



03.02.2023

Clerk of learned counsel for the appellant present. Ms. Shandan Ghani, ADEO alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for arguments on 05.04.2023 before the D.B.

SCANNED
KINGST
Peshawar


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

10.11.2022


Counsel for the appellant present.

Naseer Ud Din Shah learned Assistant Advocate General for the respondents present.

Former requested for adjournment on the ground that he has not prepared the brief. Adjourned. To come up for arguments on 09.12.2022 before D.B.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member (E)



(Rozina Rehman)
Member (J)


09th Dec. 2022

Counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present.

SCANNED
KPST
Peshawar

Learned counsel for the appellant states that due to rush of work he could not prepare the brief and seeks adjournment of the matter to 03.02.2023. On the request of learned counsel for the appellant, the matter is adjourned to his desired 03.02.2023 for arguments before the D.B as last chance, failing which the matter will be decided on the basis of available record without the arguments.



(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

12.09.2022

Learned counsel for the appellant present. Mr. Naseer-Ud-Din Shah, Assistant Advocate General for the respondents present.

Mr. Mian Muhammad, learned Member (Executive) is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments before the D.B on 11.10.2022.




(Salah-Ud-Din)
Member (J)


11th Oct., 2022

Junior to counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. A:G alongwith Shandan Ghani, ADEO for the respondents present.

Senior counsel for the appellant is not available. His junior requests for adjournment. Adjourned. To come up for arguments on 10.11.2022 before the D.B.



(Fareeha Paul)
Member (E)



(Kalim Arshad Khan)
Chairman

22.08.2022

Appellant alongwith counsel present. Miss. Shandana Ghani Litigation Officer alongwith Mr. Naseer Ud Din Shah, Assistant Advocate General for the respondents present.

Partial arguments heard. To come up for remaining arguments on 25.08.2022 before the D.B.



(Rozina Rehman)
Member(J)



(Salah-Ud-Din)
Member(J)

25.08.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned Member (Judicial) Ms. Rozina Rehman is on leave, therefore, remaining arguments could not be heard. Adjourned. To come up for remaining arguments on 31.08.2022 before the D.B.



(Salah-Ud-Din)
Member (Judicial)

31.08.2022

Clerk of learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Learned Member (Judicial) Ms. Rozina Rehman is on leave, therefore, remaining arguments could not be heard. Adjourned. To come up for remaining arguments on 12.09.2022 before the D.B.




(Salah-ud-Din)
Member (Judicial)

13.01.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not gone through the record. Adjourned. To come up for arguments before the D.B on 10.05.2022.



(Atiq-Ur-Rehman Wazir)
Member (E)


Chairman

10.05.2022

Learned counsel for the appellant present. Mr. Riaz Khan Paindakheil, Asstt.-AG for the respondents present.

Learned counsel for the appellant requested for adjournment in order to further prepare the brief. Last opportunity is granted. To come up for arguments before the D.B on 10.06.2022.


(Fareeha Paul)
Member (E)


Chairman

10.06.2022

D.B is incomplete, therefore, case is adjourned to 22.08.2022 for the same as before


Reader



29.03.2021

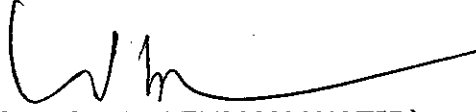
The concerned D.B is not available today, therefore, the appeal is adjourned to 29.06.2021 for the same.



Reader

29.06.2021

Mr. Imran Khan, Advocate, for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

We being Members of Larger Bench, remained busy in hearing arguments in the appeals fixed before the Larger Bench, therefore, arguments in the instant appeal could not heard. Adjourned. To come up for arguments before the D.B on 18.10.2021


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


(SALAH-UD-DIN)
MEMBER (JUDICIAL)


D

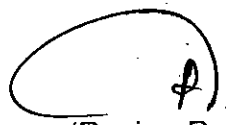
18.10.2021

Appellant present through representative.

Muhammad Riaz Khan Paindakheil learned Assistant Advocate General for respondents present.

Lawyers are on general strike, therefore, case is adjourned. To come up for arguments on 13.01.2022 before D.B.


(Atiq-Ur-Rehman Wazir)
Member (E)


(Rozina Rehman)
Member (J)

25.08.2020


Due to summer vacation case to come up for the same on 29.10.2020 before D.B.


Reader

29.10.2020

Junior to counsel for the appellant and Addl. AG for the respondents present.

The Bar is observing general strike, therefore, the matter is adjourned to 05.01.2021 for hearing before the D.B.

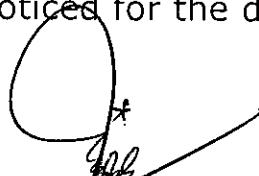

(Atiq-ur-Rehman Wazir)
Member

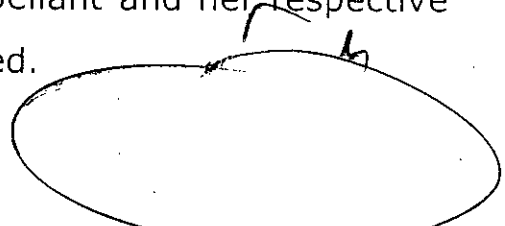

Chairman

05.01.2021

Neither appellant is in attendance nor anyone else representing her has appeared when the appeal was called for hearing lastly on 12:25 P.M. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Touseef-ur-Rehman, ADO (Litigation), for the respondents are present.

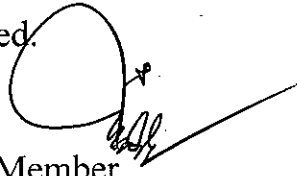
Perusal of the preceding order sheet revealed that almost ten adjournments have been granted for arguments which have not been addressed so far, in the circumstances, last chance is provided to the learned counsel for appellant to argue the appeal on 29.03.2021 before D.B. In the meanwhile, appellant and her respective counsel be noticed for the date fixed.



(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

12.02.2020

Clerk to counsel for the appellant present. Mr. Usman Ghani, District Attorney alongwith Mr. M. Arshad ADEO for respondents present. Clerk to counsel for the appellant seeks adjournment as his counsel is not available today. Adjourned. To come up for arguments on 26.03.2020 before D.B. Appellant be put on notice for the date fixed.


Member


Member

26.03.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 12.06.2020 before D.B.


Reader

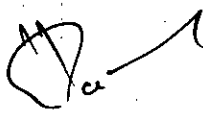
12.06.2020

Bench is incomplete. Therefore, the case is adjourned. To come up for the same on 25.08.2020 before D.B.



Reader


08.08.2019 None for the appellant present. Mr. Muhammad Jan, DDA for respondents present. Due to general strike on the call of Pakistan Bar council, the case is adjourned. To come up for arguments on 31.10.2019 before D.B.


Member



Member

30.10.2019 Mr. Ihsan Ullah (Apprentice) present on behalf of the learned counsel for the appellant. Mr. Usman Ghani learned District Attorney alongwith Mr. Arshad ADO for the respondents present. Former request for adjournment on the ground that counsel for the appellant is busy before the Hon'ble Peshwar High Court Peshawar. Adjourn. To come up for arguments on 06.12.2019 before D.B.


Member



Member


6-12-19 The Bench is incomplete
therefor case is adjourned to
12-2-2020


Reader

11.03.2019

Clerk to counsel for the appellant and Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Clerk to counsel for the appellant requested for adjournment as counsel for the appellant is not in attendance. Adjourn. To come up for arguments on 03.05.2019 before D.B


Member


Member

03.05.2019

Appellant in person and Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Appellant seeks adjournment on the ground that her counsel is not available today. Adjourned to 19.06.2019 for arguments before D.B.


(AHMAD HASSAN)
MEMBER


(M. AMIN KHAN KUNDI)
MEMBER

19.06.2019

Clerk to counsel for the appellant and Mr. Riaz Paindakhel learned Assistant Advocate General for the respondents present. Clerk to counsel for the appellant requested for adjournment as counsel for the appellant is not in attendance. Adjourn. To come up for arguments on 08.08.2019 before D.B.


Member


Member

17.10.2018

Learned counsel for the appellant and Mr. Riaz Ahmed Paidakhel learned Assistant Advocate General for the present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for rejoinder/arguments on 30-11-18 before D.B.


Member


Member

30.11.2018

Learned counsel for the appellant and Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Learned counsel for the appellant submitted rejoinder which is placed on file, and seeks adjournment. Adjourn. To come up for arguments on 15.01.2019 before S.B.


Member


Member

15.01.2019

None present on behalf of the appellant. Mr. Kabirullah Khattak, Additional AG for the respondents present. Notice issued to appellant and her counsel for attendance and arguments for 11.03.2019 before D.B.


(Ahmad Hassan)
Member


(M. Amin Khan Kundi)
Member

Service Appeal No. 145/2018

08.05.2018

The Tribunal is non-functional due to retirement of our Hon'ble Chairman. Therefore, the case is adjourned. To come up for same on 03.07.2018.


Reader


03.07.2018

Counsel for the appellant and Mr. Sardar Shaukat Hayat, Addl: AG for the respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 17.08.2018 before S.B.


Member

17.08.2018

Neither appellant nor her counsel present. Mr. Arshad Ali, ADO alongwith Mr. Kabirullah Khattak, Addl: AG for respondents present. Written reply submitted which is placed on file. Case to come up for rejoinder, if any, and arguments on 17.10.2018 before D.B.


