


18.08.2015

Counsel for the appellant present. Learned counsel for the appellant argued that identical service appeals No.758 to 789/2015 have already been admitted to regular hearing and fixed for further proceeding on 20.10.2015.

In view of the above, this appeal is also admitted to regular hearing. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 20.10.2015 before S.B at camp court A/Abad.

Appellant Deposited  
Security & Process Fee



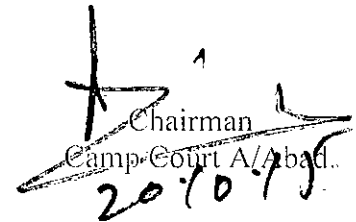
  
Chairman  
Camp Court Abbottabad

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Dismissed as withdrawn.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. 848/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28.07.2015	<p style="text-align: center;">The appeal of Mst. Romala 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	29-7-15	<p style="text-align: center;">This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>18-8-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

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

*Appeal No. 848/2015*

Mst. Rumala D/O Muhammad Iqbal (AT GGMS ~~PHLE~~) R/O  
Village Tanda, 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"	12-16
4	Copy of appointment order and corrigendum	"C"	17-22
5	Copy of Show cause notice and one page of inquiry of the then EDO	"D"	23-24
6	Copy of impugned dismissal order of appellant	"E"	25
7	Copy of departmental appeal /representation	"F"	26-27
8	Copy of merit list	"G"	28-30
9	Wakalatnama		

Dated: *16/7*/2015

*RUMALAH*  
Appellant

Through

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

Advocate, High Court

Abbottabad

(1)

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

Appeal no. 848/2015

**K.P. Province**  
**Service Tribunal**

Diary No 889

Dated 28/7/2015

Mst. Rumala D/O Muhammad Iqbal (AT GGMS ~~MANSEHRA~~) R/O  
Village Tanda, 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 AT in Dailly "The Aaj" dated 20/5/2011 for appointment of AT. The Appellant fulfills the entire criteria which sine qou non for appointment for the post of AT. Copy of Advertisement is annexed as Annexure "A"

~~28/7/15~~  
28/7/15

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2. That, the appellant qualified test as well as interview conducted by respondent No 3. The appellant is qualified Matric, Hifz, tajweed, teaching of tajweed, Shahadat, ul Almia from registered Institution/ Maddaris. Copies of Documents/testimonial are annexed as Annexure "B"
3. That, following this, the appellant was appointed as AT in respondents' Department on the basis of merits and was posted in GGHS Afzal abad vide appointment order endrst No 710-52/ ESTT (F) APPTT; AT Dated Mansehra the 14/6/2012. Copy of appointment order ~~and corrigendum~~ is annexed as Annexure "C".
4. That, the appellant served the Department with complete devotion and dedication to the entire satisfaction of her superiors from the date of her appointment i.e. 14.6.2012 onwards.
5. That, the appellant was though dismissed from service by the respondent's department endrs. No 1522-1531/AE-J/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 DEO, Shamim Akhtar was found attached with the show cause notice, wherein it

was mentioned against the name of appellant that "No relevant, sannad for appointment and the appointment is not valid and is against the recruitment policy". Copy of Show cause notice and one page of inquiry of the then EDO is annexed as Annexure "D". AS the inquiry committee did recommend any remarks against the Appellant

7. That, show cause notice issued to the appellant was properly replied by her mentioning that the appellant applied for the post of AT and appeared in ETTA Test vide Roll No 1700002, and obtained marks 172 (57.33%) dated 22.6.2011 and was placed at S. No 2 of the merits list and thereafter was appointed on merit Beside, District Education Officer solicited candid views from respondent No 2 regarding as to whether the candidate who possess their sannads of Hifz and tajweed from registered institutions are to be appointed "as per service structure in prescribe rules the sannad of Qirat from a recognized Institution meant a certificate obtained from Maddaris/Intuition Registered by the Govt. of KPK.
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

(4)

of personal hearing and adopting proper modus operandi required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order endst. No 1522-1531/AE-J/ESTB dated 3.3.2015 received on 13.4.2015. Copy of impugned dismissal order of appellant is attached as annexure "E".

9. That on receipt of dismissal order <sup>on</sup> 13.4.2015, appellant filed departmental appeal against the order of respondent No 3 to respondent No 2 on 16.4.2015. 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:-

### GROUNDS

- a. That, the appellant fulfilled the criteria of appointment as AT being qualified. The appellant was appointment on merit on the recommendation of Departmental Selection Committee and was placed at S.No: ~~14~~ of the merit list. Copy of merit list is attached as Annexure "G". Hence impugned dismissal order is illegal, perverse, discriminatory without lawful justification and null and void on the rights of the appellant.

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- b. That, as per educational record annexed with the appeal, the appellant has been appointed as AT according to the laid down procedure and criteria mentioned in the advertisement published by respondent 3. It is further submitted that no institution/madaris of female is not recognized in KPK since 1969 onwards. Therefore ATs were appointed in Education Department prior to 2012 on the basis of sannads similar to that of appellant. Therefore if hundreds of female ATs are serving in Educational Department on the basis of similar sannads then the appellant is also entitled to serve the department as per law. Hence impugned dismissal order is liable to be set aside.
- c. That, when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. As per law the appellant was eligible for appointment as AT . But the conduct of respondents department towards the appellant is mala fide, discriminatory and not maintainable at law.
- d. That, this fact may not be left to fade in oblivion that the Govt. of KPK removed the then EDO, Mansehra, Umar Kundi from service but the appellant has been dismissed from service due to no fault of her. Once an



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employee is dismissed he is de-barred to get appointment in Govt. Departments. Therefore, respondents' Department not only illegally dismissed the appellant but snatched her bread and butter in future as well. Hence impugned dismissal order is liable to be set aside.

