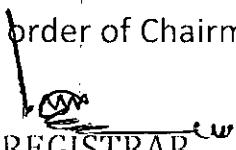


Form-A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Execution Petition No. 163/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	14.03.2023	<p>The execution petition of Mst. Gulshad Bibi submitted today by Sardar Muhammad Irshad Advocate. It is fixed for implementation report before touring Single Bench at A.Abad on _____. Original file be requisitioned. AAG has noted the next date. The respondents be issued notices to submit compliance/implementation report on the date fixed.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;"> REGISTRAR</p>

**BEOFRE KPK SERVICE TRIBUNAL  
PESHAWAR**

Execution Petition No. 163/2023

Mst. Gulshad Bibi wife of Gul Sadbar Khan Primary School  
Teacher Government Primary School Dadir Goshali District  
Upper Kohistan at Dassu

....Petitioner

**V/S**

Government of KPK through Secretary Elementary and  
Secondary Education Department, Peshawar and Others

....Respondents

**INDEX**

S.No	Description of Documents	Annexure	Page
1	Execution petition with affidavit	-	1-4
2	Copy of notification dated 05/07/2019	A	5
3	Copy of appeal No 1310/2019	B	6-9
4	Copy of judgment dated 24/09/2021	C	10-13
5	Copy of office order dated 10/12/2021	D	14
6	Copy of office order dated 27/11/2021	D/1	15
3	Vakalatnama	-	16

*Gulshad*  
Petitioner

Through:-

*Irshad*

(Sardar Muhammad Irshad)

Advocate High Court

1A Gulistan Colony College

Road Abbottabad

Cell:+92343-3326000

Email: [Sardarmuhammadirshad7@gmail.com](mailto:Sardarmuhammadirshad7@gmail.com)

BC -10 - 1155

①

**BEOFRE KPK SERVICE TRIBUNAL  
PESHAWAR**

Execution Petition No. 103 /2023

Mst. Gulshad Bibi wife of Gul Sadbar Khan Primary School  
Teacher Government Primary School Dadir Goshali District  
Upper Kohistan at Dassu

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 4334

....Petitioner 14/3/2023  
Date

**V/S**

1. Government of KPK through Secretary Elementary and Secondary Education Department, Peshawar
2. Director Elementary and Secondary Education Department, Peshawar
3. District Education Officer (Female) Elementary and Secondary Education Department District Upper Kohistan at Dasu

....Respondents

**EXECUTION PETITION FOR EXECUTION/IMPLEMENTATION  
OF ORDER CONTAINED IN JUDGMENT DATED 24/09/2021  
PASSED BY THIS HONOURABLE TRIBUNAL IN SERVICE  
APPEAL NO 1310 OF 2019**

**Respectfully Sheweth:-**

The petitioner submits as under:-

1. That the petitioner was removed from service vide notification dated 05/07/2019 notified by respondent No 3. Copy of the said notification is annexure-"A".
2. That the petitioner filed appeal No 1310/2019 before this Honourable Tribunal for setting-a-side above notification and for her re-instatement in service. Copy of aforesaid appeal is annexure-"B".

3. That this Honourable Tribunal has been pleased to accept the appeal and direct petitioner's reinstatement in service with direction to respondents to conduct denovo regular inquiry vide judgment dated 24/09/2021 in service appeal No 1310/2019. Copy of the judgment is annexure-"C".
4. That the petitioner was reinstated in her service vide office order, dated 10/12/2021 of respondent No 3 who appointed inquiry committee vide another office order dated 27/11/2021. Copies of both office orders are annexure-"D" and "D/1" respectively.
5. That the denovo inquiry has since been finalized wherein the petitioner was exonerated of the alleged charge of misconduct. The inquiry report has already been submitted before respondent No.3 while copy of which has not been given to the petitioner.
6. That in Para-6 of judgment dated 24/09/2021 passed in service appeal No 1310/2019. This Honourable Tribunal held as under:-

"In view of the above discussion, the appeal in hand is allowed by setting aside the impugned orders. The appellant is reinstated in service and the department is directed to conduct de-nova regular inquiry into the matter within a period of 03 months from the date of communication of this judgment. The issue of back benefits would be subject to the outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to record room.
7. That respondent No.3 was asked for compliance of the order of this Honourable Tribunal regarding back benefits after

3

petitioner's exoneration in de-novo regular inquiry but inability to do the needful was expressed.

