

24.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as civil servant in the prescribed manners but vide impugned order dated 3.3.2015 she was dismissed from service on the allegations of discrepancies in appointment regarding which she preferred departmental appeal on 10.3.2015 which was not responded and hence the instant service appeal on 8.7.2015.

That the appellant was given no opportunity of hearing nor the inquiry was conducted in the prescribed manners and major penalty in the shape of dismissal from service was passed which penalty is against facts and law.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 20.10.2015 before S.B at camp court A/Abad.

Appellant Deposited
Security & Process Fee



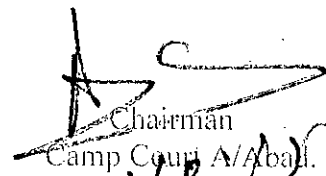

Chairman
Camp Court A/Abad

20.10.2015

Counsel for the appellant and Mr.Sakeenullah, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Representative submitted application alongwith copy of notification dated 25.8.2015 according to which the appellant has been reinstated in service.

In the light of the said application, learned counsel for the appellant requested for withdrawal of the appeal as the grievances of the appellant have been redressed.

Dismissed as withdrawn. File be consigned to the record room.


Chairman
Camp Court A/Abad



ANNOUNCED
20.10.2015

20.10.15

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 777/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	08.07.2015	<p>The appeal of Mst. Madhia Bibi presented today by Mr. Muhammad Arshad Khan Tanoli Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	10-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>24-7-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal No. **777/2015**

Mst Madhia D/O Muhammad Hamayun GGHS Murad Pur R/O
Tarangri Bala Mansehra.

.....Appellant

VERSUS


1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

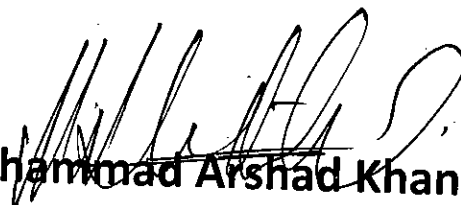
INEX

S.No	Prescription of Document	Annexure	page
1			1-10
2	Copy of Advertisement	"A"	11
3	Copies of Documents/testimonial are annexed	"B"	12-22
4	Copy of appointment order and corrigendum	"C"	23-25
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	26-28
6	Copy of impugned dismissal order of appellatant	"E"	29
7	Copy of departmental appeal /representation	"F"	30
8	Copy of merit list	"G"	31-32
9	Wakalatnama		32

Dated: -----/2015


Appellant

Through


Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal no. 777/245 ①

Mst Madhia D/O Muhammad Hamayun GGHS Murad Pur R/O
Tarangri Bala Mansehra

.....Appellant

VERSUS

A.W.F Province
Service Tribunal
Diary No. 206
Dated 8-7-15

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

SERVICE APPEAL.

Filed to-day
8/7/15

Service Appeal u/s 4 of KPK Service
Tribunal, 1974

Respectfully Sheweth,

Facts forming the back ground of the instant Service Appeal is
as under:-

(2)

1. That, respondent No 3 announced the posts of Qaria in Dailly "The Aaj" dated 20/5/2011 for appointment of Qaria. The Appellant fulfills the entire criteria which sine qou non for appointment for the post of Qaria. Copy of Advertisement is annexed as Annexure "A"
2. That, the appellant qualified test as well as interview conducted by respondent No 3. The appellant is qualified Matric, Hifz, tajweed, teaching of tajweed, Shahadat ul Almia from registered Institution/ Maddaris. Copies of Documents/testimonial are annexed as Annexure "B"
3. That, following this, the appellant was appointed as Qaria in respondents' Department on the basis of merits and was posted in GGHS Afzal abad vide appointment order endrst No 893/942/ ESTT Qaria (F) APPTT; (f) 2012 Dated 16/6/2012. Copy of appointment order and corrigendum is annexed as Annexure "C".
4. That, the appellant served the Department with complete devotion and dedication to the entire satisfaction of her superiors from the date of her appointment i.e. 16.6.2012 onwards.
5. That, the appellant was though dismissed from service by the respondent's department endrs. No 1636-45/AE-J/ESTB on 3.3.2015.

(3)

6. That, Respondent No 3 issued Show Cause notice to the appellant without annexing the statement of allegations however, a page of inquiry which was conducted against the then EDO Umar Khan Kundi DEO, Shamim Akhtar was found attached with the show cause notice, wherein it was mentioned against the name of appellant that "No relevant, sannad for appointment and the appointment is not valid and is against the recruitment policy". Copy of Show cause notice and one page of inquiry of the then EDO is annexed as Annexure "D". AS the inquiry committee did recommend any remarks against the Appellant

7. That, show cause notice issued to the appellant was properly replied by her mentioning that the appellant applied for the post of Qaria and appeared in ETTA Test vide Roll No 454 dated 22.6.2011 and was placed at S. No 9 of the merits list and thereafter was appointed on merit Beside, District Education Officer solicited candid views from respondent No 2 regarding as to whether the candidate who possess their sannads of Hifz and tajweed from registered institutions are to be appointed "as per service structure in prescribe rules the sannad of Qirat from a recognized Institution meant a certificate obtained from Maddaris/Intuition Registered by the Govt. of KPK.

(4)

8. That, the respondent No 3, as stated above, served show cause notice to the appellant, which was properly replied by her. As per law, the appellant was entitled to be heard in person by respondent No 3. But Respondent NO 3 without resorting the rules, without providing opportunity of personal hearing and adopting proper modus operandi required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order endst. No 1636-45/AE-1/Estb dated 3.3.2015. Copy of impugned dismissal order of appellant is attached as annexure "E".