- e. That, respondent No 3 did not issued final show cause notice to the appellant and dismissed her in hasty manner and wants to induct some blue eyed chaps at the alter of appellant which is discriminatory against the principle of natural justice and fair play.
- f. That, respondents' Department has led the appellant to the place which is utterly unknown to the principle of jurisprudence and natural justice.
- g. That, right from the appointment of the appellant as AT in 2012, there was no rival candidate who contested the appointment of the appellant in any Court of law anywhere in KPK.
- h. That, Govt. of KPK conducted inquiry against the then EDO, Umar Khan Kundi for committing illegalities/irregularities in appointments/promotions etc and finally removed from service. Therefore, the appellant cannot make a scapegoat for illegal acts of the then EDO Umar Kundi. Therefore on the basis of

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removal of Umar Kundj from service, the appellant cannot be dismissed for the acts committee by the ex-EDO.

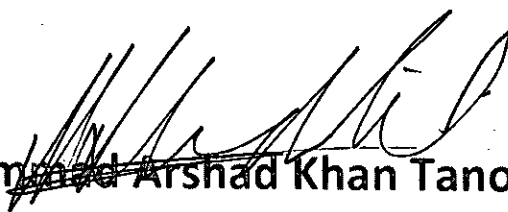
- i. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribe period of limitation

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned dismissal order endrst. No 1522-1531/AE-J/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: 16/7/2015

ROMALAH  
Appellant

Through

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

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

Kalsoom Bibi D/O Chanzaib (AT GGHS ~~(AHU)~~) R/O , 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 1522-**  
**1531/AE-J/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) Masehra 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.

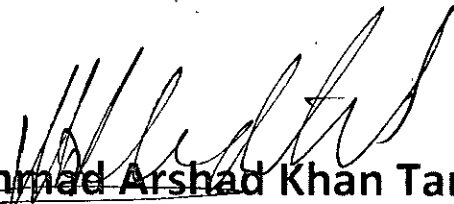
5. That, the applicant got appointment purely on the basis of merit. The applicant has been dismissed by the competent authority due to no fault of her.
6. That, the balance of convenience is infavour of the applicant and in case, status quo is not granted, the applicant shall suffer irreparable.

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: 16/7/2015

ROMALAH  
Appellant

Through

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

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

Mst. Rumala D/O Muhammad Iqbal (AT GGMS ~~Bhai Bohall~~) R/O  
Village Tanda, 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.

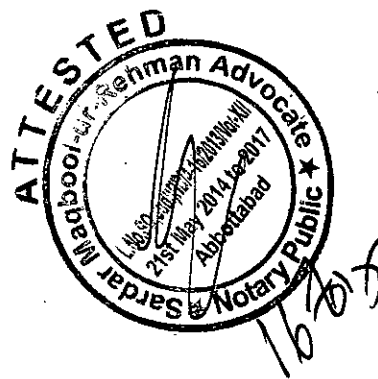
.....Respondents

**AFFIDAVIT**

I Mst. Rumala D/O Muhammad Iqbal (AT GGMS Bhai Bohall) R/O Village Tanda, 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: 16/7 /2015

**RUMALAH**  
Deponent





بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

**وفاق المدارس العربیة**  
پاکستان

**كشف الدرجات**

امتحان الشهادة العالية في العلوم الإسلامية والعربية (بي ك)

رقم التسجيل 1425-05-013412 عام ٢٠٠٦ م ١٤٢٨ (السنوات)  
6797

رقم الجلوس 6797  
اسم الطالب روميله  
اسم الوالد محمد اقبال  
المديونية ما شهره تاريخ الميلاد 12-11-1985 م

اسم الجامعة / المدرسة جامعة عمر خطاب  
مركزها ميانه نمبر ما شهره 01533

الدرجة	المادة	الدرجة	المادة
90	الفرائض	100	التفسير
95	البلاغه	67	الحديث واصوله
92	الادب العربي	85	الفقه

الدرجة الصغرى ٤٠ - الدرجة الكبرى ١٠٠ - مجموع الدرجات ٦٠٠ - الدرجات المحصلة 529

تشهد إدارة وفاق المدارس العربیة أن الطالبة المذكورة أعلاه قد نجحت في امتحان الشهادة العالية

بتقدير ممتاز

توقيع مراقب الامتحان

التاريخ 22-09-2006 م

Attested

Advocate  
Distt. Court's Abbottabad

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

وفاق المدارس العربیة  
پاکستان

**کشف الدرجات**

امتحان شہادۃ الشافعیۃ العامۃ فی العلوم الإسلامیۃ والعربیۃ (مینٹر)  
ع ۱۴۲۵ھ (لسان) 2004  
رقم التسجيل 1425-05-013-412 رقم الجلوس 13412

اسم الطالبہ رومیلہ ..... اسم الوالد محمد اقبال  
المدریۃ ماہنامہ ..... تاریخ الميلاد 12-11-1985  
اسم الجامعة/المدرسة جامعہ عمر خطاب  
الحاق نمبر 01533 مکرہامیانہ نمبر ماہنامہ

الدرجة	المادة	الدرجة	المادة
100	الصرف	86	التفسير
100	التحو	88	الحديث
84	التاريخ والأدب العربي	88	الفقه

الدرجة الشفويۃ ۰-۵۴۶ - الدرجة الكبرى ۱۰۰- مجموع الدرجات ۶۰۰ - الدرجات المتصلة ۰ 546

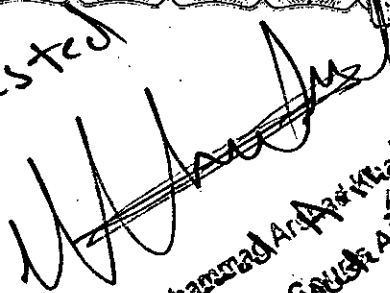
شہد إدارة وفاق المدارس العربیۃ أن الطالبۃ المذكورۃ أعلاه قد نجحت في امتحان الشہادۃ الشافعیۃ العامۃ  
بتقدير ممتاز - وصلى الله على سيدنا محمد وآله وصحبه وسلم

توقيع مراقب الامتحان

المكتب الرئيسي ملتان

الشارح 25-10-2004 ع

Attested

  
 Muhammad Anwar  
 Advocate  
 Tawal, D.I. Khan, Gujrat, Punjab

(Academic  
Certificates)