Chairman

05.03.2018


Learned counsel for the appellant present. Preliminary arguments heard and case file perused.

Learned counsel for the appellant argued that the appellant was appointed as C.T in the GGMS Shah Alam Peshawar on 15.12.1999. That the appellant performed her duty to the entire satisfaction of her superiors. That the appellant availed leave on the occasion of her marriage in 2012. That after one month the appellant went to the join her duty but she was not allowed to join duty in the school by the Head Mistress. That on 30.11.2017 when the appellant visited the office of the department to enquiry about her case, she was astonished when she was handed over with a letter dated 20.11.2017 regarding removal from service on the charges of absence from duty. That the appellant moved many applications to the department upon which no positive response was received. That the appellant is the only female member of her family as her husband has already died on 19.04.2008. That the appellant preferred departmental which was also rejected without cogent reason.


Points raised need consideration. Admitted for regular hearing subject to all legal objections including limitation. The appellant is also directed to deposit security and process within (10) days, whereafter notice be issued to the respondents department for written reply/comments on 23.04.2018 before S.B.

Appellant deposited
Security & Process Fee

SCANNED
KPST
Peshawar


(Gul Zeb Khan)
Member




23.04.2018 None present on behalf of appellant. Learned Addl. AG along with Mr. Muhammad Arshad, ADO for the respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 08.05.2018 before S.B.


Member

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. 145/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	29/1/2018	<p>The appeal of Mst. Shagufta Naz presented today by Mr. Muhammad Imran Khan Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	06/12/18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>12/02/18.</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	12.02.2018	<p>Clerk of the counsel for appellant present and requested for adjournment on the ground that learned counsel for the appellant is not in attendance today due to strike of the Bar. Adjourned. To come up for preliminary hearing on 05.03.2018 before S.B.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundli) Member (J)</p>

PAKISTAN National Identity Card
ISLAMIC REPUBLIC OF PAKISTAN

Name: **Shagufta Naz**

Husband Name: **Shahid Muhammad Yousof**

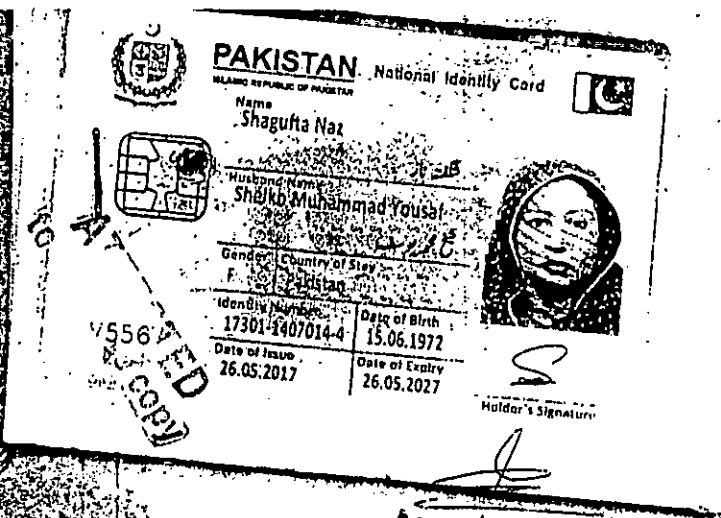
Gender: **F** Country of Stay: **Pakistan**

Identity Number: **17301-407014-4** Date of Birth: **15.06.1972**

Date of Issue: **26.05.2017** Date of Expiry: **26.05.2027**

Holder's Signature: *[Signature]*

ATTESTED COPY




ATTESTED

Office File

BEFORE
TRIBUNAL
KUALA LUMPUR

17301

قلمی نوٹ برائے عدالت کی طرف سے جاری کیا گیا ہے۔



101801188657
135-77-008264

Amman Y. Memon
Pratt & General of Pakistan

گشده کارڈ ملے پر قریبی لیڈیکس میں ڈال دیں


ATTESTED

1

BEFORE THE CHAIRMAN SERVICE
TRIBUNAL KHYBER PUKHTOON
KHAWA PESHAWAR.

MST SHAGUFTA NAZ

VERSUS

GOVERNMENT OF KPK AND OTHERS

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5	COPY OF DISMISSAL ORDER	D, D1, D2	18
6	COPY OF APPLICATIONS	E, E1, E2, E3	19-22
7	COPY OF DEATH CERTIFICATE	F	23
8	DEPARTMENTAL APPEAL	G	24-25
9	ORDER ON DEPARTMENTAL APPEAL	H	26
10	WAKALATNAMA		27
11	SPARE COPIES FOR RESPONDANTS NO: 1 TO 4		

Dated: 25.01.2018

APPELLANT



Through

Muhammad Imran Khan
Muhammad Zia Ullah
Advocate, High Court

BEFORE THE CHAIRMAN SERVICE
TRIBUNAL KHYBER PUKHTOON
KHAWA PESHAWAR.

MST SHAGUFTA NAZ WIDOW/O: MUHAMMAD YOUSAF R/O: WAZIR
 BAGH ROAD PESHAWAR.

APPELLANT

VERSUS

1. GOVERNMENT OF KPK THROUGH CHIEF SECRETARY SECRETARIAT PESHAWAR.
2. GOVERNMENT OF KHYBER PAKHTUNKHWA, THROUGH SECRETARY ELEMENTARY AND SECONDARY EDUCATION KHYBER PUKHTOONKHWA, PESHAWAR.
3. DIRECTOR ELEMENTARY AND SECONDARY EDUCATION KHYBER PUKHTOONKHWA, PESHAWAR.
4. DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

RESPONDENTS

APPEAL U/S: 4 OF THE NWFP SERVICE TRIBUNAL ACT, 1974
AGAINST THE ORDER DATED 20.11.2017, WHEREBY THE
ORDER OF REMOVAL FROM SERVICE AND AGAINST ORDER
DATED: 03.01.2018 WHEREBY THE DEPARTMENTAL APPEAL
OF THE APPELLANT HAS BEEN REJECTED.

PRAYER IN APPEAL:

ON ACCEPTANCE OF THIS APPEAL THE ORDER DATED 20.11.2017 AND ORDER DATED: 03.01.2018 PASSED BY RESPONDENT NO: 3 MAY PLEASE BE SET-ASIDE AND THE APPELLANT BE RE-INSTATED BACK TO HER SERVICE WITH ALL BACK BENEFITS.

RESPECTFULLY SHEWETH:

The appellant most humbly submits as under:

1. That the appellant was appointed as a CT Teacher in the GGMS Shah Alam Peshawar on: 15.12.1999.

2. That the appellant performed her duty to the entire satisfaction of her Superior and during the period of her service no adverse remark or black spot has been found on the part of appellant.

(Copy of service record is attached as annexure B)

3. That in the year 2002 when the appellant was entering in the marriage tie, she moved an application for one month leave to Head Mistress GGMS Shah Alam Peshawar and the Head Mistress assured her that your leave is granted for having genuine cause.

(Copy of Nikahnaman is attached as annexure C)

4. That after one month appellant went to join her duty but she was not allowed to join duty in the school and on complaint she was informed by the Head Mistress that her case is put to High-ups and the appellant will be allowed to perform duty after the decision of High-ups and then salary will be released but during that time period whenever the appellant went to school or EDO office to inquire about her case, she was often told by the staff that her case is pending before High-ups and after the decision she will be allowed to perform her duty and her salary will also be released which is stopped since October 2002.
5. That thereafter the appellant was contacting the Head Mistress as well as the EDO (Female) Peshawar but they lingered on the matter on one pretext or the other.
6. That on 30.11.2017 when the appellant visited the office of the department to enquire about her case, she was astonished when she was handed over with a letter No: 5870-75 dated: 20.11.2017 issued by District Education Officer (Female) Peshawar, in which it was mentioned that the appellant was dismissed from service on the alleged enquiry report vide Memo No: 136, dated: 02.10.2017.

(Copy of the dismissal Order is attached as annexure D)

7. That the appellant was too shocked that her service has been kicked out on mere allegations of her absence from duty.
8. That prior to this appeal the appellant moved many applications to the department upon which no positive response is received till yet.

(Copy of applications is attached as annexure D)

9. That the appellant is the only female member of her family as her husband has already been died on 19.04.2008 and he left behind two daughters and wife (appellant) and the appellant is the only member to earn livelihood for her family.

(Copy of death certificate of husband is attached as annexure E)

10. That the appellant sought no way, most humbly submitted her departmental appeal for consideration on 14.12.2017 to respondent No: 3.

