

9-11-22

Since 9th November 2022 has been declared as
Public Holiday, therefore the case is adjourned to
22.12.22 for the same.




22.12.2022


Appellant present through counsel.

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

SCANNED
KPST
Peshawar

At the very outset an application was submitted on
behalf of DEO (F) Swabi seeking submission of amendment
in the comments due to some clerical mistakes. This
application was not objected to by the learned counsel for
appellant, therefore, stands accepted with direction to the
respondents to submit proper comments/reply before date.
File to come up for comments/arguments on 22.02.2023
before D.B.


(Fareeha Paul)
Member (E)


(Rozina Rehman)
Member (J)

22.02.2023

Bench is incomplete, therefore, case is adjourned
to 07.04.2023 for the same as before.


D


Reader

12.05 2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present. No responsible officer on behalf of the respondents is present.

Respondents are directed to appear in person for tomorrow and apprise the Tribunal, failing which their salary will be attached. To come up for arguments on 13.05.2022 before D.B.


(Fareeha Paul)
Member (E)


Chairman

ORDER
13.05.2022


Deleted for reconstitution of Bench. To come up for order on 24.05.2022.


Reader

24th May, 2022

Junior to counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Asstt. AG alongwith Fazle Khaliq, ADEO for the respondents present.


Learned counsel for the appellant has sent an application for adjournment due to his indisposition. Adjourned. Last opportunity is granted. To come up for arguments on 09.08.2022 before the D.B.


(Fareeha Paul)
Member (E)


(Kalim Arshad Khan)
Chairman

9-8-2022

Due to the public holiday the case is adjourned to 9-11-2022


Reader

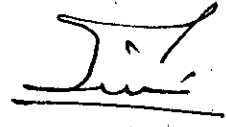
16.12.2021

Learned counsel for the appellant present. Mr. Rashid-ur-Rehman, Litigation Officer alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned counsel for the appellant sought adjournment for arguments. Adjourned. To come up for arguments on 14.02.2022 before the D.B.



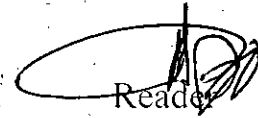
(Atiq-ur-Rehman Wazir)
Member (E)



(Salah-ud-Din)
Member (J)

14.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 12.05.2022 for the same as before.



Chairman

12.05.2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present. No responsible office on behalf of the respondents is present.


File to come up alongwith connected appeal No. 40/2018 titled "Rukhsana Wasil Versus Government" for arguments before the D.B on 13.05.2022.

(Fareeha Paul)
Member (E)

Chairman

29.03.2021


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

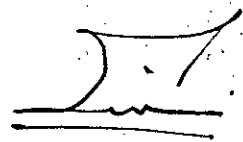

Reader

29.06.2021

Mr. Hamayun Khan, Advocate, junior of learned counsel for the appellant present. Mr. Javed Ullah, Assistant 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 21.10.2021


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



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

21.10.2021

Nemo for the appellant.

Mr. Muhammad Rasheed, Deputy District Attorney for respondents present.

Notice be issued to the appellant/counsel for arguments on 16.12.2021 before D.B.

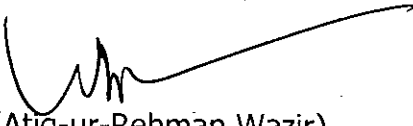

(ATIQU UR REHMAN WAZIR)
MEMBER (E)


(ROZINA REHMAN)
MEMBER (J)

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.

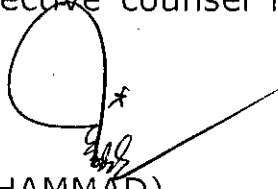

(Atiq-ur-Rehman Wazir)
Member

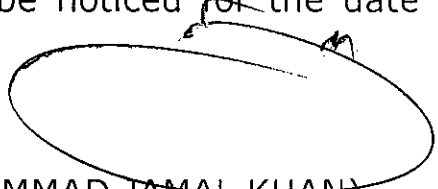

Chairman

05.01.2021

Neither appellant is present in person nor anyone else representing her has appeared at the moment when the appeal was called for hearing at 12:20 P.M. Mr. Kabirullah Khattak, Additional Advocate General and Mr. Fazle Khaliq, Litigation Officer, for the respondents are present.

The learned Additional Advocate General while referring order sheet dated 13.06.2019 submitted that the parties were directed to furnish copy of departmental appeal moved by the appellant to the competent authority but the same has not been produced when the representative of the department was queried, in response thereof he submitted that they have no copy of departmental appeal because no such appeal/representation has been made by the appellant. The matter requires clarification from the appellant and her respective counsel. The appeal is pending adjudication since 11.07.2017, therefore, last chance is provided to the appellant and her counsel to argue the instant appeal and the appeal is accordingly adjourned to 29.03.2021 for arguments before D.B. In the meanwhile appellant as well as her respective counsel have to be noticed for the date fixed.


(MIAN MUHAMMAD)
MEMBER (EXECUTIVE)


(MUHAMMAD JAMAL KHAN)
MEMBER (JUDICIAL)

26.02.2020

Learned counsel for the appellant and Mr. Riaz Khan Paindakheil learned Assistant Advocate General alongwith Fazal Khaliq ADO present. Representative of the respondent department submitted additional documents placed on file of connected service appeal No.401/2018 titled Rukhsana Wasil. Adjournment requested. Adjourn. To come up for arguments on 01.04.2020 before D.B.


Member


Member

01.04.2020

Due to public holidays on account of Covid-19, the case is adjourned. To come up for the same on 24.06.2020 before D.B.


Reader

24.06.2020

Due to public holiday on account of COVID-19, the case is acjourned for the same on 25.08.2020 before D.B.


Reader

25.08.2020

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


Reader

06.08.2019

Counsel for the appellant and Mr. Muhammad Jan, DDA Mr. Abdul Ghaffar, Supdt for respondents present.

The representative of the respondents is required to produce on the next date minutes of DPC's decision resulting in promotion notification dated 12.07.2014, 05.08.2015 and 04.08.2016, in addition to the record noted in the order dated 13.06.2019.

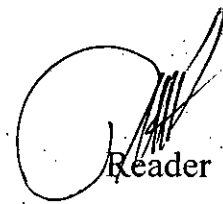
Adjourned to 29.10.2019 before D.B.


Member


Chairman

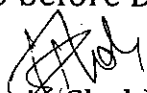
29.10.2019

Due to incomplete bench the case is adjourned. To come up for the same on 02.01.2020 before D.B.


Reader

02.01.2020

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Mr. Fazle Khaliq, ADO for the respondents present. The record mentioned in order sheet dated 13.06.2019 and 06.08.2019 has not been brought by the representative of the department. Representative of the department present in the court is strictly directed to furnish the said record on the next date positively. Case to come up for record and arguments on 26.02.2020 before D.B.


(Hussam Shah)
Member


(M. Amin Khan Kundi)
Member

04.04.2019

Clerk to counsel for the appellant Kabirullah Khattak learned Addl; AG alongwith Mr. Abdul Ghaffar Superintendent for the respondents present. Clerk to counsel for the appellant submitted rejoinder which is placed on file.

Due to general strike on the call of Bar Council learned counsel for the appellant is not in attendance.

Adjourned to 13.06.2019 before D.B.



Member



Chairman

13.06.2019

Counsel for the appellant and Mr. Riaz Ahmad Paindakheil, Assistant AG for the respondents present.

When the case was argued at some length, learned counsel for the appellant invited attention toward notification dated 12.07.2014, whereby promotion of 56 PST (BPS-12) to SPST (BPS-14) including the appellant was deferred by the Departmental Promotion Committee. According to learned counsel for the appellant, the appellant was promoted vide order dated 05.08.2015 but was not allowed to assume charge by the respondents. They were again not considered for promotion vide notification dated 04.08.2016. Through the departmental appeal, the appellant assailed the promotion order referred to above. When confronted on the point to provide a copy of departmental appeal preferred by the appellant, he informed that the same had been misplaced.

On the other hand, learned Assistant AG stated that according to the available record of the respondents, departmental appeal was not preferred by the appellant. He further contended that they had given option to forego promotion that is why their cases were not considered by the Departmental Promotion Committee in the meeting referred to above.

In order to reach to a just conclusion, both the parties are directed to provide copy of departmental appeal preferred by the appellant alongwith option, if any, to forego promotion by the appellant on or before the next date of hearing. Adjourned to 06.08.2019 for record and arguments before D.B.



(AHMAD HASSAN)
MEMBER



(M. AMIN KHAN KUNDI)
MEMBER

08.1.2019

Nemo for the appellant. Addl. AG alongwith Abdul Ghaffar, Supdt. for the respondents present.

Once again representative of the respondents requests for time to furnish the requisite reply. Adjourned to 18.02.2019 with a warning to the respondents for payment of cost in case the needful is not done in the instant case.

Chairman



18.02.2019

Clerk to counsel for the appellant and Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Abdul Ghafar Superintendent present. Representative of the respondents submitted written reply/comments. Adjourn. To come up for rejoinder/arguments on 04.04.2019 before D.B.

Member




03.08.2018

Neither appellant nor her counsel present. Mr. Kabirullah Khattak, Addl: AG for respondents present. Written reply not submitted. He made a request for adjournment. Granted but as a very last chance. To come up for written reply/comments on 19.09.2018 before S.B.


Chairman

19.09.2018

Neither appellant nor her counsel present. Mr. Kabirullah Khattak Addl: AG for the respondents present. Written reply not submitted despite last chance. Learned Addl: AG requested for further adjournment. Another last opportunity is granted. To come up for written reply/comments on 19.11.2018 before S.B.


(Muhammad Amin Kundi)
Member

19.11.2018

Neither appellant nor her counsel present. Mr. Kabirullah Khattak, Additional AG on behalf of the respondents present. Representative of the respondent-department is not in attendance therefore, notice be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned. Case to come up for written reply/comments on 08.01.2019 before S.B. Notice be also issued to appellant and her counsel for attendance for the date fixed.


Muhammad Amin Khan Kundi
Member

22.03.2018

Appellant absent. Counsel for the appellant is also absent. Mr. Kabirullah Khattak, Additional AG for the respondents present. Notice be issued to appellant and her counsel for attendance for 19.04.2018 before S.B.


Member

19.04.2018

Counsel for the appellant and Addl. AG for the respondents present. Written reply not submitted. Requested for adjournment. Adjourned. To come up for written reply/comments on 09.05.2018 before S.B.


Member

09.05.2018

The Tribunal is non functional due to retirement of the Honorable Chairman. Therefore, the case is adjourned. To come up for the same on 02.07.2018 before S.B.


Reader

02.07.2018

Counsel for the appellant and Mr. Muhammad Jan, DDA for the respondents present. Written reply not submitted. Requested for further adjournment. Adjourned. Last opportunity is granted. To come up for written reply/comments on ~~02.07.2018~~ ^{03.5.2018} before S.B.


Member


04.01.2018

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 PST on 20.10.2004 at GGPS Paromli, that as per the prevailing policy of the upgradation/promotion for PST Primary side the appellant completely fit for the promotion of B-14. Further argued that the appellant, without any reason and deficiencies deprived from promotion on 12.07.2014 then on next DPC dated 05.08.2015 the appellant promoted to SPST B-14 but the charge report not submitted within the time due to the late information and the respondent refused its implementation and no entry has made in the service book as SPST with effect from 05.08.2015. That the appellant is entitled as SPST from dated 07.12.2014 instead of 05.08.2015. That the appellant preferred departmental appeal dated 10.08.2016 which was not responded within statutory period of 90 days. That no limitation runs against salaries.

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 fee within (10) days, whereafter notice be issued to the respondents department for written reply/comments on 19.02.2018 before S.B.

Appellant Deposited
Security & Process Fee


(Gul Zeb Khan)
Member (Executive)

19.02.2018

None present on behalf of the appellant. Learned Assistant AG for the respondents present. Written reply not submitted. Learned Assistant AG requested for further time adjournment. Request accepted. The appellant is also directed to submit copies of the appeal for the respondents. To come up for written reply/comments on 22.03.2018 before S.B. Notice be issued to the appellant and his counsel for attendance.


(Gul Zeb Khan)
Member

07.12.2017

Learned counsel for the appellant present.

Preliminary arguments heard and case file perused.

Counsel for the appellant argued that the appellant has been serving in Education department as PST since 20.10.2004. That the appellant was eligible for promotion to B-14 as per prevailing policy of upgradation/ promotion at the time when DPC meeting was held and promotion were notified on 12.07.2014, but was deferred for the reason not known or communicated. That the appellant was later promotion to B-14 vide order dated 05.02.2015 with effect from 31.01.2015, but the promotion order was received late therefore no charge was taken against the B-14 post on promotion due to no entry in the service book. That office staff of respondent No. 2 & 3 informed the appellant to wait for next DPC as the earlier DPC has expired after lapse of 15 days and that fresh DPC will be arranged shortly. That the appellant preferred departmental appeal (Copy not retained and only TCS receipt dated 10.08.2017 placed in service appeal) but the same has not been decided within the stipulated period.

Pre-admission notice be issued to Learned Additional AG office to assist the Court in this respect. To come up for preliminary hearing on 04/01/18 before S.B.


(Gul Zeb Khan)
Member

18/10/2017

Clerk of counsel for the applicant present and seeks adjournment. To come up for further proceedings/arguments on office objection on 10/11/2017 before SB.


(GUL ZEB KHAN)
MEMBER


10.11.2017

None for the appellant present. Notices be issued to the appellant and his counsel. To come up for arguments on office objection on 07.12.2017 before S.B.


(AHMAD HASSAN)
MEMBER

0-----03 16.08.2017

No one present on behalf of appellant. Assistant AG for the respondent party present. Notice be issued to the appellant and his counsel for attendance. To come up for office objection on 30-8-17 before S.B.


(Muhammad Hamid Mughal)
Member

30.08.2017

alif Counsel for the appellant present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on office objection on 20.09.2017 before S.B.


(Muhammad Amin Khan Kundi)
Member

20/09/2017


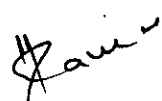
Counsel for the appellant present. Learned counsel for the appellant was heard on office objection. During the course of arguments informed the Tribunal that the appellant has misplaced the copy of departmental appeal. However, he has annexed receipt dated 10.08.2017 of the registered post whereby, appeal was dispatched to the competent authority. Notice be issued to the respondent department to confirm the factual position of the above document by producing the same. To come for further proceedings/ argument on office objection before SB on 18/10/2017.


(Ahmad Hassan)
Member

**Form- A
FORM OF ORDER SHEET**

Court of _____

Case No. /2017

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge or Magistrate |
|--|---------------------------|---|
| 1 | 2 | 3 |
| <p>1</p> <p>SCANNED KPST Peshawar</p> | <p>11/07/2017</p> | <p>As per direction of the Worthy Chairman this case is submitted to the S. Bench for decision on office objection. To be put up there on <u>20-7-17</u></p> <p align="right">  REGISTRAR 11/7/17 </p> |
| <p>02.</p> | <p>20.07.2017</p> | <p>No one present on behalf of appellant. Mr. Muhammad Adeel Butt, Additional AG for the respondent present. Notice be issued to the appellant and his counsel for attendance. To come up for office objection on 16.08.2017 before S.B.</p> <p align="right">  (Muhammad Hamid Mughal) Member </p> |

20/09/2017

Counsel for the appellant present. Learned counsel for the appellant was heard on office objection, during the course of arguments informed the Tribunal that the appellant has ~~missed~~ ^{misplaced} placed the copy of departmental appeal. However, he has annexed ^{the} receipt of registered post whereby, ~~he had sent the said appeal~~. Notice be issued to the respondent department to confirm the factual position of the above document by producing the same.. To come for further proceedings/ argument on office objection before SB on 18/10/2017

Member

appeal was dispatched to the competent authority.



dated 20/9/17

20/09/2017

Counsel for the appellant present. Learned counsel for the appellant was heard on office objection, during the course of arguments informed the Tribunal that the appellant has misplaced the copy of departmental appeal. However, he has annexed receipt dated 10.08.2017 of the registered post whereby, appeal was dispatched to the competent authority. Notice be issued to the respondent department to confirm the factual position of the above document by producing the same. To ccme for further proceedings/ argument on office objection before SB on 18/10/2017.

(Ahmad Hassan)
Member

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHUNKHWA
PESHAWAR

Appeal No _____/2018

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar ,District
Swabi.

----- [Petitioner]

Versus

1. Director of Eliminary and Secondary Education
K.P.K Peshawar.
2. District Education Officer (Female) Swabi.
3. SDEO (Female) Swabi District Swabi.

-----[Respondents]

AMENDED APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974 AGAINST THE ORDER OF
RESPONDENT NO.2 ,3 DATED 12.07.2014 ,
04.08.2016 AGAINST LAW AND INEFFECTIVE
UPON THE RIGHTS OF THE APPELLANT /
PETITIONER AND CONSIDER PETITIONER AS
B.P.S 14 FROM 12.07.2014 ALONGWITH BACK
BENEFITS AND IMPLEMENTATION/
ACTUALIZATION OF ORDER DATED 05.08.2015

ALONG WITH BACK BENEFITS EFFECTIVE
FROM 12.07.2014.

PRAYER IN APPEAL :-

On accepting this appeal the order of respondent No.2 dated 05.08.2015 may kindly be implemented and entries made in service book and alongwith back benefits from 12.07.2014 or other order deem fit considered by this Honourable Court.

Respected Sir,

Respectfully Sheweth;

FACTS OF THE CASE :-

1. That the Appellant /petitioner in serving as PST in education department since 20.10.2004.
2. That as per the proviling policy of the up gradation/ promotion for PST primary side the Appellant /petitioner completely fist for the promotion of BPS 14.
3. That the Appellant /petitioner without any reason and deficiencies deprived from promotion on dated 12.07.2014 vide order No 1535.

{Copy of order is attached as annexure "A"}

4. Against sub order of respondent No2 the Appellant /petitioner file departmental application before respondent No.2 for considering petitioner as BPS 14.

{Copy of application is attached as annexure "B"}

5. That in 2nd D.P.C for the promotion BPS-14 dated 05.08.2015 although we are selected /promoted but the order reached to us after 15days letter.

{Copy of order is attached as annexure "C"}

6. After got information the Appellant /petitioner demanded for charge in BPS -14 but the respondent No 2,3 refused to hand over charge to us and saying that your order is expired and told to petitioner filed you documents for the next D.P.C in 2016 and no implementation or entry in service book made by respondents as SPST 14.

7. When the petitioner went for collecting our documents for the promotion BPS-14 in it was told once again by the respondent No.2, 3 that you are not eligible for the said post cause of you have already in BPS-14 while the petitioner working still in BPS -12 .There is no entry of BPS14 in service book nor the office paid us the benefits for the said post.

8. On dated 04.08.2016 the respondent No.2 issue order BPS -14 up-gradation but once again the name of the petitioner ignored by respondent No.2 and to already in SPST 14.

{Copy of order is attached as annexure "D"}

9. That the Appellant /petitioner aggrieved from the aforesaid order dated 12.07.2014, 05.08.2015, and 04.08.2015 the petitioner file writ petition in Peshawar High Court Peshawar on dated 06.04.2017 the said writ petition disposed due to bar Art 212 of constitution of Islamic republic of Pakistan 1973 and

new due to illegal and un-lawfull order the petitioner filling this appeal on the following grounds.

10. Now with permission of this Honourable Court order dated 07.12.2017 the petitioner amended present appeal to the extend that the order dated 05.08.2015 the SPST 14 may kindly be implemented and entry made in service book of effective full back benefits .

GROUND S :-

A. That all the order of respondent No.2 dated 12.07.2014, 05.08.2015, 04.08.2016 are against law facts and promotion policy and hence not maintainable in law .

B. That the petitioner eligible for BPS 14 from 12.07.2014 being senior but the respondents illegally deprived from promotion committed illegality.

C. That as per policy of the up gradation /promotion for PST the petitioner completely fit for the promotion of BPS 14

but without any reason the petitioner deprived from promotion.

