

24.07.2015

Appellant Deposited
Security & Process Fee

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 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. Notice of stay application be also issued for the date fixed.



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Dismissed as withdrawn.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.
20.10.15

ANNOUNCED
20.10.2015

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 780/2015

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. Sabiya 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. 789/2015

Sabiya d/o Noor Hassan GGPS, Tanwal R/o Banda Circle Baffa
Tehsil & District 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	APPEAL		1-10
2	Copy of Advertisement	"A"	11
3	Copies of Documents/testimonial are annexed	"B"	12-23
4	Copy of appointment order and corrigendum	"C"	24-27
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	28-29
6	Copy of impugned dismissal order of appellant	"E"	30
7	Copy of departmental appeal /representation	"F"	31-32
8	Wakalatnama		

Dated: 7/7/2015

Sabiya
Appellant

Through

Muhammad Arshad Khan Tanoli
Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal no. 789/15 ①

K.P. Province
Service Tribunal
Diary No. 793
dated 08/7/15

Sabiya d/o Noor Hassan GGPS, Tanwal R/o Banda Circle Baffa
Tehsil & District 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

SERVICE APPEAL.

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:-

1. That, respondent No 3 announced the posts of PST in Dailly "The Aaj" dated 20/5/2011 for appointment of PST teachers. The Appellant fulfills the entire criteria which is sine qua non for appointment for the post of PST Teacher.

Copy of Advertisement is annexed as Annexure "A"

Filed to
8/7/15

②

2. That, the appellant qualified test as well as interview conducted by respondent No 3. The appellant is qualified Matric, F.A/F Sc PTC with extra qualification. **Copies of Documents/testimonial are annexed as Annexure "B"**

3. That, following this, the appellant was appointed as PST Teacher in respondents' Department on the basis of merits and was posted in GGPS vide appointment order endrst No 5360-5384/ Estt ; PST 2011/2012 Mansehra Dated 18.5.2012. **Copy of appointment order and 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. 18.5.2012 onwards.

5. That, the appellant was though dismissed from service by the respondents' department vide Endrs. No 1896-1905/AE /ESTB on 3.3.2015.

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 and DEO, Shamim Akhtar was found attached with the show cause notice, wherein

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it was mentioned against the name of appellant that "that appointment order was the result of misuse of authority by the then EDO according to his sweet will and wishes as against the recruitment rules". **Copy of Show cause notice annexed as Annexure "D"**. AS the inquiry committee did not 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 PST Teacher and appeared in ETTA 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 requisite qualification from recognized Institution to be appointed "as per service structure in prescribe rules the requisite qualification against the vacant post of PST Teacher is taken into consideration and thereafter appointment made on merit.
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

④

endst. No 1896-1905/AE /ESTB dated 03.03.2015. **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 11.3.2015. **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

- a. That, the appellant fulfilled the criteria of appointment as PST being qualified. The appellant was appointment on merit on the recommendation of Departmental Selection Committee and was placed on the merit list.12
- b. Hence impugned dismissal order is illegal perverse, discriminatory without lawful justification and null and void on the rights of the appellant.

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- c. That, as per educational record annexed with the appeal, the appellant has been appointed as PST according to the laid down procedure and criteria mentioned in the advertisement published by respondent 3. It is further submitted that there were vacant post of PST in the Union Council of the appellant but respondent No 3 did not appoint the appellant in her Union Council. However later on she was to be posted in her own Union Council. It is worth mentioning that there was no contesting candidate in the Union Council where the appellant was appointed as per law and procedure mentioned in the advertisement.
- d. 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 PST. But the conduct of respondents department towards the appellant is mala fide, discriminatory and not maintainable at law.
- e. 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,

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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.

- f. 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.
- g. That, respondents' Department has led the appellant to the place which is utterly unknown to the principle of jurisprudence and natural justice.
- h. That, right from the appointment of the appellant as PST in 2012, there was no rival candidate who contested the appointment of the appellant in any Court of law anywhere in KPK.
- i. 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

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cannot be dismissed for the acts committed by the Ex-
EDO.

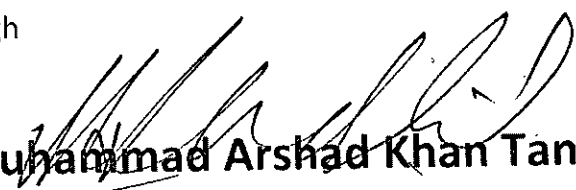
- j. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribe period of limitation

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order Endrst. No 1896-1905/AE /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

Sobie
Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad



BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Sabiya d/o Noor Hassan GGPS, Tanwal R/o Banda Circle Baffa
Tehsil & District 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

APPLICATION FOR SUSPENSION
OF IMPUGNED ORDER NO 1896-
1905/AE /ESTB AND GRANT OF
STATUS QUO TILL FINAL DISPOSAL
OF THE MAIN APPEAL .

Respectfully Sheweth,

1. That the instant service appeal is being filed today and this application may be treated as part and partial of the service appeal.
2. That, competent authority i.e District Education Officer (Male) Mansehra prior to dismissal of the applicant did not followed the procedure laid down in service laws. Hence the applicant has not been provided opportunity of personal hearing and no final show cause notice has been issued
3. That, valuable rights have been accrued to the applicant for serving teacher and Education Department since 2012 to till date.
4. That, the applicant served the Department with complete devotion and dedications. Besides, the applicant had required qualification/criteria for the said post and the

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applicant has not been contested by any one as there was no contesting rival candidate.


5. That, the applicant got appointment purely on the basis of merit. The applicant has been dismissed by the competent authority due to no fault of her.
6. That, the balance of convenience is infavour of the applicant and in case, status quo is not granted, the applicant shall suffer irreparable.