(Copy of departmental appeal is attached as annexure F)

11. That on 03.01.2018 departmental appeal of the appellant was also rejected without any cogent reason.

(Copy of order on departmental appeal is attached as annexure G)


12. That feeling aggrieved from the order dated: 20.11.2017 and order dated: 03.01.2018 appellant knocked the door of this Hon'ble Court on the following grounds *inter-alia*:

GROUNDS:-

- A. That the appellant is a pure teacher interested in her duties and teaching profession and she has never been remained absent from duty.
- B. That no codal formalities as enumerated in the concerned laws have been adopted nor any procedure as prescribed in the legal manner has been obeyed by the issuing authority.
- C. That not a single word regarding the enquiry proceedings, evidence or any final show cause notice is available on the record before passing the above said Order of dismissal against the appellant.
- D. That such an attitude of hire and fire is not even warranted by any law in the institution where a simple master and servant rule is applicable, whereas the whole procedure of dealing with the Civil Servant in the cases of any misconduct as enumerated in the Service Laws has been bulldozed in such a manner that only after writing formal lines in the dismissal letter, the service of the appellant has been dismissed in illegal manner.
- E. That the impugned order is against law and facts, without adopting the proper procedure and without giving any opportunity of personal hearing to the appellant, passed the order in a brutal manner.
- F. That the alleged absentee which is mentioned by the respondents from 04.11.2002 till date and the alleged enquiry vide office memo No: 467 was conducted by the respondents on 21.09.2017 does not apply to the prudent mind, hence the complete procedure adopted by the respondents is illegal and against the law.
- G. That not only the whole process and procedure of E&D Rules, 1973 as well as Removal from Service Ordinance, has been ignored and defied, but the service of the appellant has been terminated in such a manner which cannot be justified even under the law of jungle.
- H. That the appellant is the only serving member of her family and such harsh punishment of dismissal from the service not only put her in so many mental worries, financial crises but also spoiled her career in a very bad way.
- I. That there is a basic principle of Islam as well as of law that no one should be condemned unheard but such rule has been ruined out by passing one sided Order.

IT IS, THEREFORE, PRAYED THAT ON ACCEPTANCE OF THIS APPEAL THE ORDER DATED 20.11.2017 AND ORDER DATED: 03.01.2018, WHEREBY THE SERVICE OF THE APPELLANT HAS BEEN DISMISSED BEING ILLEGAL, UNLAWFUL WITHOUT AUTHORITY/JURISDICTION AS WELL AS BEING UN-CONSTITUTIONAL AND BASED ON THE MALAFIDE INTENTIONS OF THE DEPARTMENT MAY PLEASE BE SET-ASIDE AND THE APPELLANT BE RE-INSTATED BACK TO HIS SERVICE WITH ALL HIS BACK BENEFITS FROM THE DATE OF HIS ABOVE SAID REMOVAL.

Appellant

Through 

Dated: 25.01.18

Muhammad Zia Ullah
 Muhammad Imran Khan
 Farhad Ali

Peshawar.

BEFORE THE CHAIRMAN SERVICE
TRIBUNAL KHYBER PUKHTOON
KHAWA PESHAWAR.

MST SHAGUFTA NAZ

VERSUS

GOVERNMENT OF KPK THROUGH CHIEF SECREATARY

AFFIDAVIT

It is verified upon oath that the contents of this appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.


Deponent

6

Appointment Letter

Appellant is on serial No-26

Annexure-A

OFFICE OF THE DISTRICT EDUCATION OFFICER (GENERAL) SECONDARY PESHAWAR

APPOINTMENT:

Consequent upon the Selection by the Departmental Selection Committee and duly approved by the competent authority, The following (Female) Candidates (Trained) are hereby appointed against the C.T vacant post at the school noted against their name in BPS-09 (CRs; 1605-97-3060) plus usual allowances as admissible under the Rules with immediate effect:-

S.NO:	Name & Address.	D/O Birth:/ Domicile.	Open/ Batch- Wise.	Batch/ Year	Score	School	Remarks.
1	2	3	4	5	6	7	8
1.	Ambreen Anjum D/O Said Ali Shah Moh; Qari Abad No; 2 H.No; 121 O/S Yakka Toot Peshawar.	<u>18-06-71</u> Peshawar	OPEN	-	50.89	GG COMP; HSS Peshawar.	Against the vacant CT Post.
2.	Neena Gul D/O Rohan Gul Sharif Abad Taj Chowk Shaheen Muslim Town Shah-dand chairman Daftar. Peshawar.	<u>19-05-73</u> Peshawar	-do-	-	59.50	GGHS Urmar Miara Pesh;	-do-
3.	Saiqa Raheem D/O Rahim Baksh C/O Naveed Amir Peshawar General oil Filter work street No; 7 Faqir Abad No; 2 Peshawar.	<u>28-03-74</u> Peshawar	-do-	-	58.63	GGMS Mian Gujar Peshawar	-do-
4.	Zehida Aman D/O Mohammad Abdul Rehman 33/A Civil Quarters Kohat Road Pesh;	<u>15-09-59</u> Peshawar	-do-	-	58.03	G.G.H.S. Mathra Pesh;	-do-
5.	Farzana Shaheen D/O Zulfiqar Ahmad AL-Affiyat neara Madni Masjid Amin Colony Kohat Road Pesh; Or Lab; Asstt; GGHS Hayat Abad.	<u>9-8-70</u> -do-	-do-	-	57.68	G.G.M.S Kaga Wala Pesh;	-do-
6.	Sadia Farid D/O Arbab Farid Ullah Vill; & P.O Tarnab Farm Pesh;	<u>23-11-73</u> -do- Peshawar	-do-	-	57.49	GGHS Tarnab Farm Peshawar.	-do-
7.	Shahida Shaheen D/O S.Lal Badshah H.No; 1040 Hussain Abad Colony Gulbahar Pesh;	<u>08-03-73</u> Pesh;	-do-	-	57.38	G.G.M.S. Budhni Pesh;	-do-
8.	Samra Ambreen D/O Sami-Ud-Din H.No; 53 Opposite Ishrat Cinema Gulbahar Peshawar.	<u>13-04-72</u> Peshawar	-do-	-	56.59	GGHS Dabgari Peshawar.	-do-
9.	Shazia Rani D/O Abdul Hakim Haidar Shah Colony Dalazak Road Peshawar.	<u>19-05-77</u> Peshawar	-do-	-	56.55	G.G.M.S Tola Khel Peshawar	-do-
10.	Nahced D/O Ghulam Naqshband Khan Village & P.O. Badaber Teh; & District Peshawar.	<u>03-05-72</u> -do-	-do-	-	56.52	GGHS Badaber Peshawar	-do-

Next Page No; 2 Cont...

1	2	3	4	5	6	7	8
11.	Noor Johan D/O Mohammad Ullah Khan Durrani Faqir Abad No; 2 Near Mughal Building Peshawar.	01-01-55 Peshawar	Batch Wise.	26-5-87	39.61	CGMS Wadpatta Peshawar.	Against the vacant post of C.T.
12.	Mubina Shaheen D/O Abdul Ghafar FFC GGTS Sarki Gate Peshawar.	19-10-64 Peshawar	-do-	16-4-90	34.61	G.G.M.S. Feroz Abad	-do-
13.	Samina Bano D/O Faqir Mohammad H.No; 164 Gunj Gate Peshawar.	5-12-67 Peshawar	-do-	14-3-91	50-72	GGHS Urmar Payan Pesh;	-do-
14.	Nasim Akhter D/O Mohammad Bahshish H.No; 558 Moh; Pir Gulab Shah Pesh;	15-04-66 Peshawar	-do-	27-10-92	39.20	G.G.M.S. Shagi Bala	-do-
15.	Martha Hawali D/O Hawali Masih Ilaqa Dabgari Kandas Peshawar.	10-02-68 Peshawar	-do-	21-11-92	43.15	G.G.M.S Feroz Abad	-do-
16.	Siddiqi Jamil D/O Sher Ahmad Vill; & P.O. Sheikh Mohamudi Moh; Haji Khel Peshawar.	01-05-72 Peshawar	-do-	22-11-92	45.13	G.G.M.S. Sheikh Moh- -amudi Pesh;	-do-
17.	Nighat Nazreen D/O Amanullah Khan Qadi Khel Vill; & P.O Chamkani.	29-03-69 Peshawar	-do-	22-11-92	39.05	G.G.H.S Mologo Pesh;	-do-
18.	Bushra Hussain D/O Mohammad Hussain 24/A Civil Quarters Peshawar.	2108-64 Pesh;	-do-	22-11-92	36.84	G.G.M.S Kaga Wala	-do-
19.	Samina Akhter D/O Atta Mohammad H.No; 2864 Moh; Mudti Ali Ahmad Asia Peshawar.	01-01-69 Peshawar	-do-	07-04-93	47.17	G.G.M.S Ghari Malak Sher Bahader.	-do-
20.	Yusra Najma D/O S.Semaj-ul-Haq F.C. Pakha Ghulam Teh; & Distt; Peshawar, (Durrani Tur Kambo)	25-09-64 Peshawar	-do-	07-04-93	44.65	G.G.M.S Wadpatta Pesh;	-do-
21.	Khuffiat Jehan D/O Abdul Hakim H.No; 3751 Moh; New Dabgari Gate Peshawar.	31-03-66 Peshawar	-do-	25-12-93	54.91	G.G.M.S Deh Bahader Pesh;	-do-
22.	Ismat Begum D/O Al-Haj Faqir Mohammad, Din Bahar Colony Pesh;	23-03-69 Peshawar	-do-	29-05-94	43-01	G.G.M.S Zaryab Colony;	-do-
23.	Ismat Ara D/O Qasim Khan Lala Rukh Colony Konat. Road Pesh;	14-05-68 Peshawar	-do-	29-05-94	32.11	GGMS Adezai Pesh;	-do-
24.	Yasmin Anjum D/O Ghulam Mohammad H.No; 1229/2 Shah Jehan Building Sunheri Masjid Road Peshawar Cantt;	13-05-64 Peshawar	-do-	10-07-94	39-03	GGMS Warsak Colony	-do-
25.	Safina Gul D/O Aurangzeb Urmar Miama Lali Khel Peshawar.	05-04-71 Peshawar	-do-	05-05-96	39.05	GGHS Urmar Miama Pesh;	-do-
26.	Shagufta Naz D/O Ghulam Mohammad H.No; 5052 Moh; Gulbadshah Jee Pesh;	15-06-72 Peshawar	-do-	05-05-96	36.02	GGMS Shah Alam Pesh;	-do-
27.	Ghazala Yasmin D/O Abdul Raheem H.No; 5044 Moh; Gul Badshah Jee Peshawar.	20-02-73 Peshawar	-do-	25-05-96	45.02	GGMS Shah Alam Pesh;	-do-

Next Page No; 3 Contd:.....