9. That on receipt of dismissal order, appellant filed departmental appeal against the order of respondent No 3 to respondent No 2 on 10.3.2015. Copy of departmental appeal /representation is attached as annexure "F" but respondent No 2 did not bother to reply the representation of the appellant so far. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-

GROUND

(5)

- a. That, the appellant fulfilled the criteria of appointment as Qaria being qualified. The appellant was appointed on merit on the recommendation of Departmental Selection Committee and was placed at S.No 21 of the merit list. Copy of merit list is attached as Annexure "G". Hence impugned dismissal order is illegal, perverse, discriminatory without lawful justification and null and void on the rights of the appellant.

- b. That, as per educational record annexed with the appeal, the appellant has been appointed as Qaria according to the laid down procedure and criteria mentioned in the advertisement published by respondent 3. It is further submitted that no institution/madaris of female is not recognized in KPK since 1969 onwards. Therefore Qarias were appointed in Education Department prior to 2012 on the basis of sannads similar to that of appellant. Therefore if hundreds of female Qarias are serving in Educational Department on the basis of similar sannads then the appellant is also entitled to serve the department as per law. Hence impugned dismissal order is liable to be set aside.

(6)

- c. That, when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. As per law the appellant was eligible for appointment as Qaria . But the conduct of respondents department towards the appellant is mala fide, discriminatory and not maintainable at law.
- d. That, this fact may not be left to fade in oblivion that the Govt. of KPK removed the then EDO, Mansehra, Umar Kundi from service but the appellant has been dismissed from service due to no fault of her. Once an employee is dismissed he is de-barred to get appointment in Govt. Departments. Therefore, respondents' Department not only illegally dismissed the appellant but snatched her bread and butter in future as well. Hence impugned dismissal order is liable to be set aside.
- e. That, respondent No 3 did not issued final show cause notice to the appellant and dismissed her in hasty manner and wants to induct some blue eyed chaps at the alter of appellant which is discriminatory against the principle of natural justice and fair play.

- f. That, respondents' Department has led the appellant to the place which is utterly unknown to the principle of jurisprudence and natural justice.
- g. That, right from the appointment of the appellant as Qaria in 2012, there was no rival candidate who contested the appointment of the appellant in any Court of law anywhere in KPK.
- h. That, Govt. of KPK conducted inquiry against the then EDO, Umar Khan Kundi for committing illegalities/irregularities in appointments/promotions etc and finally removed from service. Therefore, the appellant cannot make a scapegoat for illegal acts of the then EDO Umar Kundi. Therefore on the basis of removal of Umar Kundi from service, the appellant cannot be dismissed for the acts committed by the ex-EDO.
- i. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribed period of limitation


(8)

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order endrst. No 1636-45/AE-1/Estb dated 3.3.2015 may graciously be set aside and respondent No 3 may be directed to reinstate the appellant in service in the School with effect from the date of her dismissal with all service back benefits in terms of pay etc. Any other relief which this Honourable Court deems appropriate in the circumstance may also be done.

Dated: 7/7/2015


Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

(9)

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Mst Madhia D/O Muhammad Hamayun GGHS Murad Pur R/O
Tarangri Bala Mansehra.

.....Appellant

VERSUS

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

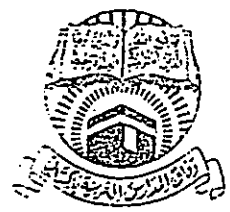
.....Respondents

AFFIDAVIT

I, Mst Madhia D/O Muhammad Hamayun GGHS Murad Pur R/O Tarangri Bala Mansehra do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

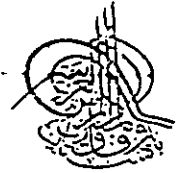
Dated: 7/7/2015


Deponent



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

شهادة حفظ القرآن الكريم



الحمد لله رب العالمين، والصلوة والسلام على نحاتنا النبيين، سيدنا محمد وعلى آله وصحبه أجمعين، وبعد:

تشهد رئاسة وفاء المدارس الرشيدية باكستان بأن الطالبة مديحة نجيب

بيت سن شهر سنة ١٩٩٠م

قد حفظت القرآن الكريم كاملاً بظهور الغيب في تعليل القرات البينات بتفصيل ما يلي: ومجتمعت في الحفظ

الخطى المنعقد تحت إشراف وفاق المدارس العربية بتقدير جيد جداً منج شدة

حفظ القرآن الكريم ورئيس وفاق اذ يمنحها هذه الشهادة بوصيها بتقوى الله عز وجل، وأن تتعاهد القرآن الكريم بتلاوته

أنا الليل واطراف النهار وان تعمل بتعاليمه، التمحاول أن تعلمه غيرها، والله الموفق.



رئيسة المدرسة
 HEAD MISTRESS
 Govt. Girls High School
 Afzal Abad

رقم التسجيل 1194192
 رقم الشهادة 134985
 محل الإصدار
 الشاريف 12/12/1999م

Handwritten signatures and notes on the left margin.



حکومت پاکستان کے دستور تحت
(1973)

دارالعلوم مانسہرہ میں تدریس القرآن کریم



الشہادۃ التجوید القریم
سند

(13)

Attested
Distt. Courts Abbottabad

الحمد لله رب العالمين والصلوة والسلام على خاتم الانبياء والمرسلين وعلى الوصية الطيبة التي جعلها الله لرسوله محمد بن عبد الله
الطالب/الطالبة **مديحة بي بي** بن/بنت **علي خان** من **مانسہرہ**
قد فرغ من تجويد القرآن الكريم في مدرستنا دارالعلوم جامعہ محمدیہ عربیہ تدریس القرآن والحديث (رجسٹرڈ)
خواجگان مانسہرہ پاکستان المولود/المولودة في عام 1988-11-12. ونجح/ونجحت في الاختبار السنوي عام
1423ھ بتقدير **ممتاز** وبناء على ذلك استحق/استحقت الشهادة التجويد
ويوصيه/يوصيها بتقوى الله عز وجل. لخدمة التجويد القرآن الكريم. والله الموفق المعين.