It is, therefore, prayed that respondent No.3 be directed to implement the order by payment of back benefits in the interest of Justice.

Gurshad  
Petitioner

Through:-



(Sardar Muhammad Irshad)

Advocate High Court

1A Gulistan Colony College

Road Abbottabad

Cell: +92343-3326000

Email: [Sardarmuhammadirshad7@gmail.com](mailto:Sardarmuhammadirshad7@gmail.com)

4

**BEOFRE KPK SERVICE TRIBUNAL  
PESHAWAR**

Execution Petition No. \_\_\_\_\_/2023

Mst. Gulshad Bibi wife of Gul Sadbar Khan Primary School  
Teacher Government Primary School Dadir Goshali District Upper  
Kohistan at Dassu

....Petitioner

**V/S**

1. Government of KPK through Secretary Elementary and Secondary  
Education Department ,Peshawar
2. Director Elementary and Secondary Education Department,  
Peshawar.
3. District Education Officer (Female) Elementary and Secondary  
Education Department District Upper Kohistan at Dasu

....Respondents

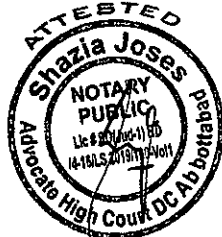
**AFFIDAVIT**

I, Gulshad Bibi, petitioner do hereby solemnly affirm and declare  
that the contents of the accompanying execution petition are true  
and correct to the best of my knowledge and belief and nothing has  
been concealed from this Honorable Court.

Gulshad  
Deponent

**VERIFICATION**

Verified on Oath at Abbottabad on day of 7<sup>th</sup> March 2023 that the  
contents of above affidavit are true and correct to the best of my  
knowledge and belief.



13/3/2023

Gulshad  
Deponent



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)  
DISTRICT UPPER KOHISTAN

NOTIFICATION

WHEREAS Mst. Gul Shad PST GGPS Sultana Abad District Upper Kohistan proceeded against under Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011 on account of her willful and unauthorized absence from duty.

2. AND WHEREAS as per report of ASDEO Circle as well as report of the DCMAs of IMU Kohistan the teacher concerned was reported remained absent from her duties w.e.f 01/01/2019 to till date without any prior permission/leave sanctioned of the competent authority.

3. AND WHEREAS Show Cause notice was served upon her vide this office letter No. 1355 dated 02/05/2019, she submitted her reply to the Show Cause notice on 29/05/2019 through SDEO Concerned his latter No 626 dated 29/05/2019.

4. AND WHEREAS reply to the Show Cause notice submitted by the teacher concerned was declared as non-convincing by the Competent authority, and directed the teacher to attend this office on 13/06/2019 before the District Education Officer Female Kohistan Upper for personal hearing vide this office letter No. 2706-9 Dated 30/05/2019, but she failed to avail opportunity of personal hearing.

5. AND WHEREAS the Competent Authority (District Education Officer ('F')) after having considered the charges and evidence on record response to the Show Cause Notice, is of the view that the charges against the accused teacher have been proved.

6. NOW, THEREFORE, in exercise of the powers conferred under the Khyber Pakhtunkhwa, Government Servants (Efficiency & Discipline) Rules, 2011, the Competent Authority (District Education Officer ('F')) is pleased to impose major penalty of "REMOVAL FROM SERVICE" w.e.f 01/01/2019 upon Mst. Gul Shad PST GGPS Sultana Abad District Upper Kohistan. Salary drawn by the teacher concerned during her absence period w.e.f 01/01/2019 to 30/06/2019 if any will be recovered.