3. They should join the post within one month of the issue of this Notification.
4. Their Seniority will be determined in accordance with the merit of Departmental Selection Committee.
5. Their appointments are purely temporary and liable to termination at any time without any assigning/transfer or notice.
6. Their Service will liable to termination at any stage if their Certificate/Degree testimonials are found fake.
7. Their original Certificate/Degree should be checked and verified from the concerned University/P.I.E./R.D.E etc; concerned before handing over charge by the D.D.C concerned.
8. Their Declaration of assets should be obtained and kept in safe custody by the D.D.C concerned.
9. They are required to produce Health and age certificate from the Civil Surgeon before taking over charge.
10. Charge report should be submitted to all concerned.
11. The above selection has been made on the following criteria:-

Marks obtained Multiplied by the Marks Allocation to the Certificate/Degree and divided by the Total Marks i.e. $\frac{20 \times 25}{100} = 5$

ALLOCATION MARKS.

S.D.C	25
P./F.Sc;	25
P.I.E./Exam;	25
B./F.Sc;	10
M./F.Sc;	10
Experience.	5

(MRS. SHEKHARI BEGUM)
DISTRICT EDUCATION OFFICER
(Female) Secondary Education

Enst: No. 3565-3642 / Dated Feshwar the 09/12 1992.

Copy of the above is forwarded for information and necessary action to the:-

1. Private Secretary to Secretary Govt; of M.P. Education Department.
2. I.A to Director Secondary Education M.P. Feshwar.
3. Accountant General M.P. Feshwar, with the request not to honour their pay bills till clearance/Verification of their Certificate/Degrees duly authenticate by this office.
4. Headmistress GHS/GMS Concerned.
5. Superintendent Local Office.
6. Cashier Local Office.
7. Candidate Concerned.
8. I/File.

(Signature)
District Education Officer
(Female) Secondary Education

8

Amexure- B

SERVICE BOOK

OF

Mrs. SHAGUNTA SAZ
C.T

PN012297101

[Handwritten signature]

[Handwritten signature]

Price : Rs. 10.00

Note: The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

1. Name *SHAGFATA NAZ* ✓

2. Race *MUSLIM*

3. Residence *H NO. - 5052 MOHALAH GULBARCHA SEC
TEH & DIST PESHAWAR* ✓

4. Father's name and residence *GHAULOM MOHAMMAD* ✓

5. Date of birth by Christian era as nearly as can be ascertained *(15-6-72)* ✓
Fifteen June Ninety Two ✓

6. Exact height by measurement *5-2*

7. Personal marks for identification *A MOLE ON CHEEK*

8. Left hand thumb and Finger impression of (non-gazetted) officer

Little Finger. Ring Finger

Middle Finger. Fore Finger

Thumb.

9. Signature of Government servant
Shagfata Naz

10. Signature and designation of the Head of the Office, or other Attesting Officer.

[Signature]
Dy. District Election Officer
(Female) Secondary Peshawar

(For use in Police Department only).

Heirs,

1. certified that all the original certification
 2. Degrees have been verified from concerned Board
 University and found correct. After verification
 her copy has been retained with DEO (FIS) Pesh. Encl. to
 No. 2216-23, dt. 4.3.2000 at S.No. 2
 Verification Roll No. dated

received back

By: District Education Officer
 (Female) Secondary Peshawar

Left thumb-impression.

① Passed S.S.C. Exam from BISE
 Peshawar under R.No-6374 Session
 1991 (CA) marks obtained 399 out of

Qualification	Pass in Grade	Date
English	✓	
Pashtu	✓	
Urdu	✓	
Plan-drawing	✓	
Finger print	✓	
Drill instructing	✓	
Court duties	✓	
Reserve duties	✓	

② Passed CT General Examination from
 Peshawar under R.No. 2631228
 1995 obtained 54% marks in (C. Grade)
 Pledership examination

③ Passed F.A. Examination from
 Board of Intermediate & Secondary
 Education Peshawar (CA)
 1998 marks obtained 190 out of

Training School Final examination
 Other qualifications--

1100 Under R.No-523012
 (523312)

By: District Education Officer
 (Female) Secondary Peshawar

By: District Education Officer
 (Female) Secondary Peshawar

N.B.—line to be drawn under the qualification possessed.

10	11	12	13		14	15		
Signature of the head of the office or other attesting officer in pursuance of sub-section 10 to 8	Date of termination of appointment.	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Leave Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Period	Government to which debitable			
DDO (H) Peshawar	30/11/1959	2000 Aynchi	DDO (H) Peshawar	Appointed as a teacher	upto 4 months	DDO (H) Peshawar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
DDO (H) Peshawar	30/11/1959	2000 Aynchi	District Officer (Admin)	Appointed as a teacher	upto 4 months	DDO (H) Peshawar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
District Officer (Admin)		2000 Aynchi	District Officer (Admin)	Appointed as a teacher	upto 4 months	DDO (H) Peshawar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
District Officer (Admin)		2000 Aynchi	District Officer (Admin)	Appointed as a teacher	upto 4 months	DDO (H) Peshawar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
District Officer (Admin)		2000 Aynchi	District Officer (Admin)	Appointed as a teacher	upto 4 months	DDO (H) Peshawar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
District Officer (Admin)		2000 Aynchi	District Officer (Admin)	Appointed as a teacher	upto 4 months	DDO (H) Peshawar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
District Officer (Admin)		2000 Aynchi	District Officer (Admin)	Appointed as a teacher	upto 4 months	DDO (H) Peshawar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
District Officer (Admin)		2000 Aynchi	District Officer (Admin)	Appointed as a teacher	upto 4 months	DDO (H) Peshawar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
District Officer (Admin)		2000 Aynchi	District Officer (Admin)	Appointed as a teacher	upto 4 months	DDO (H) Peshawar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
District Officer (Admin)		2000 Aynchi	District Officer (Admin)	Appointed as a teacher	upto 4 months	DDO (H) Peshawar	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	

By Order of the Dy. District Officer (Admin) Peshawar

Dy. District Officer (Admin) Peshawar

14

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary	3 If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	4 Pay in substantive post	5 Additional pay for officiating	6 Other emolument falling under the term 'Pay'	7 Date of appointment	8 Signature of Government servant
CT 2,900 S. S. S. Alam Kishan	Off. Temp.	B-9. B. 1605-97-3060	B. 1605/-			15-12-99	[Signature]
do	"	Revision of pay scale with effect from 1-12-2000 B. 1702/PA B.S. 9 (B. 2410-145-6760)				1-12-2000	[Signature]
do	"					12-1-2001	[Signature]
do	"		B. 1700/-				[Signature]

APPLICATION FORM FOR THE POST OF CT/DM/PT/AT/TT/QAR/LAB. ASST./JR. CLERK.

Form No. 138/C

District PESHAWAR Male/Female

1. Name of applicant (Block letters) MISS SHAGUFTA NAZ
 2. Father's Name MUHAMMAD MOHAMMAD
 3. Name of post applied for CT Teacher
 4. Whether to be considered on batchwise or yearwise merit (for CT/DM/PT only) or open merit or both or disabled Both
 5. Date of birth (as per SSC): 15-06-1973
 6. Age on 24.08.1999: 27 year 7 months 21 days.

