

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 16.3.2015 which was not responded and hence the instant service appeal on 13.7.2015.

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Dismissed as withdrawn.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

ANNOUNCED
20.10.2015

20.10.15



Appellant Deposited
Security & Process Fee



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 806/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	13.07.2015	<p>The appeal of Mst. Saeeda Haider 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	14-7-15	<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. 806/2015

Mst. Saeeda Haider d/o Mir Haider W/O Zia ur Rehman GGPS,
Ghakar R/o Ghadal Sher Gharh Tehsil Oghi & 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

INDEX

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"	12-22
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"	26-27
6	Copy of impugned dismissal order of appellant	"E"	28
7	Copy of departmental appeal /representation	"F"	29-30
8	Wakalatnama		31

Dated: 9/7/2015


Appellant

Through


Muhammad Arshad Khan Tanoli

Advocate, High Court

Abbottabad

①

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Appeal no. 806/2015

A.W.P Province
Service Tribunal
Diary No. 840
Dated 13-7-2015

Mst. Saeeda Haider d/o Mir Haider W/O Zia ur Rehman GGPS,
Ghakkar R/o Ghadal Sher Gharh Tehsil Oghi & 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"

File to file
13/7/15

(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 2046-55/AE /ESTB on 9.3.2015.
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

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

endst. No 2046-55/AE /ESTB dated 09.03.2015. **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 16.3.2015. **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.

- 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,

6

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

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

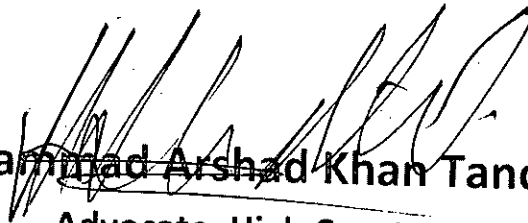
It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order Endrst. No 2046-55/AE /ESTB dated 9.3.2015 may graciously be set aside and respondent No 3 may be directed to reinstate the appellant in service in the School with effect from the date 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: 9/7/2015



Appellant

Through



Muhammad Arshad Khan Tanoli
Advocate, High Court
Abbottabad

BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.

Mst. Saeeda Haider d/o Mir Haider W/O Zia ur Rehman GGPS,
Ghakkar R/o Ghadal Sher Gharh Tehsil Oghi & 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 2046-
55/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

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 09.03.2015 may graciously be suspended and status quo may also be granted till final decision of the main appeal.

Dated: 9/7/2015

Arshad
Appellant

Through

Muhammad Arshad Khan Tanoli
Muhammad Arshad Khan Tanoli
 Advocate, High Court
 Abbottabad

**BEFORE THE KHYBER PUKHTUNKHAW SERVICE
TRIBUNAL, PESHAWAR.**

Mst. Saeeda Haider d/o Mir Haider W/O Zia ur Rehman GGPS,
Ghakkar R/o Ghadal Sher Gharh Tehsil Oghi & 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, Mst. Saeeda Haider d/o Mir Haider W/O Zia ur Rehman GGPS,
Ghakkar R/o Ghadal Sher Gharh Tehsil Oghi & 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.



Deponent

Dated: 9/7/2015.

حکومت صوبہ خیبر پختونخوا

31-G/Mardan/B04/G
ADP No. 102(2010-11)

31-5-2011 کو رات 11:00 بجے ایک بینک منصف ہوگی جس میں پوری دستاویزی کام کے لئے درخواستیں جمع کروانی جائیں گی۔

نمبر	تفصیلات	قیمت	تاریخ
1	ادبیات اور تاریخ	89.106	2-6-2011
2	ادبیات اور تاریخ	1801000	8-8-2011
3	ادبیات اور تاریخ	1801000	15-6-2011

Pre Bid Meeting
31-5-2011 کو رات 11:00 بجے ایک بینک منصف ہوگی جس میں پوری دستاویزی کام کے لئے درخواستیں جمع کروانی جائیں گی۔

نمبر	تفصیلات	قیمت	تاریخ
1	ادبیات اور تاریخ	89.106	2-6-2011
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Pre Bid Meeting
31-5-2011 کو رات 11:00 بجے ایک بینک منصف ہوگی جس میں پوری دستاویزی کام کے لئے درخواستیں جمع کروانی جائیں گی۔