It is, therefore, very humbly prayed that on acceptance of the instant application, impugned termination order dated 03.03.2015 may graciously be suspended and status quo may also be granted till final decision of the main appeal.

Dated: 7/7-2015

S. Khan
Appellant

Through


Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

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BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Sabiya d/o Noor Hassan GGPS, Tanwal R/o Banda Circle Baffa
Tehsil & District 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, Sabiya d/o Noor Hassan GGPS, Tanwal R/o Banda Circle Baffa Tehsil & District 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: 2/7/2015

Sabiya
Deponent

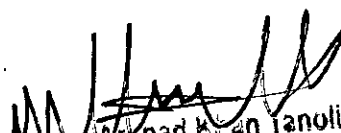
P-11 Annex - A

نمبر	تاریخ	موضوع	محل
18	2-7-09	2-7-11 GGIS 2-7-11	11
19	4-7-09	11	
20	6-7-11		
21	9-7-11		
22	11-7-11		
23	14-7-11		
24	19-7-11		

گورنمنٹ آف پاکستان کے سرکاری اخبار (پبلک گزٹ) میں شائع ہونے والے نوٹیفکیشن کے تحت، گورنمنٹ آف پاکستان نے اپنے سرکاری اداروں کے لیے کئی نوٹیفکیشن جاری کیے ہیں جن سے متعلقہ اداروں کو مطلع کیا گیا ہے۔

1. تمام سرکاری نوٹیفکیشن گورنمنٹ آف پاکستان کے سرکاری اخبار (پبلک گزٹ) میں شائع ہونے لگے۔
 2. تمام سرکاری نوٹیفکیشن گورنمنٹ آف پاکستان کے سرکاری اخبار (پبلک گزٹ) میں شائع ہونے لگے۔
 3. تمام سرکاری نوٹیفکیشن گورنمنٹ آف پاکستان کے سرکاری اخبار (پبلک گزٹ) میں شائع ہونے لگے۔

1. تمام سرکاری نوٹیفکیشن گورنمنٹ آف پاکستان کے سرکاری اخبار (پبلک گزٹ) میں شائع ہونے لگے۔
 2. تمام سرکاری نوٹیفکیشن گورنمنٹ آف پاکستان کے سرکاری اخبار (پبلک گزٹ) میں شائع ہونے لگے۔
 3. تمام سرکاری نوٹیفکیشن گورنمنٹ آف پاکستان کے سرکاری اخبار (پبلک گزٹ) میں شائع ہونے لگے۔


 Muhammad Arshad Khan Tanoli
 Advocate
 Distt: Courts Abbottabad

P-12

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No: 208637

PROVISIONAL RESULT CARD

Name SABINA
Father's Name NOOR HUSSAIN
Address VILL BAFFA NERA GANDHIAN P. O
GANDHIAN C/ D JADON P/S
Tehsil MANSEHRA
District MANSEHRA

Roll No. AC641657
Registration No. 09NMA00976
Final Semester AUT- 2009

Annex B

has successfully completed PRIMARY TEACHING CERTIFICATE

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 09	0613	SCHOOL ORGANIZATION & MANAGEMENT	100	65
SPR- 09	0614	EDUCATIONAL PSYCHOLOGY	100	61
SPR- 09	0613	PRINCIPLES OF EDUCATION	100	59
SPR- 09	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	62
AUT- 09	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	70
AUT- 09	0618	TEACHING OF MATHEMATICS	100	55
AUT- 09	0617	TEACHING OF URDU	100	77
AUT- 09	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	78
AUT- 09	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	63

Muhammad Arshad Khan Janjani
Dist: District

CREDITS: 5

Total Marks / Obtained 900 / 590

Result Declared on SEPTEMBER 17, 2010

Percentage / Grade 66 B

Date of issue SEPTEMBER 29, 2010

[Signature]

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.



HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

DETAILED MARKS CERTIFICATE

BA ANNUAL EXAMINATION 2011

P-13

Roll No: 57298

Reg No: 10-PM-2035

Name: Sabhia

F/ Name: Noor Hassan

Institution/ MANSEHRA
District: _____

Part: Second

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
Part-I Marks----->	285				138	ONE HUNDRED THIRTY-EIGHT	
ENGLISH	75		25		25	TWENTY-FIVE	Pass
URDU	75		45		45	FORTY-FIVE	Pass
PAKISTAN STUDIES	40		21		21	TWENTY-ONE	Pass
ISLAMIC STUDIES	75		44		44	FORTY-FOUR	Pass
Total:	550				273	TWO HUNDRED SEVENTY-THREE	

Percentage: 49.64

Division: **SECOND**

Print Date: 15-08-2011

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
August 15, 2011

Muhammad Arshad Hussain
Advocate
Distt: Courts Abbottabad

Roll No. 62405

ADAN# 115088

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



P-14

Abbottabad N.W.F.P. - Pakistan
HIGHER SECONDARY SCHOOL EXAMINATION CERTIFICATE
SESSION ANNUAL 2009
Humanities Group

This is to certify that SABIHA
Daughter of NOOR HUSSAIN
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 2009 as a Private candidate. She has obtained 576 marks out of 1100 and has been placed in Grade C Representing 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. ISLAMIC HISTORY | 5. CIVICS | 6. URDU (ADVANCE) |

Muhammad Ali
Muhammad Ali
District Council Abbottabad

[Signature]
Asstt. Secretary

This certificate is issued without alteration or erasure.