7. Qualification:

Examination passed.	Roll No	Year	Date of declaration of result.	Total marks of the Exam.	Marks obtained.	Merit position (SCC) Instruction No.4 (below)
a. S.S.C	<u>6374</u>	<u>1991</u>	<u>10/7/91</u>	<u>850</u>	<u>399</u>	<u>0</u>
b. F.A./F.Sc.	<u>522312</u>	<u>1993</u>	<u>08/09/93</u>	<u>470</u>	<u>1100</u>	<u>0</u>
c. CT/DM/PT/PE. D	<u>6314207</u>	<u>1993</u>	<u>03/2/96</u>	<u>493</u>	<u>900</u>	<u>0</u>
d. Darul-Nizami & Hons in Arabic.						
e. Sanad-e-faragha/TT/Sanad-e-Qilmi	<u>-</u>	<u>1990</u>	<u>12/1/90</u>	<u>-</u>	<u>-</u>	<u>-</u>
f. B.A./B.Sc.	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
g. MA/M.Sc.	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>

8. Total marks for academic & professional qualification: 37
 9. Whether a fresh or inservice candidate: Fresh
 10. If inservice, state exact date & duration of service after passing the professional exam specified for the post applied for: N/A
 11. Service/experience marks (In accordance with S.No.10 above) (2 marks for one year, 3 for 2, & 5 for three years): 5
 12. Overall merit position (i.e. total of S.No.8 + 11): 42

SHAGUFTA NAZ
 Signature of applicant.
 Perm address: 5032
Mohi-ud-Din, P.O. Badli, Badli, Peshawar
 Present address: Mohi-ud-Din, P.O. Badli, Badli, Peshawar
 GHSS/GHS/GMS/GPS or GGHS/GGHS/GGMS/GGPS

Instructions:-

1. Fill the form neatly & explicitly.
2. Score on the marks/columns/S.No. not applicable.
3. Check mark/tick mark relevant marks/columns S.No. etc.
4. Determine your merit against each column/entry under the column "merit position" by multiplying your "marks obtained" with that of the "marks allocated" i.e. the percentage degree (as per S.No.5 below), dividing by the "total marks of the exam" e.g. (a) Total marks of SSC exam = 850 (b) marks obtained by a candidate = 680 (c) marks allocated to SSC of a candidate will be $\frac{680 \times 25}{850} = 20$

5. Allocation of marks:

	CT/DM/PT =	AT/TT/Qar	Labr.Asst./J. Clerk.
SSC.	25	25	40
F.A./F.Sc.	25	20	40
Professional exam	25	Sanad = 30	00
B.A./B.Sc.	10	10	10
M.A./M.Sc.	10	10	10
Experience.	05	05	00
Total:-	100	100	100

17

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۱۸۔ آبا شوہر نے طلاق کا حق قبول کر دیا ہے اور کر دیا ہے تو کوئی شرط کے تحت

۱۹۔ آبا شوہر کے طلاق کے حق پر کسی قسم کی پابندی لگائی گئی ہے۔

خانہ فقہ دیا جانے کا

~~Blank lines for text entry~~

۲۰۔ آبا شادی کے موقع پر نان و نفقہ وغیرہ ہے متعلق کوئی دستاویز تیار کی گئی ہے اگر کی گئی ہے تو اس کے مختصر مندرجات

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۲۱۔ آبا دو لہاکے یہاں پہلے سے کوئی بڑی موجود ہے اگر ہے تو آبا اس نے دوسری شادی کر کے پہلے مسلم خاندان سے تعلق رکھنے والے ہیں ۱۹۶۱ کے ترمیمی قانون سے اجازت حاصل کر لیا ہے

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۲۲۔ غیر تازہ تاریخ میں سے ذیلی نالی کو نسل سے دلہا کو دوسری شادی کرنے کی اجازت دی ہے نکاح حوالہ کا نام اور ولادت کی تاریخ

مولانا سید مسیح احمد و صاحبہ سنی و خان

حضرت قاضی مسیح الرحمن خان صاحب مدظلہ العالی

3-3-2003

۲۳۔ شادی کو درجہ حریر کرنے کی تاریخ

۲۵۔ فیس حریر میں حوالہ کی گئی دو لہا یا اس کے وکیل کے دستخط

دو لہاکے وکیل کے دفتر کے گواہان کے دستخط

دہا

Sam Yousof

دہا

دہا کے دستخط

دہا

دہا کے دستخط

نکاح حوالہ کے دستخط

دہا کے دستخط

دہا

شادی کے گواہان کے دستخط

نکاح حریر کے دستخط اور مہر

دہا کے دستخط

دہا

دہا کے دستخط



1578
132

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

NOTIFICATION:

1. WHEREAS Ms. Shagufta Naz, CT GGMS Shah Alam Peshawar was proceeded against under Khyber Pakhtunkhwa Govt. Servant (Efficiency & Disciplinary) Rules, 2011 for the charge of Absence from duty i.e. 4/11/2002 till date.
2. AND WHEREAS: The competent authority appointed enquiry officer namely Firasat Hadi Principal GGHS Bahari Peshawar vide this office Memo NO.467 dated 21/9/2017
3. AND WHEREAS: The enquiry Officer has submitted enquiry report vide Memo RO.136 dated 2/10/2017, and recommended the accused teacher "removal from Service".
4. AND WHEREAS: The competent Authority, District Education Officer (Female) Peshawar after having considered the charges, evidence on record and facts of the case of the view that the charge of wilful absence from duty against the official concerned have been proved.
5. NOW THEREFORE, In exercise of the Powers conferred under Rules-4 (b) iii of Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, I the competent Authority District Education Officer (Female) Peshawar is pleased to impose major penalty of "Removal from Service" upon Ms. Shagufta Naz, CT GGMS Shah Alam Peshawar with immediate effect. The period of his absence i.e. 4/11/2002, till date is hereby treated as unauthorized absence from duty without pay.


Removal
from
Service

(ULFAT BEGUM) -
District Education Officer
(Female) Peshawar.

Encl. No. 5870-73 / Date: 20/11/2017.

Copy forwarded to the :-

1. Assistant Director Khyber Pakhtunkhwa Peshawar.
2. District Secretary T.S. SED Khyber Pakhtunkhwa Peshawar.
3. District Officer S.O. of Khyber Pakhtunkhwa Peshawar.
4. Head, District Office.
5. District Establishment Officer.
6. Other concerned.


District Education Officer
(Female) Peshawar.

محرمیت صواب ٹیوشنل ایڈوائز اور تعلیم پشاور
 19 درخواست بمبارجی و جاری کرنا مایانہ تنخواہ
 ملازمت

Annexure - E

صواب عالی! مودبانہ گزارش ہے کہ سائلہ GGMs شاہ عالم سکول

پشاور میں مؤرخہ 12/11/99ء کو بطور سی ڈی ٹیچر موبی ہوئی۔ نہایت ایماندارہ
 سے ایسی خدمات انجام دیتی رہی۔ مگر جب سائلہ نے اکتوبر 2000ء
 کے لیے چھٹی کی درخواست بوجہ شادی دی جو کہ منظور ہوئی۔ اس
 کے بعد جب سائلہ دوبارہ چھٹی قسم بیوہ کے بعد ایسی ملازمت پر واپس
 گئی تو سائلہ کو پیڈ ماسٹرس مامبہ نے یہ کہہ کر کام کرنا سے روک
 دیا کہ آپ کا ایس افسران بالا کے پاس دیر تجویز ہے۔ اس لیے
 سرنکٹی۔ اس کے باوجود بھی سائلہ ہر روز سکول ضرورہ جاتی ہے بلکہ
 اسے کام نہیں کرتا دیا جاتا اور نہ ہی سائلہ کو مایانہ تنخواہ
 دی جاتی ہے۔ اس لیے آپ مایانہ سے گزارش ہے کہ سائلہ کی
 نوکری بحال کی جائے اور اس کی گزشتہ پانچ مہینوں کی تنخواہ
 بھی جاری کی جائے۔

عین گزارش ہوگی

12-03
 2003

العارض
 سائلہ شلفیتہ ناز زوجہ شیخ محمد یوسف
 سائلہ وزیر پبلک روڈ شاہ
 سی ڈی ٹیچر گورنمنٹ گزٹنگ سکول شاہ عالم پشاور

محرم صبا ڈسٹرکٹ ایجوکیشن آفیسر (Female) شاہ

20

درخواست بھراہ جمال ملازمت و فاری کت طابع نہ تنخواہ

Annexure - E

صبا عالی

موردبانہ گزارش ہے کہ سائلہ GMS شاہ عام سکول

شاہ میں 15/12/1999 کو بطور آف ٹیچر بھرتی ہوئی۔ نہایت ایماندارہ سے اپنی خدمات انجام دیتی رہی۔ لیکن جب سائلہ نے 2002ء کے لیے چھٹی کی درخواست بوجہ شادی دی تو منظور ہوئی۔

چھٹی ختم ہونے کے بعد سے آج تک سائلہ کو ملازمت پر نہیں چھوڑا جا رہا اور نہ ہی سائلہ کی تنخواہ کی فاری کت جاری ہے۔

جب تک سائلہ نے اس سلسلہ میں اپنے بھی کسی درخواستیں جمع کرا لیں لیکن ان پر عمل درآمد نہیں ہوا۔ یہ کہ سائلہ

کاشمیر آب مورفہ 19.4.08 کو وفات پا چکا ہے۔ جس سے سائلہ کی دو بیٹیاں ہیں اور سائلہ اپنی گھر کی واحد کفیل ہے۔

اور آب گھر کا سزا بہت مشکل ہوئی ہے۔ اس لیے آب مامیان سے گزارش میں کہ سائلہ کی نوکری بحال کی جائے اور

سائلہ کی آگست 2008 سے لے کر آب تک کی تمام تنخواہیں بھی جاری کی جائیں۔

عین نوازش ہوگی

21/5/2008

العارض

سائلہ شہتہ ناز بیوہ مسیح محمد یوسف

رکنہ وزیر بلع روڈ شاہ

آف ٹیچر ڈسٹرکٹ گورنر سکول شاہ عام شاہ

گڈ وی بڈ سکرٹ ایکوئیشن آفیسر (Female)