D. That there was no deficiency in relevant papers nor pending any inquiry of department a judicial inquiry against the petitioner.

E. That on dated 05.08.2015 2nd D.P.C and promotion of petitioner in BPS-14 order reached after 15 days and no notes or information given before expiry of 15 days .

F. The out of respondents No. 2, 3 about not implementation order of D.P.C dated 05.08.2015 and no entire made in service book against law and illegal.

G. That junior of the petitioner already promoted to BPS 14 from dated 12/07/2014 against fundamental rights.

H. That the application filed to the respondent No.2,3 for seeking remedy still pending and

advise the petitioner to approach a court of law.

I. That any other grounds may be taken during arguments of this appeal .

It is, therefore, most humbly prayed, that on acceptance of this appeal the promotion order as SPST BPS 14 of the petitioner may kindly be implemented entry made in service book effective from 12.07.2014 being senior with full back benefit or any other adequate remedy / relief which the Honourable Bench /August Court deems fit may kindly also be awarded to the petitioner and obliged .

Dated : 03 -01-2018


PETITIONER
DILMAN NAZ PST GGPS Parmoli
Through attorney Ali Rehman

Through


RAWIL KHAN Advocate
High Court
at District Court Swabi

CERTIFICATE

Certified that as per instruction of client no such like Service Appeal has earlier been filed by the petitioner in this Honourable Court .


Rawil Khan Advocate
High Court
at District Court Swabi

LIST OF BOOKS

- A. Constitution of Islamic Republic of Pakistan 1973.
- B. Esta code KPK
- C. Case Law

Advocate



The appeal of Mst. Dilman Naz PST GGPS Parmoli Tehsil Razzar distt. Swabi received today on 21.06.2017 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

Not removed

- 1- Memorandum of the appeal may be got signed by the appellant. ✓
- 2- Copy of departmental appeal is not attached with the appeal which may be placed on it. ✓
- 3- The law under which appeal is filed is wrong. ✓
- 4- Annexures of the appeal may be flagged. ✓
- 5- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal. ✓

No. 1584 /S.T.

Dt: 21/6 /2017

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Rawil Khan Adv. Swabi.

Sir/

The copy of departmental appeal is missing from ~~records of appeal~~ ^{Petitioner's} records however the Receipt is enclosed with an appeal.

Therefore you are requested for Re-submission to be placed before the Bench for early disposal.

Sir,

The observation of this office and reply of counsel for the appellant is submitted for order please.

The Chairman.

21/6/17

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHUNKHWA
PESHAWAR

Appeal No 41 /2018

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar ,District
Swabi.

-----[Appellant / Petitioner]

Versus

Director of Eliminary and Secondary Education K.P.K

Peshawar and others

-----[Respondents]

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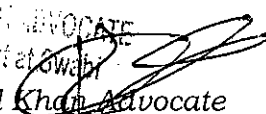
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Dated : 21-06-2017

PETITIONERS

Through :

RAWIL KHAN ADVOCATE
High Court at Swabi

Rawil Khan Advocate
High Court
at Judicial Complex Swabi
Cell No 03149898651

①

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Appeal No 41 /2018

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar ,District
Swabi.

----- [Petitioner]

Versus

1. Director of Eliminary and Secondary Education
K.P.K Peshawar.
2. District Education Officer (Female) Swabi.
3. SDEO (Female) Swabi District Swabi.

----- [Respondents]

APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974
AGAINST THE ORDER OF RESPONDENT NO.2 ,3
DATED 12.07.2014 , 05.08.2015 , 04.08.2016
AGAINST LAW AND INEFFECTIVE UPON THE
RIGHTS OF THE APPELLANT / PETITIONER AND
CONSIDER PETITIONER AS B.P.S 14 FROM
12.07.2014 ALONGWITH BACK BENEFITS .

PRAYER IN APPEAL :-

On accepting this appeal the order
of respondent No.2 dated 12.07.2014, 05.08.2015 and

1

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHUNKHWA
PESHAWAR

Appeal No 4 /2018

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar ,District
Swabi.

----- [Petitioner]

Versus

1. Director of Eliminary and Secondary Education
K.P.K Peshawar.
2. District Education Officer (Female) Swabi.
3. SDEO (Female) Swabi District Swabi.

-----[Respondents]

APPEAL UNDER SECTION CIVIL SERVANT
ACT 1974 AGAINST THE ORDER OF
RESPONDENT NO.2 ,3 DATED 12.07.2014 ,
05.08.2015 , 04.08.2016 AGAINST LAW AND
INEFFECTIVE UPON THE RIGHTS OF THE
APPELLANT / PETITIONER AND CONSIDER
PETITIONER AS B.P.S 14 FROM 12.07.2014
ALONGWITH BACK BENEFITS .

PRAYER IN APPEAL :-

On accepting this appeal the order
of respondent No.2 dated 12.07.2014, 05.08.2015 and

04.08.2016 modified and the appellant /petitioner may kindly be considered as BPS -14 PST from 12.07.2014 along with full back benefits etc or other order deem fit considered by this Honourable Court.

Respected Sir,

Respectfully Sheweth;

FACTS OF THE CASE :-

1. That the Appellant /petitioner in serving as PST in education department since 20.10.2004.
2. That as per the prevailing policy of the up gradation/ promotion for PST primary side the Appellant /petitioner completely fit for the promotion of BPS 14.
3. That the Appellant /petitioner without any reason and deficiencies deprived from promotion on dated 12.07.2014 vide order No 1535.

{Copy of order is attached as annexure "A"}

4. Against sub order of respondent No2 the Appellant /petitioner file departmental application before respondent No.2 for considering petitioner as BPS 14.

{Copy of application is attached as annexure "B"}

5. That in 2nd D.P.C for the promotion BPS-14 dated 05.08.2015 although we are selected /promoted but the order reached to us after 15days letter.

{Copy of order is attached as annexure "C"}

6. After got information the Appellant /petitioner demanded for charge in BPS -14 but the respondent

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No 2,3 refused to hand over charge to us and saying that your order is expired and told to petitioner filed you documents for the next D.P.C in 2016.

7. When the petitioner went for collecting our documents for the promotion BPS-14 in it was told once again by the respondent No.2, 3 that you are not eligible for the said post cause of you have already in BPS-14 while the petitioner working still in BPS -12 .There is no entry of BPS14 in service book nor the office paid us the benefits for the said post.
8. On dated 04.08.2016 the respondent No.2 issue order BPS -14 up-gradation but once again the name of the petitioner ignored by respondent No.2.

{Copy of order is attached as annexure "D"}

9. That the Appellant /petitioner aggrieved from the aforesaid order dated 12.07.2014, 05.08.2015, and 04.08.2015 the petitioner file writ petition in Peshawar High Court Peshawar on dated 06.04.2017 the said writ petition disposed due to bar Art 212 of constitution of Islamic republic of Pakistan 1973 and new due to illegal and un-lawfull order the petitioner filling this appeal on the following grounds.

GROUND S :-

- A. That all the order of respondent No.2 dated 12.07.2014, 05.08.2015, 04.08.2016 are

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against law facts and promotion policy and hence not maintainable in law .

B. That the petitioner eligible for BPS 14 from 12.07.2014 being senior but the respondents illegally deprived from promotion committed illegality.

C. That as per policy of the up gradation /promotion for PST the petitioner completely fit for the promotion of BPS 14 but without any reason the petitioner deprived from promotion.

D. That there was no deficiency in relevant papers nor pending any inquiry of department a judicial inquiry against the petitioner.

E. That on dated 05.08.2015 2nd D.P.C and promotion of petitioner in BPS-14 order reached after 15 days and no notes or information given before expiry of 15 days .

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F. That in next D.P.C dated 04.08.2016 .The respondent No.2,3 and their clerical staff refused to collect the documents for BPS-14 illegally unlawfully.

G. That junior of the petitioner already promoted to BPS 14 from dated 12/07/2014 against fundamental rights.

H. That the application filed to the respondent No.2,3 for seeking remedy still pending and advise the petitioner to approach a court of law.

I. That any other grounds may be taken during arguments of this appeal .

It is, therefore, most humbly prayed, that on acceptance of this appeal order of respondent No.2 modified and the petitioner may be promoted to BPS14 from 12.07.2014 alongwith back benefits or any other adequate remedy / relief which the Honourable Bench /August Court deems fit

(8)


may kindly also be awarded to the
petitioners and obliged .

Dated 21-06-2017

RAWIL KHAN ADVOCATE
PETITIONERS

DILMAN NAZ PST GGPS Parmoli
Through attorney Ali Rehman

Through


RAWIL KHAN Advocate
High Court
at District Court Swabi

CERTIFICATE

Certified that as per instruction of client no such like
Service Appeal has earlier been filed by the petitioners in
this Honourable Court .


Rawil Khan Advocate
High Court
at District Court Swabi

LIST OF BOOKS

- A. Constitution of Islamic Republic of Pakistan 1973.
- B. Esta code KPK
- C. Case Law


Advocate

7

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHUNKHWA
PESHAWAR**

Appeal No _____/2017

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar ,District
Swabi.

-----[Appellant / Petitioner]

Versus

Director of Eliminary and Secondary Education K.P.K
Peshawar and others

-----[Respondents]

AFFIDAVIT

I Ali Rehman S/O ALI ZAR KHAN special power of
resident of village Shera , Tehsil Razar, District SWABI attorney
of petitioners, do hereby solemnly affirm and declare on oath
that contents of the Service Appeal are true and correct to the best
of my knowledge and belief and nothing has been concealed from
this August Court .


Dated 21/06/2017

Deponent _____
Ali Rehman
CNIC No :



Identified By :

RAWIL KHAN ADVOCATE
High Court of Swabi


Rawil Khan Advocate
High Court
At Judicial Complex Swabi

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**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHUNKHWA
PESHAWAR**

Appeal No _____/2017

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar ,District
Swabi.

-----[Appellant / Petitioner]

Versus

Director of Eliminary and Secondary Education K.P.K
Peshawar and others

-----[Respondents]

CORRECT ADDRESSEES OF THE PARTIES

ADDRESS OF THE PETITIONER/ APPELLANT

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar ,District
Swabi.

ADDRESSES OF THE RESPONDENTS

1. Director of Eliminary and Secondary Education
K.P.K Peshawar.
2. District Education Officer (Female) Swabi.
3. SDEO (Female) Swabi District Swabi.

Dated : 21-06-2017

PETITIONERS

Through Special Attorney
Ali Rehman

RAWIL KHAN ADVOCATE
High Court at Swabi

Through

RAWIL KHAN Advocate
High Court
at District Court Swabi

(9)

0301-835797

OFFICE OF THE DISTRICT EDUCATION OFFICER(FEMALE) SWABI NOTIFICATION

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No.SO(B&A)/1-18/E&SE/2012 dated 11-7-2012 and Finance Department EndstNo.SO(FR)/FD/10-22(E) 2010 dated 16-7-2012 the following Female PST BPS-12 are hereby promoted to the post of Senior PST B-14 of Rs (8000-710-26300) plus usua lallowances as admissible under the rules on regular basis under the existing policy Provincial Government,in teaching cadre on the terms and condition given below from the date of 29-5-2014 and further they will be posted in the Government Girls Primary Schools on the District against the newly upgraded SPST B-14 posts.

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| | |
|--|------|
| Total No of PST (F) Posts duly verified by the DAO | 1767 |
| Total No of Sanctioned Primary Schools in the District | 427 |
| 40% Share of Senior PST | 536 |
| Promoted to the post of Senior PST B-14 | 480 |
| Differed from promotion | (56) |
| No of Post to be notified | 480 |
| Total notified | 480 |
| Reserved for promotion as Senior | 0 |

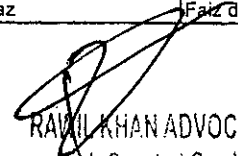
| S/No | S/List No. | Name of Teacher | Father's Name | Name of school |
|------|------------|-----------------|-------------------|------------------------|
| 1 | 661 | Hamshida Begum | Abdul Ali | GGPS Kala |
| 2 | 662 | Rozeena Naz | Muhammad Nawab | GGCMS Baja |
| 3 | 664 | Robina Bibi | Sher Bahadar | GGPS Shagai Turtandi |
| 4 | 665 | Nargis Niaz | Niaz Muhammad | GGPS Rashaka Bachai |
| 5 | 667 | Zaheen Akhtar | Faqir Mohammad | GGPS Dodher 1 |
| 6 | 668 | Ainee Zada | Sher Zada | GGPS Baja |
| 7 | 669 | Sajida Naz | Musamar Khan | GGCMS Naroo Jadeed |
| 8 | 670 | Sabeeha Begum | Fazal Qadir | GGPS Ahad Khan |
| 9 | 671 | Tilaj Begum | Aman Khan | GGPS Dheri Yar Hussain |
| 10 | 673 | Naz Begum | Shams ul Qamar | GGPS Shewa 2 |
| 11 | 1499 | Mehnaz Begum | Mulabar Shah | GGPS-3-Ulla |
| 12 | 674 | Raheela Naz | Sher Afsar Khan | GGPS Thand Koi |
| 13 | 676 | Shazia Aman | Aman Khan | GGPS Dagai 1 |
| 14 | 677 | Rahat Begum | Sahib Zada | GGPS Kala |
| 15 | 678 | Bibi Sabira | Muhammad Ghufuran | GGPS Parmoli 1 |
| 16 | 681 | Sadia Rahman | Inayat ur Rahman | GGSP Jamal Abad KSK |
| 17 | 682 | Akhtar Zia | Muhammad Ameen | GGPS Dandooqa 3 |
| 18 | 683 | Farida | Dheran Shah | GGPS Dagai 2 |
| 19 | 684 | Musarrat Begum | Samar Dad | GGPS Parmoli 1 |
| 20 | 685 | Ummya Begum | Abdul Ali | GGPS Kala |
| 21 | 686 | Basmeen | Sher Jang | GGPS Lahor 3 |
| 22 | 688 | Shahnaz Akhtar | Sher Rahman | GGPS Zaida 2 |
| 23 | 689 | Shahida Anjum | Muhammad Akram | GGPS Firdos Abad |
| 24 | 690 | Anjum Naseem | Abdul Wajid Khan | GGPS Zaida 1 |
| 25 | 691 | Shaheen Begum | Mutalib Shah | GGPS Mian Killi |
| 26 | 692 | Samia Gul | Muhammad yousaf. | GGPS Topi 1 |
| 27 | 693 | Begum Raveela | Rahman Ullah | GGPS Yar Hussain 2 |
| 28 | 695 | Shazia Noreen | Ali Bahadar | GGPS Kunda 1 |
| 29 | 697 | Raheela Shah | Rangeen Shah | GGPS Maneri Bala 1 |
| 30 | 698 | Shamim Akhtar | Bahdar Sher | GGPS Ismaila 1 |
| 31 | 699 | Ulfat Begum | Muhammad Asghar | GGPS Gar Shagai |
| 32 | 700 | Balkis Shahnaz | Juma Khan | GGPS Tordher 1 |
| 33 | 701 | Shalsta Khan | Subhan Ullah | GGPS Maneri Bala 1 |

RAWIL KHAN ADVOCATE
High Court at Swabi


RAWIL KHAN ADVOCATE
High Court at Swabi

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| | | | | |
|----|-----|----------------|--------------------|------------------------|
| 34 | 702 | Shakeela | Pordil Khan | GGPS Tarakai 1 |
| 35 | 703 | Farhad Asad | Zarb Ali Khan | GGPS Darra 1 |
| 36 | 704 | Anjuman Begum | Syed Dilaram Shah | GGPS Ismaila 1 |
| 37 | 705 | Saiqa Naz | Habib ur Rahman | GGPS Gar Munara |
| 38 | 706 | Nargis Begum | Hakeem Dad | GGPS Gar Shagai |
| 39 | 707 | Naheed Begum | Alam Zeb | GGPS Saleem Khan 3 |
| 40 | 709 | Waziat | Haji Bahadar | GGPS Sano Banda Y/H |
| 41 | 711 | Shahida Begum | Sher Afzal Khan | GGPS Saleem Khan 2 |
| 42 | 712 | Hameeda Aman | Aman Khan | GGPS Seen Khel |
| 43 | 713 | Abida Begum | Madar Khan | GGPS Shagai |
| 44 | 714 | Sameera Faraz | Gul Faraz | GGPS Lahor 1 |
| 45 | 716 | Zakia Habib | Habib Ullah | GGPS Tordher 1 |
| 46 | 717 | Maida Naz | Ali Haidar | GGPS Shamali Banda |
| 47 | 718 | Sahoon | Amir Zada | GGPS Kaddi Dagi |
| 48 | 719 | Zakira | Umara Khan | GGPS Baja |
| 49 | 720 | Zakia Munawar | Munawar Khan | GGPS Dagai 5 |
| 50 | 721 | Fozia | M. Yazdan | GGPS Yar Hussain 2 |
| 51 | 725 | Romaila Kausar | Nazar Muhammad | GGPS Zarobi 1 |
| 52 | 726 | Nargis | Zareen Badshah | GGPS Maneri Bala 3 |
| 53 | 728 | Naseem | Usman Ghani | GGPS Doulat Dobian |
| 54 | 729 | Surriya Begum | Muhammad Arif | GGPS Gar Panj Pir |
| 55 | 730 | Huriat parveen | Jamil Shah | GGCMS Daulat Abad |
| 56 | 731 | Nasira Begum | Jamil Rehmat | GGPS Tordher 1 |
| 57 | 732 | Asmat Begum | Mian Noor Muhammad | GGPS Khoro Banda |
| 58 | 733 | Nasrat | Muhammad Sher | GGCMS Yar Hussain 3 |
| 59 | 734 | Danish | Noor Muhammad | GGPS Asota Sharif |
| 60 | 735 | Nighat Parveen | Shah Jehan | GGPS Dagai 3 |
| 61 | 736 | Shahista | Shamsher | GGPS Nary Wand S/China |
| 62 | 737 | Shazla | Hayat Khan | GGPS Dagai 3 |
| 63 | 738 | Wilayat Begum | Sabz Ali Khan | GGPS Badraga Dagai |
| 64 | 739 | Ishrat Shahnaz | Sabz Ali | GGPS Dandooqa 1 |
| 65 | 741 | Tayyeba | Fazal Quresh | GGPS Qasam Banda |
| 66 | 742 | Tayyeba | Fazli Qados | GGPS Yaqubi |
| 67 | 743 | Nehayat Begum | Bakht Jamal | GGPS Kalabat |
| 68 | 752 | Jawalz Iqbal | Muhammad Sherin | GGPS Swabi 1 |
| 69 | 754 | Fazeelat Begum | Shafi Ullah | GGPS Parmoli 1 |
| 70 | 756 | Rabia Tariq | Nawab Ali Tariq | GGPS Beka 2 |
| 71 | 757 | Rasheeda Begum | Shad Ali | GGPS Marghuz 2 |
| 72 | 758 | Nighat Shaheen | Fazil Rabi | GGPS Khoro Banda |
| 73 | 759 | Firasat | Wasal Khan | GGPS Gandaf Bala |
| 74 | 762 | Bas Raj Begum | Sultan Muhammad | GGPS Kotha 2 |
| 75 | 763 | Bibi Samina | Sultan Muhammad | GGPS Kotha 2 |
| 76 | 766 | Yasmin Begum | Siraj ud din | GGPS Sher Baz Banda |
| 77 | 767 | Bushra | Sher Zada | GGPS Kotha 2 |
| 78 | 768 | Alia Gohar | Said Gohar Shah | GGPS KSK 1 |
| 79 | 769 | Minhas Begum | DIR MUHAMMAD | GGCMS Kunda Mera |
| 80 | 770 | Shafqat | Syed Mutasim Shah | GGPS Parmoli 1 |
| 81 | 771 | Gulshan Ara | Muhammad Khan | GGPS Raees Abad |
| 82 | 772 | Bibi Amina | Taj Muhammad | GGPS Kalu Khan 2 |
| 83 | 773 | Farzia Naseem | Zahir Shah | GGPS Hund 1 |
| 84 | 775 | Asia Zaman | Zaman Khan | GGPS Gujrano Kothay |
| 85 | 776 | Memona Kanul | Fazal Shah | GGPS Dobian 2 |
| 86 | 777 | Nuzhat Begum | Fazal Qadir | GGPS Ismaila 3 |
| 87 | 778 | Nusrat Jabin | Muhammad Jamil | GGPS Batakara |
| 88 | 780 | Dil Naz | Fazl Dar din | GGPS Dobian 1 |