- 1) تیز رفتاری سے کام کے لئے کم از کم قیمتیں پیش کرنا۔
- 2) تیز رفتاری سے کام کے لئے کم از کم قیمتیں پیش کرنا۔
- 3) تیز رفتاری سے کام کے لئے کم از کم قیمتیں پیش کرنا۔
- 4) کام کی تفصیلات Subtolling کی صورت میں پیش کرنا۔
- 5) 10% سے زیادہ Bulowage نہ ہونے اور اس کے ساتھ ساتھ Rate Analysis میں 8% اضافی کی شرح پیش کرنا۔
- 6) تیز رفتاری سے کام کے لئے کم از کم قیمتیں پیش کرنا۔
- 7) تیز رفتاری سے کام کے لئے کم از کم قیمتیں پیش کرنا۔
- 8) کام کی تفصیلات Subtolling کی صورت میں پیش کرنا۔
- 9) تیز رفتاری سے کام کے لئے کم از کم قیمتیں پیش کرنا۔
- 10) تیز رفتاری سے کام کے لئے کم از کم قیمتیں پیش کرنا۔
- 11) تیز رفتاری سے کام کے لئے کم از کم قیمتیں پیش کرنا۔

0937-870861 فون مرنان

نمبر	تفصیلات	قیمت	تاریخ
1	ادبیات اور تاریخ	89.106	2-6-2011
2	ادبیات اور تاریخ	1801000	8-8-2011
3	ادبیات اور تاریخ	1801000	15-6-2011

31-5-2011 کو رات 11:00 بجے ایک بینک منصف ہوگی جس میں پوری دستاویزی کام کے لئے درخواستیں جمع کروانی جائیں گی۔

0937-870861 فون مرنان

Annex

A

P-11

Mardan District Council
District Council Mardan

P-12a
Annex B,

BOARD OF INTERMEDIATE & SECONDARY EDUCATION
ABBOTTABAD

SB No. 25804
DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(SCIENCE GROUP)

Session 19 95 (Annual/supplementary)

Name Saeeda Hameed
Father's Name Mrs Hameed Roll No. 1622

SUBJECT	Total Number of marks allotted	MARKS OBTAINED	
		in figures	In words
1. English	150	55	
2. Urdu	150	89	
3. Islamiyat	75	58	
4. Pakistan Studies	75	43	
5. Mathematics/ (Elec.)	100	83	
6. Physics	100	55	
7. Chemistry	100	52	
8. Biology	100	52	
Total	850	487	Four Hundred & eighty seven

Note: Errors/ommissions accepted
F: failed in the paper (s)

Date _____ 19 _____

Inword
Director of Examinations
Board of Intermediate & Secondary Education
Abbottabad

Attested
[Signature]

Inword
[Signature]
Associate Professor
Govt. P. M. S. Abbottabad

Attested
[Signature]
Muhammad Arshad Khan Farooqi
Advocate
Distt: Courts Abbottabad



HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

DETAILED MARKS CERTIFICATE

MASTER OF ARTS (PREVIOUS)
ANNUAL EXAMINATION 2012

P-13

Roll No: 19281
Name: Saeeda haider
Institution / District: MANSEHRA

Reg No: 08-P-2795
Father's Name: Mir Haider
Subject: Islamiyat

Course Title:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
(Al-Qura'an) Translation 1st Half Commentator & Principles of Tafseer	100		74		74	SEVENTY-FOUR	Pass
Hadith and Principles of Hadith	100		43		43	FORTY-THREE	Pass
Islamic Jurisprudence (Text)	100		68		68	SIXTY-EIGHT	Pass
Seer'at un Nabi (SAWS) & History of Islam	100		64		64	SIXTY-FOUR	Pass
Arabic Grammar and Literature	100		79		79	SEVENTY-NINE	Pass
Total:	500				328	THREE HUNDRED TWENTY-EIGHT	
Percentage:	65.60						

Print Date: 15-01-2013

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.

Accepted

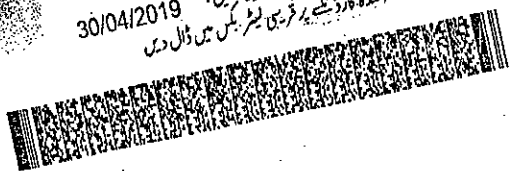
Controller Examinations
Hazara University, Mansehra
14 January, 2013

Imam Hussain
Associate Professor
Govt. Boys Degree College
Javollan, A.D.