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



وفاق المدارس العربية  
باكستان

## كشف الدرجات

امتحان شهادة الثانوية الخاصة في العلوم الإسلامية والعربية (ايضا)

عام 1422 هـ (السنوات) 2005

رقم التسجيل 1425-05-013412 رقم الجلوس 9570

اسم الطالب روميله اسم الوالد محمد اقبال

المديرة مانسبره تاريخ الميلاد 12-11-1985

اسم الجامعة/ المدرسة جامعه عمر خطاب الحاق نمبر 01533  
مكرها ميانه نمبر مانسبره

الدرجة	المادة	الدرجة	المادة
65	اصول الفقه	57	التفسير
99	التحوي	91	الحديث
86	الأدب العربي والشايج	76	الفقه

الدرجة الضميمة 4 - الدرجة الكبرى 100 - مجموع الدرجات 600 - الدرجات المحصلة 474

تشهد إدارة وفاق المدارس العربية أن الطالب المذكور أعلاه قد نجح في امتحان الشهادة الثانوية الخاصة بتقدير جيد جدا

بسم الله الرحمن الرحيم

توقيع مراقب الامتحان



المكتب الرئيسي ملتان

الشايج 18-10-2005

Attested

*Muhammad Arshad Khan, Faisal  
Advocate  
Distt: Courts Abbottabad*



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

وفاق المدارس العربیة  
پاکستان

# كشف الدرجات

امتحان الشهادة العالمية في العلوم الإسلامية والعربية (بشيء عربي إسلامي)

ع ٢٨ - ١٤ (الساعات) 2007

رقم التسجيل 1425-05-013412 رقم الجلوس 6469

اسم الطالب روميله اسم الوالد محمد اقبال

المديرية مانسهره تاريخ الميلاد 12-11-1985 ع

اسم الجامعة جامعة عمر خطاب

الحاق نمبر 01533 مكرها ميانه نمبر مانسهره

الدرجات	الكتب الدراسية	الدرجات	الكتب الدراسية
86	الصحیح للجباري	61	الصحیح للجباري
77	الجامع للترمذی	73	الصحیح لمسلم
66	السنن لأبي داؤد	78	الجامع للترمذی

الدرجة الصغرى ٤- الدرجة الكبرى ١٠٠- مجموع الدرجات ٦٠٠- الدرجات المتصلة 441

شهادة إدارة وفاق المدارس العربیة أن الطالبة المذكورة أعلاه قد نجحت في امتحان الشهادة العالمية

بتقدير جيد جدا

توقيع مراقب الامتحان



المكتب الرئيسي ملتان

13-09-2007

الشارح

Attested

*Arshad Khan Tanoli*  
Arshad Khan Tanoli  
Distt: Courts Abbottabad

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



وفاق المدارس العربیة  
باكستان

## كشف الدرجات

امتحان الشهادة العالمية في العلوم الاسلامية والعربية (رابعة عربي اسلاميات)

ع ٢٨ - ١٤ (السنين)  
2007

رقم التسجيل 1425-05-013412 رقم الكولم 6-469

اسم الطالب بروميله اسم الوالد محمد اقبال

المديرة ماسميره تاريخ الميلاد 12-11-1985 ع

اسم الجامعة جامعه عمر خطاب

حاق نمبر 01533 مكانها ميانه نمبر ماسميره

الدرجات	الكتب الدراسية	الدرجات	الكتب الدراسية
86	الصحيح للجباري <sup>ع</sup>	61	الصحيح للجباري <sup>ع</sup>
77	الجامع للترمذي <sup>ع</sup>	73	الصحيح لمسلم <sup>ع</sup>
66	السنن لأبي داود <sup>ع</sup>	78	الجامع للترمذي <sup>ع</sup>

الدرجة الضميمة ٤- الدرجة الكبرى ١٠٠- مجموع الدرجات ٦٠٠- الدرجات المحصلة 441

تشهد إدارة وفاق المدارس العربیة أن الطالب المذكور أعلاه قد نجح في امتحان الشهادة العالمية

بتقدير جيد جدا

بسم الله الرحمن الرحيم



توقيع مراقب الامتحان

المكتب الرئيسي ملتان

التاريخ 13-09-2007 ع

Attest  
Muhammad Arshad Khan Jahan  
District Courts Abbottabad

(17)

Annex C

ORDER

As approved by the Departmental Selection Committee, the Competent Authority has been pleased to appoint the following AT (Female) against vacant posts mentioned against each in BPS-15 @ Rs.8500-700-29500 pm plus usual allowances as admissible under the rules in the interest of Public Service with effect from the date of their taking over charge subject to the following terms & conditions:-

Sr	Name	Father's Name	Address	Place of Posting	Remarks
1	BIBI MANIFA	ABDUL HAMM	BAFFA MERA	GGMS Balimang	ANIPost
2	BIBI HALIMA	QAZI SAFOUR REHMAN	MANSEHRA	GGMS Moorat Mera	ANIPost
3	SHAMILA	YOUSAF	MANSEHRA	GGMS Khait Sarash	ANIPost
4	ROMALA	M. IOBAL	TANDA	GGMS Ahi	ANIPost
5	SAFIA BIBI	HABIB REHMAN	BAFFA MARA	GGMS Mathra Jal Saji	ANIPost
6	MARIA	ASHRAF	MANSEHRA	GGMS Chansair	ANIPost
7	BUSHRA GUL	MASOOD KHAN	BAFFA	GGMS Kotri	ANIPost
8	FOZIA BIBI	FAZAL REHMAN	BLHAG BALA	GGMS Sinjli	ANIPost
9	ASIA KHATOON	FAR ZAMAN	KAWAI	GGHS Kawai	ANIPost
10	BIBI SADIYA	GHULAM SARWER	MANSEHRA	GGMS Chamial	ANIPost
11	KALSCOM BIBI	CHANZEB	JISCRAN	GGMS Bai Bohal	ANIPost
12	PARVIN BIBI	MOHD YAGUS	SHINKIAR	GGMS Bradar	ANIPost
13	SEEM NAZ	SHEIKH AHMED	DAB MANSEHRA	GGMS Karori	ANIPost
14	SIDRA BIBI	GHULAM AHMED	BALAKOT	GGMS Mohandri	ANIPost
15	SHAZIA RANI	MOHD ISMAHIL	DADAR	GGMS Kamal Ban	ANIPost
15	SAMMIA	GHULAM FARID	OGHI	GGMS Fateh Bandi	ANIPost
17	AYSHA	M. SIDDIQUE	OGHI	GGMS Bagrian	ANIPost
18	ZAMIRIA	M. FAID	KALGAN	GGMS Madseran	ANIPost

Note: The pay of the candidates falls at S# 8,11,&12 will be effective from 01/09/2012 after the re-opening of summer vacations Zone Schools.