-SD-

District Education Officer (F)  
Upper Kohistan

Endst: No 3058-64 dated 5/7/2019:

Copy forwarded for information and necessary action to the –

1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
2. Deputy Commissioner District Kohistan
3. District Accounts Officer District Kohistan
4. District Monitoring Officer IMU Kohistan
5. Sub Divisional Education Officer (F) Kohistan with the directions to ensure recovery for absent period mentioned above( if any) within 15 days under intimation to this office
6. Teacher Concerned.
7. Office File.

Attested

District Education Officer (F)  
Upper Kohistan

SARDAR MUHAMMAD  
Advocate High C.  
Abbottabad

6



Before KPK Service Tribunal, Peshawar

Appeal No. 1310/2019

Mst. Gulshad W/o Sad Bar Khan Ex-PST Government Girls Primary School Sultanabad Harban District Kohistan C/o Sad Bar Khan Process Server Labour Court Haripur.

Kyber Pakhtunkhwa Service Tribunal

Diary No. 1294 Appellant

Dated 10-10-2019

V/s

1. Govt. of KPK Through Secretary Elementary and Secondary Education Department Peshawar
2. Director Elementary and Secondary Education Department KPK Peshawar
3. District Education Officer (Female) Dasso District upper Kohistan

Respondents

Appeal U/S 4 of KPK Service Tribunal Act, 1974 against Notification bearing Endst: No 3058-64, dated 05/07/2019 of Respondent No 3 whereby appellant was removed from her service (original order) and against letter No.4475/F No 325/ F/Appeal Kohistan dated 01/10/2019 of Respondent No.2 whereby appellant's departmental appeal was dismissed (appellate order)

Filed to-day

PRAYER

Registrar

For setting-a-side original and appellate orders and for appellant's reinstatement in service with all back benefits.

Respectfully Sheweth:

This appeal arises in the backdrop of the following facts:-

FACTS

1. That the appellant was appointed on merit as primary School Teacher (PST) in 2006 when all codal formalities contained in the relevant rules were complied with in the process of her

ATTESTED

EXAMINER  
Kyber Pakhtunkhwa  
Service Tribunal  
Peshawar



appointment. Copy of the letter of appointment is annexure-  
"A"

2. That the appellant was posted/adjusted in GGPS Sultanabad with a view to functionalize the same vide office order dated 17/01/2018. Copy of the said office order is annexure-"B"
3. That the appellant has been succeeded to functionalize GGPS Sultanabad and remained present therein during the period from 01/01/2019 to 24/05/2019 while the School remained close on account of summer vacation commencing from 25/05/2019. In support of the above claim copy of Attendance Register duly verified by sub-divisional Education officer( Female) Dassu District Upper Kohistan is annexure -"C"
4. That the appellant has devotedly been performed her duties since inception and no complaint whatsoever from any quarter has ever been filed against her, therefore, her service record is clean and spotless. All of a sudden the appellant shocked to receive impugned Notification, dated 05/07/2019 from Respondent No 3 without receipt of any show cause Notice etc. whereby major penalty of removal from the service was imposed upon her. Copy of said Notification is annexure -"D"
5. That appellant filed departmental appeal on 22/07/2019 wherein Respondent No 2 was requested to set the above Notification at naught on the ground that no inquiry was conducted and no Notice was issued before taking above action and that it was factually incorrect. Copy of departmental appeal before Respondent No 2 is annexure -"E"
6. That Respondent No.2 vide his letter dated 01/10/2019 addressed to Respondent No.3 rejected the appellant's appeal without assigning any reason explicitly. Copy of the said letter is annexure -"F". Hence this appeal inter alia on the following grounds:-

