(Applications are attached herewith)*

Grounds:

- a) That the act, of the respondent are against the law and basic human right guaranteed by the constitution of Islamic Republic of Pakistan.
- b) That the post of petitioner is still lying vacant and the respondent are not adjusting the petitioner, on her own seat, neither releasing her salaries, these acts of the respondent are against the law.
- c) That the respondents should not be allowed to be wiser, then law and in the garb of colorful exercise of power, they cannot be allowed to deprive the petitioner from her vested and basic rights.
- d) That any other ground will be raised at the time of arguments with prior permission of this hon'ble court.

**It is, therefore, most humbly prayed that on acceptance of the instant service appeal, an**

(4)

appropriate order may be issued, directing the respondents to release the salaries of petitioner from February 2013 till now.

*Shaista Begum*  
Petitioner

Through

*Kanwar*

**Kanwar Kamal  
& Manzoor Alami Khan  
& Malik Ihsan Ullah**  
Advocates High Court,  
Peshawar

*MB*

Date: 21.01.2020

**Note:** No such service appeal on the same subject matter has earlier been filed before this hon'ble court.

Advocate

*MB*

**AFFIDAVIT**

I, Shaista Begum W/o Essa Khan R/o Haleemzai, P.O. Shabqadar, District Charsadda, do hereby solemnly affirm and declare on Oath that the contents of the instant service appeal are true and correct to the best of my knowledge and belief and nothing has been conceal from this hon'ble court.


*Shaista Begum*  
DEPONENT

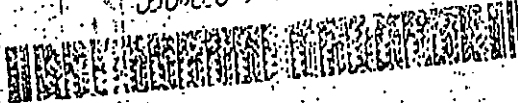
Shaista Begum  
CNIC No. 17103-0586463-2  
Cell No. 0333-9000723



22 JAN 2020

(7)


  
 7103-058846-2
   
 عمان لایف سٹین
   
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 7103-0036403-2
   
 25/02/2025
   
 25/02/2015
   


Annex (A)

APPOINTMENT ORDER:-

Consequent upon the recommendations of the Recruitment Committee the appointment of the following named candidates are made against Lab. Assst. (Female) posts in BPS No.07, plus usual allowances in the schools noted against their names from the dates of their taking over charge.

S.No.	Name with parentage	Tehsil	Merit Marks	Place of Posting	Remarks
01	Aisha Taurat D/O Taurat Khan	17 Ghund	61.32	GHHS Ghallanai	Vacant Post
02	Sajra Arshad D/O Arshad Khan	17 Ghund	61.18	do	do
03	Farida Begum D/O Badshah Khan	Halimzai	57.09	do	do
04	Shanista Begum D/O Rehan	Halimzai	20.39	do	do

TERMS/CONDITIONS

- The appointments of the candidates are purely on a temporary basis and are liable to termination at any time without assigning any reason.
- They are entitled to avail all kinds of benefits specified for Govt. servants, including CP Fund, except Pension, gratuity and GP Fund.
- They will produce Health and Age certificate issued by the Agency Surgeon Mohmand Agency.
- A Candidate will not be handed over the charge of her post if she is below 18 Years and above 40 Years on 16.5.2009.
- If any certificate, i.e. SSC Certificate, B.A, B.A. MA, Service Certificate OR Domestic Certificate of any candidate proves fake bogus at any stage, the appointment of the particular candidate will be considered as cancelled.
- The verifications of the Documents will be made through the office of the undersigned.
- No payment will be made to any candidate till the verification of her all documents from the institution concerned.
- If a candidate fails to report his arrival for duty on her particular session, within 15 days, her appointment will be deemed as cancelled.
- If the appointment of a particular candidate is made against a situation where the required vacancy is not available, then the appointment of the candidate with the lowest merit in the particular Tehsil will be withdrawn.
- If a candidate wishes to resign the post, she will have to give one month prior notice or pay for the one month will be forfeited in lieu thereof.
- The service Books of the candidates must be prepared when they are given the charge of their duties.
- Charge Reports should be submitted to all concerned.

(MOHAMMAD YOUSAF)  
Agency Education Officer,  
Mohmand Agency at Ghallanai.

Endst: No. 817-27 dated 29/01/2009.

Copy to:-

- Director of Education, FATA, NWFP, Peshawar.
- Political Agent Mohmand Agency at Ghallanai
- Head Masters Concerned.
- Agency Accounts Officer, Mohmand Agency at Ghallanai.
- Agency Surgeon Mohmand at Ghallanai.
- Candidates concerned.
- ICEMS local office.
- AAEO, concerned local office.
- Cashier local office.
- Notice Board local office.
- Dealing Assst. B-Local office.