TERMS & CONDITIONS:

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

- 1 -

*[Handwritten signature]*

Page I  
(Appointment order)  
We are on  
4th number  
will be effective on  
4-9-2012

Attested  
M. Muhammad Arshad Khan Tanoli  
Advocate  
Manshera

EXECUTIVE DISTRICT OFFICER  
E&S EDUCATION  
MANSEHRA

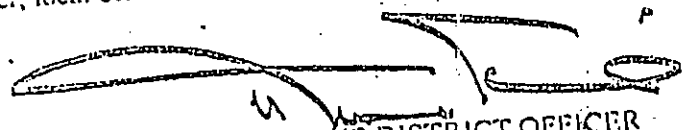
5. They will submit to this office their all testimonial and along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
6. The release of the pay by the concerned DDOs will be subject to the receipt of verified documents by the appointing authority / (EDO E&SE Manshira)
7. In case a document or documents is / are found fake or forged or Bogus or such a nature or all the verification in 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 unsatisfactory; they will be proceeded against under the removal from service under E&E Rules 2011.
10. They should produce Age & Health Certificate from the MS DHQ Hospital Manshira.
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 1<sup>st</sup> July 2001 in pervious post, they are entitled for pension / gratuity etc.
13. No TA/DA etc is allowed.
14. Charge report should be submitted to all concerned in duplicate.

(Dr. Ambar Ali Khan)  
DISTRICT COORDINATION OFFICER  
MANSEHRA

Encls: No 7/0 - 52 - E&S (F) Appn AT (F) 2012 Dated Manshira the 15/6/2012

Copy to the:-

1. Secretary to Govt: of KPK E&SE Department Peshawar.
2. Director E&SE Department KPK Peshawar.
3. District Accounts Officer, Manshira.
- 4-5. District Officer (M&F) Local Office.
- 6-23. Principal/Headmistresses School concerned.
24. PA to District Coordination Officer, Manshira.
25. Budget & Accounts Officer, local office, Manshira.
- 26-43. Candidates concerned.

  
EXECUTIVE DISTRICT OFFICER  
E&SE MANSEHRA

(Page no 2)

Attested  
Muhammad Arshad Khan Tanoli  
Advocate  
Distt: Govt: Abbottabad

19

62

WORKING PAPER FOR THE APPOINTMENT OF AT (BPS-15) IN THE EXISTING EDUCATIONAL INSTITUTIONS MANSEHRA

AT posts of BPS-15 in the existing educational institution Mansehra were advertised through Director information KPK Peshawar in the light of Notification No. SOE-IV/E&AD/1-35-2002 Dated :26/09/2003 of the Government Khyber Pakhtunkhwa Establishment and Administration Department (Establishment Wing) Peshawar accordingly method of recruitment for the post of AT B-15 in as under (Annexure-I).

25 Posts of AT B-15 are lying vacant in the educational institutions in the district 75% by initial recruitment within age limit of 18 to 35 years having SSC Shadat-ul-Almia at least 2<sup>nd</sup> Division from the recognized university/Board and 25% posts are reserved for promotion from Qari post B-09 to AT BPS-15.

In response 966 candidates were appeared in ETEA which was conducted by the ETEA Authority (Annexure-II)

Interview were conducted by the committee (Annexure -III)

Tentative Merit list was prepared by the Committee and displayed (Annexure-IV).

22 No. of appeals were received which were disposed off (Annexure-V).

According to the criteria of selection for promotion /Initial Recruitment rules as (Annexure-VI).

Final Merit list showing educational qualification and Marks of ETEA (Annexure-VII).

The DSC is requested to recommend 18 candidates for the appointment of AT B-15

EXECUTIVE DISTRICT OFFICER  
ELE. & SECY: EDU: MANSEHRA

Abdullah  
Munsif Manshera  
Distt: Courts Abbottabad  
Khan Tanzeel  
Advocate

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----

190	Tayyuba Bibi D/O Mohammad Rasheed	Endst No. 6514-19/Estt: appt:(F) AT/2011-12 Dated Manshera 11.8.2012  Appointed as AT at GGHS Kawai in BPS-15	Appointment order was issued by the EDO E & SE Mansehra on acceptance of <b>appeal</b> . Her name was at S.No 190 of the merit list with score 22.16. Candidates from S.No 1 to 18 were appointed. The score of the last candidate was 49.52. The appointment is unjustified. DSC meeting was not held to decide the case and proper procedure was not adopted <b>(Annex-XXXIII)</b> .	The appointment is irregular and illegal.
4	Romala D/O Mohammad Iqbal	Endst No. 710-52/Estt:(F) appt:AT/2012 Dated 14.6.2012  Appointed at GGMS Ahl in BPS-15	Her MA Previous DMC was attached with her Forms at the time of submission of application but MA final result was declared on 16.1.2012. weightage of MA was awarded to her in the merit list which was not justified as the closing date for the receipt of the application form was 6.6.2011. Her merit was raised by award of weightage of MA which is against the recruitment policy and also the condition of advertisement. <b>(Annex-XXXIV)</b> .	The appointment is irregular and against the recruitment rules/procedure.
	Bushra Gul D/O Masood Khan	Endst No. 710-52/Estt:(F) appt:AT/2012 Dated 14.6.2012  Appointed at GGMS Kotril in BPS-15	She was not MA at the submission of application form. Result of MA was declared on 29.1.2012 i.e. after the closing date. Award of fake weightage of MA to raised the merit is not justified <b>(Annex-XXXV)</b> .	The appointment is against the recruitment rules/procedure