**ATTESTED**


**EXAMINER**  
Shyler Akhtukhwa  
Service Tribunal  
Peshawar



## GROUNDS

- (i) That the impugned action is wholly against the law and facts as such cannot sustain alone on this score.
- (ii) That the impugned action was taken without issuing any notice to the appellant, therefore she has been condemned unheard.
- (iii) That during the period for which she has been shown absent the appellant remained present in her school and performed her duties efficiently and with dedication as such the impugned action is factually incorrect.
- (iv) That the disputed and complicated questions of facts are involved in the case against appellant as such the same cannot be resolved without holding regular inquiry. Moreover the procedure laid down in Rule 9 of KPK Government Servant (Efficiency and Discipline Rules, 2011 has not been followed.
- (v) That no show cause Notice was given to the appellant and no opportunity of personal hearing was granted to the appellant as such the impugned action is violative of the principle of Audi Alteram Partem.
- (vi) That impugned action was taken in grave violation of the principles of natural Justice being passed in appellant's back.
- (vii) That appellant's fundamental rights guaranteed by the Constitution have been done away in grave violation of Article 10-A of the Constitution Islamic Republic of Pakistan as her right to due process and fair trial was ignored.
- (viii) That it is Appellant's Inalienable right to be dealt with according to law within the meaning of Article 4 of the Constitution but the Respondents while taking impugned action against the appellant violated the above Constitutional Provision.
- (ix) That Respondent No 3 (Competent Authority) and Respondent No 2 (Appellate Authority) failed to pass speaking orders containing explicit reasons for the action take.

ATTESTED

  
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

(x) That the impugned action is bad in law and perverse as such cannot sustain.

It is , therefore, prayed that this Honorable Tribunal may graciously be pleased to accept this appeal set-a-side the impugned original as well as appellate orders and direct appellant's reinstatement in her service with all back benefits in the interest of Justice.

Gul Shad  
Appellant

Through:

*NASIR SALEM*  
(Nasir Saleem)  
Advocate  
236- Iqbal Shopping Complex  
The Mall, Abbottbad  
No: +92334-1054951

*Irshad*  
(Sardar Muhammad Irshad)  
Advocate High Court  
236- Iqbal Shopping Complex  
The Mall, Abbottbad  
No: +92343-3326000

Certified to be true copy  
*[Signature]*  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Date of Presentation of Application 03/03/23  
Number of Pages Page 4  
Copying Fee 20/-  
Urgent Yes  
Total 25/-  
Name \_\_\_\_\_  
Date of Receipt 03/03/23  
Date of Delivery of Copy 03/03/23

10

"C"

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR**  
**AT CAMP COURT, ABBOTTABAD**

Service Appeal No. 1310/2019

Date of Institution ... 10.10.2019

Date of Decision ... 24.09.2021



Mst. Gulshad W/o Sad Bar Khan Ex-PST Government Girls Primary School Sultanabad Harban District Kohistan C/o Sad Bar Khan Process Server Labour Court Haripur.

(Appellant)

**VERSUS**

Government of Khyber Pakhtunkhwa Through Secretary Elementary and Secondary Education, Department Peshawar and two others.

(Respondents)

-----  
Mr. SARDAR MUHAMMAD IRSHAD,  
Advocate

--- For appellant.

MR. RIAZ KHAN PAINDAKHEIL,  
Assistant Advocate General

--- For respondents.

MR. SALAH-UD-DIN

--- MEMBER (JUDICIAL)

MR. ATIQ-UR-REHMAN WAZIR

--- MEMBER (EXECUTIVE)

**JUDGEMENT:**

**SALAH-UD-DIN, MEMBER:-**

Precise facts forming the back ground of the instant service appeal are that the appellant while serving as PST was posted in GGPS Sultanabad, when she was departmentally proceeded against on the allegations of her willful and unauthorized absence from duty. Show cause notice was straight away issued to the appellant and major penalty of removal from service w.e.f 01.01.2019 was awarded to the appellant and it was also ordered that the salary drawn by the

**ATTESTED**


MEMBER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

appellant during the absence period i.e with effect from 01.01.2019 to 30.06.2019 also to be recovered from the appellant. The appellant filed departmental appeal, however the same was rejected, therefore, the appellant has now approached this Tribunal through filing of the instant service appeal for the redressal of her grievance.