*Attached to be  
true copy*  
*[Signature]*

**Manzoor Alam Khan Safi**  
Advocate Peshawar High Court  
and Federal Shariat Court  
Mob: 0300-5730524

**BETTER COPY OF THE PAGE NO.8**  
**OFFICE OF THE AGENCY EDUCATION OFFICER MOHMANDS AT**  
**GHALLANAI**

**APPOINTMENT ORDER:-**

Consequent upon the recommendation of the Recruitment Committee the appointment of the following named candidates are made against Lab: Asstt: (Female) posts in BPS No. 07 plus usual allowances in the schools noted against their names from the dates of their taking over charge.

S.N	Name with percentage	Tehsil	Merit Marks	Place of Posting	Remarks
01	Aisha Taurat D/o Taurat Khan	E/Ghund	61.32	GGUS Ghallanai	Vacant Post
02	Saira Arshad D/o Arshad Khan	E/Ghund	61.18	do	do
03	Farida Begum D/o Badshah Khan	Halimzai	37.09	do	do
04	Shaista Bdegum D/o Rehan	Halimzai	20.39	do	do

**TERMS/CONDITIONS**

- The appointments of the candidates are purely made on temporary basis and are liable to termination any time without assigning any reason.
- They are entitled to avail all kinds of benefits specified for Govt: servants including CP Fund, except Pension, gratuity and GP Fund.
- They will produce Health and Age certificate is issued by the Agency Surgeon Mohmand Agency.
- A Candidate will not be handed over the charge of her post if she is below 18 Years and above 10 Years on 16.5.2009.
- If any certificate i.e. SSC Certificate FA, BA, MA, Service Certificate OR Domicile Certificate of any candidate proves fake bogus at any stage, the appointment of the particular candidate will be considered as cancelled.
- That verifications of the Documents will be made through the office of the undersigned.
- No payment will be made to any candidate till the verification of her all documents from the institution concerned.
- If a candidate fails to report his arrival for duty at particular station within 15 days her appointment will be deemed as cancelled.
- If the appointment of a particular candidate is made against a situation where the required vacancy is not available, then the appointment of the candidate with the lowest merit in the particular Tehsil will be withdrawn.
- If a candidate wishes to resign the post, she will have to give one month prior notice or pay for the one month will e forfeited in lieu then of.
- The service Books of the candidates must be prepared when they are given the charge of their duties.
- Charge Reports should be submitted to all concerned.

(MOHAMMAD YOUSAF)  
 Agency Education Officer,  
 Mohmand Agency at Ghallanai.

Endst: No. 1817-27/ dated 29/10/2009.

Copy to:-

- Director of Education, FATA, NWFP, Peshawar.
- Political Agent Mohmand Agency at Ghallani.
- Head Masters Concerned.
- Agency Accounts Officer, Mohmand Agency at Ghallani.
- Agency Surgeon Mohmand at Ghallani.
- Candidates concerned.
- I/C EMIS local office.
- AAEO, concerned local office.
- Cashier local office.
- Notice Board local office.
- Agency Accounts F-I local office.

**BETTER COPY OF THE PAGE NO.9**  
**OFFICE OF THE AGENCY EDUCATION OFFICER MOHMANDS**  
**AT GHALLANAI**  
**NO. 1070/DATED 19/02/2013**

Subject: TRANSFER/POSTING

Memo:

Following Transfer/Posting of Female L/Asstt is hereby ordered to the School noted against her name on her own pay and scale in the interest of public Service.

S.No.	Name & Desig	Present Posting	Transferred to	Remarks
1.	Shaista Bibi L/Asstt	GGHSS Ghallani	GGHS Bad Kor. <i>Dab</i>	against vacant Post.

Note

1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.

Agency Education Officer  
Mohmand Agency at Ghallani

Endst No. \_\_\_\_\_/Dated \_\_\_\_\_/2013  
Copy to.

1. Principal GGHSS Challani
2. Head Mistress GGHS Bad Kor.
3. AAO at Ghallani
4. Applicant Concerned.

Agency Education Officer  
Mohmand Agency at Ghallani



(B)

Amex. "C"

To

The District Education Officer (Female), District Mohmand.