 RAWIL KHAN ADVOCATE
 High Court of Swabi
 RAWIL KHAN ADVOCATE
 High Court of Swabi

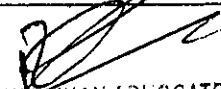
| | | | | |
|-----|--------|------------------|---------------------|-----------------------|
| 89 | 781 | Haseeba Shahwar | Mubrak Akbar | GGPS Yar Hussain 1 |
| 90 | 783 | Najma Begum | Safi Ullah | GGPS Baja |
| 91 | 785 | Bushra Jameel | Inayat ul Jameel | GGPS Dagal 3 |
| 92 | 786 | Afsha Naz | Saleem Khan | GGPS Lahor 1 |
| 93 | 788 | Tahira Syed | Syed Mehar Ali Shah | GGPS Bam Khel |
| 94 | 789 | Waheeda Begum | Said Johar | GGPS Ismaila 1 |
| 95 | 790 | Aqeela Begum | Muhammad Tahir | GGCMS Muhib Banda |
| 96 | 792 | Hashmat Bibi | Muhammad Irshad | GGPS Manki 2 |
| 97 | 793 | Tabassum Begum | Rustam Khan | GGPS Kunda 1 |
| 98 | 794 | Shakeela Naz | Israr Ullah | GGPS Sheikh Jana 2 |
| 99 | 795 | Shahnaz Begum | Bini Ameen | GGPS Ziam Y/H |
| 100 | 797 | Sabeena Begum | Hanif ullah | GGCMS Yar Hussain 3 |
| 101 | 746 | Robi Tabassum | Sabz Ali | GGPS Sheikh Dheri 1 |
| 102 | 798 | Tahira Bibi | Main Ithaj ud din | GGPS Sudher 1 |
| 103 | 799 | Hidayat Begum | Khan Sherin | GGPS Jhangira 2 |
| 104 | 498 | Kamila Zuhra | Faqir Muhammad | GGPS Jaisal 2 |
| 105 | 800 | Rakhshanda Begum | Sardar uddin | GGPS Lahor 1 |
| 106 | 801 | Robina Salar | Salar Khan | GGPS Tarakai 2 |
| 107 | 802 | Sabiha Naz | Saif ur Rahman | GGPS Swabi 3 |
| 108 | 803 | Tilawat Zeb | Aurang zeb | GGPS Sudher 2 |
| 109 | — 1497 | Hazira Begum | Alam Zeb | GGPS Dagal |
| 110 | 804 | Musarrat Ghafoor | Ghfaoor Khan | GGPS Turlandi 2 |
| 111 | 648 | Shamshad Begum | Safi Ullah | GGPS Baja |
| 112 | 805 | Rahila Naz | Sardar Khan | GGPS Kotha 1 |
| 113 | 808 | Hadia Begum | S.Ahmad Ali Shah | GGCMS Daulat Abad |
| 114 | 809 | Faheem Begum | Fazal Akbar | GGPS Qazi Abad |
| 115 | 810 | Tasreen | Zulqadr | GGPS Bagh Haram |
| 116 | 812 | Basbeeda Begum | Salah ud Din | GGCMS Panj Pir |
| 117 | 814 | Naheeda Yasmeen | Syed Mohd Quresh | GGPS Mian Dheri |
| 118 | 815 | Illaz Begum | Malik Hayat | GGPS Tarakai 1 |
| 119 | 817 | Neelam Naz | Anwar Sher | GGPS Ismaila 1 |
| 120 | 818 | Asim | Hazrat Wali | GGPS Shamroz Abad |
| 121 | 820 | Sobia Tausif | Muhammad Zarin | GGPS Topi 2 |
| 122 | 821 | Shakeela Israr | Israr Khan | GGCMS Muhib Banda |
| 123 | 822 | Robina Begum | Shamsut Tabraiz | GGPS Sard Cheena 1 |
| 124 | 823 | Momina Begum | Mahboob Khan | GGPS Zalda 3 |
| 125 | 824 | Shamim | Misal Khan | GGPS Shewa 2 |
| 126 | 825 | Saddiqa Begum | Alam Baz | GGPS Dodher 1 |
| 127 | 826 | Asia Bano | Abdul Wadood | GGPS Sheikhana Jana 3 |
| 128 | — 1607 | Basmina | Syed Bahadar | GGPS Beesak |
| 129 | 828 | Shabeena Hayat | hayat khan | GGPS Bhattain Banda |
| 130 | 829 | Nagina Begum | Amir Mohammad | GGPS Marghuz 2 |
| 131 | — 1325 | Mukhtiar Begum | Gul Omar | GGPS Sokell 2 |
| 132 | 831 | Zahida Begum | Muhammad Amin | GGPS Amrai Payan |
| 133 | 832 | Basmeena | Nawab Gul | GGPS Jhangira 1 |
| 134 | — 1716 | Naznin | Zarin Khan | GGPS Naro Banda 2 |
| 135 | 833 | Farhadia | Sarwar Shah | GGPS Ulta 1 |
| 136 | 834 | Nusrat Shaheen | Zarin Mohammad | GGPS Darra 1 |
| 137 | 835 | Sadia Gohar | Gohar Khan | GGPS Ulta 4 |
| 138 | 836 | Saiqa Naz | Manzoor Ali | GGPS Bam Khel |
| 139 | 837 | Shahnaz | Wali Muhammad | GGPS Gulshan Abad |
| 140 | 838 | Zeenat Begum | Kirmat khan | GGPS Doblan 2 |
| 141 | 840 | Wilayat Ali Khan | Arab Ali Khan | GGCMS Roshan Pura |
| 142 | 841 | Lubna Jabeen | Khan Sher | GGPS Panj Pir 1 |
| 143 | 842 | Zaib un Nisa | Sahib Zar | GGPS Shewa 2 |


 RAJNI KAUR ADVOCATE
 H-10, G-1, Swabi

| | | | | |
|-----|-----|------------------|--------------------|------------------------|
| 144 | 843 | RAMEEM BEGUM | Samar Kund | GGCMS Haji Abad |
| 145 | 844 | YASMEEN BEGUM | Munawar Khan | GGPS Takha |
| 146 | 845 | Najma | Munfat Khan | GGPS Lahor 1 |
| 147 | 847 | Malika Bibi | Noor Nabi | GGPS Sano Banda Y/H |
| 148 | 850 | Maqboliat Begum | Mohammad Sardar | GGPS Dodher 3 |
| 149 | 851 | Farah Deebe | Muhammad Ikram | GGPS Jalbai 1 |
| 150 | 852 | Wasiha Begum | Saeed Kifayat Shah | GGPS Lahor 2 |
| 151 | 761 | Inayat Begum | Muhammad Sardar | GGPS Musa Banda |
| 152 | 747 | Shagufta Naz | Wasal Shah | GGPS Bam Khel |
| 153 | 765 | Zubaida Aman | Aman Khan | GGPS Darra 1 |
| 154 | 861 | Raheela Naz | Jamsher Khan | GGPS Seri Pabaini |
| 155 | 864 | Shaista Haleem | Abdul Haleem | GGPS Gulzar Abad |
| 156 | 865 | Fazeelat begum | Wazir Muhmmad | GGPS Salah |
| 157 | 866 | Rajida Begum | Muhammad Younas | GGPS Saleem Khan 2 |
| 158 | 867 | Humaira Shams | Shamsul Hakam | GGPS Zarobi 1 |
| 159 | 868 | Imtlaz Kosar | Faqlr Hussain | GGPS Tordher 2 |
| 160 | 869 | Silmata Ara | Kifayatullah | GGPS Batakara |
| 161 | 870 | Mumlikat | Abdul Khaliq | GGPS Maneri Bala 1 |
| 162 | 871 | Naheeda Begum | Sanoobar | GGPS Kaddi Dagai |
| 163 | 872 | Bushra Malik | Fazal Malik | GGPS Baja |
| 164 | 873 | Najma | Maqbool Khan | GGPS Rustam Koroona |
| 165 | 874 | Zuhra Begum | Nisar Ahmad | GGPS Sheikha Jana 3 |
| 166 | 875 | Hashmat | Wazir Khan | GGPS Gajai |
| 167 | 876 | Shahin Begum | Sardar Bahadar | GGPS Aziz Khan Banda |
| 168 | 877 | Musarrat Begum | Gul Jabbar | GGPS Firdos Abad |
| 169 | 878 | Nahid Akhtar | Shams U tabrez | GGPS Nary Wand S/China |
| 170 | 879 | Salma Ghufuran | Ghufuran Ullah | GGPS Dodher 1 |
| 171 | 880 | Rozina Ihsan | Ihsan Ullah | GGPS Tarakai 2 |
| 172 | 881 | Firasat | Zahoor Ullah | GGPS Rafiq Abad |
| 173 | 882 | Shagufta Shaheen | Alyas Khan | GGPS Tarakai 1 |
| 174 | 883 | Tillat Ghafoor | Ghafoor Khan | GGPS Shamroz Abad |
| 175 | 884 | Umera Gul | Noor Sher | GGPS Marghuz 3 |
| 176 | 886 | Nighat | Sher Umar | GGPS Parmoli 1 |
| 177 | 887 | Ramim Bibi | Bahadar Sher | GGPS Ismaila 3 |
| 178 | 888 | Nusrat Ara | Saminul Haq | GGPS Yar Hussain 1 |
| 179 | 890 | Sadaqat Begum | Aurang Zeb | GGPS Kotha 3 |
| 180 | 891 | Nazia Begum | Gulshad Khan | GGPS Kunda 2 |
| 181 | 892 | Naheeda Begum | Gul Muhammad | GGPS Yar Hussain 1 |
| 182 | 895 | Robina Darwaish | Darwaish Khan | GGPS Parra Kalu Khan |
| 183 | 896 | Aqeela Naz | Shah Nazar Khan | GGPS Shamali Banda |
| 184 | 897 | Shaheen Begum | Muneer Muhammad | GGPS Marghuz 1 |
| 185 | 898 | Rashida Begum | Wazir Muhammad | GGPS Kalabat |
| 186 | 901 | Asmat Ara | Said Bahadar | GGCMS Adina |
| 187 | 902 | Furqat | Said Quresh | GGPS Akbar Abad © |
| 188 | 903 | Gulnaz Begum | Sher Wahab | GGCMS Naroo Jadeed |
| 189 | 904 | Tilawat Begum | Muhib Ullah | GGCMS Gujjar Abad |
| 190 | 905 | Aqeela Hayat | Muhammad Hayat | GGCMS Gujjar Abad |
| 191 | 906 | Fozia Munawar | Munawar Khan | GGPS Sadri Jadid |
| 192 | 907 | Fareeda begum | Hazrat nabi | GGPS Akhtar Abad |
| 193 | 908 | Bibi Haleema | Raziq Dad | GGPS Bam Khel |
| 194 | 909 | Fatima Bibi | Raziq Dad | GGPS Bam Khel |
| 195 | 910 | Naheed Kausar | Muhammad Badshah | GGPS Zarobi 1 |
| 196 | 911 | Norina Begum | Jamil Khan | GGPS Sar Koi Payan |
| 197 | 912 | Aqeela Naz | Salif ur Rahman | GGPS Maneri Payan 1 |
| 198 | 913 | Nahida Gul | Gul Said | GGPS Khazana |

RAWIL KHAN ADVOCATE
High Court at Swabi
RAWIL KHAN ADVOCATE
High Court at Swabi

| | | | | |
|-----|------|------------------|------------------|----------------------|
| 199 | 914 | Lalam Naz | Faqir Muhammad | GGSP Maneri Bala 3 |
| 200 | 915 | Bakht Seen | Muhammad Saeed | GGPS Sard Cheena 1 |
| 201 | 917 | Farzana Tabassum | Muhammad Sher | GGPS Kalu Khan 1 |
| 202 | 918 | Sheema Tabassum | Muhammad Sher | GGSP Managi |
| 203 | 920 | Saima Dilbar | Dilbar Khan | GGPS Topi 1 |
| 204 | 921 | Munhadia | Munjra Khan | GGPS Shera Ghund |
| 205 | 923 | Wilayat Ilyas | Muhammad Ilyas | GGPS Rafiq Abad |
| 206 | 924 | Rozina Begum | Taj Muhmmad | GGPS Unwan Abad |
| 207 | 925 | Nargis Shaheen | Muhammad Siraj | GGPS Khoro Banda |
| 208 | 926 | Shagufta Haleem | Abdul Haleem | GGPS Shera Ghund |
| 209 | 927 | Zavia Begum | Shafaras Khan | GGPS Sheikh Jana 2 |
| 210 | 928 | Anjum Ara | Pir Muhammad | GGPS Kalabat |
| 211 | 929 | Farzana Wasil | Wasil Khan | GGCMS Parmoli |
| 212 | 930 | Millat Zari | Adil Shah | GGPS Swabi 1 |
| 213 | 931 | Shahnaz Bibi | Khan Ghalib | GGPS Sanalai |
| 214 | 933 | Sadaqat Begum | Ghuncha Gul | GGPS Tordher 2 |
| 215 | 934 | Asia Begum | Muhammad Zahid | GGPS Wali M Kothey |
| 216 | 935 | Shahab Gul | Waqif Ali Shah | GGPS Nazar Banda |
| 217 | 937 | Shuhrat Ara | Mahabat Khan | GGPS Bachai 2 |
| 218 | 938 | Shakeela | Sultan Muhammad | GGCMS Yar Hussain 3 |
| 219 | 939 | Jehan Ara | Fazli Akbar | GGPS Turlandi 2 |
| 220 | 940 | Shahida | Umar Khatab | GGPS Qasam Mathra |
| 221 | 941 | Farkhanda Gul | Muhammad Nabi | GGPS Topi 1 |
| 222 | 942 | Saeeda Bibi | Rahman Shah | GGPS Ismaila 2 |
| 223 | 943 | Saddiqa Bibi | Muhammad Shah | GGPS Mansabdar |
| 224 | 944 | Tahmeena Begum | Abdullah Jan | GGPS Shera Ghund |
| 225 | 947 | Tabassum Begum | Samin Jan | GGPS Hamlet |
| 226 | 948 | Himayat Begum | Gul Habib | GGPS Islam Banda |
| 227 | 949 | Adeeba Naz | Samin Jan | GGPS Juma Khan Garai |
| 228 | 951 | Tabassum Rana | Haaz Ali | GGPS Jalbai 4 |
| 229 | 377 | Robina Raziq | Fazal Raziq | GGPS Kaddi 1 |
| 230 | 953 | Khalida Syed | Gul Syed | GGPS Kalabat |
| 231 | 955 | Rubina Syed | S.M Rana | GGPS Sher Baz Banda |
| 232 | 79 | Parveen Israr | israr ud din | GGPS Sudher 3 |
| 233 | 960 | Nahid Begum | Sikandar Khan | GGPS MDK Banda |
| 234 | 961 | Nusrat | Sajawal Khan | GGPS KSK 1 |
| 235 | 962 | Bibi Aisha | Izhar ul Haq | GGPS Pontla |
| 236 | 963 | Shafsta Naz | Shamsher Ali | GGPS Gandaf M Khel |
| 237 | 964 | Nabeela Izhar | Izhar ul Haq | GGPS Pontla |
| 238 | 974 | Nazia Begum | Saeed Gul | GGPS Gar Munara |
| 239 | 975 | Nazma Gul | Rustam Ali | GGPS Islam Banda |
| 240 | 979 | Tasneem Kausar | Inayat Ullah | GGPS Qadami |
| 241 | 950 | Azra Begum | Ghulam Nabi | GGPS Kaddi 1 |
| 242 | 980 | Arshida Begum | Numan Khan | GGPS Gar Munara |
| 243 | 853 | Shabnam | Sherin Bahadar | GGPS Bam Khel |
| 244 | 859 | Sumaira Ambareen | Sher Aslam Khan | GGPS Bam Khel |
| 245 | 973 | Sameena Naz | Syed Adil Shah | GGPS Juma Khan Garai |
| 246 | 573 | Humera Parvaiz | Mohammad Parvaiz | GGPS Marghuz 2 |
| 247 | 976 | Aafia Aslam | Sher Aslam Khan | GGPS Gar Munara |
| 248 | 855 | Roheena Akhtar | Rustam Ali | GGPS Kunda 2 |
| 249 | 985 | Nageena Begum | Sher Hassan | GGPS Thand Koi |
| 250 | 1058 | Faraha Deebea | Inyat rehman | GGPS Ball banda |
| 251 | 977 | Naeema Begum | Aurang Zeb | GGPS Gandaf Dhero |
| 252 | 968 | Rana Begum | Sameen Jan | GGPS Hamlet |
| 253 | 476 | Ghazala Yasmeen | Ghulam Khan | GGPS Gar Munara |


 RAWIL KHAN ADVOCATE
 High Court at Swabi
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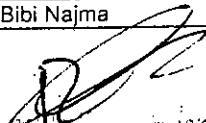
14

| | | | | |
|-----|------|------------------|-----------------|-------------------------|
| 254 | 996 | Hamida Naz | Shah Nos | GGPS Shalmani |
| 255 | 999 | Arifa Naz | Sayyad Nawaz | GGPS Dalori Bala |
| 256 | 1000 | Rifaqat Begum | Gharib Shah | GGPS Laren Gadoon |
| 257 | 1001 | Gul Nasrin | Mehraban Shah | GGPS Aaru Banda |
| 258 | 1003 | Shakila Firdos | Ferdos Khan | GGPS Naro Banda 1 |
| 259 | 1008 | Saima | Subhanullah | GGPS Beka 2 |
| 260 | 1009 | Begum | Haseem Jan | GGPS Sheikh Dheri 1 |
| 261 | 1010 | Hadia Begum | Muhammad Naseer | GGPS Jhangira 2 |
| 262 | 1011 | Safia Afsar | Sher Afsar Khan | GGPS Qasam Banda |
| 263 | 1012 | Robina Naz | Sher Wali | GGPS Jhangira 2 |
| 264 | 1013 | Rahila Handadi | Muzafar Khan | GGCMS Lahor |
| 265 | 1014 | Bakhtoor | Amir Nawab Khan | GGPS Panj Pir 1 |
| 266 | 1015 | Nusrat Begum | Muqarrab Khan | GGPS Maneri Bala 1 |
| 267 | 1016 | Maryam Shazia | Jamil Rahmat | GGPS Tordher 5 |
| 268 | 1017 | Shahista Bano | Haji ur Rahman | GGPS Salah |
| 269 | 1018 | Falak Naz | Masal Khan | GGPS Jalbai 1 |
| 270 | 1020 | Safia | Syed Laiq Shah | GGPS Zahir Abad |
| 271 | 1021 | Falak naz | Ameer Sultan | GGPS Manki 1 |
| 272 | 1022 | Shagufta Nasreen | Haya Gul | GGPS Tano |
| 273 | 1024 | Rehana Naz | Dilawar Shah | GGPS Pabaini 1 |
| 274 | 1025 | Robina Shah | Sakhawat Shah | GGPS Khisha |
| 275 | 1026 | Basria | Ali Jan | GGPS Naranji 2 |
| 276 | 1027 | Nagina Shirin | Shirin Khan | GGPS Gabai |
| 277 | 1028 | Aisha Naz | Muhammad Inam | GGPS Pontia |
| 278 | 1029 | Rukhsana Wasal | Jaipoor Khan | GGPS Shahdad Killi |
| 279 | 1030 | Nargis | Meher Rahman | GGPS Kunda 1 |
| 280 | 1031 | Shah Begum | Niaz Muhammad | GGPS Kalabat |
| 281 | 1032 | Faheema | Abdul Ghani | GGPS Rana Ghari |
| 282 | 1033 | Shazia Begum | Redi Khan | GGCMS Naroo Jadeed |
| 283 | 1034 | Rukya Naz | Abdul Majeed | GGPS Batakara |
| 284 | 1035 | Hameeda Naz | Sher Muhmmad | GGPS Lahor 1 |
| 285 | 1036 | Nargis | Akram Shah | GGPS Jalsai 2 |
| 286 | 1037 | Folada | Muhammad Yusaf | GGPS Bodu Wand |
| 287 | 1038 | Naveeda Yousaf | Yusaf Jamal | GGPS Jhangira 2 |
| 288 | 1039 | Basal Wara | Nawab Shah | GGPS Seri Pabaini |
| 289 | 1040 | Kaloom | Sami Ullah | GGPS Jhangira 2 |
| 290 | 1041 | Tofeut | Saadullah G | GGPS Hund 1 |
| 291 | 1042 | Farkhanda | Gulam Sarwar | GGPS Anbar 1 |
| 292 | 1043 | Ulfat | Gul Hayat | GGPS Nabi |
| 293 | 1044 | Anmwa | Muhammad Ilyas | GGPS Jhangira 2 |
| 294 | 1045 | Baslikat | Sultan Shah | GGPS Tano |
| 295 | 1047 | Fatima | Zamoosh | GGPS Asota Sharif |
| 296 | 1048 | Akhtar Meena | S.Amir Sultan | GGPS Manki 1 |
| 297 | 1049 | BiBi Sohila | Mohd Iqbal | GGPS Rana Ghari |
| 298 | 1050 | Sadia Amir | Amir Bahadar | GGPS Topi 3 |
| 299 | 1051 | Bakht Zari | Yousef Khan | GGPS Beka 2 |
| 300 | 1052 | Khatoon Wara | Nawab Shah | GGPS Seri Pabaini |
| 301 | 1054 | Nageena Begum | Mushtaq Hussain | GGPS Anbar 2 |
| 302 | 1055 | Saima Begum | Khair Afzal | GGPS Anbar 1 |
| 303 | 1056 | Shahnaz Begum | Zarin Taj Gul | GGPS Sard Cheena 1 |
| 304 | 1057 | Zubaida | Zar Khan | GGCMS Yaqoob shah Dhoke |
| 305 | 1059 | Tofeeqa | Bahadar Sher | GGPS Tordher 3 |
| 306 | 1060 | Shazia Begum | Noor Bahdar | GGPS Anbar 1 |
| 307 | 1062 | Naseem Taj | Ali Haider | GGPS Lahor 2 |
| 308 | 1065 | Shahnaz Gul | Ghulam Akbar | GGPS Tordher 3 |