[Signature]
Secretary



HAZARA UNIVERSITY

MANSEHRA, NWFP, PAKISTAN

SNo: 14489

DETAILED MARKS CERTIFICATE

BA ANNUAL EXAMINATION 2010

P-15

Roll No: 43219

Reg No: 10-PM-2035

Name: Sabha

Father's Name: Noor Hassan

Institution / District: MANSEHRA

Part: First

Course Title:	Max. Marks		Marks Obtained		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
ENGLISH	75	28	28		28	TWENTY-EIGHT	Pass
URDU	75	28	28		28	TWENTY-EIGHT	Pass
ISLAMIYAT	60	39	39		39	THIRTY-NINE	Pass
ISLAMIC STUDIES	75	43	43		43	FORTY-THREE	Pass
Total:					138	ONE HUNDRED THIRTY EIGHT	
Percentage:					48.42		

Print Date: 23-08-2010

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, Manshra

August 23, 2010

Attested

 District Controller
 Manshra

GOVERNMENT GIRLS HIGH SCHOOL GANDHIAN (MANSEHRA)

CHARACTER CERTIFICATE

P-16

Certified that Miss. Sabiha

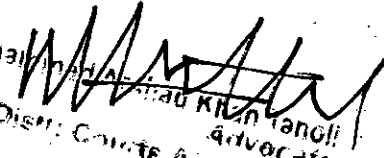
Daughter of Noor Hussain

R/O Village Baffa Mera Post Office Gandhian

Tehsil & District Mansehra, was a regular student of this school with effect from 8-4-2005 to 15-4-2007. During her stay in the school she showed good moral character.


HEADMISTRESS,
GGHS GANDHIAN.

Attended


Muhammad Ali Khan Langli
Advocate
Distt: Courts Abbottabad

ADA No 220706

Roll No. 8468

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



P-17

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

This is to certify that SABIHA
Daughter of NOOR HUSSAIN
A candidate from GOVT. GIRLS HIGH SCHOOL GANDHIAN 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 572 marks out of 900 and has been placed in
Grade B Representing VERY GOOD.

The candidate passed in the following subjects:

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

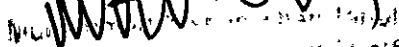
Date of Birth according to admission form is TWENTY-FIFTH DECEMBER

One Thousand Nine Hundred and NINETY-ONE (25-12-1991)


Asstt. Secretary

This certificate is issued without alteration or erasure.


Secretary


Secretary

Certificate No: AB 135393

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Roll No: 62405
Group: HUMANITIES

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

Part - II
Session: 2009 (Annual)

P-18

Name: SABIHA
Father Name: NOOR HUSSAIN
Reg No: 7155AB/MA-intFP08
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					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	42	--	25	--	67	Sixty-Seven
Urdu (Comp)	200	71	--	61	--	132	One Hundred Thirty-Two
Islamic Education	50	30	--	--	--	30	Thirty Only
Pakistan Studies	50	--	--	28	--	28	Twenty-Eight
Islamic History	200	47	--	53	--	100	One Hundred Only
Civics	200	54	--	50	--	104	One Hundred Four
Urdu (Advance)	200	66	--	49	--	115	One Hundred Fifteen

Total : 1100

576-C Five Hundred Seventy-Six Only

Remarks :

Date : 23 July, 2009

Checked By : _____

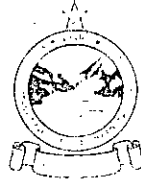
[Signature]
Controller of Examinations

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

Attest
[Signature]
Muhammad Arshad Khan Farooq
Advocate
Distt: Courts Abbottabad

Certificate No: AB 8487

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Roll No: 8468
Group: SCIENCE

DETAILED MARKS CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION

Session: 2007 (Annual)

P-19

Name: SABIHA
Father Name: NOOR HUSSAIN
Institution / District: GOVT. GIRLS HIGH SCHOOL GANDHIAN
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
				Theory / A	Pract / B		
English	75	75	150	38	41	79	Seventy-Nine
Urdu	75	75	150	53	60	113	One Hundred Thirteen
Islamiyat	75		75	53		53	Fifty-Three
Pakistan Studies	75		75	45		45	Forty-Five
Mathematics	75	75	150	61	28	89	Eighty-Nine
Physics	85	15	100	46	11	57	Fifty-Seven
Chemistry	85	15	100	56	10	66	Sixty-Six
Biology	85	15	100	58	12	70	Seventy

Total : 900

572-B Five Hundred Seventy-Two Only

Remarks


Dated: 16-JUL-07

Checked By: *[Signature]*

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

[Signature]
Controller of Examinations

[Signature]
Munir Ahmad
Secretary
Board of Intermediate & Secondary Education
Abbottabad



BOARD OF INTERMEDIATE & SECONDARY EDUCATION

ABBOTTABAD - N.W.F.P. PAKISTAN
PROVISIONAL CERTIFICATE

P-20

HSSC EXAMINATION
SESSION 2009 (Annual)

THIS IS TO CERTIFY THAT Sabiha

Daughter of

Noor Hussain

student of

Mansehra District

has passed the *Higher Secondary School Certificate Examination* of the Board of Intermediate & Secondary Education, Abbottabad held in *April/May, 2009* as a *Private* candidate. She obtained *576* marks out of *1100* and has been placed in Grade "C"

The Candidate passed the following subjects.