**APPEAL FOR THE RELEASE OF SALARIES FROM FEB. 2013 TILL DATE AND ADJUSTMENT OF THE APPELLANT ON HER OWN SEAT i.e LAB ASSISTANT AT GGHS GHALANI, DISTRICT MOHMAND.**

Respected Sir/Madam,

The appellant humbly submits as under:

1. That the appellant belongs to a respectable family and law abiding citizen of Tehsil Halimzai, District Mohmand.
2. That the appellant was appointed as Lab Assistant (Female Post) in (BPS-7) on dated: 29-10-2009 at Govt Girls High School Ghalani, the then Upper Mohmand Agency.

(Copy of Appointment Order is attached as annexure 'A')

3. That the appellant performed her duties to the best of her abilities. On dated: 19-02-2013, the Appellant was transferred from Govt Girls High School Ghalani to Govt Girls High School Dab Kor, Lower Mohmand.

(Copy of Transfer Order is attached as annexure 'B')

4. That it was the peak time of insurgency, lawless and unruly element, were governing the area of Dab Kor and its surrounding. The said school was closed due to the uncertain situations, as no government writ was then in the area. Furthermore, that appellant was threatened by anti-state element not to carry out the government job otherwise the appellant will pay the consequences and this matter was duly reported to your good self as well as to high-ups of law enforcing agencies but no step was taken and no shelter was provided to appellant and the school was closed. Your good self not issued proper order either to adjust the appellant on her own seat or to ask the Principal of GGHS Dab Kor to accept the arrival report.

(Copies of Applications to AEO (Agency Education Officer), PA Mohmand and Commandant Mohmand Rifles are respectively annexed as 'C' and 'D')

- 5. That in GGHS Dab Kor, a Lab Assistant namely Mst. Qurat-ul-Ain was already on duty. Hence on this score arrival report of the appellant was not accepted when the appellant honored the transfer order.
- 6. That the Appellant made various applications to adjust the Appellant on her own seat, i.e at GGHS Ghalani and release the monthly pay, but till now neither the appellant is adjusted to her own seat nor is her monthly pay released since 2013.

(Copies of Applications are annexed herewith)

- 7. That since February 2013, the Appellant seat is in vacum, roaming from one office to another but so far, no new order of her transfer is made neither the Appellant adjusted to her own seat nor her salaries released till now.

It is therefore, the Appellant most humbly requested that on acceptance of the instant appeal, the salaries from February 2013 till date be released and the Appellant may be adjusted on her own seat i.e Lab Assistant at GGHS Ghalani, Mohmand.

Dated: 27/09/2020

*Shaista Begum*

Yours Sincerely,

**Shaista Begum (Lab Assistant),  
Education Department**

**CNIC No: 17103-0586463-2**

**Cell No: 0333-9000723**



اگریت جیٹ AEO سے متعلق کسی بھی چیز کا (زبان)

دو تیس ہزار جاہی کی آجوائی

اور Adjust

بجای

سائنس اکیڈمی CAB اسٹیٹ ڈیپارٹمنٹ اور ایس ای

سائنس کا پروفیسر ڈیپارٹمنٹ میں ایس ای کی جگہ پر سے منسٹری  
مختلف شکل میں جانے لگی تو مختلف انجام  
انفارمیشن اور کیا کہ بیان کیا اسٹیٹ ڈیپارٹمنٹ

پندرہ سو سے زائد سے منسٹری کی طرف  
اگر ایس ای کے لئے جانے لگا

9-9-2014

منسٹری  
ڈیپارٹمنٹ

Shahid Beynon

AAEC (پیدائشی) (تاریخ)

درخواست گزار اور کارکنان  
از فروری 2013 تا حال

ص 4- علی

سید محبت بیگم ایف اے ڈیوٹی

سراجام سے رہی تھی لیکن

فنا سالہ کی حیثیت سے 1992 سے سب سے  
2013

اور کافی مشغول رہے دو چار سے

کے فنا سالہ سید عزیز خان سے ملنے

رہے اور حیوان پر اثر سب سے

سید اسد علیہ فن نام و حیوان

کاری کے کام چار روٹوں سے

فنا سالہ سید بیگم ایف اے ڈیوٹی

7-4-2014

Shant Begum

گورنمنٹ آف پاکستان ایف آئی اے (ایف آئی اے)

درخواست - برآمد Release اور درخواستی پر سفیر اور ڈائری

ص - عالی

سائٹ لیسٹ ڈیپارٹمنٹ

۱۔ یہ کہ سائٹ کے ڈائریکٹر اور ایس ایس ایف کے ڈائریکٹر (Lab Assn)