Attested

Muhammad Arshad Khan Janoli
Distt. Controller - Mansehra

30/04/2019 تاریخ ترمیم: 20/05/2009
مفتوحہ کارڈ سے برقرار رہی ہے اور اس میں ڈال دی



HAZARA UNIVERSITY MANSEHRA



P-14

PAKISTAN PROVISIONAL CERTIFICATE

Serial No 1554/13973 Registration No 08-P-2775
Roll No 57901 Result Declared on: 15/8/2011

Certified that Mr. / Miss. / Mrs. Saeeda Haider

Son / Daughter of Mr Haider

student / candidate of BA has passed the BA

Examination held in June 2011 by securing 260 Marks out of 550

and has been placed in Second Division / Grade / C.G.P.A

(The Examination was taken as a whole / in parts)


Prepared by: [Signature] Controller of Examinations
Checked by: [Signature] Hazara University

Govt. Boys High School
Manshera, Dist.

[Signature]
Muhammad Arshad Khan Tanoli
Advocate
Distt: Courts Abbottabad

P-15

ADS No 014319 Roll No. 1622



BOARD OF INTERMEDIATE AND SECONDARY EDUCATION
Abbottabad N.W.F.P. Pakistan
Secondary School Certificate Examination

SESSION SUPPLEMENTARY 1995

THIS IS TO CERTIFY THAT SAEEDA HAIDAR.

Son/Daughter of MIR HAIDAR.

and a candidate of DISTT: MANSEHRA.

has passed the Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in October 1995

as a *Private Candidate*. He/She obtained 487 Marks out of 850

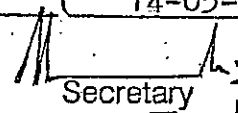
and has been placed in Grade C Representing GOOD

The Candidate passed in the following subjects.

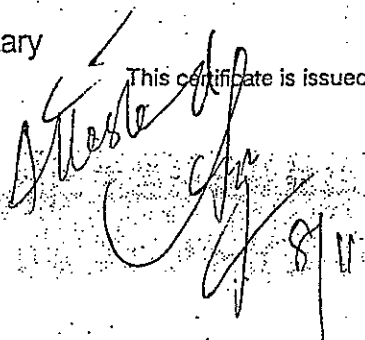
- | | | | |
|------------|---------------------|--------------|------------|
| 1. English | 3. Islamiyat | 5. MATHS (E) | 7. PHYSICS |
| 2. Urdu | 4. Pakistan Studies | 6. CHEMISTRY | 8. BIOLOGY |

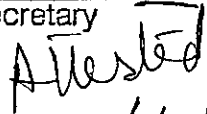
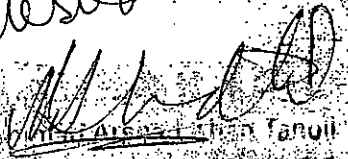
Date of birth according to admission form is FOURTEENTH MAY,
one thousand nine hundred and SEVENTY EIGHT (14-05-1978)

Asst. Secretary 

Secretary 

This certificate is issued without alteration or erasure.




 Attested

 Distt: Courts - Mansehra

P-16

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Abbottabad N.W.F.P. Pakistan
PROVISIONAL CERTIFICATE
SECONDARY SCHOOL CERTIFICATE EXAMINATION
 Session 19 95 Annual/Supplementary

THIS IS TO CERTIFY THAT Saeeda Haider
 Son/Daughter of Mir Haider
 and a candidate of Mauzhar
 has passed the Secondary School Certificate Examination of the
 Board of Intermediate and Secondary Education, Abbottabad held in oct 1995
 as a Regular/Private candidate. He/She obtained 487 Marks out of 850 and has
 been placed in Grade (C) Representing (Govt)

The Candidate passed in the following subjects.

- | | | | |
|-------------------|---------------------|-------------------|---------------------|
| 1. English | 2. Urdu | 3. Islamiyat | 4. Pakistan Studies |
| 5. <u>physics</u> | 6. <u>Chemistry</u> | 7. <u>Biology</u> | 8. <u>Math (E)</u> |

Internal assessment Grade by the institution concerned is ()

Date of birth according to admission form is Fourteenth May,
 One thousand nine hundred and Seventy Eight. (14-05-78)

Prepared by

Checked by

Date of Preparation 24/7/96

 Asst. Secretary (Certificates)
 B.I.S.E. Abbottabad

 Attested

 Muft Ahmad Ali Khan Janoli
 Advocate
 Distt: Courts Abbottabad

Certificate No: AB 15043

P-17

BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD



Roll No: 48957
Group: HUMANITIES

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

Part - II
Session: 2007 (Annual)