RAWIL KHAN ADVOCATE
High Court at Swabi
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| | | | | |
|-----|------|------------------|----------------------|-------------------------|
| 309 | 1066 | Maryam Jamila | Nosher Khan | GGCMS Lahor |
| 310 | 1068 | Fareeda Rahman | Saifur Rehman | GGPS Tordher 3 |
| 311 | 1069 | Farzana | Muhammad Ghani | GGPS Haryan 2 |
| 312 | 997 | Iram Naz | Khan Muhammad | GGPS Kotha 3 |
| 313 | 1070 | Musarrat Shaheen | Sameen Jan | GGPS Shah Mansoor 1 |
| 314 | 1071 | Nabeela Begum | Naik Muhammad | GGPS Ismaila 2 |
| 315 | 1072 | Gul Reza | Banaris Khan | GGPS Kunda 2 |
| 316 | 1073 | Tilawat Bibi | Hassan Khan | GGPS Lahor 1 |
| 317 | 1075 | Zaib un Nisa | Ghufran Ullah | GGPS Kaddi 1 |
| 318 | 1076 | Shahin Nasrat | Namroz khan | GGCMS Doulat Abad |
| 319 | 1077 | Nasihah | Muhammad France | GGCMS Shewa |
| 320 | 1078 | Shazia Khurshid | Khurshid Khan | GGPS Shera Ghund |
| 321 | 1079 | Sarwar jahan | Abdullah Shah | GGPS Seri Hasan zai |
| 322 | 1080 | Raheela Begum | Said Khan | GGPS Nabi |
| 323 | 1082 | Shahin Begum | Noshad Khan | GGPS Ulta 4 |
| 324 | 1083 | Shamsia | Taj ul Haq | GGPS Jamra 1 |
| 325 | 1085 | Saima Wasil | Wasil Khan | GGPS Parmoli 1 |
| 326 | 1086 | Samina Bibi | Hashim Khan | GGPS Bazar 1 |
| 327 | 1087 | Gulsum | Masam khan | GGCMS Lahor |
| 328 | 1088 | Safia Bibi | Muhammad Raof | GGPS Jalsai 2 |
| 329 | 1089 | Sajida | Muhammad Ullah | GGPS 2 Mankli |
| 330 | 1090 | Sadia Kosar | Jamil Rahmat | GGPS Tordher 1 |
| 331 | 1091 | HASHMAT | Hawaladar | GGPS Yaqubi |
| 332 | 1092 | Aneesa Gul | Muhammad Afzal | GGSP Aurang Abad |
| 333 | 1093 | Shah Nageen | Noor Muhammad | GGPS KSK 3 |
| 334 | 1094 | Zeenab | Sahib Zar Khan | GGPS Karim Abad |
| 335 | 1095 | Naheed Akhatar | Sher Muhammad | GGPS Beka 3 |
| 336 | 1096 | Shaheen | Mumtaz Muhammad Khan | GGPS Turlandi 3 |
| 337 | 1097 | Shuhrat Naz | Faham Dil | GGCMS Adina |
| 338 | 1098 | Balqees Bibi | Ameer Shad | GGPS Yar Hussain 2 |
| 339 | 1099 | Mehnaz Ghafoor | Syed Ghafoor | GGPS Manki 1 |
| 340 | 1101 | Shah e Kalsoom | Syed Fazal Azeem | GGPS Tahir Abad |
| 341 | 1102 | Rafaqat | abdu Gafoor | GGCMS Yaqoob shah Dhoke |
| 342 | 1103 | Basmeen Bibi | Faqir Muhammad | GGPS Lahor 1 |
| 343 | 1105 | Nizakat Sultan | Gul Rahman | GGPS Shingrai |
| 344 | 1106 | Saima Jamshed | Jamshed | GGPS Kalabat |
| 345 | 1107 | Gulania | Sultan Bahadar | GGPS Yousaf Shah Banda |
| 346 | 1108 | Rainaz Ajmal | Ajmal Khan | GGPS Beka Dheri |
| 347 | 1109 | Naz Bibi | Muhammad Bahadar | GGPS A Nawaz Banda |
| 348 | 1110 | Raisat Begum | Khan Sher | GGPS Jalsai 2 |
| 349 | 1111 | Zohra huma | Muhammad Hamayun | GGPS Pezu Ulta |
| 350 | 1112 | Farida Bibi | Gul Bacha | GGSP Managi |
| 351 | 1114 | Shehnaz Begum | Chinar Gul | GGCMS Haji Abad |
| 352 | 1116 | Shah Naz Begum | Ghulam Mustafa | GGPS Nakhtar Gudar |
| 353 | 1117 | Beena Gul | Jamraiz Khan | GGPS Jalbai 3 |
| 354 | 1118 | Tahira Sardar | Sardar Bahadar | GGPS Batakara |
| 355 | 1119 | Noshin Ghaffar | Noorul Ghaffar | GGPS Jamra 2 |
| 356 | 1120 | Sabeha Bibi | Shams ul haq | GGPS Haryan 1 |
| 357 | 1121 | Tahira Bano | Muhammad Tayyab | GGPS Zarobi 1 |
| 358 | 1122 | Tamseela | Haji Bahdar | GGPS Kunda 2 |
| 359 | 1123 | Farzana Rahman | Rahman Ullah | GGPS Maneri Bata 1 |
| 360 | 1124 | Samina Razia | Sahib Shah | GGPS Shingrai |
| 361 | 1125 | Shabeena Naz | Mutahir Shah | GGPS Shah Mansoor 1 |
| 362 | 1126 | Bibi Saeeda | Peer jamal | GGPS Gani chatra |
| 363 | 1127 | Bibi Najma | Mirza Muhammad | GGPS Pak Kia |



JAWID KHAN ADVOCATE
High Court at Swabi

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| | | | | |
|-----|------|-----------------|-------------------|----------------------------|
| 364 | 1129 | Safia Bibi | Amir Nawas | GGPS Suhbat Banda |
| 365 | 1131 | Faheema | Tareen Zada | GGPS Kandaro |
| 366 | 1132 | Buskia Begum | Sardaruddin | GGPS Manki 2 |
| 367 | 1134 | Bakhtun Begum | Zahir Shah | GGPS Panawal |
| 368 | 1135 | Roshan Akhtar | Sher Ali | GGPS Mazghund 1 |
| 369 | 1136 | Farzana Qazi | Sabir Ullah | GGPS Nabi |
| 370 | 1137 | Nasreen Inayat | Inayat ur Rahman | GGPS Basharat Abad |
| 371 | 1138 | Azra Bibi | Sbaz Ali | GGCMS Lahor |
| 372 | 1139 | Sameena | Salim Shah | GGPS Tordher 1 |
| 373 | 1140 | Kosar Inayat | Inayatullah | GGPS Thana Banda |
| 374 | 1141 | Nazia Rustam | Rustam Jan | GGPS Anbar 2 |
| 375 | 1128 | Shahzadi | Sher Zaman | GGPS Beesak |
| 376 | 1142 | Gulnaz Begum | Bahir muhammad | GGPS Rokhany |
| 377 | 1143 | Sumera | Siraj ul Haq | GGPS Gulo Dheri |
| 378 | 1144 | Najma Saleem | Saleem Khan | GGPS Shamroz Abad |
| 379 | 1145 | Tayyeba | Hazrat Noor Bacha | GGPS Qasam Mathra |
| 380 | 1146 | Saima Gul | Attul Haq | GGPS Rustam Koroona |
| 381 | 1147 | Salma Qadir | Muhammad Qadir | GGPS Gulshan Abad |
| 382 | 1148 | Uzma Gul | Jamraiz Khan | GGPS Shahi Bagh Banda |
| 383 | 1149 | Mehnaz | Muhibullah | GGPS Saifoor Banda Tordher |
| 384 | 1150 | Jehan Ara | Muhammad Hassan | GGPS Sheikhha Jana 3 |
| 385 | 1151 | Naila Alam | Alam Sher | GGPS Sheikh Dheri 1 |
| 386 | 1153 | Rania Naz | Fazal Hayat | GGPS Mera Sheikh Jana |
| 387 | 1155 | Shazia | Muhammad yousaf | GGPS Gani chatra |
| 388 | 1156 | Raheela Qureshi | Muhammad Quresh | GGPS Jaba Ulla |
| 389 | 1157 | Bibi Shahida | Abdul Hakam | GGPS Katagram |
| 390 | 1158 | Sabeeha Anjum | Samiullah | GGPS Tordher 1 |
| 391 | 1159 | Najma Jehan | Shah Jehan | GGPS Sadri Jadid |
| 392 | 1160 | Tahira Maryam | Sardar Ali | GGPS Asota Sharif |
| 393 | 1161 | Amina Bibi | Zamir Gul | GGPS Sohbat Banda |
| 394 | 1162 | Busluin Begum | Gulab Rahman | GGPS Dadu Ulla |
| 395 | 1163 | Rubina | Kaboot Khan | GGPS Dewal Gari Payan |
| 396 | 1164 | Khaton Rahman | Alta ur Rahman | GGPS Hemlat |
| 397 | 1165 | Kausar Yusaf | Yousef jamil | GGPS Shaheen Abad |
| 398 | 1166 | Shahana Khatak | Adam Sez Khatak | GGPS Naro Banda 1 |
| 399 | 1167 | Nusrat Begum | Gulab Rahman | GGPS Shnai Kandawo |
| 400 | 1168 | Bibi Wajihal | KHair ud din | GGPS Sandwa |
| 401 | 1169 | Nazrana | Khawaja khan | GGPS Pak Kia |
| 402 | 1170 | Rifat Naz | Fazli Akbar | GGPS Khair Abad |
| 403 | 1171 | Shafina Naz | Ghulam Mustafa | GGPS Ulla 1 |
| 404 | 1172 | Asia Begum | Ziarat Gul | GGPS Baloo |
| 405 | 1173 | Zainab Gul | Gareeb Gul | GGPS Tordher 1 |
| 406 | 1174 | Tamseela | Qalm Shah | GGPS Palas Gabai |
| 407 | 1175 | Nazneen | Jamraiz Khan | GGPS Umar Dok |
| 408 | 1176 | Bibi Hafiza | Muhammad Idrees | GGPS Gani Kot |
| 409 | 1177 | Saiqa Bibi | Muhammad Javaid | GGPS Ferozpur Jalbai |
| 410 | 1004 | Neelam Siddiqui | Muhammad Siddiq | GGPS Sokeli 2 |
| 411 | 1178 | Rukya Naz | Mian Zaman khan | GGPS Kabgani |
| 412 | 1310 | Bakht Niaz | Sahib Shah | Gul Abad Amral |
| 413 | 1006 | Noor Jahan | Angez Khan | GGPS Sandwa |
| 414 | 1179 | Nizakat Begum | Muqaddar Khan | GGPS Dagai |
| 415 | 1180 | Gulfam | Amir Hatam | GGPS Anwar Shah |
| 416 | 1181 | Asia Begum | Said Jabbar | GGPS Parmoli 1 |
| 417 | 1182 | Roveeda | Misal Khan | GGPS Bam Khel |
| 418 | 1183 | Bibi Misban | Minhaj ur Rahman | GGPS Ismail Abad Darra |

RAWIL KHAN ADVOCATE
High Court at Swabi

| | | | | |
|-----|------|---------------------|------------------|----------------------------|
| 419 | 1184 | Hamida Naz | Bacha Sultan | GGPS Kaddi 1 |
| 420 | 1185 | Baseerat Jamal | Hussain Ali | GGPS Saqi Mohd Kothey |
| 421 | 1186 | Khalida Begum | Mian Khan | GGPS Hal Banda |
| 422 | 1187 | Farzana Habib | Habib un Nabi | GGPS Darra 1 |
| 423 | 1188 | Mubashera | Bashir ud Din | GGPS Fazli Rahim Banda |
| 424 | 1189 | Zaib un Nisa | Nadar Khan | GGPS Fazal Abad (P) |
| 425 | 1190 | Azra Tasneem Akhtar | Ali Gohar | GGPS Geedar Band |
| 426 | 1191 | Nuzzat Shahin | Taj Bahadar | GGPS Topi 2 |
| 427 | 1192 | Naeem | Said Ul Abrar | GGCMS Yaqoob shah Dhoke |
| 428 | 1193 | Ramim Begum | Kitab Shah | GGPS Amrai Bala |
| 429 | 1194 | Salma Gul | Nazar Muhammad | GGPS Topi 1 |
| 430 | 1195 | Farzana Tabsum | Sultan Muhammad | GGPS Babu Dheri |
| 431 | 1196 | Bibi Hadia | Raj Wali Khan | GGPS Swabi 1 |
| 432 | 1197 | Nagina Naz | Fazal e Ameen | GGPS Saleem Khan 2 |
| 433 | 1198 | Anees Naz | Hazrat Wahab | GGCMS Shahid Ullah Banda |
| 434 | 1199 | Riasat | Roshin Khan | GGPS Mir Afzal |
| 435 | 1200 | Lubna Qamar | Gul Sad Bar | GGPS Baloo |
| 436 | 1201 | Dil Bahar | Muhammad Sher | GGPS Shera Ghund |
| 437 | 1202 | Falak Naz | Juma Khan | GGPS Saifoor banda Tordher |
| 438 | 1204 | Gul Siya | Raham said | GGPS Kalu Khan 2 |
| 439 | 1205 | Shazia | Amir Rahman | GGPS Geedar Band |
| 440 | 1207 | Nizakat | Nadar Shah | GGPS Kotha 2 |
| 441 | 1208 | Rozina Khan | Mir Ghawas | GGPS Parmoli 1 |
| 442 | 1209 | Shakeela Naz | Fazal Dayan | GGPS Dobian 1 |
| 443 | 1210 | Mehnaz Begum | Pir Said | GGPS Panjman |
| 444 | 1211 | Dur Shahwar Gul | Zeenat Ali | GGPS Thana Banda |
| 445 | 1212 | Dur e Samin | Sher Afzal Khan | GGPS Battli 1 |
| 446 | 1213 | Ashtab | Mir Qadar | GGSP Maneri Payan 2 |
| 447 | 1215 | Rifayat | Sher Bahadar | GGPS Lahu Dheri |
| 448 | 1216 | Sadia Shireen | Muhammad Shireen | GGPS Mangal chai 3 |
| 449 | 1217 | Bushra | Dilbar Khan | GGPS Jamal Abad |
| 450 | 1218 | Tehsin Bibi | Minhaj ur Rahman | GGPS Jatsai 2 |
| 451 | 1221 | Nighat Bibi | Muhammad Irshad | GGPS Manki 2 |
| 452 | 1224 | Nighat Seema | Mir Akbar Shah | GGPS Jangi Dher |
| 453 | 1225 | Uzma | Mughal Baz | GGPS Maneri Payan 1 |
| 454 | 1227 | Razayat | Roshan Khan | GGPS Qasam Mathra |
| 455 | 1228 | Lubna | Jamil akbar | GGPS Dobian 1 |
| 456 | 1229 | Bibi Nazia | Abdur Raziq | GGPS Bada Sar |
| 457 | 1230 | Shahnaz Jehan | Amir Jehan | GGPS Khisha |
| 458 | 1002 | Tajmeen Begum | Mian Khan | GGPS Gabasni 2 |
| 459 | 1233 | Basmeen Tabasum | Abdul Ghafoor | GGPS Ferozpur Jalbai |
| 460 | 1234 | Shazia | Afsar Khan | GGCMS Yaqoob shah Dhoke |
| 461 | 1236 | Shazia Jehan | Amir Jehan | GGPS Habib Abad |
| 462 | 992 | Shamim Ara | Rahim Gul | GGPS Kund |
| 463 | 1240 | Jamila Rahman | Faqir Rahman | GGPS Boon Shoon |
| 464 | 1219 | Gul Naz Begum | Shir Muhammad | GGPS Serai Utman Zai |
| 465 | 1241 | Nighat Ishfaq | Waris Khan | GGSP Saleem Khan 2 |
| 466 | 1242 | Umera Naz | Janas Khan | GGPS Saleem Khan 2 |
| 467 | 1243 | Hussan Pari | Aziz Khan | GGPS Muhd Akbar Khan Killi |
| 468 | 1244 | Farzana Yasmeen | Muhammad Younas | GGPS Firdos Abad |
| 469 | 1245 | Sareer | Maqbool Khan | GGPS Jalbai 1 |
| 470 | 1247 | Rabia Begum | Sher Muhmmad | GGPS Tordher 2 |
| 471 | 1248 | Mehrun Nisa | Abdul Zaman | GGPS Seri Chanal |
| 472 | 1249 | Arjumand Shaheen | Abdul Hadi | GGSP Parra Kalu Khan |
| 473 | 236 | Shakila Naz | Israr ul Arifeen | GGPS No.2 Marghuz |


 JAWID KHAN ADVOCATE
 High Court at Swabi

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|-----|-----|-----------------|------------------|-------------------|
| 474 | 437 | Khalida Perveen | Fazal Dad | GGPS Saproona |
| 475 | 483 | Nasira Israr | Israr ul Arifeen | GGPS No.2 Marghuz |
| 476 | 571 | Tanveer Begum | Anwar ul Haq | GGPS B.Desh Banda |
| 477 | 604 | Nousheen Akhtar | Said Qamar | GGPS No.2 KSK |
| 478 | 626 | Asia Naz | Israr Ullah | GGPS No.2 KSK |
| 479 | 628 | Majida Begum | Waris Khan | GGPS No.2 Marghuz |
| 480 | 632 | Naila Begum | Amir Nawaz | GGPS No.2 Bachai |

Terms and conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their service can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter Se-Seniority on lower post will remain intact.
6. No No TAVPA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service Books to the effect that if any over payment is made to him in the light of this order will be recovered and if she is wrongly promoted he will be reversed.
8. From S.No.473 to 480 are forego their promotion before the adjustment on PSHT-15 due to domestic problems, Enimety or illness it will be adjusted in on top priority basis.