ختم المدرسه

توقيع مدير الجامعة
(مولانا) محمد سراج الدين محمدی
مهتم دارالعلوم خواجگان مانسہرہ

توقيع رئيس المدرسه
خطيب ابن خطيب
(مولانا) حافظ محمد نصير الدين محمدی
خطيب مركزي جامع مسجد لور بئكل خواجگان

توقيع الامين العام
قاري مولانا
حافظ محمد سيف الدين محمدی
خواجگان

رقم الشهادة 124
مجموع الدرجات (400)
الدرجات المحصلة 290
التاريخ الاجراء 1-10-2002
محل الاصدار خواجگان مانسہرہ

HEAD MISTRESS
Govt Girls High School



كشف الدرجات

الشهادة التجويد والقرأت

الدرجات	الكتب الدراسية
٨١	جمال القرآن
٨٥	مقدمة الجزرية
٨٥	فوائد مكيه
٨٢	معلم التجويد
٤١	تيسر التجويد
٩١	مشق و حدر
(٤٥٥)	مجموع الدرجات
٢٩٥	الدرجة المحصلة

Certificate No: AB 29931

Annex "B"

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Roll No: 7917
Group: SCIENCE

DETAILED MARKS CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION
Session: 2007 (Annual)

14

Name: MADEEHA BIBI
Father Name: ALI KHAN
Institution / District: GOVT. GIRLS HIGH SCHOOL AFZALABAD, MANSEHRA

has secured the marks shown against each subject in the Secondary School Certificate Examination held in the month of April / May as a Regular candidate

Subjects	Total Marks			Marks Obtained		Total	Marks in Words
	75	75	150	Theory / A	Pract / B		
English	75	75	150	53	49	102	One Hundred Two
Urdu	75	75	150	57	64	121	One Hundred Twenty One
Islamiyat	75	75	150	56		56	Fifty Six
Pakistan Studies	75	75	150	58		58	Fifty Eight
Mathematics	75	75	150	67	49	116	One Hundred Sixteen
Physics	85	15	100	51	14	65	Sixty Five
Chemistry	85	15	100	50	13	63	Sixty Three
Biology	85	15	100	60	13	73	Seventy Three
Total: 900						654	Six Hundred Fifty Four Only

Dated: 16 JUL 07

Checked By: [Signature]

Remarks:

Controller of Examinations

Muhammad Wasem
G.H.S.S. Mansehra

Note: Errors/Omissions excepted. Any mistake in the Name, Father Name etc must be intimated within 30 days of the issuance date of this Certificate to BISE Abbottabad. Visit us at: www.biseatd.edu.pk

ADA No 220291

Roll No. 7917

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan
SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2007

(15)

This is to certify that MADEEHA BIBI

Daughter of ALI KHAN

A candidate from GOVT. GIRLS HIGH SCHOOL AFZALABAD MANSEHRA

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in April/May, 2007 as a regular candidate. She has obtained 654 marks out of 900 and has been placed in Grade A Representing EXCELLENT.


The candidate passed in the following subjects:-

- | | | |
|----------------|------------|--------------|
| 1. ENGLISH | 2. URDU | 3. ISLAMIYAT |
| 4. PAK STUDIES | 5. MATHS | 6. PHYSICS |
| 7. CHEMISTRY | 8. BIOLOGY | |

Date of Birth according to admission form is FOURTH NOVEMBER

One Thousand Nine Hundred and EIGHTY-EIGHT (04-11-1988)


Asstt. Secretary


Secretary

This certificate is void if used without the official seal and signature.

(16)

GOVT. GIRLS HIGH SCHOOL AFZAL ABAD. (MANSEHRA)

PROVISIONAL CERTIFICATE

ANNUAL EXAM
SESSION 2007 (Annual)

Roll No: 7917 Admission No: 99 Enroll No: 005500/001

Certified that Miss: MADEEHA-BIBA

D/O ALI-KHAN. has passed the secondary school

Certificate Examination from the Board of intermediate and Secondary

Education Abbottabad, held in April/May 2007 Annual/ Supplementary

As a regular Student of this School.

Her Date of Birth according to School record is (in figure) 04-11-1988.

(in words) Fourth, November N.H. & Eighty Eight.

SUBJECT PASSED

1. English 2. Urdu 3. Islamiyat 4. Pakistan Studies

5. Mathematics 6. Physics 7. Chemistry 8. Biology

Marks Obtained 654 Grade "A"

Conduct Excellent. Games _____

Date 16-07-2007.

Prepared by Tahira Imran.

Checked by KA

Attest
[Signature]
[Stamp: National Institute of Science & Technology, Islamabad]

[Signature: Nalehraj Beg]
HEADMISTRESS
GOVT. GIRLS HIGH SCHOOL,
AFZAL ABAD. (MANSEHRA).
Head Mistress
Govt: Girls High School
Afzal Abad (Mansehra)

Certificate No: AB 210215

(17)

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Roll No: 75226
Group: PRE-MEDICAL

**HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION
DETAILED MARKS CERTIFICATE**

Part - II
Session: 2010 (Annual)

Name: MADEEHA BIBI
Father Name: ALI KHAN
Reg No: 0075227006
Institution/
District: MANSEHRA

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of April/May as a Private Candidate.