Name: SAEEDA HAIDER
Father Name: MEER HAIDER
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 May/June as a Private Candidate

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	43	--	56	--	99	Ninety-Nine
Urdu (Comp)	200	53	--	71	--	124	One Hundred Twenty-Four
Islamic Education	50	39	--	--	--	39	Thirty-Nine
Pakistan Studies	50	--	--	43	--	43	Forty-Three
Islamic History	200	55	--	52	--	107	One Hundred Seven
Civics	200	50	--	70	--	120	One Hundred Twenty Only
Islamic Studies	200	66	--	74	--	140	One Hundred Forty Only

Total: 1100

672-B Six Hundred Seventy-Two Only

Remarks :

Date: 10-08-2007

Checked By: _____

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

Attested
10/8/11


Controller of Examinations

Muhammad Arshad Khan Tanoli
Advocate
Distt: Courts Abbottabad

P-18

S.No: 207048957

Roll No: 48957



BOARD OF INTERMEDIATE & SECONDARY EDUCATION

ABBOTTABAD - N.W.F.P. PAKISTAN

INTERMEDIATE EXAMINATION

PROVISIONAL CERTIFICATE

SESSION 2007 (Annual)

THIS IS TO CERTIFY THAT Saeeda Haider

Daughter of Meer Haider

student of Mansehra District

has passed the *Higher Secondary School Certificate Examination* of the Board of Intermediate & Secondary Education, Abbottabad held in *May/June, 2007* as a *Private* candidate. She obtained 672 marks out of 1100 and has been placed in Grade "B"

The Candidate passed the following subjects.

- | | | |
|--------------------|------------|-------------------------------|
| 1. Urdu | 2. English | 3. Islamic Edu. & Pak Studies |
| 4. Islamic History | 5. Civics | 6. Islamic Studies |

Registration No: 0588AB/MA-intFP06

Checked by _____

Computer Section BISE,ATD

Handwritten signature and date: 29/8/07

Handwritten signature
Asstt. Secretary (Certificate)

Date of Issue: August, 10 2007

Handwritten signature
Muhammad Arshad Khan Tanoli
Advocate
Dist: Courts Abbottabad

P-19



HAZARA UNIVERSITY

MANSEHRA, PAKISTAN

DETAILED MARKS CERTIFICATE

BA ANNUAL EXAMINATION 2011

Roll No: 57901

Reg No: 08-P-2795

Name: Saeeda haider

F/ Name: Mir Haider

Institution/ MANSEHRA

Part: Second

District _____

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
Part-I Marks----->	285				144	ONE HUNDRED FORTY-FOUR	
ENGLISH	75		26		26	TWENTY-SIX	Pass
URDU	75		34		34	THIRTY-FOUR	Pass
PAKISTAN STUDIES	40		15		15	FIFTEEN	Pass
ISLAMIC STUDIES	75		41		41	FORTY-ONE	Pass
Total:	550				260	TWO HUNDRED SIXTY	
Percentage:	47.27						
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.

Muhammad Asif
 Distt. Controller
 District Mansehra
 Advocate

Controller Examinations
 Hazara University, Mansehra
 August 15, 2011

P-20

Serial No.

130964

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD
PROVISIONAL RESULT CARD



Name SAEEDA HAIDER
Fathers's Name MIR HAIDER
Address D/O MIR HAIDER HABIB ULLAH
COLONY ST NO 4 H/NO F-1-146

Roll No N605227
Registration No 03NMA0288
Final Semester SPR- 2006

Tehsil ABBOTTABAD
District ABBOTTABAD

has successfully completed PRIMARY TEACHING CERTIFICATE Programme.

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR- 03	0613	PRINCIPLES OF EDUCATION	100	48
AUT- 04	0617	TEACHING OF URDU	100	55
AUT- 04	0618	TEACHING OF MATHEMATICS	100	63
AUT- 04	0620	TEACHING OF ISLAMIAT & SOCIAL STUDIES	100	52
AUT- 04	0619	TEACHING OF SCIENCE & PHYSICAL EDUCATION	100	61
SPR- 05	0611	PRACTICAL WORKSHOP & TEACHING PRACTICE	100	70
SPR- 06	0614	EDUCATIONAL PSYCHOLOGY	100	62
SPR- 06	0615	SCHOOL ORGANIZATION & MANAGEMENT	100	65
SPR- 06	0616	SCHOOL COMMUNITY & PRACTICAL ARTS	100	72

Attested
[Signature]
8/11

Attested
[Signature]
Muhammad Arshad Khan Tanon
Advocate
District Council, Abbottabad

CREDITS: 5

Total Marks / Obtained 500 / 546

Result Declared on JANUARY 19, 2007

Percentage / Grade 61 B

Date of issue FEBRUARY 01, 2007

[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.

ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



Serial No. 540050

PROVISIONAL RESULT CARD

Name **SAEEDA HAIDER**
 Father's Name **MIR HAIDER**
 Address **VILLAGE GOBAI PO SHERGARH**

Roll No. **AG630154**
 Registration No. **03NMA0288**
 Final Semester **SPR-2014**

Tehsil **OGHI**
 District **MANSEHRA**

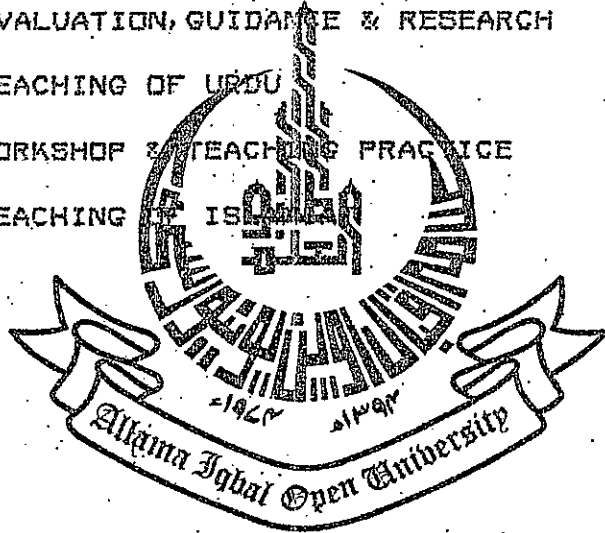
BACHELOR OF EDUCATION (B. ED)

has successfully completed

p-21

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 12	0513	SCHOOL ORGANIZATION	100	62
AUT- 12	0651	ENGLISH (COMPULSORY)	100	70
AUT- 12	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	60
AUT- 12	0512	PERSPECTIVES OF EDUCATION	100	63
AUT- 12	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	65
AUT- 12	0514	EVALUATION, GUIDANCE & RESEARCH	100	60
SPR- 14	0658	TEACHING OF URDU	100	65
SPR- 14	0655	WORKSHOP & TEACHING PRACTICE	100	74
SPR- 14	0654	TEACHING ISLAMIC EDUCATION	100	52



Attested

[Signature]

M. Iqbal
 Distt: G. J. M. M. M.

CREDITS: 6

Total Marks / Obtained

900 / 571

Result Declared on **JANUARY 16, 2015**

Percentage / Grade

63 B

Date of issue **JANUARY 20, 2015**

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

DUPLICATE

P-22

**MASTER OF ARTS (FINAL)
ANNUAL EXAMINATION 2013**Roll No: 30025Reg No: 08-P-2795Name: Saeeda haiderF/ Name: Mir HaiderInstitution/ MANSEHRASubject: Islamiyat

District _____

COURSE TITLE:	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
MA Previous Marks	500				328	THREE HUNDRED TWENTY-EIGHT	
(Al-Qura'an) Translation 2nd Half & Commentary alongwith Grammar	100		56		56	FIFTY-SIX	Pass
Principles of Islamic Jurisprudence	100		50		50	FIFTY	Pass
Islam & other World Religions	100		50		50	FIFTY	Pass
Kalam & Philosophy of Islam / Islam in Contemporary Muslim World	100		66		66	SIXTY-SIX	Pass
Islamic Economics / Islamic Politics / Islam & Science	100		60		60	SIXTY	Pass
General Viva Voce	100		43		43	FORTY-THREE	Pass
Total: 1100					653	SIX HUNDRED FIFTY-THREE	
Percentage: 59.36							
Division: SECOND							

Print Date: 20-04-2015

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.

Arshad Khan Tanoli
**Controller Examinations
 Hazara University, Mansehra
 February 26, 2014**

Arshad Khan Tanoli
**Muhammad Arshad Khan Tanoli
 Advocate**

Distt: Courts Abbottabad

Arshad Khan Tanoli
**Muhammad Arshad Khan Tanoli
 Advocate**

DOMICILE CERTIFICATE

P-22-A

I declare that I am born of parents who are permanently domiciled in N.W.F. Province having been born in this Province.