میں سے سائٹ کے متعلقہ افسران کی جانب سے درخواست کی جا رہی ہے اور اس کے بارے میں جاننے کے لئے درخواست دی جا رہی ہے۔

اس کے بارے میں اسٹیٹس کے ساتھ ساتھ درخواست کی جا رہی ہے اور اس کے بارے میں جاننے کے لئے درخواست دی جا رہی ہے۔

تاریخ 11-12-2013

اسٹیٹس کے ساتھ ساتھ درخواست کی جا رہی ہے اور اس کے بارے میں جاننے کے لئے درخواست دی جا رہی ہے۔

درخواست سرکے تہے پھلورونہ لکورد

جہان بخش میں مختلف درخواستیں دی

کہ ڈب اور میں چونکہ مکتوبت اور طالبان ۲ درصیان لڑائی  
ہوئی ہے اور اسلئے ڈب اور میں حامی پوسٹ بھی

پس ہے پھر ذراہ لڑا یا تو اپنے پوسٹ پاسکول

میں اپڑ جسٹ کیا جائے

اور میری نخواست بھی رپلیسری جائے

کیونکہ میرے بچے میں اور نہ تو مجھے اپنے سیکول میں جگہ

مل رہی ہے نہ ہی ڈب اور میں اور نہ ہی نخواست مل

رہے

شکر

25-11-2013

Shauko Begum

یہاں سے لے کر اس کے ساتھ ساتھ  
یہاں سے لے کر اس کے ساتھ ساتھ

Anex.

"I"

جناب عالی

میں نے دو عواصن کو 2013-3-6 کو

آپ کے حبان کو دی ہے جس میں اتنی ہی ہے کہ

یا تو مجھے اپنے پوسٹ پر ~~پر~~ والی کھینچا جائے یا اس

دیگر سکول پر ریٹرنیشن کیا جائے کیونکہ اس سکول

ڈس کوور میں فرقہ العنصریہ والا پوسٹ پر ہے

حکومتی ہے اور میری توجہ کی ہے

اس کو بھی حکم کیا جائے کہ مجھے ادا کرے

9-7-2013

Shauka Begum



خدمت صحت - ڈسٹریکٹ اسپتال ایجنسی (PA) صحت ٹھکانہ ایجنسی

درخواست برائے تحفظ فراہم کرنے

صحت عالی -

میں نذر اللہ دہلوی کمانڈنٹ صحت اور  
AEO ٹھکانہ ایجنسی سے تحفظ فراہم کرنے کی درخواست کی تھی۔  
میں گورنمنٹ گریڈ ہائی سکول علیہ میں بطور "الٹ اسٹوڈنٹ"  
کام کرتی ہوں۔ مجھے مسلسل دھمکیاں مل رہی ہیں کہ سکول  
کو آنا چاہنا چھوڑ دو ورنہ ہم تمہیں مار دیں گے۔ اور سکول  
کو بھی صتم کر دیں گے۔

پہلے ہی فرما کر مجھے اور سکول کے طالبانہ کو فراہم کیا گیا۔  
تخلیہ فراہم کی جائے۔

شکر ہے

9-4-2013

تاریخ

فقط ذرا -

Shaista Begum

آئی ٹی ماہر

(ایسٹوڈنٹ)

شاہینہ بیگم

رائلہ مینبر - 0333-9000723

حضرت صاحبہ کا پتہ صاحبہ - محمد راضی

صاحبہ عالی

خود جانے گزار رہی ہے کہ

میں گورنمنٹ گورنر چھائی سکول علی، محمد احمسی  
میں بطور Lab Assistant اپنی ذمہ داریاں پوری سنہری  
سے سرانجام دے رہی ہوں۔ کہ گزشتہ ایک مہینے سے  
مستقل مجھے دھمکیاں مل رہی ہے کہ جو اس گھروں  
سے باہر نہیں نکلتی اور نوکریاں نہیں کرتی لہذا  
سکول کی نوکری چھوڑ دو اور طالبہ کو بھی اطلاع  
دو کہ وہ بھی سکول نہ آئے۔ اگر تم نے ہماری  
حکم نہ مانی تو ہم تمہیں جان سے مار دیں گے۔

صاحبہ عالی

آج حضرت صاحبہ انکس ہے کہ مجھے تحفظ فراہم

المقام 29-3-2013

کيا جائے  
Shahida Begum

آپ کی نامہ  
شہیدہ بیگم (Lab Assistant)