Subjects	Marks	Marks Obtained					Total	Marks in Words
		Part-I		Part-II		Marks in Words		
		Theory	Pract	Theory	Pract			
English	200	62	-	65	-	127	One Hundred Twenty-Seven	
Urdu (Comp)	200	73	-	77	-	150	One Hundred Fifty Only	
Islamic Education	50	37	-	-	-	37	Thirty-Seven	
Pakistan Studies	50	-	-	34	-	34	Thirty-Four	
Physics	200	47	11	60	12	130	One Hundred Thirty Only	
Chemistry	200	36	13	32	14	95	Ninety-Five	
Biology	200	61	11	53	13	138	One Hundred Thirty-Eight	
Total : 1100							711-B	Seven Hundred Eleven Only
Remarks :							MI	

Date : 23 July, 2010

Checked By : _____

Controller of Examinations

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: www.biseatd.edu.pk

Muzammil Ahmad
B.S (Eng) BPS 17
G.S. Dhodial, Manshra

ADA No. 0132110

Roll No. 75226

BOARD OF INTERMEDIATE & SECONDARY EDUCATION

ABOTTABAD BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad Khyber Pakhtunkhwa Pakistan

HIGHER SECONDARY SCHOOL EXAMINATION CERTIFICATE

SESSION ANNUAL 2010

Pre-Medical Group

This is to certify that MADEEHA BIBI

Daughter of ALI KHAN

A candidate from MANSEHRA DISTRICT

has passed the Higher Secondary School Certificate Examination of the Board of

Intermediate and Secondary Education, Abbottabad held in April/May 2010 as a

Private Candidate She has obtained 711 marks out of 1100 and has been

placed in Grade B Representing VERY GOOD

The Examination was taken as a Whole/In Parts and the candidate passed in the

following subjects:

1. ENGLISH 2. URDU 3. ISL: EDU-PAK STUDIES

4. PHYSICS 5. CHEMISTRY 6. BIOLOGY

Asstt. Secretary

Secretary

Muhammad Waseem
S.S. (Eng) BPS-17
G.D. Shodial Manshera



HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

DETAILED MARKS CERTIFICATE

BSc ANNUAL EXAMINATION 2012

Roll No: 17005

Reg No: 11-MSRG-55

Name: Madeeha Bibi

F/ Name: Ali Khan

Institution/ GOVT. GIRLS DEGREE COLLEGE NO.1

Part: Second

District MANSEHRA

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
Part-I Marks----->	285		182		182	ONE HUNDRED EIGHTY-TWO	
PAKISTAN STUDIES	40		32		32	THIRTY-TWO	Pass
CHEMISTRY	60	15	31	15	46	FORTY-SIX	Pass
BOTANY	50	25	38	21	59	FIFTY-NINE	Pass
ZOOLOGY	60	15	34	12	46	FORTY-SIX	Pass
Total:	550		365		365	THREE HUNDRED SIXTY-FIVE	

Percentage: 66.36

Division: FIRST

Print Date: 14-08-2012

Checked By: _____

Controller Examinations

Hazara University, Mansehra

August 14, 2012

Errors and omissions are subject to subsequent rectification.

Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

Attested
my M
Muhammad Waseem
S.S (Eng) BPS-17
GHS & Dhodial, Mansehra

(19)

Roll No. 17005

S. No. 951

GOVERNMENT DEGREE COLLEGE FOR GIRLS



Provisional Certificate

Session 2012

This is to Certify that Miss Madeeha Bibi
Daughter of Ali Khan has passed the Intermediate/Bachelor
of Arts/Science Examination of the B.I.S.E, Abbottabad/Hazara University,
Mansehra under Registration No. 11-MSAG-55, Roll No. 85
held in 2012 in the 1st Division.

The candidate passed the following subjects:

- | | |
|---------------------------|---------------------|
| 1. English Compulsory | 5. <u>Chemistry</u> |
| 2. Urdu Compulsory | 6. <u>Zoology</u> |
| 3. Islamiyat Compulsory | 7. <u>Botany</u> |
| 4. Pak Studies Compulsory | 8. _____ |

Her conduct during her stay in this College was Good She performed duty
as _____ for the session _____


PRINCIPAL
Govt. Degree College for Girls
Mansehra

Prepared by _____

Attested
my MI
Muhammad Waseem
S.S.(Eng) BPS-17
Dhodial Mansehra

Serial No. 005325

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Registration No. 11-MSRG-55

Roll No. 17005

HAZARA UNIVERSITY

Mansehra, Pakistan



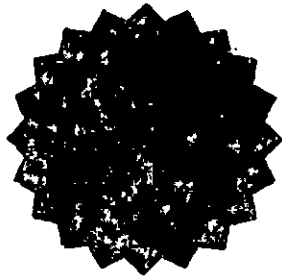
(20)

The University in recognition of the fulfilment of prescribed requirements has conferred upon
Mr / Ms Madeeha Bibi Son / Daughter of Ali Khan

The Degree of **BACHELOR OF SCIENCE** in the examination
field in June 2012 session Annual 2012 (Regular)

He / She was placed in First Division / Grade / CGPA.

The examination was taken as a Whole / Inparts.



 [Signature]
Controller of Examinations

Date 14-Aug-2012

 [Signature]
Vice Chancellor

 [Signature]
Registrar

Attested
Muhammad Wa
S.S. (Eng) B.S.
G.H.S. Dhodial

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 191270
 Name MADHUKA BIKH
 Father's Name ALI KHAN
 Address F-10 SHOUKAT ABAD

PROVISIONAL RESULT CARD

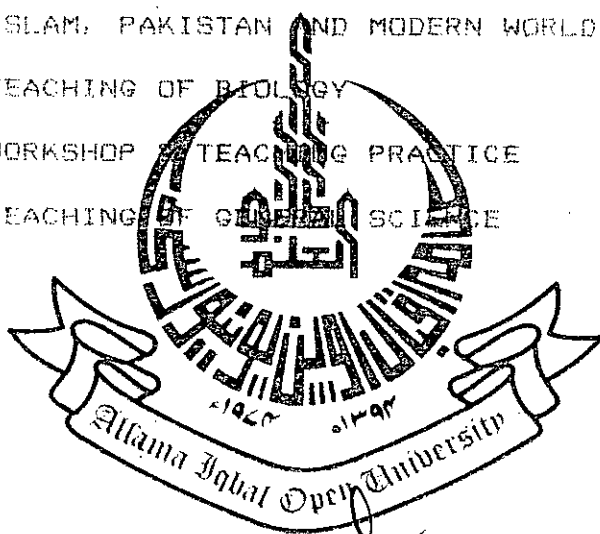
Roll No. AH040546
 Registration No. 1201MA03130
 Final Semester SPR-2013