I was born at GOBAI (Chansar) Tehsil OGHI
 District MANSEHRA
 I passed Primary Examination from G.G.P. School, CHANSAR
 Resident of GOBAI CUM CHANSAR UPPER TANAWAL BACKWAR AREA Zone-III.
 Tehsil OGHI
 District MANSEHRA
 Date 26.7.95 dated

Pursuance to the declaration dated.....
 Filed by SAEBEDA HAIDAR B/O MIR WAD HAIDAR
 Tribe TANOLI Section..... Subsection.....
 R/ of GOBAI (Chansar) Tehsil OGHI District MANSEHRA
 to the effect that he had been born of parents who are permanently domiciled in
 N.W.F.P. Province having been born within to.....

I have satisfied myself from ~~the original~~ ^{the original} ~~my own knowledge~~ the above
 declaration is true and certify accordingly.

Given under my hand and the seal of Court this.....
26.7. day of July 1995.

Dated.....
COUNTERSIGNED (HIFZUR REHMAN)
 MAGISTRATE 1ST CLASS, OGHI

Muhammad
 District Magistrate
 Countersigned
 District Magistrate



Muhammad
 8/11

Muhammad Arshad Khan Tanoli
 Advocate
 Distt: Courts Abul Khas

Annex C P-23

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

Muhammad Arshad
Advocate
Distt. Court, Jullabad

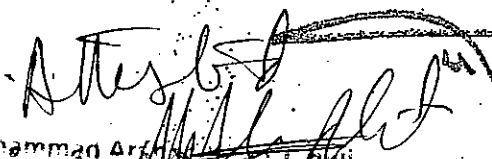
U/C Lissan Nawab				
29	Sobia Arshad	Muhammad Arshad	Lissan Nawab	Own UC M/List
30	Rashida Bibi	M.Zahoor	Lissan Nawab	Own UC M/List
U/C Mohandari				
31	Bibi Naseema	Ghulam Nabi	Mohandari	Own UC M/List
U/C Nika Pani				
32	Yasmeen Wahab	Abdul Wahab	Nika Pani	Own UC M/List
33	Neelam	Abdul Latif	Darband	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	From Adjacent UCs Merit 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	Munaza Daud	Daud	Behali	GGPS Ashwal	A/V/Post
4	Nazma Bibi	R.Khan Bahdar	Behali	GGPS Jamal Nakka	A/V/Post
5	Shagufta Bibi	Muhammad Shafi Khan	Battal	GGPS Karmang	A/V/Post
6	Shaista Jabeen	Muhammad Akbar	Kathai	GGPS Chandni	A/V/Post

- 2 -


 Muhammad Arif
 District Officer
 District Office
 District Office



Annex "D"

D

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 773 / S. Cause
Dated the 29/9 /2014

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

SHOW CAUSE NOTICE

P-26

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. Saeeda Haider, PST GGPS Ghakkar Mansehra Show cause Notice as follows:

- 1) You were illegally appointed as PST at GGPS Ghakkar vide defunct Executive District Officer (E&SE) Mansehra at S. No. 46, on extra and wrong marking, 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-parte action shall be taken against you.
 - 6) A copy of the finding inquiry committee related page is enclosed.

Altered
Naghmana Sardar
District Education Officer
Mansehra

Naghmana Sardar

COMPETENT AUTHORITY

Mst. Saeeda Haider

To

The District Education Officer
(Female) Mansehra

P-27

Subject: REPLY OF SHOW CAUSE NOTICE

Respected madam,

Reference your Show Cause Notice No. 7773/Establishment/2014 dated 29-09-14 the parawise reply is as under.

1. Miss Saeeda Haider D/O Mir Haider PST GGPS Ghakkar was appointed as PST GGPS Ghakkar Shergarh by EDO (Elementary & Secondary) Mansehra.

I appeared in ETEA Test and got good grade. I was appointed as Qaria at S.NO 46 among 59 candidates appointed as PST (Annex A).

Merit list was prepared in the office of EDO (Elementary & Secondary) preparation of merit is not the job of applicant/candidate.

2. After appointment my all certificates got verified from the concerned Board/University by the DEO (F) and then my pay was released.

3.a. I have committed not misconduct, dishonesty as I stood on merit which was prepared by Education Office competent Authority.

b. Consequent of my service rendered to Govt. regularly, I got the salary on the behalf of that regular service.

c. I do not think to snatch the rights of others as I applied properly in due date, appeared in ETEA, merit list prepared by Education Department and then got my appointment.

4. I received no report of Finding of inquiry committee conducted against me and have no information of any inquiry against me.