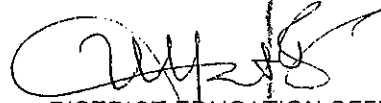
(ULFAT BEGUM)
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Endst:No. 1535-4 /Dated Swabi the:- 12/7 /2014

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

1. Diorector E & SE Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner, Swabi.
3. District Accounts Officer, Swabi.
4. All SDEO (Female) Swabi Distgriect.
5. Superintendent Local Office.
6. ADEO (Primary) Local Office.
7. Officials concerned.

RAWIL KHAN
High Comm at Swabi


DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

To

(19)

The Distt. Education Officer (P)

Appeal Swabi

Subject: B Connection in PST (P) Seniority List / B-14 Upgradation.

Respected Madam,

with due respect, It is stated that I have been appointed as PST in the Education Department & took over charge on 20¹⁰/₂₀₀₄.

Now, with your office notification for upgradation to B-14, My name has been left out while my other fellows of Session 2004 & even 2007 have been included in the notification.

I therefore request to review my case of upgradation to BPS-14 as I am not on long leave, nor suspended nor anything outstanding against me. I once again request for your kind consideration & attention.

Note Photocopy of 1st appointment order / First charge report & photocopy of my service book etc. are attached.

Dilman Naz
Yours obediently.

Dilman Naz PST (P)
GPS Permal

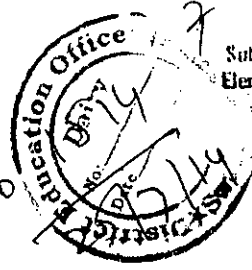
No 4724 Dated 24/7/2014. Mob # 8344-982560 or 8346-9813397

Recommended & Forwarded in original alongwith other relevant documents to the DDO (P) Swabi for favourable consideration please.

RAWAL ADVOCATE
High Court at Swabi

RAWAL ADVOCATE
High Court at Swabi

Kamal Khan 25/7
Sub-Divisional Education Officer (I)
Elementary & Secondary Edu: Swabi



(20)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SWABI

Adjustment of Senior Primary School Teacher(Female)

Consequent upon the promotion order issued vide Notification Endst:No.248-G dated 31-01-2015 the following Senior Primary School Teacher BPS-14 are hereby adjusted against the posts of the Senior Primary School teachers in the Schools noted against their names on the terms and conditions given below in the best interest of public service with effect from 31-01-2015.

| S# | Name of Teacher | Name of School | Name of School where promoted/adjusted | Remarks |
|------|-------------------|-------------------------|--|--------------------------------|
| 1 | 3 | 4 | 5 | 6 |
| 1 | Mufeeda Akhtar | GGPS No.2 Maini | GGPS No.2 Maini | Adjusted against SPST-14 Post. |
| 2 | Nishat Begum ✓ | GGPS Asota Sharif | GGPS Asota Sharif | Adjusted against SPST-14 Post. |
| 3 | Hizran Bibi ✓ | GGPS Kula Dhand | GGPS Kula Dhand | Adjusted against SPST-14 Post. |
| 4 | Ummyia Begum ✓ | GGPS No.1 Turlandi | GGPS Shera Ghund | Adjusted against SPST-14 Post. |
| 5 | Mennaz Begum ✓ | GGPS No.1 Dagai | GGPS No.2 Karkawand | Adjusted against SPST-14 Post. |
| 6 | Farzana Kausar | GGPS Hund | GGPS Hund No.1 | Adjusted against SPST-14 Post. |
| 7 | Shakeela Shah | GGPS Zahir Abad | GGPS Zahir Abad | Adjusted against SPST-14 Post. |
| 8 | Basmina | GGPS Beesak | GGPS Beesak | Adjusted against SPST-14 Post. |
| 9 | Zubaida Begum | GGPS Center Saproona | GGPS Center Saproona | Adjusted against SPST-14 Post. |
| 10 | Zari Shan | GGPS No.1 Takail | GGPS No.1 Takail | Adjusted against SPST-14 Post. |
| 11 | Maqooliat Begum ✓ | GGPS No.Kaddi | GGPS Musa Banda | Adjusted against SPST-14 Post. |
| 12 | Shazia Mirdad ✓ | GGPS Dandooqa 1 | GGPS Dandooq No.1 | Adjusted against SPST-14 Post. |
| 13 | Fareeda Khanum | GGPS Yar Hussain 1 | GGPS Yar Hussain 1 | Adjusted against SPST-14 Post. |
| 14 | Farzana Yusuf | GGPS Jhangira 3 | GGPS Jhangira 3 | Adjusted against SPST-14 Post. |
| 15 | Hurnaira Begum ✓ | GGPS Sikandari Dagai | GGPS Sikandari Dagai | Adjusted against SPST-14 Post. |
| 16 ✓ | Farhat Begum ✓ | GGSP Maneri Payan 2 | GGSP Maneri Payan 2 | Adjusted against SPST-14 Post. |
| 17 | Gulnaz Parveen ✓ | GGPS Booqa | GGPS Booqa | Adjusted against SPST-14 Post. |
| 18 | Arshida Begum ✓ | GGPS Dhook | GGPS Dhook | Adjusted against SPST-14 Post. |
| 19 | Rukhsana Wasal ✓ | GGPS Parmolli | GGPS Meher Ali | Adjusted against SPST-14 Post. |
| 20 | Cul Taj begum | GGPS Gul Abad Amrai | GGPS Gul Abad Amrai | Adjusted against SPST-14 Post. |
| 21 | Kausar Iqbal ✓ | GGCMS Roshan Pura | GGCMS Roshan Pura | Adjusted against SPST-14 Post. |
| 22 | Naheed Akhtar ✓ | GGPS Mian Killi | GGPS Mian Killi | Adjusted against SPST-14 Post. |
| 23 | Basmeen ✓ | GGPS Badraga Dagai | GGPS Badraga Dagai | Adjusted against SPST-14 Post. |
| 24 | Dilman Naz ✓ | GGPS Parmoli 1 | GGPS Fazal Abad Parmoli | Adjusted against SPST-14 Post. |
| 25 | Shabana Naz | GGPS Batti 2 | GGPS Batti 2 | Adjusted against SPST-14 Post. |
| 26 | Kalsoom ✓ | GGPS KSK 2 | GGPS Spin Kani | Adjusted against SPST-14 Post. |
| 27 | Shaheen ✓ | GGPS Malik Abad 1 | GGPS Malik Abad 1 | Adjusted against SPST-14 Post. |
| 28 | Basria ✓ | GGPS Gulshan Abad | GGPS Gulshan Abad | Adjusted against SPST-14 Post. |
| 29 | Farkhanda Aslam ✓ | GGPS Gulshan Abad | GGPS Gulshan Abad | Adjusted against SPST-14 Post. |
| 30 | Bakhtmin Taj | GGPS Salketar 2 | GGPS Salketar 2 | Adjusted against SPST-14 Post. |
| 31 | Tahira Bashir | GGCMS Fazli Rahim Banda | GGCMS Fazli Rahim Banda | Adjusted against SPST-14 Post. |
| 32 ✓ | Zahanat Begum ✓ | GGPS Shagai | GGPS Shagai | Adjusted against SPST-14 Post. |
| 33 | Bibi Haleema | GGPS Gabasni 3 | GGPS Gabasni 3 | Adjusted against SPST-14 Post. |

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SWABI

Adjustment of Senior Primary School Teacher (Female)

Consequent upon the promotion order issued vide Notification Endst:No.248-G dated 31-01-2015 the following Senior Primary School Teacher BPS-14 are hereby adjusted against the posts of the Senior Primary School teachers in the Schools noted against their names on the terms and conditions given below in the best interest of public service with effect from 31-01-2015.

| S# | Name of Teacher | Name of School | Name of School where promoted/adjusted | Remarks |
|----|-----------------|-------------------------|--|--------------------------------|
| 1 | 3 | 4 | 5 | 6 |
| 1 | Mufeeda Akhtar | GGPS No.2 Maini | GGPS No.2 Maini | Adjusted against SPST-14 Post. |
| 2 | Nishat Begum | GGPS Asota Sharif | GGPS Asota Sharif | Adjusted against SPST-14 Post. |
| 3 | Hizran Bibi | GGPS Kula Dhand | GGPS Kula Dhand | Adjusted against SPST-14 Post. |
| 4 | Umniya Begum | GGPS No.1 Turandi | GGPS Shera Ghund | Adjusted against SPST-14 Post. |
| 5 | Mennaz Begum | GGPS No.1 Dagai | GGPS No.2 Karkawand | Adjusted against SPST-14 Post. |
| 6 | Farzana Kousar | GGPS Hund | GGPS Hund No.1 | Adjusted against SPST-14 Post. |
| 7 | ShaKeela Shah | GGPS Zahir Abad | GGPS Zahir Abad | Adjusted against SPST-14 Post. |
| 8 | Basmina | GGPS Beesak | GGPS Beesak | Adjusted against SPST-14 Post. |
| 9 | Zubaida Begum | GGPS Center Sapreona | GGPS Center Sapreona | Adjusted against SPST-14 Post. |
| 10 | Zari Snan | GGPS No 1 Takail | GGPS No.1 Takail | Adjusted against SPST-14 Post. |
| 11 | Maqoolat Begum | GGPS No.Kaddi | GGPS Musa Banda | Adjusted against SPST-14 Post. |
| 12 | Shazia Mirdad | GGPS Dandooqa 1 | GGPS Dandooq No.1 | Adjusted against SPST-14 Post. |
| 13 | Fareeda Khanum | GGPS Yar Hussain 1 | GGPS Yar Hussain 1 | Adjusted against SPST-14 Post. |
| 14 | Farzana Yusuf | GGPS Jhangira 3 | GGPS Jhangira 3 | Adjusted against SPST-14 Post. |
| 15 | Hurnaira Begum | GGPS Sikandari Dagai | GGPS Sikandari Dagai | Adjusted against SPST-14 Post. |
| 16 | Farnat Begum | GGPS Maneri Payan 2 | GGPS Maneri Payan 2 | Adjusted against SPST-14 Post. |
| 17 | Gulraz Parveen | GGPS Booqa | GGPS Booqa | Adjusted against SPST-14 Post. |
| 18 | Arshida Begum | GGPS Dhook | GGPS Dhook | Adjusted against SPST-14 Post. |
| 19 | Rukhsana Wasal | GGPS Parmoli | GGPS Meher Ali | Adjusted against SPST-14 Post. |
| 20 | Gul Taj begum | GGPS Gul Abad Amrai | GGPS Gul Abad Amrai | Adjusted against SPST-14 Post. |
| 21 | Kausar Iqbal | GGCMS Roshan Pura | GGCMS Roshan Pura | Adjusted against SPST-14 Post. |
| 22 | Naheed Akhtar | GGPS Mian Killi | GGPS Mian Killi | Adjusted against SPST-14 Post. |
| 23 | Basmeen | GGPS Badraga Dagai | GGPS Badraga Dagai | Adjusted against SPST-14 Post. |
| 24 | Dilman Naz | GGPS Parmoli 1 | GGPS Fazal Abad Parmoli | Adjusted against SPST-14 Post. |
| 25 | Shabana Naz | GGPS Balti 2 | GGPS Balti 2 | Adjusted against SPST-14 Post. |
| 26 | Kalsoom | GGPS KSK 2 | GGPS Spin Kani | Adjusted against SPST-14 Post. |
| 27 | Shaheen | GGPS Malik Abad 1 | GGPS Malik Abad 1 | Adjusted against SPST-14 Post. |
| 28 | Basria | GGPS Gulshan Abad | GGPS Gulshan Abad | Adjusted against SPST-14 Post. |
| 29 | Farkhanda Aslam | GGPS Gulshan Abad | GGPS Gulshan Abad | Adjusted against SPST-14 Post. |
| 30 | Bakhtmin Taj | GGPS Salketar 2 | GGPS Salketar 2 | Adjusted against SPST-14 Post. |
| 31 | Tahira Bashir | GGCMS Fazil Rahim Banda | GGCMS Fazil Rahim Banda | Adjusted against SPST-14 Post. |
| 32 | Zaharat Begum | GGPS Shagai | GGPS Shagai | Adjusted against SPST-14 Post. |
| 33 | Bibi Haleema | GGPS Gabasni 3 | GGPS Gabasni 3 | Adjusted against SPST-14 Post. |

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|----|-------------------|---------------------------|---------------------------|--------------------------------|
| 34 | Bibi Kalsum | GGPS Ilo 2 Dadher | GGPS Musa Banda | Adjusted against SPST-14 Post. |
| 35 | Hamsiat Begum | GGPS Dabkorona lahor | GGPS Dabkorona lahor | Adjusted against SPST-14 Post. |
| 36 | Mighat Seema | GGPS Swabi 3 | GGPS Swabi 3 | Adjusted against SPST-14 Post. |
| 37 | Rakhshanda | GGPS Maneri Bala 2 | GGPS Kandari Maneri | Adjusted against SPST-14 Post. |
| 38 | Rozeena Begum | GGPS Chagai Pang Pir 2 | GGPS Dara No.1 | Adjusted against SPST-14 Post. |
| 39 | Shaneen Taj | GGSP Aurang Abad | GGSP Aurang Abad | Adjusted against SPST-14 Post. |
| 40 | Farzana Bibi | GGPS Gulo Dheri | GGPS Gulo Dheri | Adjusted against SPST-14 Post. |
| 41 | Bakht Faja | GGPS Kund | GGPS Kund | Adjusted against SPST-14 Post. |
| 42 | Najma Dilbar Khan | GGPS Topi 2 | GGPS Topi 2 | Adjusted against SPST-14 Post. |
| 43 | Samina Farhat | GGPS Kula Dhand | GGPS Kula Dhand | Adjusted against SPST-14 Post. |
| 44 | Nasira Noreen | GGPS kandari Maneri Payan | GGPS kandari Maneri Payan | Adjusted against SPST-14 Post. |

Terms and conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their service can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter Se-Seniority on lower post will remain intact.
6. No TA/ DA is Allowed.
7. They will give an under taking to be recorded in their service Books to the effect that if any over payment is made to him in the light of this order will be recovered and if she is wrongly promoted she will be reversed.

(ULFAT BEGUM)
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Endst: No. 2/36-42 Dated Swabi the:- 05/0 /2015

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

1. Diorector E & SE Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner, Swabi.
3. District Accounts Officer, Swabi.
4. All SDEO(Female) Swabi District
5. Superintendent Local Office.
6. ADEO (Primary) Local Office.
7. Officials Concerned.


DISTRICT EDUCATION OFFICER
(FEMALE) SWABI


OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SWABI

Adjustment of Senior Primary School Teacher(Female)

22

Consequent upon the promotion order issued vide Notification Endst:No.2714-G dated 28-7-2016 the following Senior Primary School Teacher BPS-14 are hereby adjusted against the posts of the Senior Primary School teachers in the Schools noted against their names on the terms and conditions given below in the best interest of public service with effect from 01-8-2016.

| S# | 3 | Name of Teacher | Name of School | Name of School where promoted/adjusted | Remarks |
|----|------|-----------------|----------------------------|--|-------------------------------|
| 1 | 12 | Zubaida Begum | GGPS No.2 Zaida | GGPS No.2 Zaida | Adjusted against SPST-14 Post |
| 2 | 166 | Ihsania | GGPS Kalu Khan 1 | GGPS Kalu Khan 1 | Adjusted against SPST-14 Post |
| 3 | 72 | Musarrat Begum | GGPS Nazim Abad | GGPS Nazim Abad | Adjusted against SPST-14 Post |
| 4 | 230 | Robin Sultan | GGPS Marghuz 2 | GGPS Marghuz 2 | Adjusted against SPST-14 Post |
| 5 | 270 | Nihar | GGPS Kalu Khan 1 | GGPS Kalu Khan 1 | Adjusted against SPST-14 Post |
| 6 | 274 | Farzana | GGPS Saproona Bachal | GGPS Saproona Bachai | Adjusted against SPST-14 Post |
| 7 | 394 | Rukhsana | GGPS Babu Dheri | GGPS Babu Dheri | Adjusted against SPST-14 Post |
| 8 | 441 | Shahnaz Akhtar | GGPS Spin Kani | GGPS Spin Kani | Adjusted against SPST-14 Post |
| 9 | 504 | Wilayat Begum | GGPS Ismaila 2 | GGPS Ismaila 2 | Adjusted against SPST-14 Post |
| 10 | 582 | Himayat Begum | GGPS Marghuz 2 | GGPS Marghuz 2 | Adjusted against SPST-14 Post |
| 11 | 608 | Khalida Akhtar | GGPS KSK 3 | GGPS KSK 3 | Adjusted against SPST-14 Post |
| 12 | 663 | Tasleem Begum | GGPS Marghuz 2 | GGPS Marghuz 2 | Adjusted against SPST-14 Post |
| 13 | 707 | Nasira Khatoon | GGPS Tordher 1 | GGPS Tordher 1 | Adjusted against SPST-14 Post |
| 14 | 736 | Zohra Bibi | GGPS Kabgani | GGPS Kabgani | Adjusted against SPST-14 Post |
| 15 | 776 | Nikraz | GGPS Jabbar | GGPS Jabbar | Adjusted against SPST-14 Post |
| 16 | 835 | Yasmin | GGPS Sher Baz Banda | GGPS Sher Baz Banda | Adjusted against SPST-14 Post |
| 17 | 842 | Bushra Begum | GGPS Gar Munara | GGPS Gar Munara | Adjusted against SPST-14 Post |
| 18 | 865 | Khalida Begum | GGPS Sandowa | GGPS Sandowa | Adjusted against SPST-14 Post |
| 19 | 869 | Shahin Jahan | GGPS Nara Banda | GGPS Nara Banda | Adjusted against SPST-14 Post |
| 20 | 872 | Mushraba Begum | GGPS Leyran | GGPS Leyran | Adjusted against SPST-14 Post |
| 21 | 920 | Dilshad | GGPS Bagh Haram | GGPS Bagh Haram | Adjusted against SPST-14 Post |
| 22 | 1012 | Rifaqat Begum | GGPS Jaba Mazghund | GGPS Jaba Mazghund | Adjusted against SPST-14 Post |
| 23 | 1084 | Nighat Seema | GGPS Potohar | GGPS Potohar | Adjusted against SPST-14 Post |
| 24 | 1092 | Ulfat | GGPS Achelai | GGPS Achelai | Adjusted against SPST-14 Post |
| 25 | 1097 | Shazia | GGPS Shikar Banda | GGPS Shikar Banda | Adjusted against SPST-14 Post |
| 26 | 1122 | Parveen | GGPS Sanoo Banda | GGPS Sanoo Banda | Adjusted against SPST-14 Post |
| 27 | 1123 | Bakht Taj | GGPS Gajai | GGPS Gajai | Adjusted against SPST-14 Post |
| 28 | 1126 | Dilshad Begum | GGPS Mangal Chal 2 | GGPS Mangal Chal 2 | Adjusted against SPST-14 Post |
| 29 | 1129 | Shakila | GGPS Mangal Chal 2 | GGPS Mangal Chal 2 | Adjusted against SPST-14 Post |
| 30 | 1130 | Neelam Begum | GGPS Ulla 3 | GGPS Ulla 3 | Adjusted against SPST-14 Post |
| 31 | 1131 | Naseema Begum | GGPS Malik Abad 1 | GGPS Malik Abad 1 | Adjusted against SPST-14 Post |
| 32 | 1132 | Fahmeeda Begum | GGPS Shagai Panj Pir 1 | GGPS Shagai Panj Pir 1 | Adjusted against SPST-14 Post |
| 33 | 1133 | Gul Salima | GGPS Gandaf 3 | GGPS Gandaf 3 | Adjusted against SPST-14 Post |
| 34 | 1134 | Nighat | GGPS Sudher 3 | GGPS Sudher 3 | Adjusted against SPST-14 Post |
| 35 | 1135 | Basroon | GGPS Qazi Abad | GGPS Qazi Abad | Adjusted against SPST-14 Post |
| 36 | 1136 | Nasia Gul | GGPS Gandaf 3 | GGPS Gandaf 3 | Adjusted against SPST-14 Post |
| 37 | 1136 | Zartaj Begum | GGPS Dadu Ulla | GGPS Dadu Ulla | Adjusted against SPST-14 Post |
| 38 | 1141 | Basmeena Akbar | GGPS Muhd Akbar Khan Killi | GGPS Muhd Akbar Khan Killi | Adjusted against SPST-14 Post |
| 39 | 1142 | Bushra | GGPS Palo Dhand | GGPS Palo Dhand | Adjusted against SPST-14 Post |
| 40 | 1143 | Waheda Begum | GGPS Saleem Khan 1 | GGPS Saleem Khan 1 | Adjusted against SPST-14 Post |
| 41 | 1145 | Nizakat Begum | GGPS Taali | GGPS Taali | Adjusted against SPST-14 Post |
| 42 | 1146 | Humaira Begum | GGPS Shewa 2 | GGPS Shewa 2 | Adjusted against SPST-14 Post |
| 43 | 1147 | Farzana | GGPS Bakar Seri | GGPS Bakar Seri | Adjusted against SPST-14 Post |
| 44 | 1148 | Bil Huda | GGPS Nara Banda | GGPS Nara Banda | Adjusted against SPST-14 Post |
| 45 | 1149 | Shabana Rahib | GGPS Nakhtar Gudar | GGPS Nakhtar Gudar | Adjusted against SPST-14 Post |