2. Learned counsel for the appellant has contended that the appellant never absented from duty and her attendance in the relevant register was duly marked during the period of her alleged absence from duty; that the alleged absence of the appellant from duty was factual controversy, which could be properly ascertained through a regular inquiry, however the competent authority has dispensed with the regular inquiry without assigning any reason, which fact has rendered the entire inquiry proceedings as wrong and illegal; that a show cause notice was allegedly issued to the appellant, however the same was sent on school address and has never been received by the appellant; that in case of willful absence, the competent authority is required to send notice on home address of a civil servant, however the same has not been complied with; that no regular inquiry was conducted in the matter and penalty has been awarded to the appellant with retrospective effect, which fact by itself has vitiated the whole proceedings. In last he requested that the impugned orders may be set aside and the appellant may be reinstated in service with all back benefits. Reliance was placed on 2007 PLC (C.S) 597, 2007 SCMR 152, 2009 SCMR 339, 2009 SCMR 329, 2012 PLC (C.S) 728, 2007 PLC (C.S) 354 and 2020 SCMR 1245.

3. On the other hand learned Assistant Advocate General has contended that the appellant was in the habit of remaining absent without any sanctioned leave and she was marked absent on many occasions by the concerned DCMA's of IMU Kohistan; that the appellant was issued proper show cause

J. I.


ATTESTED  
  
EX-MINISTER  
NIGAL  
Service Tribunal  
Kohistan

notice and opportunity of personal hearing was also afforded to her, however the appellant neither filed reply to the show cause notice nor appeared before the competent authority for personal hearing; that the appellant has been dealt with in accordance with the relevant law/rules and her absence from duty stood proved, therefore, she has rightly been removed from service.

4. We have heard arguments of learned counsel for the both the sides and have perused the record.

5. A perusal of record would show that the appellant was proceeded against on account of willful and unauthorized absence from duty w.e.f 01.01.2019 to 30.06.2019. The appellant has alleged that she remained present during the alleged period of her absence and in this respect, she has annexed photocopies of the relevant pages of register of attendance. Controversy in question is one of factual nature, therefore, competent authority was required to have conducted regular inquiry in the matter by affording opportunity to the appellant to properly defend herself. The competent authority has however dispensed with the regular inquiry without assigning any reason, which has resulted in causing of grave injustice to the appellant as she was condemned unheard. It is well settled principle of law that in normal circumstances, a case of misconduct involving controversial question of fact must not be decided in summary manner, as the dispensation of regular inquiry in such a case would amount to defeat the law and condemned a person unheard. Although copy of show cause notice is available on the record, however the same has been allegedly sent on school address and nothing is available on the record that the same was received by the appellant. The appellant has categorically denied her absence from duty, therefore, conducting of regular inquiry was necessary in the matter. August Supreme Court of Pakistan in its judgment reported as 2004 SCMR 316 has held that in case of imposing a

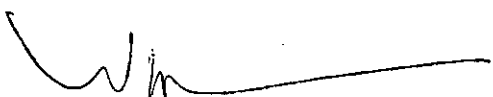
ATTESTED


  
EXAMINER  
Minister Pakhtunkhwa  
Service Tribunal

major penalty, the principle of natural justice requires that a regular inquiry is to be conducted into the matter and opportunity of defense and personal hearing is to be provided to the civil servant proceeded against. The impugned orders are thus not sustainable in the eye of law hence liable to be set aside.