(21)

Tehsil MANSEHRA
 District MANSEHRA
 has successfully completed BACHELOR OF EDUCATION (B ED)

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 12	0512	PERSPECTIVES OF EDUCATION	100	65
AUT- 12	0513	SCHOOL ORGANIZATION	100	67
AUT- 12	0514	EVALUATION, GUIDANCE & RESEARCH	100	62
AUT- 12	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	58
AUT- 12	0651	ENGLISH (COMPULSORY)	100	62
AUT- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	71
SPR- 13	0520	TEACHING OF BIOLOGY	100	68
SPR- 13	0655	WORKSHOP IN TEACHING PRACTICE	100	86
SPR- 13	0657	TEACHING OF GENERAL SCIENCE	100	65



Muhammad Waseem
 S.S. (Eng) BPS-17
 GHS, Dhodial, Manshera

CREDITS: 6

Total Marks / Obtained

900 / 604

Result Declared on: ~~DECEMBER 26, 2013~~

Percentage / Grade

67 E

Date of issue: JANUARY 15, 2014

Muhammad Waseem

Controller of Examinations

Disclaimer:

This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.



SN: 3686

HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

DETAILED MARKS CERTIFICATE

22

MASTER OF ARTS (FINAL) ANNUAL EXAMINATION 2014

Roll No: 39406

Reg No: 11-MSRG-55

Name: Madeeha Bibi

F/ Name: Ali Khan

Institution/ MANSEHRA
District

Subject: Islamiyat

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
MA Previous Marks	500				312	THREE HUNDRED TWELVE	
(Al-Qura'an) Translation 2nd Half & Commentory alongwith Grammar	100		59		59	FIFTY-NINE	Pass
Principles of Islamic Jurisprudence	100		61		61	SIXTY-ONE	Pass
Islam & other World Religions	100		70		70	SEVENTY	Pass
Kalam & Philosophy of Islam / Islam in Contemporary Muslim World	100		68		68	SIXTY-EIGHT	Pass
Islamic Economics / Islamic Politics / Islam & Science	100		73		73	SEVENTY-THREE	Pass
General Viva Voce	100		68		68	SIXTY-EIGHT	Pass
TOTAL	1100				711	SEVEN HUNDRED ELEVEN	
Percentage:	64.64						
Division:	FIRST						

Print Date: 27-02-2015

Checked By:

Errors and omissions are subject to subsequent rectification.

Note: Any mistake in Name, Father Name etc must be intimated within 60 days of the issuance date of this Certificate.

Controller Examinations
Hazara University, Mansehra
February 27, 2015
Muhammad Waseem
S.S (Eng) BPS.17
Dhodial, Mansehra

Annex "B" C

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

(23)

ORDER

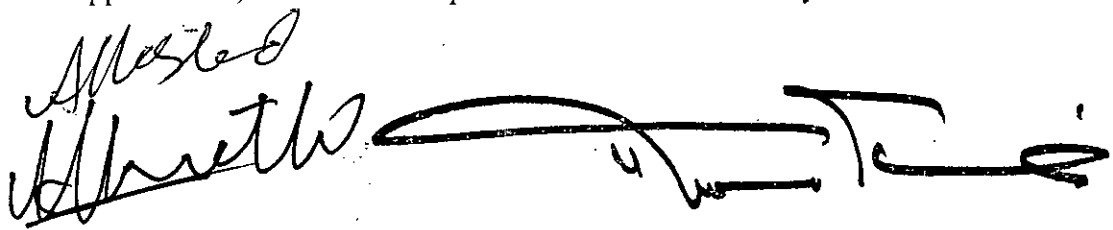
As approved by the Departmental Selection Committee, the Competent Authority has been pleased to appoint the following **Qaria teachers (Female)** against vacant posts mentioned against each in **BPS-9 @ Rs.6200-380-17600 pm** plus usual allowances as admissible under the rules in the interest of Public Service with effect from the date of their taking over charge subject to the following terms & conditions:-