*Abdullah*  
*Muhammad*  
D/O Masood Khan  
Advocate  
Abbottabad

*Sayyid*

*Tariq*

Received on  
13/9/2015

*Romala*

حاضری رپورٹ

(21)

Enrol: 52 110 110

شاہان آباد سین آڈیٹر

14/6/2012

آپ کے دفتر EDO زنا سے تعلق ہے

18-06-2012 کو

قبل از دفتر G1 GMS آپل میں حاضری کر دی ہے

حاضری رپورٹ میں خدمت ہے

Pervaiz Akhlaq

18.06.2012

Notary Public  
Abbottabad

Attested  
Muhammad Arshad Khan Jangli  
Advocate  
Distt: Courts Abbottabad

listress  
A.S. Ahl

رہنما





# سرٹیفکیٹ

(22)

تصدیق کی جاتی کہ ہمارے گورنمنٹ گرلز ہائی اسکول ----- AHL ----- میں درج ذیل سٹاف باقاعدگی سے اپنی ڈیوٹی سرانجام دے رہا ہے کوئی سٹاف غیر حاضر نہیں ہے اگر کوئی غیر حاضر ہو تو اس کی رپورٹ متعلقہ حکام کو دی جائے گی۔ رپورٹ نہ کرنے کی صورت میں خود ذمہ دار ہونگے۔ درج ذیل سٹاف کی تنخواہیں بھی باقاعدگی سے ادا کی جا رہی ہیں۔ یہ سب بحیثیت ہیڈ ٹیچر ہر ماہ اسکول کا گوشوارہ اور قبضہ وصول ہونے کی ذمہ دار ہوں۔

تاریخ: ۰۵ مارچ

سرٹیفکیٹ کے مطابق اگر کوئی بے قاعدگی پائی گئی تو اس کی تمام ذمہ داری سنبھالی جائے گی۔

نمبر شمار	نام سٹاف اور درجہ	دستخط معلم اول
۱	Sehrish Khan - SGT	
۲	Parveen Bibi - C-T	
۳	Eul Bibi - C-T	
۴	Amara Syedam	
۵	Sadia Naz - PET	
۶	Romalla Iqbal - AT	
۷	BiBi Afsareen - T-T	
۸	کتبہ نگار	
۹	Nasreen Akhter - SGT	
۱۰		

Head Mistress  
G.G.M.S AHL  
Amara Syed

Advocate  
Muhammad Arshad Khan-Tanoli  
Advocate  
Distt: Courts Abbottabad

Mistress  
A.S AHL



**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA**

No. 2211 / Establishment/ 2014      Email: deofmansehra@yahoo.com  
Dated: 29/04 / 2014      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 Romala D/O Muhammad Iqbal, AT, Govt: Girls Middle School Ahl Mansehra Show cause Notice as follows:

- 1) You were appointed as AT at GGMS Ahl vide defunct Executive District Officer (E&SE) Mansehra Endstt: No 710-52/Estt Dated 14.06.2012 where you were stranger for recruitment process initiated through EATA:  
Acceptance of your appeal & subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet will & wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department letter No SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25/08/2014 More over the then EDO(E&SE) has been removed from Government Service in connection with all such bogus appointment including yours made by him.
- 2) Going through the finding and recommendation of the inquiry committee, the material on record & other connected papers including your defiance before the inquiry committee:-

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

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

A copy of the finding inquiry committee related page is enclosed.

*[Signature]*

COMPETENT AUTHORITY

*Alleged*  
*[Signature]*  
Muhammad Alishah  
District Courts Abbottabad

Recd on 13/04/2015  
M. ROMALA

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62

WORKING PAPER FOR THE APPOINTMENT OF AT (BPS-15) IN THE EXISTING EDUCATIONAL INSTITUTIONS MANSEHRA

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In response 966 candidates were appeared in ETEA which was conducted by the ETEA Authority (Annexure-II)

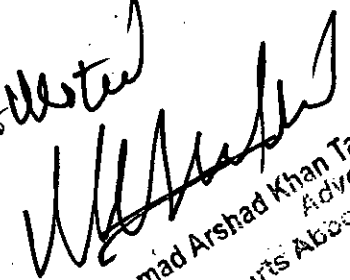
Interview were conducted by the committee (Annexure -III)

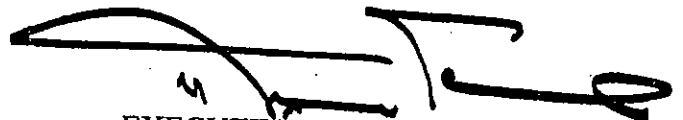
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The DSC is requested to recommend 18 candidates for the appointment of AT B-15

Attested  
  
Muhammad Arshad Khan Tanoli  
Advocate  
Distt. Courts Abbottabad

  
EXECUTIVE DISTRICT OFFICER  
ELE: & SECY: EDU: MANSEHRA

25

Annex 'E'



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

Mst. Romela D/O Muhammed Iqbal working  
was served with show cause notice and was proceeded  
under the Khyber Pakhtunkhwa 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. Akhthaq 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. Romela D/O Muhammed Iqbal CT/PET/IT AT GGHS/GGM GGPS Ahl

*[Signature]*  
DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

Endst: No. 1522-1531 /AE- I /Estab: dated 03/03/2015.  
Copy to the:-

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

*[Signature]*  
DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

Attested

*[Signature]*

Muhammad Azeem Khan Tanoli  
District Officer  
Mansehra

Received on 13/4/2015  
*[Signature]*

Dismissal order  
dated 3-3-2015

1-1  
AET/2/2015  
Man

(26)

Annex "F"

To

The Director of Education (E&SE),  
KPK, Peshawar.