 ADVOCATE
 High Court at Swabi
 ADVOCATE
 High Court at Swabi

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| 46 | 1151 | Gul siya | GGPS Gandaf 3 | GGPS Gandaf 3 | Adjusted against SPST-14 Post |
| 47 | 1154 | Menhaj | GGPS Ulla 3 | GGPS Ulla 3 | Adjusted against SPST-14 Post |
| 48 | 1157 | Samina Sahar | GGPS Kolyan | GGPS Kolyan | Adjusted against SPST-14 Post |
| 49 | 1156 | Aasiya Begum(1288) | GGPS Marghuz 2 | GGPS Marghuz 2 | Adjusted against SPST-14 Post |
| 50 | 1158 | Shagufta | GGPS Sokell 1 | GGPS Sokell 1 | Adjusted against SPST-14 Post |
| 51 | 1159 | Tahira Naz | GGPS Nazim Abad | GGPS Nazim Abad | Adjusted against SPST-14 Post |
| 52 | 1160 | Samina Naz | GGPS Aro Banda | GGPS Aro Banda | Adjusted against SPST-14 Post |
| 53 | 1161 | Hashmat | GGPS DOULAT DOBAIN | GGPS DOULAT DOBAIN | Adjusted against SPST-14 Post |
| 54 | 1164 | Anisa Mazhar | GGPS Jhangira 1 | GGPS Jhangira 1 | Adjusted against SPST-14 Post |
| 55 | 1166 | Shaista | GGPS.No.1.Shewa | GGPS.No.1.Shewa | Adjusted against SPST-14 Post |
| 56 | 1169 | Farzana Bibi | GGPS Topi 1 | GGPS Topi 1 | Adjusted against SPST-14 Post |
| 57 | 1170 | Yasmin Kausar | GGPS Topi 2 | GGPS Topi 2 | Adjusted against SPST-14 Post |
| 58 | 1171 | Saeeda Begum | GGPS Khawas Abad | GGPS Khawas Abad | Adjusted against SPST-14 Post |
| 59 | 1172 | Samina Begum | GGPS Kalabat 1 | GGPS Kalabat 1 | Adjusted against SPST-14 Post |
| 60 | 1173 | Menhas | GGPS No.2 Dhodher | GGPS No.2 Dhodher | Adjusted against SPST-14 Post |
| 61 | 1174 | Majida Begum | GGPS Baja | GGPS Baja | Adjusted against SPST-14 Post |
| 62 | 1175 | Yasmin Malik | GGPS Gandaf 2 | GGPS Gandaf 2 | Adjusted against SPST-14 Post |
| 63 | 1176 | Nazira | GGPS Gandaf No.1 | GGPS Gandaf No.1 | Adjusted against SPST-14 Post |
| 64 | 1177 | Bibi Zainab | GGPS Yar Hussain 2 | GGPS Yar Hussain 2 | Adjusted against SPST-14 Post |
| 65 | 1179 | Shahnaz Kausar | GGCMS Gujjar Abad | GGCMS Gujjar Abad | Adjusted against SPST-14 Post |
| 66 | 1181 | Farkhanda Shaheen | GGPS.Lalu Dheri | GGPS.Lalu Dheri | Adjusted against SPST-14 Post |
| 67 | 1187 | Shagufta Abdullah | GGPS Topi 1 | GGPS Topi 1 | Adjusted against SPST-14 Post |
| 68 | 1189 | Aneefa Naz | GGPS Gulo Dheri | GGPS Gulo Dheri | Adjusted against SPST-14 Post |
| 69 | 1191 | Nigal | GGPS Saitetar 2 | GGPS Saitetar 2 | Adjusted against SPST-14 Post |
| 70 | 1193 | Rifaqat | GGPS Lahor 2 | GGPS Lahor 2 | Adjusted against SPST-14 Post |
| 71 | 1196 | Hikayat bibi | GGPS JALBAI BANDA | GGPS JALBAI BANDA | Adjusted against SPST-14 Post |
| 72 | 1197 | Mustazima | GGPS Bada | GGPS Bada | Adjusted against SPST-14 Post |
| 73 | 1202 | Asmal Robi | GGPS TORDHER NO.1 | GGPS TORDHER NO.1 | Adjusted against SPST-14 Post |
| 74 | 1203 | Nishat Begum | GGPS ANBAR NO.2 | GGPS ANBAR NO.2 | Adjusted against SPST-14 Post |
| 75 | 1206 | Noreena Begum | GGPS Polhoher Zaida | GGPS Polhoher Zaida | Adjusted against SPST-14 Post |
| 76 | 1207 | Tahira Naz | GGPS Maini 1 | GGPS Maini 1 | Adjusted against SPST-14 Post |
| 77 | 1209 | Mehnaz | GGPS Shehbaz Pur | GGPS Shehbaz Pur | Adjusted against SPST-14 Post |
| 78 | 1212 | Saira Khan | GGPS Gandaf Payan 1 | GGPS Gandaf Payan 1 | Adjusted against SPST-14 Post |
| 79 | 1218 | Shahnaz | GGPS Jalsai 1 | GGPS Jalsai 1 | Adjusted against SPST-14 Post |
| 80 | 1220 | Razia Begum | GGPS Panj Pir 1 | GGPS Panj Pir 1 | Adjusted against SPST-14 Post |
| 81 | 1221 | Nabiya | GGPS Asota Sharif | GGPS Asota Sharif | Adjusted against SPST-14 Post |
| 82 | 1222 | Uzma | GGPS Baja | GGPS Baja | Adjusted against SPST-14 Post |
| 83 | 1227 | Anwar Zia | GGPS Swabi 3 | GGPS Swabi 3 | Adjusted against SPST-14 Post |
| 84 | 1228 | Anwar Zia | GGPS Mansabdar | GGPS Mansabdar | Adjusted against SPST-14 Post |
| 85 | 1229 | Usmania | GGPS KSK 3 | GGPS KSK 3 | Adjusted against SPST-14 Post |
| 86 | 1230 | Saeeda Begum | GGPSNo.1.Permoli | GGPSNo.1.Permoli | Adjusted against SPST-14 Post |
| 87 | 1234 | Shaista Qamar | GGPS Jalbal 2 | GGPS Jalbal 2 | Adjusted against SPST-14 Post |
| 88 | 1235 | Zakia Mehnaz | GGPS BAZAR NO.1 | GGPS BAZAR NO.1 | Adjusted against SPST-14 Post |
| 89 | 1236 | Sanam Seema | GGPS.Asota Sharif | GGPS.Asota Sharif | Adjusted against SPST-14 Post |
| 90 | 1238 | Mahreen Wafadar | GGPS Dagai 5 | GGPS Dagai 5 | Adjusted against SPST-14 Post |
| 91 | 1239 | Robina | GGPS Kaddi 1 | GGPS Kaddi 1 | Adjusted against SPST-14 Post |
| 92 | 1242 | Ummi Hani | GGPS Tand kol | GGPS Tand kol | Adjusted against SPST-14 Post |
| 93 | 1245 | Samia Gul | GGPS Kabganj | GGPS Kabganj | Adjusted against SPST-14 Post |
| 94 | 1246 | Basikat | GGPS Tano | GGPS Tano | Adjusted against SPST-14 Post |
| 95 | 1247 | Nadia Noor | GGPS Dagai 5 | GGPS Dagai 5 | Adjusted against SPST-14 Post |
| 96 | 1249 | Jalwa Garah | GGPS Parmoli 1 | GGPS Parmoli 1 | Adjusted against SPST-14 Post |
| 97 | 1253 | Saira Naz | GGPS Parmoli 1 | GGPS Parmoli 1 | Adjusted against SPST-14 Post |
| 98 | 1256 | Musarrat Shaheen | GGPS Palo Dhand | GGPS Palo Dhand | Adjusted against SPST-14 Post |
| 99 | 1257 | Waheeda Naz | GGPS.No.3.Swabi | GGPS.No.3.Swabi | Adjusted against SPST-14 Post |
| 100 | 1258 | Nadia Alam | GGPS Sheikh Dheri 1 | GGPS Sheikh Dheri 1 | Adjusted against SPST-14 Post |
| 101 | 1260 | ASMAT ZAIN | GGPS Lahor 2 | GGPS Lahor 2 | Adjusted against SPST-14 Post |
| 102 | 1263 | Sajida parveen | GGCMS LAHOR | GGCMS LAHOR | Adjusted against SPST-14 Post |
| 103 | 1264 | Bibi Arifa | GGPS Thand Kol | GGPS Thand Kol | Adjusted against SPST-14 Post |
| 104 | 1266 | Sheema Gul | GGPS.Managal | GGPS.Managal | Adjusted against SPST-14 Post |

RAWAL KHAN ADVOCATE
High Court at Swabi

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| 105 | 1269 | Saiqa Gul | GGPS.Shagai, Maneri | GGPS Shagai, Maneri | Adjusted against SPST-14 Post |
| 106 | 1270 | Surriya Shahab | GGCMS Muhib Banda | GGCMS Muhib Banda | Adjusted against SPST-14 Post |
| 107 | 1271 | Najma Noreen | GGPS Swabi 3 | GGPS Swabi 3 | Adjusted against SPST-14 Post |
| 108 | 1276 | Shah Rukh | GGPS Panj Pir 2 | GGPS Panj Pir 2 | Adjusted against SPST-14 Post |
| 109 | 1277 | Riasat | GGPS Jalsai 4 | GGPS Jalsai 4 | Adjusted against SPST-14 Post |
| 110 | 1280 | Jania Gul | GGPS ANBAR NO.2 | GGPS ANBAR NO.2 | Adjusted against SPST-14 Post |
| 111 | 1281 | Arfeena Begum | GGPS Nabi | GGPS Nabi | Adjusted against SPST-14 Post |
| 112 | 1282 | Sadia | GGPS Kaddi 1 | GGPS Kaddi 1 | Adjusted against SPST-14 Post |
| 113 | 1283 | limat | CMS Shewa | CMS Shewa | Adjusted against SPST-14 Post |
| 114 | 1287 | Shagufta | GGPS Lahor 2 | GGPS Lahor 2 | Adjusted against SPST-14 Post |
| 115 | 1290 | Amina Haider | GGCMS DOULAT ABAD | GGCMS DOULAT ABAD | Adjusted against SPST-14 Post |
| 116 | 1295 | Sadia | GGPS Dalori Bala | GGPS Dalori Bala | Adjusted against SPST-14 Post |
| 117 | 1299 | Shabana | GGCMS Shewa | GGCMS Shewa | Adjusted against SPST-14 Post |
| 118 | 1301 | Anees Zanir | GGPS.No.2.Shewa | GGPS No.2 Shewa | Adjusted against SPST-14 Post |
| 119 | 1302 | Bushra Ghaloor | GGSP Shah Mansoor 2 | GGSP Shah Mansoor 2 | Adjusted against SPST-14 Post |
| 120 | 1304 | Alia Naz | GGPS Lahor 1 | GGPS Lahor 1 | Adjusted against SPST-14 Post |
| 121 | 1305 | Mehwish | GGPS Pabaini 1 | GGPS Pabaini 1 | Adjusted against SPST-14 Post |
| 122 | 1306 | Nighat | GGPS Salkiter 2 | GGPS Salkiter 2 | Adjusted against SPST-14 Post |
| 123 | 1307 | Mujanida | GGPS Gandai Dehro 1 | GGPS Gandai Dehro 1 | Adjusted against SPST-14 Post |
| 124 | 1310 | Sameena Ambareen | GGPS Gulo Dheri | GGPS Gulo Dheri | Adjusted against SPST-14 Post |
| 125 | 1311 | Basmeen Ara | GGPS KUNDA NO.1 | GGPS KUNDA NO.1 | Adjusted against SPST-14 Post |
| 126 | 1315 | Shahnaz Gul | GGPS Tordher 4 | GGPS Tordher 4 | Adjusted against SPST-14 Post |
| 127 | 1318 | Fozia | GGPS Gulo Dheri | GGPS Gulo Dheri | Adjusted against SPST-14 Post |
| 128 | 1320 | Saima Naz | GGPS.No.1.Swabi | GGPS No.1.Swabi | Adjusted against SPST-14 Post |
| 129 | 1322 | Dilshad | GGPS Bagh Haram | GGPS Bagh Haram | Adjusted against SPST-14 Post |
| 130 | 1329 | Sadaf Nisar | GGPS Ismail Abad | GGPS Ismail Abad | Adjusted against SPST-14 Post |
| 131 | 1331 | Uzma Zakir | GGPS JEHANGIRA NO.2 | GGPS JEHANGIRA NO.2 | Adjusted against SPST-14 Post |
| 132 | 1332 | Sadia Gul | GGPS Jhangira 2 | GGPS Jhangira 2 | Adjusted against SPST-14 Post |
| 133 | 1339 | Shahzia | GGPS Tordher 3 | GGPS Tordher 3 | Adjusted against SPST-14 Post |
| 134 | 1344 | Haleema Bibi | GGPS Bam Khel | GGPS Bam Khel | Adjusted against SPST-14 Post |
| 135 | 1345 | Parveen Begum | GGPS Panjman | GGPS Panjman | Adjusted against SPST-14 Post |
| 136 | 1346 | Ambareen Israr. | GGPS Marghuz 3 | GGPS Marghuz 3 | Adjusted against SPST-14 Post |
| 137 | 1348 | Altaf Gohar | GGPS.No.2.KSK | GGPS.No.2.KSK | Adjusted against SPST-14 Post |
| 138 | 1351 | Zia ul Qamar | GGPS Shalmani | GGPS Shalmani | Adjusted against SPST-14 Post |
| 139 | 1352 | Baseena Bibi | GGPS Sar Koi Payan | GGPS Sar Koi Payan | Adjusted against SPST-14 Post |
| 140 | 1357 | Hashmat Ara | GGPS Bakar Seri | GGPS Bakar Seri | Adjusted against SPST-14 Post |
| 141 | 1358 | Safia Naz | GGPS Kaddi 1 | GGPS Kaddi 1 | Adjusted against SPST-14 Post |
| 142 | 1361 | Saiqa Gul | GGPS Ismail Abad Darra | GGPS Ismail Abad Darra | Adjusted against SPST-14 Post |
| 143 | 1362 | Hasrat Kifayat | GGSP Shah Mansoor 3 | GGSP Shah Mansoor 3 | Adjusted against SPST-14 Post |
| 144 | 1363 | Rubina | GGPS Kotha 3 | GGPS Kotha 3 | Adjusted against SPST-14 Post |
| 145 | 1365 | Saima Rahman | GGPS No.1 Marghuz | GGPS No.1 Marghuz | Adjusted against SPST-14 Post |
| 146 | 1366 | Salma Hakeem | GGSP Jamal Abad KSK | GGSP Jamal Abad KSK | Adjusted against SPST-14 Post |
| 147 | 1369 | Haseena | GGPS Baja | GGPS Baja | Adjusted against SPST-14 Post |
| 148 | 1372 | Shazia Begum | GGPS.Shagai Turlendar | GGPS.Shagai Turlendar | Adjusted against SPST-14 Post |
| 149 | 1373 | Asia Begum | GGPS Jalsai 1 | GGPS Jalsai 1 | Adjusted against SPST-14 Post |
| 150 | 1374 | Seema Begum | CMS.Roshan Pura | CMS Roshan Pura | Adjusted against SPST-14 Post |
| 151 | 1375 | Shamia | GGPS Sikandari Dagai | GGPS Sikandari Dagai | Adjusted against SPST-14 Post |
| 152 | 1379 | Saima | GGPS Pothohar Zaida | GGPS Pothohar Zaida | Adjusted against SPST-14 Post |
| 153 | 1384 | Haleema Sadia | GGPS Panj Pir 2 | GGPS Panj Pir 2 | Adjusted against SPST-14 Post |
| 154 | 1389 | Shahida Begum | GGPS JALSAI NO.2 | GGPS JALSAI NO.2 | Adjusted against SPST-14 Post |
| 155 | 1390 | Nadra | GGPS Zarobi 2 | GGPS Zarobi 2 | Adjusted against SPST-14 Post |
| 156 | 1392 | Bakht Bibi | GGPS Kotha 1 | GGPS Kotha 1 | Adjusted against SPST-14 Post |
| 157 | 1393 | Tabassum Rana | GGPS Swabi 3 | GGPS Swabi 3 | Adjusted against SPST-14 Post |
| 158 | 1396 | Bibi Tabassum | GGPS Manki 2 | GGPS Manki 2 | Adjusted against SPST-14 Post |
| 159 | 1398 | Guldasta | GGPS Nabi | GGPS Nabi | Adjusted against SPST-14 Post |
| 160 | 1402 | Nasiba | GGPS MANKI NO.1 | GGPS MANKI NO.1 | Adjusted against SPST-14 Post |
| 161 | 1403 | Mehnaz | GGPS MANKI NO.1 | GGPS MANKI NO.1 | Adjusted against SPST-14 Post |
| 162 | 1405 | Gulnaz | GGPS Kunda 2 | GGPS Kunda 2 | Adjusted against SPST-14 Post |
| 164 | 1407 | Ishrat | GGPS JALSAI NO.3 | GGPS JALSAI NO.3 | Adjusted against SPST-14 Post |

[Handwritten Signature]