21

Amravre - E₂

درخواست برائے بحالی ملازمت و جارجنگ
کا حق تنخواہ سائلہ

ضامہ عالمی

موجودہ کنڈیشن کے لئے سائلہ OGBMS شاہ عالم سکول

پٹنہ سے 15/12/1999 کو بطور آف ٹیمپری ہجرت ہوئی۔ اس

بابت ایماندارانہ سے ایماندارانہ سے ملازمت برقرار رہی۔ سائلہ

نے اس سے پہلے جارجنگ درخواستیں جمع کرائی تھیں لیکن ان پر

کوئی عمل درآمد نہیں ہوا۔ سائلہ نے اکتوبر 2002 میں اپنی

سزا دیکھ کر ایک مہینہ کا جارجنگ کر کے جس کے بعد سے اس نے

سائلہ کو نو فوکر کرنے کے احکامات ملے اور اس سائلہ

کو آج تک کوئی تنخواہ و سائلہ ایک بیوہ عورت ہے اور

دو بیٹیوں کا ماں ہے اور گھرانہ واحد تھیل ہے جگہ کا گناہ ہے

بیت مستقل ہے پورے ہے۔ اس لئے اس کے صاحبان سے گناہ نہیں ہے کہ

سائلہ کو بحالی بھانج لیتا ہے تنخواہیں جاری رکھیں

العالمی

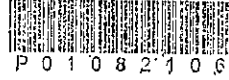
سائلہ شلفیہ ناز بیوہ آف ڈیوون

10
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2014

سینئر ڈائریکٹر روڈ شاہ
آف ٹیمپری ہجرت کنڈیشن سکول شاہ عالمی



23



حکومت خیبر پختونخوا پاکستان

Annexure F

THE GOVT OF KHYBER PAKHTUNKHWA PAKISTAN

وفات سرٹیفکیٹ

DEATH CERTIFICATE

CRMS No: D173023-11-0045

FORM No: P001082106

NATURE OF DEATH : NORMAL

درخواست دہندہ کا نام: شیخ غلام محمد

درخواست دہندہ کا شناختی کارڈ نمبر: 1730116841043

پتہ: محلہ فدا آباد وزیر باغ روڈ، شہر پشاور، تحصیل پشاور، ضلع پشاور

مدت عیالیت	وجہ موت	تاریخ وفات	جائگہ وفات/تاریخ	دین	جنس	تاریخ پیدائش	والد کا نام / شناختی کارڈ نمبر	موتی کا نام / شناختی کارڈ نمبر
	طبعی	20-4-2008	فدا آباد	اسلام	مرد	8-5-1968	شیخ محمد مسعود 13545221915	شیخ محمد یوسف

APPLICANT NAME: SHEIKH GHULAM MUHAMMAD

APPLICANT CNIC: 1730116841043/ RELATION WITH DECEASED: Brother

ADDRESS : FIDA ABAD WAZIR BAGH ROAD,

CITY: PESHAWAR, TEHSIL: PESHAWAR, DISTRICT: PESHAWAR

DECEASED NAME/ CNIC	FATHER NAME/ CNIC	DATE OF BIRTH	SEX	RELIGION	PLACE/DATE OF DEATH	DATE OF BURIAL	REASON OF DEATH	SICKNESS PERIOD
SHEIKH MUHAMMAD YOUSAF	SHEIKH MUHAMMAD MASUD 13545221915	8-5-1968	MALE	ISLAM	FIDA ABAD 19-4-2008	20-4-2008	NATURAL	

BLOOD RELATION PERSON CAUSING DISPOSAL OF BODY

ذریعہ رشتہ دار شہرین گنبد

NAME: SHEIKH HIDAYAT ULLAH

CNIC: 1730189841515

1730189841515

GRAVEYARD NAME: WAZIR BAGH

ENTRY DATE: 19-11-2011

19-11-2011

ISSUE DATE: 19-11-2011

19-11-2011

ADDITIONAL INFORMATION:

انتظامی ملاحظہ

وکیل: شیخ محمد یوسف

1730189841515

836 وزیر باغ (28) پشاور

24

TO,

Annexure -

G

THE DISTRICT EDUCATION OFFICER (FEMALE)
PESHAWAR.

SUBJECT: DEPARTMENTAL APPEAL AGAINST THE DISMISSAL
ORDER DATED: 20.11.2017 WHEREBY THE SERVICE OF
APPELLANT HAS BEEN TERMINATED.

Respected Sir:

With due honor and respect the appellant submits the Departmental Appeal on the following reasons and grounds:

1. That the appellant was appointed as a CT Teacher in the GGMS Shah Alam Peshawar on: 15.12.1999.
2. That the appellant performed her duty to the entire satisfaction of her Superior and during the period of her service no adverse remark or black spot has been found on the part of appellant.
3. That in the year 2002 when the appellant was entering in the marriage tie, she moved an application for one month leave to Head Mistress GGMS Shah Alam Peshawar and the Head Mistress assured her that your leave is granted for having genuine cause.
4. That after one month appellant again joined her duty but she *was not allowed to join duty in the school* and on complaint she was informed by the Head Mistress that her case is put to High-ups and the appellant will be allowed to *perform duty* after the decision of High-ups and *then* salary will be processed.
5. That thereafter the appellant was contacting the Head Mistress as well as the EDO (Female) Peshawar but they lingered on the matter on one pretext or the other.
6. That on 30.11.2017 when the appellant visited the office of the department to enquire about her case and *she was astonished when she was handed over with a letter No: 5870-75 dated: 20.11.2017 issued by District Education Officer (Female) Peshawar, in which it was mentioned that the appellant was dismissed from service on the alleged enquiry report vide Memo No: 136, dated: 02.10.2017.*
(Copy of the dismissal Order is attached).
7. That the appellant was too shocked that her service has been kicked out on mere allegation of her absence from duty.
8. That prior to this appeal the appellant moved many applications to the department upon which no positive response is received till yet.
9. That the appellant is the only female member of her family as her husband has already been died on 19.01.2008
(Copy of death certificate of husband is attached)
10. That the appellant feels no way, most humbly submits her departmental appeal for consideration on the following grounds.

(1) P. 14-12-17

D. 1502 614
15-12-2017

25

GROUNDS:-

- A. That the appellant is a pure teacher interested in her duties and teaching profession and she has never been remained absent from duty.
- B. That no codal formalities as enumerated in the concerned laws have been adopted nor any procedure as prescribed in the legal manner has been obeyed by the issuing authority.
- C. That not a single word regarding the enquiry proceedings, evidence or any final show cause notice is available on the record before passing the above said Order of dismissal against the appellant.
- D. That such an attitude of hire and fire is not even warranted by any law in the institution where a simple master and servant rule is applicable, whereas the whole procedure of dealing with the Civil Servant in the cases of any misconduct as enumerated in the Service Laws has been bulldozed in such a manner that only after writing formal lines in the dismissal letter, the service of the appellant has been dismissed in illegal manner.
- E. That not only the whole process and procedure of E&D Rules, 1973 as well as Removal from Service Ordinance, has been ignored and defied, but the service of the appellant has been terminated in such a manner which cannot be justified even under the law of jungle.
- F. That the appellant is the only serving member of her family and such harsh punishment of dismissal from the service not only put her in so many mental worries, financial crises but also spoiled her career in a very bad way.
- G. That there is a basic principle of Islam as well as of law that no one should be condemned unheard but such rule has been ruined out by passing one sided Order.

IT IS, THEREFORE PRAYED THAT ON ACCEPTANCE OF THIS APPEAL THE ORDER DATED 20.11.2017, WHEREBY THE SERVICE OF THE APPELLANT HAS BEEN DISMISSED BEING ILLEGAL, UNLAWFUL WITHOUT AUTHORITY/JURISDICTION AS WELL AS BEING UNCONSTITUTIONAL AND BASED ON THE MALAFIDE INTENTIONS OF THE DEPARTMENT MAY PLEASE BE SET-ASIDE AND THE APPELLANT BE RE-INSTATED BACK TO HER SERVICE WITH ALL HER BACK BENEFITS FROM THE DATE OF HER LEAVE DATED: 04.11.2002 AND THE DISMISSAL ORDER DATED: 20.11.2017 MAY BE CONSIDERED AS NULL AND VOID AND INEFFECTIVE UPON THE RIGHTS OF APPELLANT.

DATED: 14.12.2017

Appellant



SHAGHUFTA NAZ WIDOW OF
MUHAMMAD YOUSAF
P/O: WAZIR BAGH ROAD
PESHAWAR.

26

Annexure - H

DISTRICT EDUCATION OFFICER,
(FEMALE) PESHAWAR.

NO 269 DATED 03/01/2018

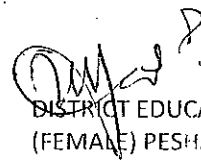
To,

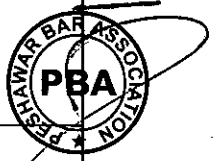
The Shagufta Naz,
Ex CT GGMS Shah Alam Peshawar

Subject APPEAL

Memo

I am refer to the subject cited above and to state that your appeal received to this office under Dairy No.614 dated 14/12/2017, in connection with departmental appeal against the dismissal order dated 20/11/2017, whereby your service has been already terminated with effect from 20/11/2017, is hereby rejected due to you have not provide of your absentee reason.


DISTRICT EDUCATION OFFICER,
(FEMALE) PESHAWAR.