6. In view of the above discussion, the appeal in hand is allowed by setting aside the impugned orders. The appellant is reinstated in service and the department is directed to conduct de-novo regular inquiry into the matter within a period of 3 months from the date of communication of this judgment. The issue of back benefits would be subject to the outcome of de-novo inquiry. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED  
24.09.2021

  
(ATIQ-UR-REHMAN WAZIR)  
MEMBER (EXECUTIVE)  
CAMP COURT, ABBOTTABAD

  
(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT, ABBOTTABAD

**Certified to be true copy**  
**EX-MINISTER**  
**Khyber Pakhtunkhwa**  
**Service Tribunal**  
**Peshawar**

Date of Presentation of Application 02/03/23  
Number of Pages 4  
Copying Fee 24/-  
Urgent 8/02  
Total 25/-  
Name of ---  
Date of Completion of Copy 03/03/23  
Date of Delivery of Copy 03/03/23



## OFFICE OF THE DISTRICT EDUCATION OFFICER



### OFFICE ORDER

Whereas Mst: Gul Shad PST GGPS Sultan Abad was removal from service vide DEO (Female) Kohistan 3058-64 Dated 05-07-2019 and she submitted service appeal in service Tribunal Peshawar against the taken action. The Honourable Tribunal accepted her appeal and passed decision on 24-09-2021 of re-instatement of the teacher in the light of the appeal No 1310/2019 Dated 10-10-2019. subject to only de-novo enquiry.

In the view of the above facts, Mst: Gul Shad Ex- PST is hereby re-instated and adjusted in GGPS Dadir Goshali only for the purpose of de-novo enquiry in the consequences of the directions of Honourable Service Tribunal Khyber Pakhtunkhwa.

#### Conditions:

1. No TA/DA is allowed
2. Her re-instatement and other benefits will remained fully dependent upon the recommendation of de-novo enquiry report
3. Charge report should be submitted to all concerned

/

District Education Officer  
(Female)Kohistan

E/No: Estt/ Sec/ 504--10 DEO (F) Dated 10/12/2021  
Copy of the above is forwarded to:

1. Director E&SE Khyber Pakhtunkhwa Peshawar
2. Registrar Khyber Pakhtunkhwa Peshawar
3. District Account Officer Kohistan
4. Sub-Divisional Education Officer (Female) Dasso Kohistan
5. ADEO Litigation Local Office
6. PA to DEO(Female) Kohistan
7. Office copy

/

12.12.21  
District Education Officer  
Female Kohistan

10/12/2021



14

2



**OFFICE OF THE DISTRICT EDUCATION OFFICER**



**OFFICE ORDER**

Whereas Mst. Gul Shad PST GGPS Sultan Abud was removal from service vide DEO (Female) Kohistan 3058-64 Dated 05-07-2019 and she submitted service appeal in service Tribunal Peshawar against the taken action. The Honourable Tribunal accepted her appeal and passed decision on 24-09-2021 of re-instatement of the teacher in the light of the appeal No 1310-2019 Dated 10-10-2019. subject to only de-novo enquiry.

In the view of the above facts, Mst. Gul Shad Ex- PST is hereby re-instated and adjusted in GGPS Dadir Goshali only for the purpose of de-novo enquiry in the consequences of the directions of Honourable Service Tribunal Khyber Pakhtunkhwa.

**Conditions:**

1. No TA/DA is allowed
2. Her re-instatement and other benefits will remained fully dependent upon the recommendation of de-novo enquiry report
3. Charge report should be submitted to all concerned

\_\_\_\_\_  
District Education Officer  
(Female) Kohistan

U.S. No. Estt. Sec. 504-10 DEO (F) Kohistan 10/12/2021

Copy of the above is forwarded to

1. Director I & SI Khyber Pakhtunkhwa Peshawar
2. Registrar Khyber Pakhtunkhwa Peshawar
3. District Account Officer Kohistan
4. Sub-Divisional Education Officer (Female) Dasso Kohistan
5. ADEO Litigation Local Office
6. PA to DEO (Female) Kohistan
7. Office copy

Attested  
\_\_\_\_\_

\_\_\_\_\_  
12.12.2021  
District Education Officer  
Female Kohistan  
10/12/2021

(14)

14

**OFFICE OF THE DISTRICT EDUCATION OFFICER**

Belle OMT

**OFFICE ORDER**

Whereas Mst Gul Shad PS1 GGPS Sultan Abad was removal from service vide DEO (Female) Kohistan 3058-64 Dated 05-07-2019 and she submitted service appeal in service Tribunal Peshawar against the taken taken action. The Honourable Tribunal accepted her appeal and passed decision on 24-09-2021 of re-instatemetn of the teacher in the light of the appeal No 1310/2019 Dated 10-10-2019 subject to only de-novo enquiry.