Therefore it is requested that I may please be exempted from such allegations as not committed by me and show cause may please be withdrawn.

Thanks.

Yours sincerely

Miss Saeeda Haider
D/O Mir Haider
PST GGPS Ghakkar Shergarh
GGPS Galibadral Shergarh

Saeeda Haider
M. Saeeda Haider
M. Saeeda Haider
Advocate
Distt. Courts Abbottabad



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

- 1:- Where as Mst. Saeeda Haider D/O Mir Haider working as PGT GGHS/GGM/GGP Ghakar 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 Pakhtunkhawa 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. Saeeda Haider D/O Mir Haider CT/PET/TT PST GGHS/GGM GGPS Ghakar.

(Signature)
DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

Endst: No. 204655 /JAE- /Estab: dated 9/03/03 2015.

Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhawa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhawa, 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.-

(Signature)
DISTRICT EDUCATION OFFICER
FEMALE MANSAEHRA.

(Signature)
Attested
Muhammad Arshad Khan
Advocate
Dist: Courts Abbottabad

To

The Director,
Elementary & Secondary Education,
KPK Peshawar.

Annex

P-29

Subject: DEPARTMENTAL APPEAL AGAINST THE IMPUGNED NOTIFICATION ISSUED UNDER ENDST NO. 2046-55/AE-1/ESTAB. DATED 03-03-2015 WHEREBY MAJOR PANALTY OF DISMISSAL FROM GOVT SERVICE WAS IMPOSED UPON THE APPELLANT WITHOUT LAWFUL AUTHORITY (COPY OF IMPUGNED NOTIFICATION IS ATTACHED & MARKED AS ANNEX "A")

Prayer: IMPUGNED NOTIFICATION MAY PLEASE BE SET ASIDE FROM THE DATE OF ITS ISSUANE DECLARING THE SAME WITHOUT LAWFUL AUTHORITY CONTRADUCTORY TO THE RECRUITMENT POLLICY & RULES AND RE-INSTATE THE APPELLANT WITH ALL BACK BENEFITS AT THE SAME STATION.

Respected Sir,

I would like to invite your kind attention to the following facts in connection to colorful exercise of power on the part of authority i.e DEO (F) Mansehra.

- i. That the then EDO (E&SE) Mansehra invited application for recruitment of teachers of various cadres in District Mansehra through advertisement published in daily MASHRAQ (Copy attached and marked as Annex "B").
- ii. That as per procedure appellant applied for the post of PST & ETA Test was conducted on 26-06-2011 and appellant appeared as a candidate under Roll No 1702736 and obtained 120 marks out of 300. (copy attached and marked as Annex "C").
- iii. That the then EDO conducted interview and scrutinized the documents of the candidates and merit list of the candidate was displayed for receiving objections. After due process the meeting of DSC was held and approved the cases of 59 candidates for appointment against the post of PST whereas the name of appellant falls at S. No 46.
- iv. That appointment order of the appellant was issued under Endstt No 5360-5384/Estt:/F Apptt: PST(F)/2012 dated 18-05-2012 and appellant was posted against the post of PST GGPS Ghakkar Mansehra. (Copy Attached and marked as Annex "D")
- v. That appellant continuously performing her duty without any break for the last 02 Years and 09 Months while she received a show cause notice whereby allegations were leveled against the appellant based on conduction and concealment of facts. The same are reproduced as below.

YOU WERE APPOINTED AS PST GGPS GHAKKAR VIDE DEFUNCT EXECUTIVE DISTRICT OFFICER (E&SE) MANSEHRA ENDSTT NO 5360-5384/ESTT PST (F)/2012 DATED 18-05-2012 WHERE YOU WERE STRANGER FOR RECRUITMENT PROCESS INITIATED THROUGH ETA ACCEPTANCE OF YOUR APPEAL AND SUBSEQUENTLY YOUR APPOINTMENT ORDER WAS THE RESULT OF MISUSE OF AUTHORITY BY THE THEN EDO ACCORDING TO HER SWEET WILL AND WISHES AGAINST THE RECRUITMENT RULES. (copy attached and marked as Annex "E")

Attested
MURSHID
ALERT COURT

- vi. That a reply was submitted in response to show cause notice whereas applicant adopted continuation that she was appointed after due recruitment process and her appointment order along with 58 other candidate was issued in a lot after the approval of DSC (Copy attached and marked as Annex "F")
- vii. That appellant received impugned order dated 03-03-2015 whereas the major penalty of dismissal from service has been imposed upon the appellant.
- viii. That appellant passed her professional qualification i-e Intermediate / F.A (BISE Abbottabad), B.A , M.A (Hazra University, PTC, B.Ed (AIOU Islamabad).