ممبر = 0333-900723

درخواست مراد مراد (protection) بر صلاطین

صبا - عالی -

کہ میری گونٹ گزرتی تھی سکول میں صبا  
میری گزرتی تھی۔ تو اس مسئلے میں صبا میری  
صاحبہ کو ملنے جاری تھی۔ تو میں صبح اور اس کے بعد  
دیار اور کہا کہ ہم آپ کو جان سے مار دیں گے اور سکول  
کو ہم سے اڑا دینگے اگر تم نہ نوکری نہیں چھوڑی تو تمہاری  
صبر نہیں رہے۔ پھر سکول میں صبا لیس سٹاپ جاری تھی تو صبح  
لوگوں نے مجھے روکا اور کہا کہ ہم صبا سے ڈرنا چھوڑ دوں گا اور  
گھر میں بیٹو ہالوں۔ ورنہ ہمیں آپ کا لگا کرنا آتا ہے۔ صبا کے بعد  
مجھے ڈر محسوس ہوا اور میں کل صبح گھر سے ہنسی نکلتی ہوں۔  
برائے میری تھی غلط فہم ہو گیا۔

بتاریخ - 27-3-2013

Shaisla Begum

صبا

صبا  
(Lab Assistant)

درخواستیں برائے جاری کردہ نچواہ  
وائڈ جسٹس کے ساتھ

حذاق علی نے ہمارے آئیڈیو درخواستیں بھیجی ہیں

کہ ہمارے مجھے ایسے سکول ایسے پوسٹ پر

جو ابھی تک Vacant ہے یہ ایڈ جسٹس پر ہمارے

پالیسی بھی ڈیپٹر سکول میں ایڈ جسٹس کے لئے سفر لیا جائے

میں حوندہ علی برترہائی سکولوں میں

رکورد L Asst برترہائی خود سے Vacant post ہے

مجھے تو کس نے برترہائی سکولوں ڈب اور

علی ڈیپٹر سفر لیا گیا ہے۔ جہاں پر نہیں اسٹڈی مٹر العین

تعمیرات ہے مجھے میری نچواہ کے دانی جائے

اور میرے نہیں کا سیکلہ بھی لیا جائے

6/3/2013  
صفر ۲۰۱۳

شکرہ

Shaira Begum

حکومت جناب A E O صاحب علی محمد الحسن

ایسٹریٹ ایڈمنسٹریشن و پبلک ورکس  
ٹرینسپورٹ سائڈ

جناب عالی اس سائلہ کو ٹرانسفر 19<sup>3</sup> 2013 کو ٹرانسفر ہائیر

سلیڈری سٹور ڈن کور ہوئی ہے۔ جناب عالی! مجھے

vacand post پر بھیجا گیا ہے۔ جہاں پر فخر العین صاحبہ ہیں

سے ڈپٹی سر ایف ایم دینی ہے۔ میری گزارش ہے کہ مجھے وہی

کہی جاے۔ یا کسی دیگر سکول ٹوٹر انسٹر یا ایڈجسٹ

ڈیا جائے کیونکہ اس علاقہ میں سکول جتنے ہو رہی ہے

صدا فر

6-3-2013

Shaukat Begum

کدالتیہ۔ چتریت سرور کورجی لکھتے

سائنس بنام گوت

در فو اسٹم اور اعداد و حساب کے قواعد  
پرکے اظہار کے لیے Respondants

سائنس کے اصول اور قواعد کے بارے میں

1۔ سائنس کے اصول اور قواعد کے بارے میں

2۔ سائنس کے اصول اور قواعد کے بارے میں  
Respondants کے بارے میں

3۔ سائنس کے اصول اور قواعد کے بارے میں  
Respondants کے بارے میں


سائنس کے اصول اور قواعد کے بارے میں  
Respondants کے بارے میں

18-11  
2020

گوت


سائنس کے اصول اور قواعد کے بارے میں  
Respondants کے بارے میں

made the instant appeal formally defected, and in the  
circumstance the submit withdrawal of the instant appeal.

~~the instant appeal~~ 

5) That there is no legal bra on acceptance of this petition.

It is, therefore, most humbly prayed that on acceptance  
of the instant petition, petitioner may be allowed to  
withdraw the instant appeal ~~the instant appeal~~

  
Petitioner *Shaukat Babi*

Through

*Kanwar*  
*Kanwar Kamal*  
Kanwar Kamal  
Advocate High Court,  
Peshawar

Dated: 26.10.2021

**AFFIDAVIT**

I, , do hereby solemnly affirm and declare on Oath that the  
contents of instant petition are true and correct to the best of my  
knowledge and belief and nothing has been concealed from this  
hon'ble tribunal.