In the view of the above facts, Mst Gul Shad Ex-PST is hereby re-instated and adjusted in GGPS Dadir Goshali only for the purpose of de-novo enquiry in the consequences of the direction of Honourable Service Tribunal KhyberPakhtunkhwa.

**Conditions:-**

1. No TA/DA is allowed
2. Her re-instatement and other benefits will remained fully dependent upon the recommendation of de-novo enquiry report
3. Charge report should be submitted to all concerned

District Education Officer  
(Female) Kohistan

S.No Esst Sec 504-10 DEO (F) 10-12-2021

**Copy of the above is forwarded to**

1. Director E&ST Khyber Pakhtunkhwa Peshawar
2. REGISTRAR KhyberPakhtunkhwa Peshawar
3. District Account Officer Kohistan
4. Sub-Divisional Educaiton Officer (Feamle) Dassu Kohistan
5. ADEO Litigation Local Office
6. PA to DEO (Female) Kohistan
7. Office Copy

District Education Officer  
Female Kohistan

15

2/11



**OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE**  
**KOHISTAN**

**OFFICE ORDER**

In the light of the decision of honorable service tribunal Peshawar regarding re-instatement of Mst. Gul Shad for the appeal No 1310/2019 dated 24/09/2021 and re-instatement of Mst. Huree Bibi for the appeal No 1300 dated 30-09-2021, subject to the De-novo Enquiry.

Now in the consequences of the above decision of the honorable service tribunal KP Peshawar in respect of Mst. Gul Shad PST GGPS Sultan Abad Harban Huree Bibi PST GGPS Nimraty. The following officers are hereby nominated as Enquiry officers for the mentioned De-novo Enquiry with the directions to go through the service regard as well as adopted procedure. The officers may submit the report within 07 days with clear cut recommendation.

1. Fozia Bibi SDEO (F) Dassu
2. Abdul Salam ASDEO (F) Estt: Secy: Kohistan

**District Education Officer**  
**(Female) Kohistan**

Endstt No 417-21 Dated 27/11/2021

**Copy of the above is forwarded to the:**

1. Registrar Service Tribunal KP Peshawar.
2. Deputy Commissioner Kohistan Upper.
3. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.
4. SDEO (F) Dassu Kohistan
5. Office Copy

**District Education Officer**  
**(Female) Kohistan**

Attested

Amir

**VAKALATNAMA****BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR****GULSHAD BIBI  
VERSUS  
GOVERNMENT OF KPK & OTHERS**

I Gulshad Bibi hereby appoint M/S. SARDAR MUHAMMAD IRSHAD, SARDAR ADEEL AND WAJHAT NADEEM MUGHAL Advocates in the above mentioned case, to do all or any of the following acts, deeds and things:-

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected herewith.
2. To sign, verify and file appeals, petitions, suits, affidavits and applications for compromise or withdrawal or for referring to arbitration of the said case as may be deemed necessary or advisable by clients for the conduct, prosecution or defense of the said case at all its stages.

AND hereby agree:-


- a. That the advocates shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remained unpaid.

In witness whereof I / We have signed this Vakalatnama hereunder, the contents of which have been read / explained to me / us and fully understood by me / us.

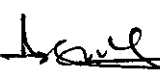
Accepted by:-

Signature of Executant Gulshad.

  
SARDAR ADEEL  
ADVOCATE

  
WAJHAT NADEEM MUGHAL  
ADVOCATE

BC - 17 - 1661

  
(Sardar Muhammad Irshad)

Advocate High Court  
1A Gulistan Colony College  
Road Abbottabad  
Cell:+92343-3326000

Email: [Sardarmuhammadirshad7@gmail.com](mailto:Sardarmuhammadirshad7@gmail.com)