Sir,

- a. Appellant was appointed after due process of recruitment through ETA test and appointment order of 59 candidates was issued after the approval of DSC. The appellant served for a period of 02 Years and 09 Months without any break to the entire satisfaction of department.
- b. No inquiry was conducted or initiated. No opportunity of defense offered. No personal hearing was made. How the authority passed the order in the light of E&D Rules and under what charges/evidence imposed such a harsh punishment of dismissal from service.

It is stated that no such recommendation was made by the committee who was constituted to conduct inquiry against the then EDO.

In the light of above facts you are requested to set aside the impugned notification of dismissal from service that is without lawful authority and having no legal sanctity and re-instate the original appointment order of the appellant with all back benefits at the same station who was appointed against the post of PST in result of completion of due recruitment process on merit basis.

16-03-2015

Attested

Muhammad Asghar Khan Tandi
 Advocate
 Distt: Courts Abbottabad

Yours Faithfully

(Appellant)
Saeeda Haider PST
GGPS GHAKKAR

وکالت نامہ

Be Fore the Service Tribunal KPK ^{Peshawar} عدالت جناب

گورنمنٹ K.P.C. ڈپٹی سیکرٹری

Appellant

Civil Appeal دعویٰ یا جرم

مندرجہ بالا عنوان میں اپنی طرف سے بیرونی درخواست دہی بنام محمد ارشد خان (دعویٰ ایلڈ وکالت)

ایڈوکیٹ آزاد بدیں شرط وکیل مقرر کیا ہے میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور یقینت پکارے جانے پر وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی اور جگہ پکھری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیرونی کرنے کے جائز نہ ہوں گے۔ اگر مقدمہ مقام پکھری کے کسی اور جگہ سماعت ہونے پر بروز پکھری کے اوقات کے آگے یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے، مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے کہ مجھے کل ساختہ پر داختمہ صاحب مثل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد ثالثی و راضی نامہ و فیصلہ برخلاف کرنے و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یک طرفہ درخواست حکم اتنماعی یا ڈگری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادا ہوگی علیحدہ بیرونی مختار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا پیر منتر کو بجائے اپنے ہمراہ مقررہ کریں اور ایسے مشیر

قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری نہیں تاریخ پیشی سے پہلے ادا نہ کروں گا اور صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے کہ یہ سندر ہے۔ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

۲۰۰۱ء

مورخہ

Muhammad Asad Khan
Advocate
Govt. Peshawar

محمد اسد خان

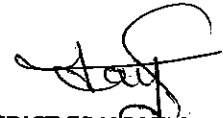
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.806/2015

Respectfully Shewth

1. That the services appeal No: 806/2015 in respect of MST: Saeeda Haider is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4106-12/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

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

NOTIFICATION.

WHEREAS, Mst. Saeeda Haider, (PST) at Government Girls Primary School Ghallar District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 2046-55 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 Shergarh where 04 posts were lying vacant. Her name was at S. No.02 of the merit list of her U/C under ETEA R. No. 1702736. She was wrongly awarded the marks of B.A as she was not acquired the B.A qualification but after deducting the marks of B.A her score was reduced to 42.91 from 45.29 and her position in her U/C of the merit list remains unchanged. She was appointed at GGPS Gakar U/C Sher Garh vide Endst.No.5360-84 dated 18/5/2012 at S.No. 46.
2. Appeal may be accepted as she was on merit in her U/C.

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. 2046-55 dated 03/03/2015 and reinstate Ms. Saeeda Haider PST at Government Girls Primary School Ghallar District Mansehra with effect from the date of her dismissal with all back benefits.

Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4106-12 /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

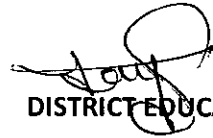
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.806/2015

Respectfully Shewth

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2. That reference director E & SE department notification Endst: No 4106-12/F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellatant 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

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

NOTIFICATION.

WHEREAS, Mst. Saeeda Haider, PST at Government Girls Primary School Ghallar District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 2046-55 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.

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Director
Elementary & Secondary Education,
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4106-12 /F.No. 79/Appeals Female MSR Dated Peshawar the 25/8/2015

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4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.


Deputy Director (Female)
Directorate E&SE, KP