1. Urdu

2. English

3. Islamic Edu. & Pak Studies

4. Islamic History

5. Civics

6. Urdu (Advance)

Registration No: 7155AB/MA-intFP08

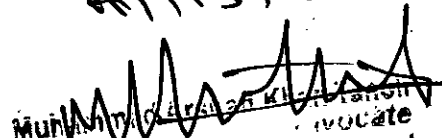
Checked by

Asst. Secretary (Certificate)

Computer Section BISE,ATD

Date of Issue: July 23, 2009

Attested


 District Court Advocate
 Distt. Courts Abbottabad

GOVT. GIRLS HIGH SCHOOL GANDHIAN



(MANSEHRA)

P-21

S.NO. 1117

PROVISIONAL CERTIFICATE

SESSION 2007-2008

Certified that Miss Sabira D/of Mansehra Appeared in S.S.C Annual /Supply Examination 2007 from the Board of Intermediate & Secondary Examination Abbottabad, held in April 2007. Under the Roll No. 3468 and Registration No. 0055011001 according to preliminary result statement supplied by the Secretary B. I. S. E Abbottabad, has been declared successfully obtaining 572 Marks in the following Subjects. Placing in B Grade.

- 1. English
- 2. Urdu
- 3. Pakistan Studies
- 4. Islamyit ©
- 5. Physics
- 6. Chemistry
- 7. Biology
- 8. Arabic

Date of Birth according to school record is (in figures) 25.12.1991
 (In words) Twenty fifth Dec. N.H. a ninth one Ad. No. 757

Prepared by M. S. Khan Checked by B. Riki

Date of Issue

Muhammad Ali
 Headmistress

HEAD MISTRESS
 Govt. Girls High School
 Gandhian (Mansehra)

DOMICILE CERTIFICATE

NWFP DISTRICT

MANSEHRA



P-22

I declare that i am born of parents who are/were permanently domiciled in NORTH WEST FRONTIER PROVINCE having been born/settled in this province.

MUSHTAK & FBI
G.G.H.S Gandian
Mansehra

I was born at Village/Mohallah BAFFA MERA GANDHIAN

Tehsil MANSEHRA District MANSEHRA Hazara Division

Muhammad Aslam
Advocate
Distt. Courts Abbottabad

Sabiha
Signature of Applicant

Date. 27-07-2007

Pursuance of the Declaration date _____

Filled by Mr./Miss./Mrs. SABIHA ABBASI

S/D/W/O NOOR HASSAN

Domiciled in North West Frontier Province, it is hereby certified that the said APPLICANT is born of parents who are/were/permanent residents of the North West Frontier Province, having been born/settled within it.

Verification Over Seal

I have satisfied myself from personal/my knowledge verification that the above decelerationis true and certify accordingly

This _____ day of _____ 2007

No 7110 Dated 01-8-07

Countersigned
DISTRICT OFFICER
REVENUE & ESTATE

Distt. Revenue & Estate Mansehra

DEPUTY DISTRICT OFFICER
REVENUE & ESTATE

Iftikhar Printing Press Shinkari Road Mansehra 03023509047

0301-255212379

پیشکش - لکھنؤ کی عورتوں کو جو کہ معاہدہ جیو جیو اور دفتر نورین قریب سے رہتی ہیں ان کے لئے
 کوئی کوئی بھروسہ نہیں ہے۔ یہ لڑکے اور لڑکیاں ہیں جو کہ پورے ملک میں پھیل چکی ہیں۔
 سب سے پہلے ان کو بچانے کے لئے اقدامات کیے جائیں۔

Alam Zeb Khan
 Nazim UK Baffa Town
 Member Zilla Council Manshra

P-23

وہاں تک کہ وہ بچے کو بچانے کے لئے اقدامات کیے جائیں۔
 ان کے لئے کوئی بھروسہ نہیں ہے۔ یہ لڑکے اور لڑکیاں ہیں جو کہ پورے ملک میں پھیل چکی ہیں۔
 سب سے پہلے ان کو بچانے کے لئے اقدامات کیے جائیں۔

31/7/17

رپورٹ پٹواری تصدیق شدہ
 گرداور سرکل
 01/8/07

01/8/07

Annex - e P-24

OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

ORDER

Consequent upon the recommendation of the Departmental Selection Committee District Mansehra, the competent authority is pleased to appoint the following candidates as a Primary School Teacher **PST (Female)** against newly created / resultant vacated posts in their relevant union councils in **BPS 7 @ Rs.5800-320-15400** plus usual allowances as admissible under the rule on regular basis under the existing policy of provincial Government on the terms and conditions given below with immediate effect.

U/C BAFFA				
S#	Name of Candidate	Father's Name	Home Address/ Domiciled U/C	Remarks
1	Niaz Gul	Abdul Razaq	Baffa	Own UC M/List
2	Sabia ✓	Noor Hussain	Baffa	Own UC M/List
U/C BEHALI				
3	Munaza Daud	Daud	Behali	Own UC M/List
4	Nazma Bibi	R.Khan Bahdar	Behali	Own UC M/List
U/C Battal				
5	Shagufta Bibi	Muhammad Shafi Khan	Battal	Own UC M/List
6	Shaista Jabeen	Muhammad Akbar	Kathai	From Adjacent UCs Merit list
U/C Bherkund				
7	Bushra	Ghulam Mustafa	Bhekund	Own UC M/List
U/C Gari Habib Ullah				
8	Naida Ashraf	Muhammad Ashrif Bag	Gari Habib Ullah	Own UC M/List
9	Gul Naz Bibi	S. Qabal Shah	Gari Habib Ullah	Own UC M/List
U/C Hilkot				
10	Bibi Asia	Abdul Ghafoor	Hilkot	Own UC M/List
U/C Hangrai				
11	Irum Saeed	Saeed Akhtar	Hangrai	Own UC M/List
12	Marium Bibi	Muhammad Younis	Hangrai	Own UC M/List
U/C Ichrian				
13	Bibi Sajida	Saeed ur Rehman	Ichrian	Own UC M/List
14	Saima Ara	M.Fareed Khan	Ichrian	Own UC M/List
U/C Jabar Daveli				
15	Mah Jabeen	Muhammad Farooq	Jabar Daveli	Own UC M/List
16	Saba Tariq	Muhammad Tariq	Sachan	From Adjacent UCs Merit list
U/C Jaloo				
17	Sobia Bibi	Abdul Ghafoor	Jaloo	Own UC M/List
18	Saima Naz	Mir Afzal	Jaloo	Own UC M/List
U/C Karnol				
19	Fara Naz	Muhammad Khurshid	Karnol	Own UC M/List
20	Nadia Rehman	Habib ur Rehman	Pairan	From Adjacent UCs Merit list
U/C Karori				
21	Amrin Younis	Muhammad Younis	Karori	Own UC M/List
22	Musrat Bibi	Khalil ur Rehman	Karori	Own UC M/List
23	Zenab	Alam Zeb	Karori	Own UC M/List
24	Amrin Kusar	Muhammad Miskeen	Karori	Own UC M/List
25	Rukhsana Taj	Taj Muhammad	Karori	Own UC M/List
26	Rifat Bibi	Faqeer Muhammad	Shanaya	From Adjacent UCs Merit list
27	Ashiya	Misri Khan	Shanaya	From Adjacent UCs Merit list
28	Razia Bibi	Muhammad Zaman	Darband	From Adjacent UCs Merit list