RAWIL KHAN
HUMAN RIGHTS ADVOCATE

11111 SWABI

| | | | | | |
|-----|------|------------------|------------------------|------------------------|-------------------------------|
| 165 | 1274 | Haseena | GGPS No.1 Jalsai | GGPS No.1 Jalsai | Adjusted against SPST-14 Post |
| 166 | 1409 | Shaista | GGCMS Lahor | GGCMS Lahor | Adjusted against SPST-14 Post |
| 167 | 1411 | Bibi Asia | GGPS Manki 2 | GGPS Manki 2 | Adjusted against SPST-14 Post |
| 168 | 1412 | Anila Zahid | GGPS Kalabal 1 | GGPS Kalabal 1 | Adjusted against SPST-14 Post |
| 169 | 1413 | Najma Hassan | GGPS Mira Dhoke | GGPS Mira Dhoke | Adjusted against SPST-14 Post |
| 170 | 1414 | Mamoonah Farid | GGPS ISMAIL ABAD | GGPS ISMAIL ABAD | Adjusted against SPST-14 Post |
| 171 | 1416 | Noor Jehan | GGCMS Lahor | GGCMS Lahor | Adjusted against SPST-14 Post |
| 172 | 1417 | Safia Naz | GGPS Jalbai 3 | GGPS Jalbai 3 | Adjusted against SPST-14 Post |
| 173 | 1426 | Saima Mushtaq | GGPS Beka 2 | GGPS Beka 2 | Adjusted against SPST-14 Post |
| 174 | 1429 | Iram Haroon | GGPS Jhangira 1 | GGPS Jhangira 1 | Adjusted against SPST-14 Post |
| 175 | 1431 | Kalsoom Nisar | GGPS Jamra 1 | GGPS Jamra 1 | Adjusted against SPST-14 Post |
| 176 | 1432 | Asan Rehman | GGPS Gar Munara | GGPS Gar Munara | Adjusted against SPST-14 Post |
| 177 | 1434 | Hameeda Naz | GGPS Bam Khel | GGPS Bam Khel | Adjusted against SPST-14 Post |
| 178 | 1436 | Hashmat | GGCMS Roshan Pura | GGCMS Roshan Pura | Adjusted against SPST-14 Post |
| 179 | 1438 | Alia Naz | GGPS Bakyana | GGPS Bakyana | Adjusted against SPST-14 Post |
| 180 | 1439 | Shagufta Naz | GGPS YAQOOBI | GGPS YAQOOBI | Adjusted against SPST-14 Post |
| 181 | 1449 | Majida Begum | GGPS No.1 Baja | GGPS No.1 Baja | Adjusted against SPST-14 Post |
| 182 | 1451 | Kalsoom | GGCMS Shewa | GGCMS Shewa | Adjusted against SPST-14 Post |
| 183 | 1458 | Zainab Bibi | GGPS Chak Sokeli | GGPS Chak Sokeli | Adjusted against SPST-14 Post |
| 184 | 1460 | Azra Parveen | GGPS Bam Khel | GGPS Bam Khel | Adjusted against SPST-14 Post |
| 185 | 1462 | Bushra Begum | GGPS Asola Sharif | GGPS Asola Sharif | Adjusted against SPST-14 Post |
| 186 | 1469 | Sameen | GGPS Bacha Gul Dhok | GGPS Bacha Gul Dhok | Adjusted against SPST-14 Post |
| 187 | 1482 | Sabeeha | GGPS HUND NO.2 | GGPS HUND NO.2 | Adjusted against SPST-14 Post |
| 188 | 1483 | Nargis | GGPS TOROHER NO.1 | GGPS TOROHER NO.1 | Adjusted against SPST-14 Post |
| 189 | 1487 | Brikhna | GGPS Shaheeda Shardara | GGPS Shaheeda Shardara | Adjusted against SPST-14 Post |
| 190 | 1488 | Saima | GGPS LAHOR | GGPS LAHOR | Adjusted against SPST-14 Post |
| 191 | 1490 | Shehla | GGPS Kalabal-1 | GGPS Kalabal-1 | Adjusted against SPST-14 Post |
| 192 | 1492 | Aqeela Naz | GGPS Anbar 2 | GGPS Anbar 2 | Adjusted against SPST-14 Post |
| 193 | 1493 | Raheela | GGPS Haryen 2 | GGPS Haryen 2 | Adjusted against SPST-14 Post |
| 194 | 1496 | Benish Zuhoor | GGPS Sher Abad | GGPS Sher Abad | Adjusted against SPST-14 Post |
| 195 | 1499 | Noreena Tabassum | GGPS Kunda-2 | GGPS Kunda-2 | Adjusted against SPST-14 Post |
| 196 | 1500 | Nadia | GGPS Kunda 1 | GGPS Kunda 1 | Adjusted against SPST-14 Post |
| 197 | 1503 | Toheeda Bibi | GGPS Jalbai 5 | GGPS Jalbai 5 | Adjusted against SPST-14 Post |
| 198 | 1508 | Afseer Nazi | GGCMS YAQOOB SHAH DHOK | GGCMS YAQOOB SHAH DHOK | Adjusted against SPST-14 Post |
| 199 | 1510 | Safina Naz | GGPS Arakh Banda | GGPS Arakh Banda | Adjusted against SPST-14 Post |
| 200 | 1511 | Nasreen | GGPS Bacha Gul Dhok | GGPS Bacha Gul Dhok | Adjusted against SPST-14 Post |

Terms and conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their service can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their inter Se-Seniority on lower post will remain intact.
6. No TA/DA is Allowed.
7. They will give an undertaking to be recorded in their service Books to the effect that if any over payment is made to him in the light of this order will be recovered and if she is wrongly promoted he will be reversed.

(NAGHMANA SARDAR)
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

RAWIL KHAN ADVOCATE
High Court at Swabi

Endst.No. 2797-2804 / Dated Swabi the:- 04/8 / 2016

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

RAWIL KHAN ADVOCATE
High Court at Swabi

1. Director E & SE Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner, Swabi.
3. District Accounts Officer, Swabi.
4. All SDEO(Female) Swabi District
5. Superintendent Local Office.
6. ADEO (Primary) Local Office.
7. Officials Concerned.

District Edu. Officer
(Female) Swabi

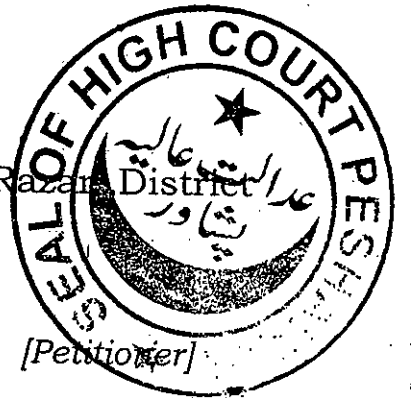
20



BEFORE THE PESHAWAR HIGH COURT,
PESHAWAR

Writ Petition No 4492-P/2016

Dilman Naz PST G.G.P.S Parmoli Tehsil Razan District
Swabi.



[Petitioner]

Versus

1. Director of Eliminary and Secondary Education
K.P.K Peshawar.
2. District Education Officer (Female) Swabi.
3. SDEO (Female) Swabi District Swabi.

-----[Respondents]

WRIT PETITION UNDER ART 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN 1973 FOR DECLARATION TO THE
EFFECT THAT THE ORDER OF RESPONDENT
NO.2,3 DATED 12.07.2014, 05.08.2015 ,
04.08.2016 ARE AGAINST LAW VIDE
OBINITIO INEFFECTIVE UPON THE RIGHTS
OF THE PETITIONER AND CONSIDER
PETITIONER AS BPS-14 FROM 12.07.2014
ALONGWITH BACK BENEFITS.

FILED TODAY **ATTESTE**

Deputy Registrar **EX AMINER**
Peshawar High Ct

26 NOV 2016

4 APR 2017

27 2

PRAYER IN WRIT PETITION :-

On accepting this writ petition the order of respondent No.2 dated 12.07.2014, 05.08.2015 and 04.08.2016 modified and the petitioner may kindly be considered as BPS -14 PST from 12.07.2014 along with full back benefits etc or other order deem fit considered by this Honourable Court.

Respected Sir,

Respectfully Sheweth;

FACTS OF THE CASE :-

1. That the petitioner in serving as PST in education department since 20.10.2004.
2. That as per the proviling policy of the up gradation/ promotion for PST primary side the petitioner completely fit for the promotion of BPS 14.
3. That the petitioner without any reason and deficiencies deprived from promotion on dated 12.07.2014 vide order No 1535.

{Copy of order is attached as annexure "A"}

4. Against sub order of respondent No2 the petitioner file departmental application before respondent No.2 for considering petitioner as BPS 14.

{Copy of application is attached as annexure "B"}

FILED TODAY
Deputy Registrar
26 NOV 2016

ATTESTED
EXAMINER
Peshawar High Court
11 APR 2017

(28) (B)

5. That in 2nd D.P.C for the promotion BPS-14 dated 05.08.2015 although we are selected /promoted but the order reached to us after 15days letter.

{Copy of order is attached as annexure "C"}

6. After got information the petitioner demanded for charge in BPS -14 but the respondent No 2,3 refused to hand over charge to us and saying that your order is expired and told to petitioner filed you documents for the next D.P.C in 2016.

7. When the petitioner went for collecting our documents for the promotion BPS-14 in it was told once again by the respondent No.2, 3 that you are not eligible for the said post cause of you have already in BPS-14 while the petitioner working still in BPS -12 .There is no entry of BPS14 in service book nor the office paid us the benefits for the said post.

8. On dated 04.08.2016 the respondent No.2 issue order BPS -14 up-gradation but once again the name of the petitioner ignored by respondent No.2.

{Copy of order is attached as annexure "D"}

9. That the petitioner is aggrieved from the aforesaid orders dated 12.07.2014, 05.08.2015, 04.08.2016. The petitioner having no other alternate remedy against such illegal orders approached to this Honourable Court and filling this constitutional petition inter alia on the following grounds.

FILED TODAY

Deputy Registrar

26 NOV 2016

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EXAMINER
Peshawar High Court

14 APR 2017

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GR O U N D S :-

A. That all the order of respondent No.2 dated 12.07.2014 ,05.08.2015,04.08.2016 are against law facts and promotion policy and hence not maintainable in law .

B. That the petitioner eligible for BPS 14 from 12.07.2014 being senior but the respondents illegally deprived from promotion committed illegality.

C. That as per policy of the up gradation /promotion for PST the petitioner completely fit for the promotion of BPS 14 but without any reason the petitioner deprived from promotion.

D. That there was no deficiency in relevant papers nor pending any inquiry of department a judicial inquiry against the petitioner.


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26 NOV 2016

ATTESTED
EXAMINER
Peshawar High Court
14 APR 2017

and the petitioner may be promoted to BPS14 from 12.07.2014 alongwith back benefits or any other adequate remedy / relief which the Honourable Bench /August Court deems fit may kindly also be awarded to the petitioners and obliged .

Dated 25-11-2016


PETITIONERS
DILMAN NAZ PST GGPS Parmoli
Through attorney Ali Rehman

Through 
RAWIL KHAN Advocate
High Court
at District Court Swabi

RAWIL KHAN ADVOCATE
High Court at Swabi

CERTIFICATE

Certified that as per instruction of client no such like constitutional petition has earlier been filed by the petitioners in this Honourable Court .

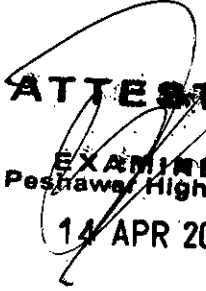

Rawil Khan Advocate **FILED TODAY**
High Court
at District Court Swabi **Deputy Registrar**

RAWIL KHAN ADVOCATE **26 NOV 2016**
High Court at Swabi

LIST OF BOOKS

- A. Constitution of Islamic Republic of Pakistan 1973.
- B. Esta code KPK
- C. Case Law

Advocate

ATTESTED

EXAMINER
Peshawar High Court
14 APR 2017

320 7

BEFORE THE PESHAWAR HIGH COURT,
PESHAWAR

Writ Petition No 442-P/2016

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar , District
Swabi.

----- [Petitioner]

Versus

Director of Eliminary and Secondary Education K.P.K
Peshawar and others

----- [Respondents]

AFFIDAVIT

I Ali Rehman S/O ALI ZAR KHAN special power of
resident of village Shera , Tehsil Razar, District SWABI attorney
of petitioners, do hereby solemnly affirm and declare on oath
that contents of the Constitutional Writ Petition are true and
correct to the best of my knowledge and belief and nothing has
been concealed from this August Court .

Dated : 25/11/2016

Deponent Ali Rehman
Ali Rehman
CNIC No : 16202-61030857

FILED TODAY
Deputy Registrar
26 NOV 2016

12480
I affirm that the above contents are true and correct to the best of my knowledge and belief and nothing has been concealed from this August Court.
Subscribed by me on this 25th day of Nov 16
Ali Rehman
who was identified by me
Rawil Khan Advocate

Identified By : Rawil Khan Advocate
High Court
At Judicial Complex Swabi
RAWIL KHAN ADVOCATE
High Court of Swabi

25/11/16
EXAMINER
Peshawar High Court
14 APR 2017

33 8

BEFORE THE PESHAWAR HIGH COURT,
PESHAWAR

Writ Petition No 442 P/2016

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar ,District
Swabi.

----- [Petitioner]

Versus

Director of Eliminary and Secondary Education K.P.K
Peshawar and others

----- [Respondents]

CORRECT ADDRESSEES OF THE PARTIES

ADDRESS OF THE PETITIONER

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar ,District
Swabi.


ADDRESSES OF THE RESPONDENTS

1. Director of Eliminary and Secondary Education
K.P.K Peshawar.
2. District Education Officer (Female) Swabi.
3. SDEO (Female) Swabi District Swabi.

Dated : 28 11-2016

FILED TODAY
Deputy Registrar
26 NOV 2016

PETITIONERS
Through Special Attorney
Ali Rehman

Through 
RAWIL KHAN Advocate
High Court
at District Court Swabi
RAWIL KHAN ADVOCATE
High Court at Swabi

ATTESTED

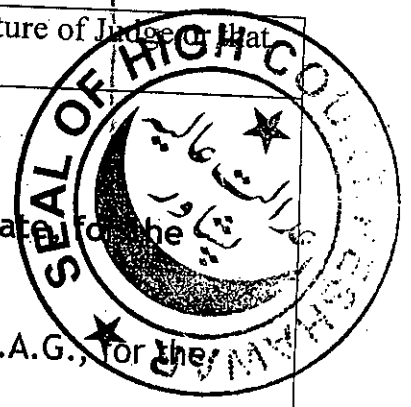
EXAMINER
Peshawar High Court
14 APR 2017

PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET

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| Date of Order or proceedings | Order or other proceedings with Signature of Judge or that of parties or counsel where necessary. |
|------------------------------|--|
| 06.04.2017 | <p><u>W.P.No. 4492-P/16</u></p> <p>Present: Mr. Rawil Khan, Advocate for the petitioner.</p> <p>Mr. Mujahid Ali Khan, A.A.G., for the respondents.</p> <p>.....</p> <p><u>ABDUL SHAKOOR, J.-</u> The petitioner through this petition is seeking issuance of an appropriate writ by making the following prayer therein:-</p> <p>“It is, therefore, most humbly prayed, that on acceptance of this writ petition order of respondent No.2 modified and the petitioner may be promoted to BPS-14 from 12.07.2014 along with back benefits or any other adequate remedy/relief which the Honorable Bench/August Court deems fit may kindly also be awarded to the petitioners and obliged.”</p> <p>2. Concise facts leading to the filing of the instant petition are that the petitioner is serving as PST in education department since 20.10.2004. As per assertion of petitioner, she in view of policy in vogue was entitled to be promoted from BPS-12 to BPS-14 but she was</p> |



GL

ATTESTED
EXAMINER
Peshawar High Court
14 APR 2017

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deprived from that right of promotion without any reason and justification. Against that deprivation, the petitioner filed departmental appeal before respondent No.2. However, she was subsequently promoted on 05.08.2015 which order is available on the file but despite that order she was not given the charge of BPS-14 on the ground that the same order due to expiry has become ineffective. Thereafter respondent No.2 told the petitioner that she may submit her documents for the next DPC which was stated to be held in the year 1016. It was very shocking for the petitioner that her name was missing in the order dated 04.08.2016 where under other teachers of BPS-12 were promoted to BPS-14. In such circumstances, the petitioner is constrained to move this Court through the instant petition for issuance of an appropriate writ for her promotion to BPS-14.

3. This Court, at the very outset of the preliminary arguments, had drawn the attention of the learned counsel for the petitioner towards the status of the petitioner as civil servant and he was further asked as to how this petition in view of clause 1 and 2 of Article 212 of the Constitution has been moved before this Court

ATTESTEDEXAMINER
Peshawar High Court

14 APR 2017

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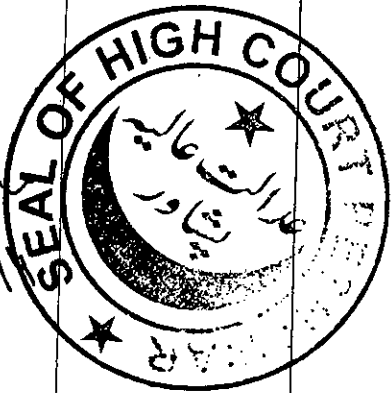
under Article 199 of Constitution of Islamic Republic of Pakistan seeking direction to the respondents for the promotion of petitioner allegedly denied to her, and promotion of civil servant falls within the contemplation of terms and conditions of civil service as visualized by the KPK Civil Servants Act, 1973, the learned counsel for the petitioner in view of above legal position could not put in any justification for filing this petition. Thus, this petition being hit by clause 1 and 2 of Article 212 of the Constitution of Islamic Republic of Pakistan is hereby dismissed in limine.

[Signature]
 JUDGE

Announced:
 06-04-2017

JUDGE

W/ Qaim Raza et al
vs
Mr. Amul Shakoor et al



off
12/1

23665

CERTIFIED TO BE TRUE COPY

Examiner
 Peshawar High Court, Peshawar
 Authorized Under Article 87 of
 The Qanun-e-Shenasai Order 1984

14 APR 2017

No.
 Date of Presentation of Application *06/4/17*
 No of Pages *11*
 Copying fee
 Urgent Fee *44/1*
 Total *1476/17*
 Date of Preparation of Copy *14/4/17*
 Date Given For Delivery *14/4/17*
 Date of Delivery of Copy *21/4/17*

C. V. K. P. S.

وکالت نامہ

(37)

بعدالت سرور میں سرور کو وکیل کا نام لکھا گیا ہے
 نام D. S. O. وکیل
 منجانب راجندر سنگھ دعویٰ یا جرم

تھانہ باعث تحریر آئیکہ ایف آئی آر تاریخ
 مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی بمقام سرور کو وکیل کے لیے
 لکھا گیا ہے

کو بدیں شرط وکیل مقرر کیا ہے میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بروقت
 پکارے جانے مقدمہ جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کرونگا، اگر پیشی پر من
 مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس
 کے کسی طرح ذمہ دار نہ ہونگے، نیز وکیل صاحب موصوف صدر مقام پکھری سے کسی اور جگہ یا پکھری کے
 مقررہ اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہونگے، اگر مقدمہ علاوہ صدر پکھری
 کے کسی اور جگہ سماعت ہونے یا بروز تعطیل سے پکھری کے اوقات کے آگے پیچھے پیش ہونے پر من مظہر کو کوئی
 نقصان پہنچے تو اس کی ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختار نامہ واپس کرنے کے بھی
 صاحب موصوف ذمہ دار ہونگے، مجھ کو کل ساختہ پرواختہ صاحب موصوف مثل کردہ ذات خود منظور و قبول ہوگا
 اور صاحب موصوف کو عرضی دعویٰ و جواب دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی
 درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کا روپیہ
 وصول کرنے اور رسید دینے اور داخل اور ہر قسم کے بیان دینے اور سپرد مالشی و راضی نامہ کو فیصلہ پر خلاف
 کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت اپیل برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ
 درخواست حکم اتنا ہی یا قرتی یا گرفتاری قبل اجراء ڈگری بھی موصوف کو بشرط ادائیگی علیحدہ مختار نامہ پیروی کا
 اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا، یا مقدمہ مذکورہ یا اس کے کسی جزو کی
 کارروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا بیرسٹر کو بجائے اپنے یا پانے ہمراہ
 مقرر کریں اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہونگے جیسے کہ صاحب
 موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا وہ صاحب موصوف کو پورا اختیار ہوگا
 کہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ بھی صاحب موصوف کے برخلاف نہیں ہوگا،
 لہذا یہ مختار نامہ لکھ دیا تاکہ سند رہے۔

مورخہ 21/6/2017ء مضمون مختار نامہ من لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

ال

ال

گواہ شد

Attested & Accepted



بار ایسوسی ایشن نمبر

بار کونسل نمبر

9220238-0344

دستخط وکیل

BEFORE THE SERVICE TRIBUNAL K.P.K, PESHAWAR

Service Appeal No. 41/2018

Mst Dilman Naz PST GGPS Parmoli Tehsil Razar Distrit Swabi
.....Appellant.