SUBJECT: DEPARTMENTAL APPEAL AGAINST THE ORDER DATED  
03.03.2015 RECEIVED BY THE APPELLANT ON 13.04.2015,  
WHEREBY THE APPELLANT WAS DISMISSED FROM THE  
SERVICE

Respected Sir,

FACTS:

1. That the appellant was appointed on AT post (BPS-15) vide order dated 14.6.2012 after the proper recommendation of Departmental Selection Committee and took over charge at GGMS Ahl. Copy of order and charge report are attached as Annexure-A&B)
2. That the appellant regularly performed her duty at GGMS Ahl which is evident from certificate and attendance register. The appellant also took salaries up to March 2015. (Copy of certificate and attendance register is attached as Annexure-C&D)
3. That the March 2015 salary of the appellant was not transferred to bank and when she inquired about that, she was informed that she was dismissed from her service w.e.f 03.03.2015 on the basis of illegal appointment without charge sheet, inquiry and show cause notice, and there and then on 13.04.2015, the appellant was handed over the copy of order dated. 13.04.2015. (Copy of dismissal order is attached as Annexure-E)
4. That now the appellant filed the departmental appeal on the following grounds.

GROUND:

- A) That the impugned order dated 03.03.2015 is against the law, rules and material on record, therefore liable to be set aside.
- B) That the appellant has possessed all the requirements of AT post and was appointed after proper recommendation of Departmental Selection Committee & NTS test.
- C) The appellant was appointed after fulfilling all the codal formalities and could be punished for the fault of others if any.

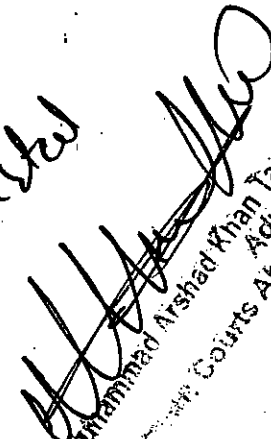
Accepted  
Muhammad  
Advocate  
Distt: Courts Abbottabad

- D) That the dismissal of the appellant is against the principle of "LOCUS POENITENTIAE" as the appointment order created valuable rights in favour of appellant which cannot be taken away so simply.
- E) That the appellant has regularly performed his duty which is evident from the certificate and attendance register.
- F) That no charge sheet and statement of allegation was served to the appellant before imposing major punishment of dismissal which is the violation of law and rules.
- G) That no inquiry was conducted against the appellant before imposing major nor she was associated with the same which is the violation of Superior Courts judgment.
- H) That even show cause notice was not issued to the appellant nor received by appellant before imposing the major punishment of dismissal from service. Which is the violation of principal of Audi Alteram Partem and fair play
- I) That the appellant has been condemned unheard and has not been treated according to law and rules.

It is therefore, most humbly requested that impugned order dated 03.03.2015 may be set aside and reinstated the appellant with all back and consequential benefits.

Date: 16-4-2015

Appellant **ROMALA**  
 Romala (Ex-AT) D/O Muhammad Iqbal,  
 Village & Post office Tanda, Dish,  
 Mansehra.  
 Cell.No. 03466230615

Attended  
  
 Muhammad Arshad Khan Tanvir  
 Advocate  
 Courts Abbottabad

(We also applied for  
 Departmental Proceedings  
 dated 16-4-2015)

Final Merit List of Applicants for TAT-II (Female) (Applied for AT)

Sl	Roll No	Name	Father Name	Address	D/O of Decl: of Prof:Result	DATE OF BIRTH	ETEA Marks	Total	Page	Academic Qualification																Remarks
										SSC			FA/FSC			BA/BSC			MA/JMSC							
										Obt	Tot	Plage	Obt	Tot	Plage	Obt	Tot	Plage	Obt	Tot	Plage	Plage				
1	197	BIBI HANIFA	ABDUL QAIM	BAFFA MARA		20/4/86	188	300	25.1	650	850	7.65	756	1100	10.3	357	550	12.98	864	1100	5.5	61.5				
2	95	BIBI HALIMA	QAZI RAFIQ UR REHMAN	Mansehra	19/12/08	21/12/82	168	300	22.4	616	850	7.25	711	1100	9.7	345	550	12.55	871	1100	5.5	57.43				
3	150	SHAMILA	YOUSAF	Mansehra	22/09/06	11-08-84	184	300	24.5	520	850	6.12	736	1100	10	347	550	12.62	610	1100	3.9	57.19				
4	2	ROMALA	M IQBAL	Tanda	13/09/07	11-12-85	172	300	22.9	497	850	5.85	713	1100	9.72	364	550	13.24	826	1100	3.3	57	MA Pre			
5	196	SAFIA BIBI	HABIB REHMAN	BAFFA MARA		01-07-77	196	300	26.1	579	850	6.81	612	1100	8.35	276	550	10.04	816	1100	5.2	56.52				
6	143	MARIA	ASHRAF	Mansehra	22/09/06	28/10/88	164	300	21.9	590	850	6.94	713	1100	9.72	319	550	11.6	1435	2000	5	55.15				
7	255	BUSHRA GUL	MASOOD KHAN	BAFFA	21/9/09	08-02-88	164	300	21.9	571	850	6.72	683	1100	9.31	333	550	12.11	1396	1900	5.1	55.15	MA Pre			
8	309	FOZIA BIBI	FAZAL REHMAN	BLHAG BALA	21/8/09	09-01-79	184	300	24.5	499	850	5.87	589	1100	8.03	289	550	10.51	741	1100	4.7	53.66				
9	26	ASIA KHATOON	FAR ZAMAN	Kawai	13/09/07	15/04/81	184	300	24.5	547	850	6.44	788	1100	10.7	307	550	11.18				52.88				
10	150	BIBI NAGINA	ABDUL RASHID	MANSEHRA			120	300	16.00	738	1050	7.04	778	1100	10.58	345	550	14.34	685	1100	4.5	52.8	MA Pre			
11	130	BIBI SADIA	GHULAM SARWER	Mansehra	22/09/06	03-02-86	156	300	20.8	564	850	6.64	623	1100	8.5	319	550	11.6	755	1100	4.8	52.34	MA Pre			
12	336	KALGOOM BIBI	CHAN ZEB	JISGRAN	13/9/07	02-12-83	176	300	23.5	597	850	7.02	547	1100	7.46	422	600	10.55	503	1000	3.5	52.02				
13	313	FARVIN BIBI	MOHD YAQUB	Shinkhari	13/9/07	30/1/82	152	300	20.3	466	850	5.48	664	1100	9.05	317	550	11.53	815	1100	5.2	51.52				
14	312	SEEMI NAZ	SHEIKH AHMED	Dab Mansehra	25/10/04	04-10-84	152	300	20.3	555	850	6.53	629	1100	8.58	289	550	10.51	800	1100	5.1	50.97	Documents Required			
15	540	SIDRABIBI	GHULAM AHMED	Balakote	19/12/08	26/1/86	156	300	20.8	511	850	6.01	657	1100	9.96	280	550	10.18	726	1100	4.6	50.57	MA Pre			
16	41	SHAZIA RANI	MOHD ISMAHIL	DADER	13/12/07	06-05-75	148	300	19.7	522	850	6.14	564	1100	7.69	330	550	12	780	1100	5	50.53	MA Pre			
17	100	SAMIMA	GHULAM FAR'D	Dahi	04-01-02	15/10/60	160	300	21.3	588	850	6.92	654	1100	8.92	527	800	13.18				50.34				
18	65	AYSHA	M SIDDIQUE	Dahi	09-01-08	16/03/87	136	300	18.1	541	850	6.36	641	1100	8.74	311	550	11.31	799	1100	5.1	49.63				
19	173	ZAUBRIA	M FAID	KALGAN	21/8/09	03-08-87	184	300	24.5	529	850	6.22	573	1100	7.81	301	550	10.95				49.52				
20	200	BIBI HAJRA	JAFFAR SHAH	SHANKH ABAD	23/12/10	16-6/83	140	300	18.7	568	850	6.68	602	1100	8.21	496	800	12.4	500	1000	3.5	49.46				
21	553	SHUMILA RANI	GHAZI KHAN	Dab Mansehra	11-02-02	04-05-83	148	300	19.7	493	850	5.8	568	1100	7.75	293	550	10.65	785	1100	5	48.93				
22	633	SHABANA BIBI	MOHD HAROO	Mansehra	12-01-01	13-12-82	144	300	19.2	442	850	5.2	614	1100	8.37	312	550	11.35	749	1100	4.7	48.83				