*Shaukat Babi*

DEPONENT

17103-0586463-2

ATTESTED

~~Stamp~~

**ATTESTED**  
*Mussain*  
26/10/2021  
Notary Public  
Sheikh Fazal Mussain Advocate  
District Courts Peshawar

**BEFORE THE HON'BLE**  
**CHAIRMAN KP SERVICE TRIBUNAL, PESHAWAR**

Mst. Shaista \_\_\_\_\_

**V E R S U S**

Secretary Education etc. \_\_\_\_\_

**Petition for withdrawal of captioned**  
**appeal, ~~with permission to file a fresh~~**  
**appeal.**

**Respectfully Sheweth,**

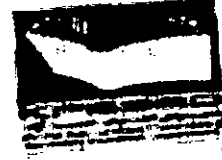
The petitioner most respectfully submits as under:

- 1) That captioned appeal is pending adjudication before this hon'ble tribunal.
- 2) That the instant appeal is for releasing the salaries of appellant since 19.02.2103 till date.
- 3) That the comments today i.e. 26.10.2021a submitted by the official respondent, today before this hon'ble tribunal that appellant has been removed from service.
- 4) That from perusal of respondent comment / reply, the appellant got the knowledge of her removal from service;





OFFICE OF THE DISTRICT EDUCATION OFFICER  
MOHMAND TRIBAL DISTRICT  
Ph No: 0224-290187  
FAX: 0224-291100  
Email: deomohmand@gmail.com  
NO. \_\_\_\_\_ DATED \_\_\_\_\_/2021



### NOTIFICATION

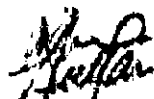
1. WHEREAS Mst. Shaista Begum Lab. Assistant GGHSS Ghallana under report transfer to GGHS Dab Kor Eka Ghund had been reported for long absenteeism without any prior permission
2. AND WHEREAS show cause notice was served upon the accused under Khyber Pakhtunkhwa Government servants (Efficiency and Disciplinary) Rules 2011, for the charge of "wilful absence from duty" as mentioned in the show cause notice at her home school address vide No 2439-46 dated 11/06/2020 wherein she was directed to resume her duty but she failed.
3. AND WHEREAS Mst. Shaista Begum Lab. Assistant GGHSS Ghallana under report transfer to GGHS Dab Kor Eka Ghund did not report to her duty nor consult with the office within stipulated period of time and turned her ears deaf
4. AND WHEREAS Charge sheet was served upon Mst. Shaista Begum Lab. Assistant GGHSS Ghallana under report transfer to GGHS Dab Kor Eka Ghund Mohmand Tribal District vide E-11, No: 2752-53 dated 27/06/2020 through her home school address therein the accused was directed to submit reply in his defense through personal contact to this office
5. AND WHEREAS the accused failed to put any defense in written and did not appear to be heard in person within stipulated time.
6. AND WHEREAS absence notice was published in "Daily Mashriq" Peshawar dated 09/09/2020 and Daily "Aaj Peshawar" dated 07/08/20 therein Mst. Shaista Begum Lab. Assistant GGHSS Ghallana under report transfer to GGHS Dab Kor Eka Ghund Mohmand Tribal District was again directed to appear before the competent authority and show reason of her absence but once again she failed to do so
7. AND NOW THEREFORE, in exercise of the Powers conferred under Rule 4.1 (b) (iii) of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, the competent authority, District Education Officer Mohmand Tribal District is pleased to impose major penalty of "REMOVAL FROM SERVICE" upon Mst. Shaista Begum Lab. Assistant GGHSS Ghallana under report transfer to GGHS Dab Kor Eka Ghund Tribal District with effect from the date on which her salaries had been stopped due to her wilful absence from duty

(Mr. Sultan Muhammad)  
District Education Officer  
Mohmand Tribal District

Encl: No. 1733/4 Dated 31/8/2021

Copy forwarded to the:

1. Director of Education E&SE Department Khyber Pakhtunkhwa Peshawar.
2. DC Mohmand Tribal District Mohmand.
3. Additional Director (NMDs) Khyber Pakhtunkhwa Peshawar.
4. DMO Tribal District Mohmand
5. District Accounts Officer Mohmand Tribal District at Ghallana.
6. ADEO Concerned.
7. Pay Clerk Local Office for necessary entry in her service book.
8. Official concerned.

  
District Education Officer  
Mohmand Tribal District