- 1 -

District Officer, Mansehra
 Mansehra

P-25

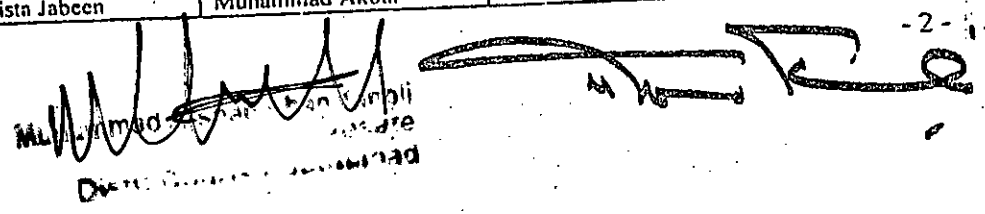
U/C Lassan Nawab				
29	Sobia Arshad	Muhammad Arshad	Lassan Nawab	Own UC M/List
30	Rashida Bibi	M.Zahoor	Lassan Nawab	Own UC M/List
U/C Mohandari				
31	Bibi Naseema	Ghulam Nabi	Mohandari	Own UC M/List
U/C Nika Pani				
32	Yasmeen Wahab	Abdul Wahab	Nika Pani	Own UC M/List
33	Neelam	Abdul Latif	Darband	From Adjacent UCs Merit list
U/C Perhinna				
34	Lubna Younis	M.Younis	Perhinna	Own UC M/List
35	Zahida Bano	Ali Zaman	Perhinna	Own UC M/List
U/C Phulra				
36	Bibi Saleha	Abdula Jan	Phulra	Own UC M/List
37	Mehnaz Bibi	M.Iqbal	Phulra	Own UC M/List
38	Bibi Mewash	M.Naveed	Phulra	Own UC M/List
39	Farzana Yousaf	M.Yousaf	Phulra	Own UC M/List
40	Bibi Farah	Khurshid Khan	Sawan Maira	From Adjacent UCs Merit list
U/C Sachan Kalan				
41	Bibi Salama	Shezada Khesro Faredon	Sachan Kalan	Own UC M/List
42	Bibi Norin	Rehmat Ullah	Sachan Kalan	Own UC M/List
U/C Sawan Maira				
43	Tahira Jabeen	Muhammad Ayub	Sawan Maira	Own UC M/List
U/C Shanaya				
44	Safoora Farat	Abdul Razaq	Shanaya	Own UC M/List
45	Irum Shaheen	Anwar Khan	Shanaya	Own UC M/List
U/C Shergarh				
46	Saeeda Haidar	Mir Haidar	Shergarh	Own UC M/List
47	Fozia Bibi	Sher Bahadar	Shergarh	Own UC M/List
48	Sadia Gul	M.Zaman	Shergarh	Own UC M/List
49	Asma	Abdul Malik	Darband	From Adjacent UCs Merit list
U/C Shuakat Abad				
50	Sadia Javed	Javed Khan	Shuakat Abad	Own UC M/List
51	Sabeen	M.Haroon	Shuakat Abad	Own UC M/List
52	Tabasam Rashid	Abdul Rashid	Shuakat Abad	Own UC M/List
U/C Trangri Sabir Shah				
53	Nabeela Ghuncha Gul	Bashir Ahmad Khan	Trangri Sabir Shah	Own UC M/List
54	Khalida Bibi	M.Yousaf Khan	Trangri Sabir Shah	Own UC M/List
55	Sidra Hamayun	M.Hamayun	Trangri Sabir Shah	Own UC M/List
U/C Bandi Shungli				
56	Salma Javed	Muhammad Javed	Darband	From Adjacent UCs Merit list
57	Nosheen Bibi	Fazal ur Rehman	Darband	From Adjacent UCs Merit list
U/C Tanda				
58	Sahibzada Hazmat Rabani	Ghulam Rabani	Tanda	From Adjacent UCs Merit list
59	Asma Noreen	Nawab Khan	Dhodial	From Adjacent UCs Merit list

ADJUSTMENT ORDER

Consequent upon the above, the following adjustment are hereby ordered against the posts mentioned against each.