✓

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Handwritten signature and initials

Muhammad Arshad  
Distt: Courts Ab...  
Tarpill

SAJIDA SAKHI  
A.D. O (F)

WASEERA BEGUM  
Assistant District Officer



**APPLICATION FORM FOR RECRUITMENT OF TEACHER IN E & SE DEPAR**

**(29)**

District Code: 017 Roll No:             
(TO BE FILLED IN BY THE OFFICE)

(TO BE FILLED IN BY THE CANDIDATE)

TYPE OF TEST APPLIED FOR:  TAT-1  TAT-2  
(TICK RELEVANT BOX) PST/CT/DM/PET AT/TT/QARI

1461 HJ  
13

1. NAME (CAPITAL LETTERS) ROMALA
2. FATHER'S NAME (CAPITAL LETTERS) MUHAMMAD JOBAL
3. GENDER:  MALE  FEMALE
4. DATE OF BIRTH 12-11-1985
5. CNIC NO 13503-1487663-2
6. DOMICILE (DISTRICT) Mansehra
7. PERMANENT ADDRESS Vill. & P/O Tanda  
Feh & Distt Mansehra.
8. ADDRESS FOR CORRESPONDANCE AS ABOVE
9. CONTACT NO. 03459570153 = 03219974058
10. NAME OF OFFICER ATTESTING THE PHOTO ABDUL WAHEED KHAN
11. BANK DRAFT NUMBER 0588227 DATE 23.5.21 BRANCH Mansehra

**UNDERTAKING BY THE CANDIDATE:**

I ROMALA S/O M. JOBAL do certify that I have personally filled out this form and the given information is correct to the best of my knowledge and belief.

Initials of issuing Authority

ROMALA  
Signature of Candidate

- Note:
- Application will not be entertained without Bank Draft of Rs. 400 to be attached with this form in original.
  - Photo Must be attested by 1st Class Gazetted Officer



**ROLL NUMBER SLIP**  
(TO BE FILLED IN BY THE OFFICE)

DISTRICT CODE 0 1 7

ROLL NO           

1461

TYPE OF TEST APPLIED FOR:  
(TICK RELEVANT BOX)

TAT-1  TAT-2  
PST/CT/DM/PET AT/TT/QARI



(TO BE FILLED IN BY THE OFFICE)

1. NAME (CAPITAL LETTERS) ROMALA
2. FATHER'S NAME (CAPITAL LETTERS) MUHAMMAL JOBAL
3. DOMICILE (DISTRICT) MANSEHRA

Muhammad Tanvir  
Muhammad Tanvir  
Distt: Courts Abbottabad  
Advocate

Signature Issuing Authority/Sta

**PLEASE BRING TO THE TEST CENTER**

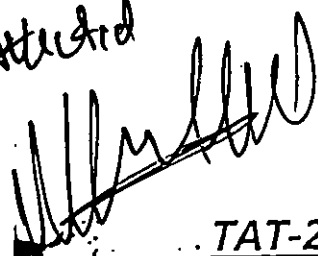
- 1) COMPUTERIZED NATIONAL IDENTITY CARD (ORIGINAL)
- 2) THIS ROLL NO. SLIP
- 3) A CLIP BOARD
- 4) BLACK THIN MARKER (DOLLAR SKETCH LINE)