S#	Name	Father Name	Address	Place of Posting	Remarks
1	BIBI BUSHRA	FIDA HUSSAN	MANGLOOR	GGHS HASSA	AV/Post
2	SHAZIA	M AFZAL KHAN	BANDA GESUCH	GGHS JABORI	AV/Post
3	FATIMA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DOGA	AV/Post
4	FARHAT BIBI	M.HAMAYUN	DHODIAL	GGHS DYARYAL	AV/Post
5	MANAZZA	MOHD.HAMYUN	TRANGRI BALA	GGHS MURAD PUR	AV/Post
6	MADHIA BIBI	ALI KHAN	AFZALABAD	GGHS AFZAL ABAD	AV/Post
7	BIBI SAEEDA SALAMA	FIDA HUSAIN	MANGLOOR	GGHS THATHI KHURD	AV/Post
8	ASMAT BIBI	ABDUL REHMAN	LASSAN NAWAB	GGHSS LASSAN NAWAB	AV/Post
9	BIBI MARIUM	FIDA HUSSAIN	MANGLOOR	GGHS PAIRAN	AV/Post
10	SAMMIYA RAHIEM	RAHIM SHAH	OGHI MANSEHRA	GGHS Oghi	AV/Post
11	SAIMA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DANDA KHOLIAN	AV/Post
12	ALYIA BIBI	ALI KHAN	AFZALABAD	GGHS SANGAR	AV/Post
13	AYSHA KANWAL	KHALIL UR REHMAN	LABARKOT	GGHS MAIRA AMJID ALI	AV/Post
14	AMBER ZEB	ALAM ZEB	PHULRA	GGHS PHULRA	AV/Post
15	AISHA BANO	SHAHZADA	M.M.POLE MANSEHRA	GGHSS BAFFA	AV/Post
16	BUSHRA BIBI	LAL KHAN	PHULRA	GGHS SAWAN MAIRA	AV/Post
17	MAMOONA WAJID	WAHJID	BHERKUND	GGHS CHANOOL	AV/Post
18	HAMEEDA	MOHD YOUSAF	PHULRA	GGHS JARED	AV/Post
19	TABSUM	MOHD NAZIR	OGHI MANSEHRA	GGHS TRAWRA	AV/Post
20	SABA NOOR	SHEIKH NOOR ELLAHI	MANSEHRA	GGHS TALHATA	AV/Post
21	ASMA NAZ	RAJA MANZOOR HUSSAIN	BEHALI	GGHS MOHAYIAN	AV/Post

Note: The pay of the candidates, falls at S# 1, 8, 16 & 20 will be effective from 01/09/2012 after the re-opening of summer vacations Zone Schools

TERMS & CONDITIONS:

1. Their appointments are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. They will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which they belong.
3. In case they failed to assume the charge of their posts within 15 days of their appointment, candidature-ship will be stand automatically cancelled.

M. S. S.


(24)

- Their services are regular but will not be entitled for pension/gratuity & they will not contribute any amount towards GP Fund however they will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. They will submit to this office, their all testimonial/Registration copy of their Madrasa (Institutions), along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
 6. The release of the pay by the concerned DDOs will be subject to the (a) receipt of verified documents by the appointing authority / (EDO E&SE Mansehra) (b) duly attested & verified registration copy of the concerned Dini Madrasa (Institutions), where he/she has obtained his/her Sanad/Certificate.
 7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.
 8. Their services are liable to termination on one month prior notice from either side in case of resignation without prior notice. Their one month pay/allowances if any shall be forfeited to Government Treasury.
 9. Their services can be terminated at any time in case their performance is found un-satisfactory; they will be proceeded against under the removal from service under E&D Rules 2011.
 10. They should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.
 11. They may not be handed over the charge if their age is above 35 years and below 18 years.
 12. The Candidates who are working as regular before 1st July 2001 in pervious post, their entitled for pension / gratuity etc.
 13. No. TA/DA etc is allowed.
 14. Charge report should be submitted to all concerned in duplicate.

(Umar Khan Kundi)
EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA

Endst: No 893-942 /Estt: (F)Apptt: Qaria (F)/2012 Dated Mansehra the 16/6/2012

Copy to the:-

1. Secretary to Govt: of KPK E&SE Department Peshawar.
2. Director E&SE Department KPK Peshawar:
3. District Accounts Officer, Mansehra.
- 4-5. District Officer (M&F) Local Office.
- 6-26. Principal/Headmistresses School concerned.
27. PA to District Coordination Officer, Mansehra.
28. Budget & Accounts Officer, local office, Mansehra.
- 29-50. Candidates concerned.

Attested
[Signature]
District Coordination Officer
Mansehra

[Signature]
EXECUTIVE DISTRICT OFFICER
E&SE MANSEHRA



(25)
Annex^c C,

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSHEHRA

No. 7726

D/O 2014

E-mail: deofmanshra@yahoo.com

Dated 29/9/2014

2014

Phone & Fax: 0997-302518

To

Head Mistress,
Govt. Girls High School

Subject:

Abdul Akbar

SHOW CAUSE NOTICE

Memo:

Show Cause notice in respect of Mr. Mahmood Raza D/O
Ali Khair of your school is attached herewith. You are
directed to serve the same to the teacher concerned and return one copy to this
office as a token of receipt.

[Signature]
DISTRICT EDUCATION OFFICER
FEMALE MANSHEHRA

Encl: No. _____

Copy to the:

1. Deputy Commissioner, Manshra
2. District Monitoring Unit Manshra.
3. Sub Divisional Education Officer (Female) Manshra.
4. ADEO Circle concerned is directed to ensure the attendance by the concerned teacher.

Attested
[Signature]
M. S. Faridi
Govt. Girls High School
Distt. Council Manshra

DISTRICT EDUCATION OFFICER
FEMALE MANSHEHRA



Anney 10

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7126 / Establishment / 2014
Dated: 27/9/2014

Email: deofmansehra@yahoo.com

Phone & Fax: 0997-302518

26

SHOW CAUSE NOTICE

I, Naghmata Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Servant (Efficiency & Discipline) rules, 2011, do hereby serve you Mst Madhia D/O Ali Khan, Qaria, Govt: Girls High School Afzal Abad Mansehra, Show cause Notice as follows:

- 1) You were appointed as Qaria at GGHS-Afzal Abad vide defunct Executive District Officer (E&SE) Mansehra Endst: No 893-942/Estt Qaria (I)/2012 Dated 16.06.2012 where you were stranger for recruitment process initiated through EATA: Acceptance of your appeal & subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet will & wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department letter No SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25/08/2014 More over the then EDO(E&SE) has been removed from Government Service in connection with all such bogus appointment including yours made by him.
- 2) Going through the finding and recommendation of the inquiry committee, the material on record & other connected papers including your defiance before the inquiry committee:

I am satisfied that you have committed the following acts/Omissions specified in rules.