S#	Name	Father's Name	Home Address/ Domiciled U/C	Place of Posting	Remarks
1	Niaz Gul	Abdul Razaq	Baffa	GGPS Baffa Khurd	A/V/Post
2	Sabia	Noor Hussain	Baffa	GGPS Kando Gali	A/V/Post
3	Munza Daud	Daud	Behali	GGPS Ashwal	A/V/Post
4	Nazma Bibi	R.Khan Bahdar	Behali	GGPS Jamsal Nakka	A/V/Post
5	Shagufta Bibi	Muhammad Shafi Khan	Battal	GGPS Karmang	A/V/Post
6	Shahista Jabeen	Muhammad Akbar	Kathai	GGPS Chandni	A/V/Post

- 2 -



8	Bushra	Ghulam Mustafa	Bhekund	GGPS Kehnia Mian	A/V/I/Post
9	Naida Ashraf	Muhammad Ashrif Bag	Gari Habib Ullah	GGPS Danna Ganaila	A/V/I/Post
10	Gul Naz Bibi	S. Qabal Shah	Gari Habib Ullah	GGPS Chuntri	A/V/I/Post
11	Bibi Asia	Abdul Ghafoor	Hilkot	GGPS Khan Balimang	A/V/I/Post
12	Irum Saheed	Saeed Akhtar	Hangrai	GGPS Kalas Ghanaila	A/V/I/Post
13	Marium Bibi	Muhammad Younis	Hangrai	GGPS Kalas Ghanaila	A/V/I/Post
14	Bibi Sajida	Saeed ur Rehman	Ichriani	GGPS Karmang Payeen	A/V/I/Post
15	Saima Ara	M. Farced Khan	Ichriani	GGPS Ramsara	A/V/I/Post
16	Mah Jabeen	Muhammad Farooq	Jabar Daveli	GGPS Baso Manda Gucha	A/V/I/Post
17	Saba Tariq	Muhammad Tariq	Sachan	GGPS Baso Manda Gucha	A/V/I/Post
18	Sobia Bibi	Abdul Ghafoor	Jaloo	GGPS Talian Di Kasi	A/V/I/Post
19	Saima Naz	Mir Afzal	Jaloo	GGPS Chor Banda	A/V/I/Post
20	Fara Naz	Muhammad Khurshid	Karnol	GGPS Bhoraj	A/V/I/Post
21	Nadia Rehman	Habib ur Rehman	Pairan	GGPS Dheri Sohail	A/V/I/Post
22	Amrin Younis	Muhammad Younis	Karori	GGPS Seri Malwal	A/V/I/Post
23	Musrat Bibi	Khalil ur Rehman	Karori	GGPS Malhar	A/V/I/Post
24	Zenab	Alam Zeb	Karori	GGPS Malhar	A/V/I/Post
25	Amrin Kusar	Muhammad Miskeen	Karori	GGPS Fata Bandi	A/V/I/Post
26	Rukhsana Taj	Taj Muhammad	Karori	GGPS Fata Bandi	A/V/I/Post
27	Rifat Bibi	Faqeer Muhammad	Shanaya	GGPS Naryala	A/V/I/Post
28	Ashia	Misri Khan	Shanaya	GGPS Thakra	A/V/I/Post
29	Razia Bibi	Muhammad Zaman	Darband	GGPS Dhok	A/V/I/Post
30	Sobia Arshad	Muhammad Arshad	Lassan Nawab	GGPS Sharota	A/V/I/Post
31	Rashida Bibi	M. Zahoor	Lassan Nawab	GGPS Chapra Bala	A/V/I/Post
32	Bibi Naseema	Ghulam Nabi	Mohandari	GGPS Badal Gran	A/V/I/Post
33	Ynsmeen Wahab	Abdul Wahab	Nikh Puni	GGPS Cham	A/V/I/Post
34	Neelam	Abdul Latif	Darband	GGPS Cham	A/V/I/Post
35	Lubna Younis	M. Younis	Perhinna	GGPS Phalkot	A/V/I/Post
36	Zahida Bano	Ali Zaman	Perhinna	GGPS Phalkot	A/V/I/Post
37	Bibi Saleha	Abdula Jan	Phulra	GGPS Ghazikot	A/V/I/Post
38	Mehnaz Bibi	M. Iqbal	Phulra	GGPS Dhaman	A/V/I/Post
39	Bibi Mewash	M. Naveed	Phulra	GGPS Ghazikot	A/V/I/Post
40	Farzana Yousaf	M. Yousaf	Phulra	GGPS Batangi	A/V/I/Post
41	Bibi Farah	Khurshid Khan	Sawan Maira	GGPS Gojar Gali	A/V/I/Post
42	Bibi Salama	Shezada Khesro Fareedon	Sachan Kalan	GGPS Kalas Nawaz Abad	A/V/I/Post
43	Bibi Norin	Rehmat Ullah	Sachan Kalan	GGPS Kalas Nawaz Abad	A/V/I/Post
44	Tahira Jabeen	Muhammad Ayub	Sawan Maira	GGPS Mohar	A/V/I/Post
45	Safoora Farat	Abadul Razaq	Shanaya	GGPS Numshera Shahkot	A/V/I/Post
46	Irum Shaheen	Anwar Khan	Shanaya	GGPS Numshera Shahkot	A/V/I/Post
47	Saeeda Haidar	Mir Haidar	Shergarh	GGPS Gakharh	A/V/I/Post
48	Fozia Bibi	Sher Bahadar	Shergarh	GGPS Perchaian	A/V/I/Post
49	Sadia Gul	M. Zaman	Shergarh	GGPS Perchaian	A/V/I/Post
50	Asma	Abdul Malik	Darband	GGPS Shorolian	A/V/I/Post
51	Sadia Javed	Javed Khan	Shuakat Abad	GGPS Lalan Da Darra	A/V/I/Post
52	Sabeen	M. Haroon	Shuakat Abad	GGPS Chajar Bala	A/V/I/Post
53	Tabasam, Rashid	Abdul Rushid	Shuakat Abad	GGPS Panjyali	A/V/I/Post
54	Nabeela Ghuncha Gul	Bashir Ahmad Khan	Trangri Sabir Shah	GGPS Trangri Bala	A/V/I/Post
55	Khalida Bibi	M. Yousaf Khan	Trangri Sabir Shah	GGPS Trangri Bala	A/V/I/Post
56	Sidra Hamayun	M. Hamayun	Trangri Sabir Shah	GGPS Khatri Palci	A/V/I/Post
57	Salma Javed	Muhammad Javed	Darband	GGPS Pagora	A/V/I/Post
58	Noshin Bibi	Fazal ur Rehman	Darband	GGPS Beer Bat	A/V/I/Post
59	Sahibzadi Azmat Rebani	Ghulam Rabani	Tanda	GGPS Talian Manda Gucha	A/V/I/Post
59	Asma Noreen	Nawab Khan	Dhodial	GGPS Kothri	A/V/I/Post