88525

ایڈووکیٹ/دستخط: محمد عمران خان
 بار کونسل ابار ایسوسی ایشن نمبر: BCI 11-1543
 رابطہ نمبر: 0314-9171770

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: سید منیر حسین سید مسعود سید نواز سید ارمین

منجانب: <u>مسائلہ</u>	دعویٰ <u>Service Appeal</u>
<u>مسماہ شگفتہ ناز</u>	علت نمبر: _____
<u>بنام</u>	مورثہ: _____
<u>گورنمنٹ آف ایف اے اے اور غیرہ</u>	جرم: _____
	تھانہ: _____

بابت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ
 آن مقام سید منیر حسین کیلئے محمد عمران خان و محمد ضیاء اللہ کو وکیل مقرر
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر حالت و فیصلہ برصحت دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر جانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب
 مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا سامنتہ پداختہ منظور و قبول ہوگا دوران مقدمہ
 میں جو خرچہ ہر جہان التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وصول کرنے کا حقدار ہوگا کوئی تاریخ پیشی مقام
 دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم:

_____ مقام

نوٹ: اس وکالت نامہ کی کوئی کاپی قابل قبول ہوگی

Accepted
M. W. Ad

Accepted
Diaz

THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL NO.145/2018

Mst: Shagufta Naz

V/S

Secretary Education Etc.

REPLY ON BEHALF OF RESPONDENT NO.1,2,3&4.

Respectively Sheweth:

The Respondent submits below:

PRELIMINARY OBJECTIONS:

1. That the Appellant has got no cause of action /locus standi.
2. That the Appellant has concealed material facts from this Hon,ble Tribunal.
3. That the Appellant has been stopped by her own conduct to file the instant appeal before this Hon'ble Tribunal.
4. That the instant Appeal is badly time barred.
5. That the instant Appeal is not maintainable in its present form.
6. That the instant Appeal is bed for mis- joinder and non- joinder of the necessary parties.
7. That the Appellant has not come with clean hands to this Hon'ble Tribunal.
8. That the instant Appeal is barred by law.

ON FACTS.

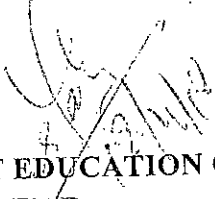
1. That Para No.1 pertains to record.
2. That Para No.2 is also pertains to record.
3. That Para No.3 pertains to record.
4. That Para No.4 is misleading and against the facts the Appellant was willful absent and she did not resume on her duty the Head Mistress of GGMS Shah Alam wrote letter No: 91, Dated: 04/03/2003 in light of letter No: 3796, Dated: 07/01/2003 of the EDO to resume on her duty immediately but she did not resume on her duty and did not compliance the order of the high ups.
(Letters Of the EDO, Head Mistress & Receipt of Registry are Attached as Annex: A, B, C & D)
5. That Para No.5 is also misleading and against the facts the respondent informed the Appellant time in again to resume on her duty but she did not obey the order of the high ups. Moreover the respondent conducted inquiry and the facts of the inquiry report of Para No: 4 the inquiry officer clarified the position of the Appellant and stated that "it is clear that the Appellant was failed to submit her arrival after the completion of earned leave on the due date and after a serious correspondence made by the EDO through school at last the Appellant forwarded another application for extension of previous earned leave.
(Inquiry Report, Application Extention of leave arc Attached as Annex: E & F)
6. That reply to Para No.6 it is submitted that the Appellant was willful absent from her duty since 01/12/2002, the respondent also issued explanation letter regarding her willful absentee vide letter No: 4419-23, Date 21/04/2003, but she did not explain her willful absentee. Furthermore the Appellant absent since 01/12/2002 to 20/11/2017. Then the respondent acted according to law & rules.
(Explanation letters are Attached as Annex G)

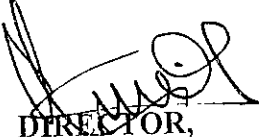
- 44
- That Para No: 7 is misleading and against the facts. The respondent bound to act according to existing law & rules.
- That Para No: 8 is incorrect and misleading the respondent informed the Appellant time in again to resume on her duty but she was not interested in her duty.
9. That Para No: 9 pertains to Appellant personal record, no comments.
10. That Para No: 10 pertain to record.
11. That Para No: 11 also pertain to record.
12. That Reply to Para No: 12 it is submitted that the Appellant has no cause of action to knock at the door of this Honorable Tribunal.


GROUNDS

- A. That Ground-A is incorrect and misleading the Appellant was remained willful absent since 01/12/2002 to 20/11/2017.
- B. That Ground-B is also incorrect. The respondent acted according to the existing law & rules.
- C. That Ground-C is incorrect and misleading.
- D. That Reply of Ground-D has already discussed in above Para's.
- E. That the Reply of Ground- E has already discussed in the facts Para.
- F. That the Reply of Ground-F has already discussed in above Para's.
- G. That the Reply to Ground-G is also discussed in the facts Para.
- H. That Ground-H is pertaining to Appellant personal record.
- I. That Reply to Ground: I the respondents have bound to act on existing law and rules.

It is therefore, very humbly prayed that on acceptance of this reply, the instant appeal may very kindly be dismissed with cost.


DISTRICT EDUCATION OFFICER,
(F) PESHAWAR.


DIRECTOR,
(E&SE) KPK, Peshawar.


SECRETARY,
E&SE, Khyber Pakhtunkhwa, Peshawar.
(Respondents No.1 & 2)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
SCHOOL & LITERACY PESHAWAR

3796 / P/1110

Peshawar, the 27/11/2003

(Handwritten signature)

To

The Headmistress,
GGMS, Shah Alam Peshawar.

Subject; - EARNED LEAVE

Memo; -

Reference your No. & date mentioned on the subject note above.

It is submitted for your kind information that Mst. Shagufta Naz C.T of your school may be informed to resume her duty immediately.

Therefore, after arrival this office may be informed accordingly.

DISTRICT OFFICER, FEMALE
SCHOOL & LITERACY, PESHAWAR

*Received by
D-10-V-5-A-K-11
28/24/11/2003*

11/03

46 (B) - 46

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لذا ہیڈ مسٹرس ڈورنٹ گورنمنٹ سکول ستاہ عالم
بتاریخ 4/03/2003

پر

مختلفہ ناز سینیٹیو سٹریٹس ڈورنٹ گورنمنٹ سکول ستاہ عالم

کو الٹا بھیجی گئی ہے 3796 فورم 7/1/2003 آفس

ایئر ایڈسٹریٹ آفیسر سکولز اینڈ ٹیچنگ

آئیو سیکرٹریاٹ سے۔ تم آپ فوراً اپنی ڈیوٹی

پر حاضر ہو جائیں گے۔ اس کی بھی منسلک ہے۔

حاضر نہ ہونے کی صورت میں ڈسپلنری ایکشن لیا جائے گا

Perveen Akhtar

پروین اختر
ہیڈ مسٹرس ڈورنٹ گورنمنٹ سکول ستاہ عالم

Perveen Akhtar
Head Mistress
G. G. M. S.
Shah Alam

Copy forwarded for information please
to the EDO Schools & Literacy Peshawar

Perveen Akhtar

Head Mistress
G. G. M. S.
Shah Alam

(26)

(42)

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(C) - 11/11/03

از: پیڈ ماسٹرس گورنمنٹ گرلز میڈل سکول شاہ عالم، پیسباد

تاریخ: 2003-3-3

نمبر شمارہ: 92

شاہ عالم، پیسباد

شلفتم ناز سی ڈی مسٹرس گورنمنٹ گرلز میڈل سکول

جواب چھی نمبر 3796 مورخ 7/1/2003 آفس

ایگزیکٹو ڈسٹرکٹ سکولز اینڈ لٹریسی

مسٹرس مذکورہ کو بیزنس ریجسٹری نمبر 1188 تاریخ 5/3/2003

بہرہ برابگی کیا گیا۔ تا حال مسز شلفتم ناز نے ڈیوٹی پر آئی ہے اور نہ اس نے

کوئی اطلاع دی ہے اطلاع عرض ہے۔

Arveen Akhtar
بیرون دفتر

پیڈ ماسٹرس گورنمنٹ گرلز میڈل سکول شاہ عالم، پیسباد

Copy is forwarded to A.D.O. of Literacy
Pesh for info. and neqy action.

Arveen Akhtar
Headmistress

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(E)

TO

THE DISTRICT EDUCATION OFFICER (F)
E&SE KHYBER PAKHTOON KHWA PESH.

SUBJECT: REPORT OF THE INQUIRY AGAINST Mst. SHAGUFTA NAZ
Ex.CT AT GGMS SHAH ALAM PESH.

Reference your office No.467 dated 21/9/2017. Mst. Firasat Hadi Principal GGHS Nahaqi Peshawar being inquiry officer conducted the said inquiry on 23/9/2017. The purpose of the inquiry was to find facts regarding the absence of the said teacher from her duty since long without prior information. In this regard I visited the present H/T of the said School to collect the required record of the case concerned. However from the perusal of the record it is evident that the said teacher remained absent after availing an earned leave for more than a month. She is now asking for favor to be re-adjusted against the said post.