- a) Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
- b) Inflicted huge financial losses to the Govt: Treasury receiving pay are result of bogus appointment.
- c) By snatching established rights of the deserving candidates due for appointment on merit. Cheating/canceling the facts for an lawful appointment with coordination of then EDO.
- 3) As a result thereof, I as competent authority have tentatively decided to impose upon you the major penalty of dismissal from services under rule 4 of the said rules.
- 4) You, are thereof, required to Show Cause as to why the aforesaid penalty should not be imposed upon you & also intimate where you desire to be heard in person.
- 5) If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defiance to put in and in that case an ex-parte action shall be taken against you.
- 6) A copy of the finding inquiry committee related page is enclosed.

Requested
Mst Madhia
Mst Madhia D/O Ali Khan
Advocate
Distt. Courts Abbottabad

COMPETENT AUTHORITY

Naghmata Sardar
District Education Officer
(Female) Mansehra

یہ سب سچ ہے جو مدعیہ پر بے اثر، کالعدم اور بلا اختیار ہے۔
ماریت لغرض کورٹ فیئر و اختیار ساعت و رالت

Interestingly, the aforementioned minutes / record of the DSC was not made in the office of the District Officer (Female) Mansehra and the same were, however, brought back from office of the DO (M) Mansehra after frequent requests.

The following irregularities have been found in the appointments of Qarias.

NAME & REGISTER NO.	PLACE OF POSTING	Facts	Remarks
Sushra Fida D/O Fazal	GGHS Hassa	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
D/O Muhammad Khan	GGHS Jabori	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Bibi Fida D/O Fazal	GGHS Doga	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Bibi D/O Muhammad Ayub	GGHS Dyaryal	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
M D/O Muhammad Ayub	GGHS Muradpur	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Shahida D/O Ali Khan	GGHS Afzal Abad	Sanad Hifz ul Quran from wafaq but Sanad Qirrat is not from recognized institution	The appointment is not valid and is against the recruitment rule/policy
Sayda D/O Fazal	GGHS Thathi Khurd	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Bibi D/O Abdul Karim	GGHS Lassan Nawab	No Sanad Sanad Hifz ul Quran and No Sanad Qirrat	The appointment is not valid and is against the recruitment rule/policy
Maryum D/O Fazal	GGHS Pairan	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Munira D/O Shah	GGHS Oghi	Sanad Hifz ul Quran is from recognized institution but Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy.
Bibi D/O Fazal	GGHS Danda Kholian	Sanad Hifz ul Quran and Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy
Bibi D/O Khan	GGHS Sangar	Sanad Hifz ul Quran is from recognized institution but Sanad Qirrat is not from recognized institution.	The appointment is not valid and is against the recruitment rule/policy

Attested

 Advocate
 Distt: Courts Abbottabad

EDUCATION
MANSEHRA

Madeeha

D/O Ali Khan

Qaria BPS-17

G.GHS Afzalabad Mansehra

To,

The Office of the DO (F)
Mansehra

(29)

Sub: Response of show cause notice

Memo:

1. It is submitted for your kind attention that I have been appointed as Qaria at GGHS Afzalabad vide no longer existing Executive District Officer (E&SE) Mansehra Endstt: No. 893-942/Estt Qaria (F) 2012 dated 16-06-2012.
2. We were recommended and recruited by the competent Authority i.e. Departmental selection committee after passing EATA test and checking our original Documents along with professional registered certificate about relevant job.
3. Further District account officer and other concerned Department have furnished our verified documents before releasing pay.
4. We were required to submit attested copies of all related documents to the EDO (S&L) concerned. Who checked our original Certificates/Degrees before handing over the charge.
5. Appointments were made purely on merit.
6. No element of faked/bogus appointment found any where even than the competent authority has tentatively decided to impose major penalty of dismissal from service upon me which is quite unlawful and uninviting. Therefore I apologise that my appointment is totally based on merit and through proper channel No such action should be taken against me.

The authority should secure my career and service. Thanking you in anticipation.

Sincerely your's

Dated 30-10-2014

Madeeha Bibi D/O Ali Khan

Qaria at GGHS Afzalabad

Muhammad
District Councils
District Councils



Annex 'E'

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

(29)

- 1:- Where as Mst: Madhia Bibi D/O Ali Khan working as Qaria GGHS/GGMS/GGP Afzal Akbar was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice.
- 2:- And where as the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Ex- Executive District Officer Elementary and Secondary Education Mansehra.
- i) Syed hidayat Jan, (PCS SG B-20) Agricultural Department Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)
- ii) Mr. Akhalhaq Baig, Principal BS-20 RITE Male Haripur.
- 3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.
- 4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notices, is of the view that the charges against you have been proved.
- 5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhwa Govt: Servants (Efficiency and Discipline) Revised Rules 2011 the District Education Officer (Female) Mansehra, in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt: Services upon Mst. Madhia Bibi D/O Ali Khan CT/PET/TT Qaria GGHS/GGM GGPS Afzal Akbar

[Handwritten Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 1636-45 /AE- I /Estab: dated 03/03/2015.

Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. District Accounts Officer Mansehra.
4. District Monitoring Officer Mansehra.
5. Deputy Commissioner Mansehra.
6. Principal/Headmistress Qaria Afzal Akbar
7. SDEO (F) Mansehra.
8. Budget and Accounts Officer Local Office.
9. Mst: Madhia Bibi Qaria
10. Office File.

[Handwritten Signature]
Mst. [Signature]
Advocate
Dist: Courts & Tribunal

[Handwritten Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

3

(30)

Dated 10.03.2015

To,

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Annex 4 F

Subject: - **DEPARTMENTAL REPRESENTATION/APPEAL**

Respected Sir,

It is submitted in your honour that I had been appointed Qaria Teacher vide DEO(&ESE) Mansehra order No. 893-942/Estt Qaria(F)/2012 dated 16.06.2012. (**Annexure "A"**).