TERMS & CONDITIONS:

1. Their appointments are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.

(Handwritten signatures and stamps)

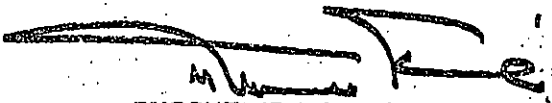
They will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which they belong.

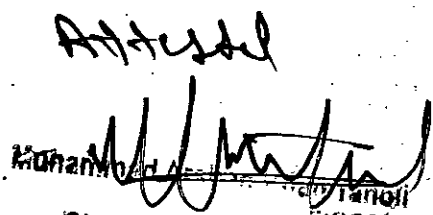
3. In case they failed to assume the charge of their posts within 15 days of their appointment, candidature-ship will be stand automatically cancelled.
4. Their services are regular but will not be entitled for pension/gratuity & they will not contribute any amount towards GP Fund however they will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
5. They will submit to this office, their all testimonial and domicile/ UC Certificate from the secretary concerned union councils 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 receipt of verified documents by the appointing authority / (EDO E&SE Manshara)
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 Manshara.
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. 5360-5384 /Estt: (F)Apptt:PET(F)/2011-12 Dated Manshara the 18th May, 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, Manshara.
- 4-5. District Officer (M&F) Local Office.
6. Deputy District Officer (Female) E&SE Manshara.
7. PA to District Coordination Officer, Manshara.
8. Budget & Accounts Officer, local office, Manshara.
- 9-67. Candidates concerned.


EXECUTIVE DISTRICT OFFICER
E&S EDU: MANSEHRA


Muhammad Tanzeel
District Advocate
Distt: Manshara



Annex D P-28

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7748 / Establishment/ 2014

Dated: 29/9/ / 2014

Email: deofmansehra@yahoo.com
Phone & Fax: 0997-302518

SHOW CAUSE NOTICE

I, Naghmana Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Servant (Efficiency & Discipline) Rules, 2011, do hereby serve you Mst.Sobia D/O Noor Hussain GGPS Kando Gali Mansehra Show cause Notice as follows:

1) You were illegally appointed as PST at GGPS Kando Gali vide defunct Executive District Officer (E&SE) Mansehra at S. No. 2, outside your U/C 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 well& 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) Inflected huge financial losses to the Govt: Treasury receiving pay as result of bogus appointment.
 - c) By snatching established rights of the deserving candidates due for appointment on merit. Cheating/canceling the facts for unlawful appointment with collusion 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 hereby, 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-party action shall be taken against you.
- 6) A copy of the finding inquiry committee related page is enclosed.

COMPETENT AUTHORITY

Mst. Sobia D/O Noor Hussain

GGPS Kando Gali

Munah Ashraf Khan Tanoli
Advocate

Distt: Courts Azmatnagar

TO THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

Subject: REPLY OF SHOW CAUSE NOTICE


P-29

Respected madam:

Reply of show cause notice is as under:

1. That I Mst. Sabiha D/o Noor Husain had applied for the post of PST Female along with all requisite qualification.
2. That after fulfilling all the requirement for appointment being meritorious I was appointed on the post of PST at her own U/C Baffa vide order dated 18/5/2012 but subsequently the competent Authority issued the adjustment order vide which was posted GGPS Kando Galli (copy of order is annexed).
3. That my appointment order was absolutely in accordance with the law and rules was meritorious in all respect and I was quit eligible for the said appointment. The allegation leveled against me in the show cause notice are wrong ,illegal and against the law and facts.
4. That I was intentionally appointed in my own U/C Baffa but subsequently adjustment was made by the competent Authority and it was beyond my control to refuse the adjustment order so I was spouse to obey the order of competent Authority and at the same time I should not be prejudiced by the Act of Concerned Authority and if I would be prejudiced by the Act of Concerned Authority it would be against the norms of Justice.
5. That my Appointment order is on the merit, being the citizen of Pakistan. It was my fundamental and constitutional right and I was my right I have not deprived any candidate due for appointment while instant show cause notice is an istep to deprive me from my right.
6. That I deny all the baisless allegation against me in the show cause notice all the allegation mention in the show cause notice are wrong , incorrect it is therefore hoped that no action against me on the basses of baisless allegation would be taken and the Justice would be done and I would not be deprive from my appointment by your good self.

Thanks


Muhammad Asghar Khan Talodi
District Officer

Sabiha D/o Noor Hassain

GGPS Jaba Khanizaman U/C Shoukatabad

Tehsil and District Mansehra

Sabiha



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst: Sobia D/O Noor Hussain working as PSI GGHS/GGMS/GGP Kando Gali 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: Sobia D/O Noor Hussain CT/PET/TT PSI GGHS/GGM GGPS Kando Gali

[Handwritten Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 1896-1905 /AE- /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 _____
7. SDEO(F) Mansehra.
8. Budget and Accounts Officer Local Office.
9. Mst: _____
10. Office File.