Date             
Time             
Venue           

**PLEASE BE AT THE CENTER 45 MINUTES AHEAD OF TIME**

**Calculators, Calculator Watches, Mobiles Phones or any electronic Devices are not Allowed**



Attended  


30

**TAT-2 FEMALE MANSEHRA RESULT 2011**

Roll No	Name	Father Name	Marks	%age
1700001	LUBNA	AURANG ZEB	152	50.67
1700002	ROMALA	M IQBAL	172	57.33
1700003	NAGINA	FAZAL ELLAHI	148	49.33
1700004	AMJINA AFZAL	M AFZAL KHAN	116	Fail
1700005	PHOOL NAGHMA	M ASGHAR	128	42.67
1700006	NIDHA RANI	BASHIR AFZAL	132	44.00
1700007	RASHIDA BIBI	M SHARIF	128	42.67
1700008	NIDA RANI	BASHIR HUSSAIN	128	42.67
1700009	RAHIRA JABEEN	GULAM NABI	Absent	#VALUE!
1700010	NAZMA NOREEN	ANWER UL HAQ	Not Alloted	#VALUE!
1700011	NAZMA NOREEN	ANWER UL HAQ	88	Fail
1700012	KIRAN BIBI	M KALIQ	136	45.33
1700013	CHAN MERAJ	M RAFIQUE	108	Fail
1700014	SOBIA	M SALIM	144	48.00
1700015	NAILA	BADRI ZAMAN	136	45.33
1700016	ASMA BIBI	SHAMS UR EHMEN	188	62.67
1700017	RUBINA AZIZ	MATI UR REHMAN	100	Fail
1700018	ISRAT FATIMA	SHAH LAYIF	112	Fail
1700019	MAMOONA BIBI	SABIR HUSSAIN SHAH	92	Fail
1700020	ALYIA BIBI	AURABGZEB	112	Fail
1700021	RAZIA MEHNAZ	REHMAN ULLAH	108	Fail
1700022	AYESHA BIBI	AURANGZEB	124	41.33
1700023	ATIQA BIBI	FIDA HUSSAIN SHAH	112	Fail
1700024	FOQIA BASHIR	M BASHIR	Absent	#VALUE!
1700025	BASIRAT SHAHEEN	M AKBER AWAN	160	53.33
1700026	ASIA KHATOON	FAR ZAMAN	184	61.33
1700027	NABEELA BIBI	M. YOUNIS	160	53.33
1700028	KALSSON BIBI	FARD ZAMAN	124	41.33
1700029	MANWAR SULTANA	MOHD NAWAZ	124	41.33
1700030	SAIMA	SARFARAZ	140	46.67
1700031	SALAMA JABEEN	FAZAL RAHIM	164	54.67
1700032	KOSAR MEHMOOD	QAZI MEHMOOD	112	Fail
1700033	NABEELA NOSHEEN	SHER AKBAR	144	48.00
1700034	SANUM	MOHD KHURSHID	152	50.67
1700035	SHAISTA BIBI	MALIK AMAN	112	Fail
1700036	SOBIA	MOHD ANWAR	80	Fail
1700037	RANI ZENIB	JEHANZEB	140	46.67
1700038	ABIDA RAZZAQ	RAZA MOHD	140	46.67
1700039	NADIA	ABDUL SATTAR	116	Fail
1700040	NUSRAT JABEEN	M SADIQ	104	Fail
1700041	ARUM NAZ		104	Fail
1700042	FOZIA		84	Fail
1700043	ASMA		168	56.00
1700044	RIZWANA		96	Fail
1700045	ZAINAB BIBI	GHULAM MUJATABA SHAH	128	42.67
1700047	BIBI SAIMA	GHULAM MUJATABA SHAH	96	Fail
1700048	BIBI SADIYA	GHULAM MUJATABA SHAH	144	48.00
1700049	SHAMINA	SHAH ZAMAN	108	Fail
1700050	SAJIDA KHANM	SAEED UR REHMAN	108	Fail
1700051	BIBI AZRA	M YOUSAF	76	Fail
1700052	SHAZIA BIBI	UMAR KHAN	88	Fail
1700053	BIBI NUZAT	M NAZIER	124	41.33
1700054	BIBI ZANAB	M AYUB	108	Fail
1700055	FAZIA BIBI	SAAD HUSSAIN SHAH	140	46.67
1700056	SOBIA BIBI	RAZA HUSSAIN	164	54.67



Muhammad Arshad  
 Dis: 

قیمتی

کورٹ فیس

# وکالت نامہ

بعدالت KPK سرویس کنزرویٹوئل ٹرسٹ

عنوان: سماہ رو میڈیا ڈسٹری بیوٹن کمپنی بنام گورنمنٹ آف سندھ

منجانب: اسد علی

نوعیت مقدمہ: اصل سروس

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آں مقام  
محمد ارشد خان نسیمی رٹورنری کورٹ کے لیے  
کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب  
موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف و دینے اقبال و دعویٰ اور بصورت دیگر ڈگری کرانے اجراء  
وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور  
کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار  
بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پرداختہ مجھ کو منظور 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 برآمد استجارت نالش بصفینہ مفلسی کے دائرہ کرنے اور اس کی  
پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند Accepted  
رقوم: 16 جولائی 2015 بمقام: اسد علی

Muhammad Arshad Khan Tanoli  
Advocate  
Distt. Court, Abbottabad

Muhammad Arshad Khan Tanoli  
Adv. High Court Abbottabad

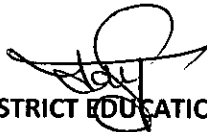
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

**Service Appeal No.848/2015**

Respectfully Shewth

1. That the services appeal No: 848/2015 in respect of **MST: Rumala** is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4022-27 /F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been **reinstated against the post of AT (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 Romala AT~~ at Government Girls Middle School AHL District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1432-41 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. Romala's name was included in the Merit list at S.No. 04. On awarding the marks of M.A (Previous) wrongly instead of M.A (Final) whose result was not declared, her score in the merit list was raised for which she was not deserving. But after deduction of her M.A marks her score is reduced to 51.70 and her position in the merit list reaches to S. No 12 wherein she deserved to be appointed on merit basis against one of the prevailing 18 vacancies of A.T.
2. ~~Appeal may be accepted as she~~ fulfilled the minimum prescribed qualification for the post.

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. 1522-1531 dated 03/03/2015 and reinstate Ms. Romala AT at Government Girls Middle School AHL District Mansehra with effect from the date of her dismissal with all back benefits.

Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4022-27 /F.No. 74/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. District Accounts Officer Mansehra
3. Head Mistress Concerned.
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.

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