The said vacancy had been advertised in a local daily "AAJ", Abbottabad dated 20.05.2011. (**Annexure "B"**). I applied for the said post and took ETEA test vide Roll No. 454, serial No. 9 dated 22.06.2011 and passed the same and was also called for interview.

After aforementioned formalities, I was appointed Qaria Teacher BPS-09 at GGHS, Afzal Abad, Mansehra against the available vacant post.

I joined duty at GGHS on 18.06.2012 and have been serving there 06.03.2015.

On 23.10.2014 I was served a show cause notice by DEO(Female) Mansehra vide No. 7726/ Establishment/2014 dated 29.09.2014 alongwith enclosure alleging therein that my recruitment was made without due process of recruitment etc (**Annexure "C"**) while as per enclosure "**Sanad Hifzul Quran & Sanad Qirat is not from recognized institution**", hence appointment is not valid and is against the recruitment rule/policy. (**Annexure "D"**).

The undersigned submitted her reply (**Annexure "E"**) alongwith the documentary proof that I was inducted after due process and my sanads were issued by "**Darul Uloom Muhammadiyah Arabia Tadrees-Ul-Quran Khawajgan**", which is recognized by Rabta Tul Madaris Pakistan, Multan vide registration No. 2810. (**Copies of sanads and affiliation are enclosed as Annexure "F", "G", "H" & "I"**).

The DEO Mansehra, without due consideration to the above facts and without personal hearing dismissed the undersigned from service vide notification No. 1636-45/AE-J/Est, dated 03.03.2015. (**Annexure "J"**).

Since my degrees are original and I possess much higher education than the prescribed qualification and the institute is recognized by Wafaqul Madaris, Pakistan. Moreover I had been posted after observing due process by the department.

It is, therefore, requested that I may kindly be re-instated into service after revoking the whimsical and unlawful order of DEO(Female) Mansehra.

Thanking you in anticipation.

Sincerely yours

Madiha Bibi

Madiha Bibi
Ex-Qaria Teacher,
GGHS Afzal Abad
Mansehra.

Annex "B"
Merit List

Address: -
Madiha Bibi
r/o Post Office Afzal, Abad
Tehsil and District Mansehra
Cell#0331-9324795

Attested
Mukhtar Ahmad
Advocate
Distt: Courts Abbottabad

وکالت نامہ

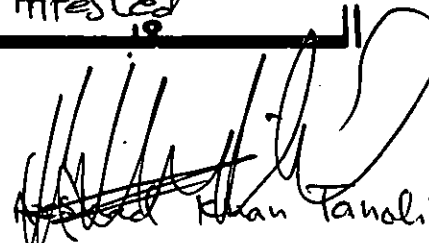
بعدالت KPIK سر ویس ٹریبونل لاہور
 عنوان: عدالت عالیٰ کی حاکم بنام حکومت (ایجوکیشن) وٹمنٹ
 منجانب: اسعدت
 نوعیت مقدمہ: ایسٹ

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آں مقام
 حاکم کی طرف سے منوی اور حکومت کے حاکمی کورٹ کے آرڈر ۲۰۱۲
 کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب
 موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء
 وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور
 کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار
 بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور و قبول
 ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔
 نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف
 پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جز و بقایا ہو تو وکیل صاحب موصوف
 مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد استجارت نالاش بصیغہ مفلسی کے دائر کرنے اور اس کی
 پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

بمقام: _____ المرقوم: _____

Attest

 M. Asad Khan Tanoli
 Adv High Court Attd

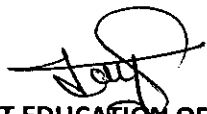
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 777/2015

Respectfully Shewth

1. That the services appeal No: 777/2015 in respect of MST: Madiha Humayun is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4184-89 /F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been conditionally reinstated against the post of Qaria (Notification: attached).

It is requested that the above mentioned appeal may kindly be dispose off please.


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

ADD

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst. Madeeha, Qaria at Government Girls High School Afzal Abad District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1636-45 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

1. Her name was at S.No. 07 of the merit list. Her sanad of Hifzul Quraan was from Wafaqul Madaris Multan whereas the asnad of Tajveedulquraan was from Darul Uloom Jamea Muhammadia Arbia Tadreesul quraan WaHadees Khwajgan Mansehra. She was appointed as Qaria vide a general order Endst: No. 893-942 dated 16/06/2012 at S. No. 06.

2. Appeal may be accepted subject to condition that the madaris/ institution from where she acquired asnad (Qirat & Hifz ul Quran) for the post of Qaria must be affiliated with Wafaq-ul Madaris in line with the Govt. of KPK E&SE Deptt. Letter No. SO(PE)5-12/ Darululoom Swat/ Chitral/ 10 dated 7/6/2012.

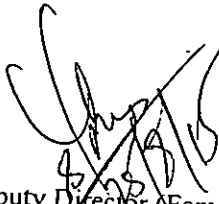
NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 1636-45 dated 03/03/2015 and reinstate Ms. Madeeha, Qaria, at Government Girls High School Afzal Abad District Mansehra with effect from the date of her dismissal with all back benefits subject to production of the requisite registration & affiliation to the DEO (F) Mansehra.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

st: No. 4184-89 /F.No. 11 /Appeals Female MSR Dated Peshawar the 27 /2015

Copy of the above is forwarded for information & n/action to the:-

- District Education Officer (Female) Mansehra with the remarks to obtain/ascertain the requisite registration & affiliation from Mst. Madeeha, Qaria and place on record under intimation to this office.
- District Accounts Officer Mansehra
- Principal, Concerned
- Appellants concerned
- PA to Director E&SE KP, Peshawar
- Master File.


Deputy Director (Female)
Directorate E&SE, KP