[Handwritten Signature]

DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Mst. Sobia D/O Noor Hussain

GGPS Kando Gali

[Handwritten Signature]

[Handwritten Signature]
Distt: Courts Ad. Portab

Annex-F

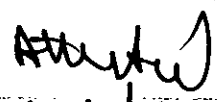
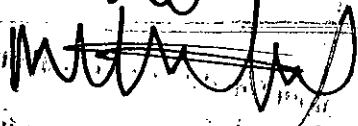
To:

The Director
Elementary & Secondary Education Department
KPK Peshawar

Subject : APPEAL AGAINST THE ORDER NO 1896-1905 DATED 3-3-2015
WHERE BY APPELLANT HAS BEEN DISMISSED FROM
SERVICE.

Sir,

1. That the order No 1896-1905 dated 3-3-2015 passed by District Education officer (Female)Mansehra is wrong against the facts , illegal without lawful authority and against the law & justices hence liable to be canceled.
2. Appellant Mst Sabiha D/o Noor Husain had applied for the post of PST Female along with all requisite qualification .
3. That after fulfilling all the requirement for appointment being meritorious Appellant was appointed on the post of PST at her own U/C Baffa vide order dated 18/5/2012 but subsequently the competent Authority issued the adjustment order vide which was posted GGPS Kando (copies of order and relevant documents are annexed).
4. That appellant appointment order was absolutely in accordance with the law and rules was meritorious in all respect and appellant was quit eligible for the said appointment. The allegation leveled against appellant in the show cause notice No 7748 Establishment 2014 Dated 29-09-2014 are wrong , illegal and against the law and facts.
5. That Appellant was initially appointed in her own U/C Baffa but subsequently adjustment was made by the competent Authority and it was beyond the control of appellant to refuse the adjustment order so appellant was spouse to obey the order of competent Authority and at the same time appellant should not be prejudiced by the Act of Concerned Authority and if appellant would be prejudiced by the Act of Concerned Authority it would be against the norms of Justice..
6. That appellant Appointment order is on the merit, being the citizen of Pakistan. It was the appellant's fundamental and constitutional right and it was appellant's right appellant have not deprived any candidate due for


 Multai 
 District Education Officer

appointment while impugned order is an instep to deprive appellat from her right.

- 7 That so called inquiry was an exparty proceeding and no opportunity was given to appellat and without haring the appellat exparty order was issued .
- 8 That so called allegations imposed on appellat are wrong against the facts frivolous and incorrect.

It is therefore requested that the impugned order dated 3 3 2015 may kindly be cancelled and the appellat be restored on here services

Thanks.

Sabiha D/o Noor Hussain

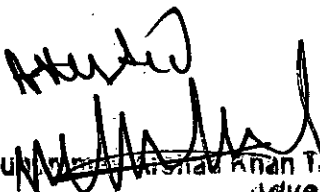
Sabiha

GGPS Jaba Khanizaman

U/C Shoukatabad

Tehsil & District Mansehra

Contact No 0345-8826605


Muhammad Anwar Khan Tandi
Advocate
Distt: Courts Abbottabad

قیمتی

کورٹ فیس

وکالت نامہ

بعدالت ۱۹۶۷ء سرسبز ٹریڈنگ کمپنی اور

عنوان: صاحبہ آریہ بنام گورنمنٹ آف پاکستان

منجانب: ایڈووکیٹ

نوعیت مقدمہ: ریل

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ آں مقام

جمہور سرفراز خان نیازی ایڈووکیٹ صاحب کی طرف سے ارسال کیا گیا

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی 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 کارروائی 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 پر داختم 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 جزو بقایا ہو تو وکیل صاحب موصوف

مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد استجارت ناش بصیغہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند ہے۔

المقوم:

بمقام:

Attest

M. Asghar Khan Tandi
Adv High Court Attd

صبر
Sobis


BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.780/2015

Respectfully Shewth

1. That the services appeal No: 780/2015 in respect of MST: Sabiya.Noor.hassan is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4082-87/F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been reinstated against the post of PST.(Notification attached).

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


DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

شہر - پشاور

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.**

NOTIFICATION.

WHEREAS Mst. Sabiha, PST at Government Girls Primary School Kando Gali, District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1896-1905 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. She belongs to U/C Baffa where two posts of PST were lying vacant. Her name was at S. No. 02 of the merit list of her U/C. She was appointed in her own U/C Baffa but wrongly adjusted in GGPS Kando Gali U/C Chatter Plain vide Endst. No.5360-84 dated 18/5/2012 at S.No. 2.
2. ~~Appeal may be accepted as she was on merit. She is required to be adjusted in her own U/C according to merit. However, if she is comfortable with her posting, she may be allowed to continue as usual.~~

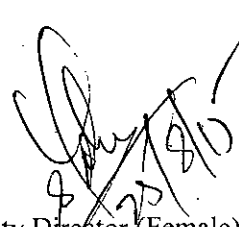
NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 1826-35 dated 03/03/2015 and reinstate Ms. Sabiha PST at Government Girls Primary School Kando Gali District Mansehra with effect from the date of her dismissal with all back benefits.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4082-87 /F.No. 79 /Appeals Female MSR Dated Peshawar the 25/8/2015

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

1. District Education Officer (Female) Mansehra
2. Sub Divisional Education Officer (Female) Mansehra
3. District Accounts Officer Mansehra
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.


Deputy Director (Female)
Directorate E&SE, KP
Peshawar