FACT/FINDINGS

1. The said teacher was appointed as a CT teacher in 1999 and posted to GGMS Shah Alam Peshawar.
2. She applied for earned leave w.e.f 1/10/2002 till 30/11/2002(61) days.
3. Sanction was accorded w.e.f 1/10/2002 to 3/11/2002 (34) vide office Endst No. 5769/ I-AE/II-AE Dated Peshawar the 7/11/2002. :-
4. She failed to submit her arrival after the completion of earned leave on the due date.
5. She was informed by the office concerned through letters to resume her duty otherwise disciplinary action will be taken against her but in vain.
6. After a series of correspondence made by the EDO Pesh. through school at last she forwarded another application for the extension of the previous earned leave i.e w.e.f 1/12/2002 till 1/12/2003(one year)
7. No sanction of the said extension was found in the record; however the teacher concerned remained absent from her duty till date.

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(9)

RECOMMENDATIONS

Following are the recommendations:

1. As it is very much clear from the record that the said teacher has served for a very short period after her appointment and availed an earned leave for about more than a month but was failed to submit her arrival on the expiry of the said leave and again applied for the extension of the leave for which no sanction was accorded; so she does not deserve to be given a chance to retain on the post.
2. In spite of so many letters issued by the office of the EDO Peshawar, no reply from the teacher concerned was received neither by the school nor the office; therefore she does not deserve to be pitied.
3. The office concerned must have taken a disciplinary action against her as was already mentioned in the letters for information to resume her duty.
4. According to Govt. rules; any teacher who remain absent from duty without any information will be terminated from services; Now the said teacher Mst. Shagufta NAz had violated rules so the decision of termination may be issued as soon as possible.

Thanks

INQUIRY OFFICER

(Signature) 2/11/2017

Mst Firasat Hadi
Govt. Girls High School
Maharaj Peshawar

PRINCIPAL GGHS NAHAQI
PESHAWAR

Copy for information forwarded to:

1. Director E&SE Govt. of KPK

(Signature) 2/11/2017
Govt. Girls High School
Maharaj Peshawar

21 35 6 7

To The Executive District Officer,
Schools & Literacy Peshawar.

Through Proper Channel

Subject: - EARNED LEAVE.
S/Sir.

Respectfully I beg to state that I was entitled for earned leave w.e.f. 1.10.2002 up to 30.11.2002 (61) days and my leave has been sanctioned vide Executive District Officer Pesh: memo, No. 5769/I-AE/II-AE dated 7.11.2002.

It is further requested that due to my domestic problems I am facing great difficulties to continue my duty.

It is therefore requested that my earned leave may be extend w.e.f. 1.12.2002 to 1.12.2003 (one year).

I shall be very much thankful to you for this act of kindness.

Yours Obediently,
Shagufta Naz
Shagufta Naz
C.T. Teacher
Govt. Girls Middle School
Shah Alam Peshawar.

Date: 15.12.2002.

EXECUTIVE DISTRICT OFFICER,
SCHOOLS AND LITERACY PESHAWAR

NO. 449-23 dt. 21/4/03.

To,

1. Ms: Nageena Akhtar,
SET GGMS Daman Afghani.
2. Ms: Shagufta Naz DT
GGMS Shah Alam.
3. Lubna Tahseen PET
GGMS Achanai Payan.
4. Arzoo Saleem PET,
GGMS Hayat Abad.
5. Rozina Hamid AT
GGMS No. 2 Pesh: Cantt.

Subject:- EXPLANATION.

Memos:-

It has been noted during the Annual Inspection/Surprise visits, you have been found remained absent from your Govt: duties from the period mentioned against each:-

S. NO.	Name and Designation	Name of School	Absent from
1.	Nageena Akhtar SET	GGMS Daman Afghani	w.e.f. 16.1.2003
2.	Shagufta Naz CT	GGMS Shah Alam	w.e.f. 1.12.2002
3.	Lubna Tahseen PET	GGMS Achanai Payan	w.e.f. 1.11.2002
4.	Arzoo Saleem PET	GGMS Hayat Abad	w.e.f. 2.9.2002
5.	Rozina Hamid AT	GGMS No. 2 Pesh: Cantt	w.e.f. 1-1.2003

You are therefore directed to explain your position about your absence from Govt: duty since so long.

Your explanation should reach to the undersigned immediately.

District Officer (Female)
Schools and Lit: Peshwar.

Endst: NC.

Copy forwarded to:-

1. The Director of Schools and Lit: NWFP, Peshawar with ref: to his letter No. 1329-52/F, NO. 9/M&E/Teachers Absenteeism dated 2.4.2003.
2. Headmistress concerned are directed to explain their position for not submitting absence report of the above noted concern teacher immediately to the undersigned.
3. Mr. Aslam Khan dealing with local Office is directed to submit their cases alongwith their P/Files and complete rep regarding absence of the above mentioned teachers to Miss, Shazala Shahid ADO (Estab:) immediately for taking necessary action.

District Officer (Female)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

In Ref S.A _____/2018

SHAGUFTA NAZ VS GOVT OF KP

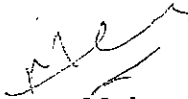
INDEX

S.No.	Description of Document	Annex	Pages
1	rejoinder		1-2
2	affidavit		3

Dated: 30.11.18

Appellant

Through


Muhammad Imran Khan

Advocate High Court, Peshawar

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR.

In Ref S.A _____/2018

SHAGUFTA NAZ VS GOVT OF KP

**REJOINDER ON BEHALF OF THE APPELLANT TO THE COMMENTS FILED BY THE
RESPONDANTS NO.1 TO 4.**

Respectfully sheweth:

Reply to preliminary objections.

1. Incorrect and denied, the appellant has got a good cause of action.
2. Incorrect and expressly denied.
3. Incorrect and expressly denied.
4. Incorrect and denied.
5. Incorrect the instant appeal is maintainable.
6. Incorrect, all the necessary parties are correctly mentioned.
7. Incorrect and expressly denied.
8. Incorrect and denied.

ON FACTS:

1. Record is placed on file as the appellant was appointed as CT teacher in GGMS shah alam Peshawar on 15,12,1999.
2. The appellant performed her duty to the entire satisfaction of her high ups during the period of her service.
3. True and detailed picture is given in para no,3 of the appeal.
4. Incorrect, in fact the appellant was not absent a proper application for leave was filed by the appellant and the appellant was informed by the head mistress that the said application for earned leave was allowed and after expiry of the leave period the appellant went to join duty but she was informed by the head mistress that the case of the appellant is

put up to high ups. The letters in that connection as mentioned in the para no,4 of the comments are baseless and against the facts hence denied. A true picture and detailed picture is given in para no 4 of the appeal.

5. Incorrect, the appellant herself visited the school for joining the duty but the appellant was not allowed to join her duty by the headmistress and the appellant was informed that her case is pending before the high ups. While the rest of the para is baseless against law and facts hence no nexus with the facts, hence expressly denied.
6. Para no 6 is baseless detailed answer is given in the above mentioned paras.
7. Para no 7-8 are incorrect, wrong against law and facts, hence expressly denied. The detail answer is given in the above pars.
8. Paras No: 9-11 need no reply.
9. Para No: 12 is incorrect, in fact the appellant has got the cause of action and she rightly knocked the door of this Hon'ble Tribunal for the redress of her grievances.

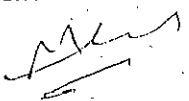
GROUND WISE REPLY:

- I. Ground A to I of the comments are false, frivolous, against law and fact having no nexus with reality. The detail answer is given in the above paras, hence expressly denied.

It is therefore prayed that on acceptance of instant rejoinder, the appeal of the appellant may graciously be allowed, as prayed for therein.

Appellant

Through


Muhammad Imran Khan
Muhammad Zia Ullah
Advocates High Court

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR.

SHAGUFTA NAZ VS THE GOVT KP & OTHERS

AFFIDAVIT

I MUHAMMAD IMRAN ADVOCATE PESHAWAR, AS PER INSTRUCTION OF MY CLIENT DO HEREBY SOLEMNLY AFFIRM AND DECLARE ON OATH THAT CONTENTS OF THE REJOINDER ARE TRUE AND CORRECT.

DATED, 30/11/2018

M. Imran
DEPONENT

IDENTIFIED BY

M. IMRAN ADVOCATE

خدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر (Female)

D.A.C.F

درخواست برداشتہ لکھنؤ ٹیسٹ CT پیپر

27/10/14

جناب عالی۔ ذرا تشریح فرمائیے کہ اس مسئلہ کے بارے میں اس وقت کیا حکم ہے۔

- ① یہ اس مسئلہ کے تحت تعلیم سے محروم ہونے والی لڑکیوں کی شناخت اور ان کے لئے اسکولوں کی فراہمی کے بارے میں حکومت کی پالیسی کیا ہے۔
- ② یہ مسئلہ کس سال سے جاری ہے اور اس کے تحت کتنی لڑکیاں متاثر ہوئی ہیں۔
- ③ یہ مسئلہ کس ادارے کے تحت سنبھالا گیا ہے اور اس کے لئے کتنی رقم خرچ ہوئی ہے۔

④ یہ مسئلہ کس ادارے کے تحت سنبھالا گیا ہے اور اس کے لئے کتنی رقم خرچ ہوئی ہے۔

⑤ یہ مسئلہ کس ادارے کے تحت سنبھالا گیا ہے اور اس کے لئے کتنی رقم خرچ ہوئی ہے۔

⑥ یہ مسئلہ کس ادارے کے تحت سنبھالا گیا ہے اور اس کے لئے کتنی رقم خرچ ہوئی ہے۔