VERSUS

1. Director Elementary and Secondary Education KPK Peshawar.
2. District Education Officer(Female) Swabi.
3. Sub-Divisional Education Officer(female) Razzar/Swabi.

.....Respondents.

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DEPONENT

CNICNO 16101-6559490-1

District Education Officer
(Female) Swabi

BEFORE THE SERVICE TRIBUNAL K.P.K, PESHAWAR

Service Appeal No. 41/2018

Mst DILMAN NAZ PST GGPS Parmoli Tehsil Razar District Swabi
.....Appellant.

VERSUS

1. Director Elementary and Secondary Education KPK Peshawar.
2. District Education Officer (Female) Swabi.
3. Sub-Divisional Education Officer (female) Swabi.
..... Respondents.

REPLY ON BEHALF OF THE RESPONDENTS NO. 1 TO 3

Respectfully Sheweth;

PRELIMINARY OBJECTIONS:

- 1) That, the appellant has no cause of action to file the instant appeal.
- 2) That, the instant appeal is badly time barred.
- 3) That, the appellant has filed the instant appeal just to pressurize the respondents.
- 4) That the appellant has not come to the Tribunal with clean hands.
- 5) That the appellant has concealed material facts from Honourable Tribunal.
- 6) That appellant is stopped to file the appeal by his own conduct.
- 7) That upon concealment of facts, no one can claim any relief hence the instant appeal is liable to be dismissed.

Facts:-

1. That the para relates to the first appointment of the appellant, Hence no needs of comments.
2. That the applicant was fit for promotion to the post of SPST BPS.14 and was promoted vide notification Endst: No 2136-42 /dated swabi the 5/8/2015. She was adjusted at GGPS Fazli Abad Parmoli at S.NO:24.
3. That the appellant was fit for promotion to SPST BPS .14 and was promoted vide notification Endst'NO'2136-42 dated swabi the 5/8/2015. She was adjusted at GGPS Fazli Abad Parmoli. Present at S.NO.24 page NO;20.
4. Inçorrect, hence denied the appellant was not deprived from promotion but was promoted vide notification Endst NO:2136-42 date 5/8/2015. She was adjusted GGPS Fazli Abad Parmoli present at SNO:24 Copy order is annexed with the appeal by the appellant at page NO:20. The appellant claimed to serve against a post of PST B.12 and earn perks and privileges of SPST BPS NO.14 which is illegal. That why the appellant

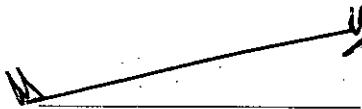
- remained silent and kept himself unaware of her promotion. The claim of depriving from promotion at the belated stage is ludicrous and beyond the scope of human mind.
5. That the respondent /competent authority took a lenient view and the appellant was promoted. The appellant himself confesses that she was promoted to SPST BPS-14 dated 05.08. 2015. She was promoted and adjusted at GGPS MEHER ALI. As the promotion was once again given to the appellant in another school. Thus the appellant once again remained silent and after passage time now she is talking argy bargy. Another words it was another decline. As discussed in length under Appointment, promotion, transfer rule 1989, rule 7(5). She stands superseded permanently for such promotion. The appellant is not entitled to ^{be} promoted. The appellant is not in the position to be promoted as such.
 6. Incorrect, Hence denied, the claim of the appellant is ludicrous. It is beyond the scope of human mind. The appellant is talking argy bargy. The claim of the appellant is not acceptable in any shape.
 7. Incorrect, hence denied, the appellant did not take over charge "she is permanently superseded for such promotion as per law, rule and policy. The appellant is throwing arrows in the dark. the claim of the appellant is nothing but only mudslinging.
 8. That as per Appointment, promotion, transfer, rule 1989, rule 7(5) the appellant was not entitled for promotion and was rightly not promoted. The appellant was not entitled for such promotion.
 9. Incorrect, hence denied, the write petition filed in Peshawar high court Peshawar was dismissed in limine, dated 06.04. 2017. The service appeal is badly time barred and also hit by the principal of laches. The appellant is not an aggrieved person at all. The appellant has no cause of action to file the instant appeal and the appeal in hand is liable to be dismissed inter alia on the following grounds:

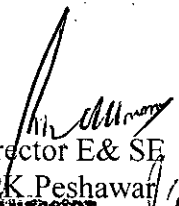
Grounds

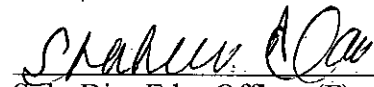
- A. Incorrect, hence denied, all the orders of the responded no dated 12.07.2014, 05.08.2015, 04.08.2016 are according to law, facts, promotion policy and hence maintainable in the eye of law.
- B. Incorrect, hence denied, the appellant was promoted to SPST, BPS14 but she failed to avail the benefits due to the school, where she adjusted not of her choice. hence the appellant has no vested right to be promoted as per law, rule and policy. The act of the respondent is legal.
- C. Incorrect, hence denied the appellant was promoted but she did not take over charge due to the school where she was adjusted not of her choice. The appellant is continuously concealing the reason, which she knows the best.
- D. Incorrect, hence denied, the appellant is continuously concealing the fact, that she did not take over charge intentionally. Appointment, promotion, transfer rule 1989, rule 7(5) is hurdle in the way of promotion of the appellant.
- E. Incorrect, hence denied, the appellant is concealing material facts from the honourable tribunal. She did not take over charge intentionally.
- F. Incorrect, hence denied, She was promoted twice but did not take over charge intentionally. The reason was that her adjustment not in the school of her choice.

- 2/11
- G. Incorrect, hence denied, the applicant was promoted earlier of her "Junior" but she did not take over charge intentionally in time.
- H. Incorrect, hence denied, That the appellant did not file any application in time she intentionally did not take over charge. no appeal is pending before the respondent. She is talking argy bargy. Without any departmental appeal before the service tribunal is not maintainable. No one has given him the advice to approach the court Peshawar High court Peshawar has already been dismissed the written petition in limine on the same slance. The service appeal of the appellant is not maintainable in the present form and also in present circumstances of the issue.
- I. That the respondents seek permission to raise/argue other points/grounds at the day of hearing this case.

In view of the above stated submissions, it is earnestly requested that the appeal in hand may very graciously be dismissed with cost in favour of the respondents.


District Education Officer
(Female) District Swabi
District Education Officer
(Female) Swabi


Director E& SE
KPK Peshawar
Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar


Sub; Div; Edu; Officer (F)
Lahor District, Swabi.

BEFORE THE SERVICE TRIBUNAL K.P.K, PESHAWAR

Service Appeal No. 41/2018

Mst Dilman Naz PST GGPS Parmoli Tehsil Razar Distrit Swabi
.....Appellant.

VERSUS

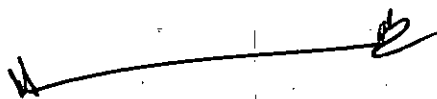
1. Director Elementary and Secondary Education KPK Peshawar.
 2. District Education Officer (Female) Swabi.
 3. Sub-Divisional Education Officer (female) Razzar/Swabi.
- Respondents.

AFFIDAVIT

I Rehana Yasmeen do hereby solemnly affirm and declare that the contents of the accompanying Para-wise comments submitted by respondents are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honourable Tribunal.

IDENTIFIED BY

ADVOCATE GENERAL
OF KHYBER PAKHTUNKHWA
PESHAWAR


District Education Officer
(Female) District Swabi

**District Education Officer
(Female) Swabi**

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHUNKHWA
PESHAWAR

Appeal No _____/2018

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar ,District
Swabi.

----- [Petitioner]

Versus

1. Director of Eliminary and Secondary Education
K.P.K Peshawar.
2. District Education Officer (Female) Swabi.
3. SDEO (Female) Swabi District Swabi.

----- [Respondents]

AMENDED APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974 AGAINST THE ORDER OF
RESPONDENT NO.2 ,3 DATED 12.07.2014 ,
04.08.2016 AGAINST LAW AND INEFFECTIVE
UPON THE RIGHTS OF THE APPELLANT /
PETITIONER AND CONSIDER PETITIONER AS
B.P.S 14 FROM 12.07.2014 ALONGWITH BACK
BENEFITS AND IMPLEMENTATION/
ACTUALIZATION OF ORDER DATED 05.08.2015

ALONG WITH BACK BENEFITS EFFECTIVE
FROM 12.07.2014.

PRAYER IN APPEAL :-

On accepting this appeal the order of respondent No.2 dated 05.08.2015 may kindly be implemented and entries made in service book and alongwith back benefits from 12.07.2014 or other order deem fit considered by this Honourable Court.

Respected Sir,

Respectfully Sheweth;

FACTS OF THE CASE :-

1. That the Appellant /petitioner in serving as PST in education department since 20.10.2004.
2. That as per the proviling policy of the up gradation/ promotion for PST primary side the Appellant /petitioner completely fist for the promotion of BPS 14.
3. That the Appellant /petitioner without any reason and deficiencies deprived 'from promotion on dated 12.07.2014 vide order No 1535.

{Copy of order is attached as annexure "A"}

4. Against sub order of respondent No2 the Appellant /petitioner file departmental application before respondent No.2 for considering petitioner as BPS 14.

{Copy of application is attached as annexure "B"}

5. That in 2nd D.P.C for the promotion BPS-14 dated 05.08.2015 although we are selected /promoted but the order reached to us after 15days letter.

{Copy of order is attached as annexure "C"}

6. After got information the Appellant /petitioner demanded for charge in BPS -14 but the respondent No 2,3 refused to hand over charge to us and saying that your order is expired and told to petitioner filed you documents for the next D.P.C in 2016 and no implementation or entry in service book made by respondents as SPST 14.

7. When the petitioner went for collecting our documents for the promotion BPS-14 in it was told once again by the respondent No.2, 3 that you are not eligible for the said post cause of you have already in BPS-14 while the petitioner working still in BPS -12 .There is no entry of BPS14 in service book nor the office paid us the benefits for the said post.

8. On dated 04.08.2016 the respondent No.2 issue order BPS -14 up-gradation but once again the name of the petitioner ignored by respondent No.2 and to already in SPST 14.

{Copy of order is attached as annexure "D"}

9. That the Appellant /petitioner aggrieved from the aforesaid order dated 12.07.2014, 05.08.2015, and 04.08.2015 the petitioner file writ petition in Peshawar High Court Peshawar on dated 06.04.2017 the said writ petition disposed due to bar Art 212 of constitution of Islamic republic of Pakistan 1973 and

new due to illegal and un-lawfull order the petitioner filling this appeal on the following grounds.

10. Now with permission of this Honourable Court order dated 07.12.2017 the petitioner amended present appeal to the extend that the order dated 05.08.2015 the SPST 14 may kindly be implemented and entry made in service book of effective full back benefits .

GROUND S :-

A. That all the order of respondent No.2 dated 12.07.2014, 05.08.2015, 04.08.2016 are against law facts and promotion policy and hence not maintainable in law .

B. That the petitioner eligible for BPS 14 from 12.07.2014 being senior but the respondents illegally deprived from promotion committed illegality.

C. That as per policy of the up gradation /promotion for PST the petitioner completely fit for the promotion of BPS 14

but without any reason the petitioner deprived from promotion.

D. That there was no deficiency in relevant papers nor pending any inquiry of department a judicial inquiry against the petitioner.

E. That on dated 05.08.2015 2nd D.P.C and promotion of petitioner in BPS-14 order reached after 15 days and no notes or information given before expiry of 15 days .

F. The out of respondents No. 2, 3 about not implementation order of D.P.C dated 05.08.2015 and no entire made in service book against law and illegal.

G. That junior of the petitioner already promoted to BPS 14 from dated 12/07/2014 against fundamental rights.

H. That the application filed to the respondent No.2,3 for seeking remedy still pending and

advise the petitioner to approach a court of law.

I. That any other grounds may be taken during arguments of this appeal .

It is, therefore, most humbly prayed, that on acceptance of this appeal the promotion order as SPST BPS 14 of the petitioner may kindly be implemented entry made in service book effective from 12.07.2014 being senior with full back benefit or any other adequate remedy / relief which the Honourable Bench /August Court deems fit may kindly also be awarded to the petitioner and obliged .

Dated : 03 -01-2018


PETITIONER
DILMAN NAZ PST GGPS Parmoli
Through attorney Ali Rehman

Through


RAWIL KHAN Advocate
High Court
at District Court Swabi

CERTIFICATE

Certified that as per instruction of client no such like Service Appeal has earlier been filed by the petitioner in this Honourable Court .


Rawil Khan Advocate
High Court
at District Court Swabi

LIST OF BOOKS

- A. Constitution of Islamic Republic of Pakistan 1973.
- B. Esta code KPK
- C. Case Law

Advocate



**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHUNKHWA
PESHAWAR**

Appeal No 41/2018

DILMAN NAZ PST G.G.P.S Parmoli Tehsil Razar ,District Swabi.
----- [Appellant]

Versus

Director of Eliminary and Secondary Education K.P.K
Peshawar and others ----- [Respondents]

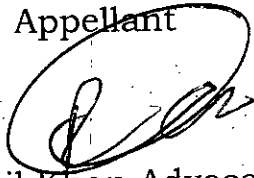
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Dated 03.04.2019

Appellant

Through Counsel:


Rawil Khan Advocate
High Court
At Judicial Complex Swabi

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**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHUNKHWA
PESHAWAR**

Appeal No 41/2018

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar ,District
Swabi. ----- [Appellant]

Versus

Director of Eliminary and Secondary Education K.P.K
Peshawar and others -----[Respondents]

Subject : Re- joinder on behalf of Appellant

Respected Sir,

1. That the respondent in 2014 when they are preparing the Seniority list for the SPST post. They ignored them intentionally and promoted most junior teachers to SPST post . Thus the applicant filed an appeal in SDEO (Female) Swabi office for justice vide diary No 1514 dated 25.07.2014. The copy of appeal on main file on Page No. (19)
2. That in the response of the reply of the High authorities, the high up has been collected an apply in which they concealed the truth from the Honourable Court and very tortured the reputation of appellant .The caused a bad blow/ stain on the face of their occupation The promotion of the appellant was done to GGPS Fazli Abad vide order No 2136-42 dated 08.05.2015 .While the said order reached after 15 days no notice for of information covey to the appellant. Then after got information the respondent No.2 , 3 refused to hand over charge.
3. The appellant does not refuse ^{No 2} to denied to obey their promotion order, but the respondent told them orally to collect their documents for the 2nd DPC then the appellant applied for 2nd DPC for SPST post and submitted their document in the office, but they told them orally that she has not eligible for further SPST promotion under the rules of Department 1989 Rule 7 (5) .

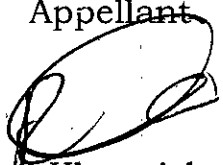
2

4. That when the 2nd DPC approved and order issued the appellant was badly defer and suffered in it. Thus the appellant acted upon that (prov) defer not till tomorrow what my be done to day and wrote an appeal direct to Honourable Chief Minister KP for justice and also to Director Elementary Education Peshawar which is available on main file on page No .
5. That all the presumption and pretext of the High authorities to evasion the case from the first DPC 2014 update no correspondence or intimation in written shape given to the appellant by the office so for.
6. That the applicant submitted all application, appeal with in time.
7. That order of respondent are illegal and unlawful and no limitation applicable in illegal order .

It is therefore, most humbly prayed , that on acceptance of this rejoinder the promotion order as SPST PBS 14 of the petitioner may kindly be implemented entry made in service book effective from 12.07.2014 being senior with full back benefit or any other adequate remedy / relief which the Honourable Bench / August Court deems fit may kindly be awarded to the appellant and obliged.

Appellant

Through Counsel:


Rawil Khan Advocate
High Court
At Judicial Complex Swabi

3

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHUNKHWA
PESHAWAR**

Appeal No 41/2018

Dilman Naz PST G.G.P.S Parmoli Tehsil Razar ,District
Swabi. ----- [Appellant]

Versus

Director of Eliminary and Secondary Education K.P.K
Peshawar and others ----- [Respondents]

AFFIDAVIT

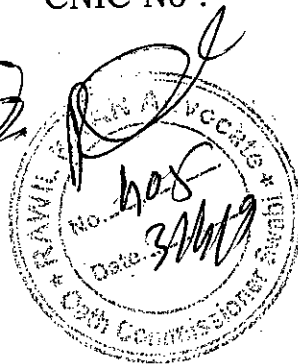
I ALI REHMAN S/O ALI ZAR KHAN special power of
resident of village Shera , Tehsil Razar, District SWABI attorney
of petitioners, do hereby solemnly affirm and declare on oath
that contents of the re-joinder are true and correct to the best of
my knowledge and belief and nothing has been concealed from this
August Court .

Dated : /04/2019

Deponent Ali Rehman .
Ali Rehman
CNIC No :

Identified by

Rawil Khan Advocate
High Court
At Judicial Complex



4

From,

1-Dilman Naz PST GGPS Parmoli.
2-Rukhsan Begum PST GGPS Parmoli

To,

The Honorable Chief Minister Khyber Pakhtoonkhwa
Peshawar

Subject:- Appeal for justice/Enquiry

H/C.M

With due respect , it is kindly stated that we have been appointed as PST in the Education Department Since 20/10/2004. As per the prevailing policy of the up gradation/promotion for PSTs primary side , we are completely fit for the promotion of BPS-14. There were no deficiencies in our relevant papers nor pending any sort of departmental or judicial enquiry against us.

We are ignored/depressed constantly three times from the promotion of BPS-14 .
Detail are as under.

- 1- The First D.P.C notification of the Up gradation for BPS-14 have been issued on 12-07-2014 vide Order No; 1535-G . In this order of up gradation we are put back cause of non available F.A Certificate while our file were already completed in all respect .But however the Office did not give us any kind of information but they hide the facts and posted their own teachers at the same school on SPST Posts and later on we informed by the Office saying that you will be included in the next DPC for the year 2015.
- 2- In the second D.P.C for the Promotion BPS-14 for the year 2015 although we were selected but the order reached to us after Fifteen days later.
When we demanded for Charge in BPS-14 , so they refused to hand over charge to us. And saying that your order is expired and told us filed your documents for the next D.P.C 2015
- 3- When we went for collecting our documents for the promotion BPS-14, it was told once again by the High ups to us that you both are not eligible for the said post cause of you have already in BPS-14. While we are working still in BPS-12 .There is no entry of BPS-14 in our Service Books nor the office paid to us the benefits for the said Post.

At last we appeal for justice in this regard to you Sir, Because in this connection we have already appealed to all concerned for justice but in vain, (Copies attached for proofs).
H/Chief Minister Sahib this is the era of justice and we feel great change in the current situation so on that basis we hope for justice from your side.

Therefore in this regard a fair enquiry may kindly conduct against the following officers and officials.

- 1- SDEO female primary along with Clerical Staff i.e Superintendent, Assistant , S/Clerk of District Swabi .
- 2- DEO Female Primary along with Clerical Staff i.e Superintendent, Assistant , S/Clerk of District Swabi .

Honorable chief Minister Sahib we want to bring your kind attention to ward the current situation in District Swabi , they have opened and introduced new ways of corruption and they are trapping the naive teachers in their trap in their own style .

Thanks

Yours Obediently

1- Dilman Naz PST *Dilman Naz*

2- Rukhsana Begum PST *Rukhsana Begum*

COPY FOR INFORMATION TO THE

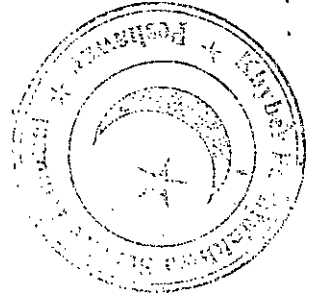
1) DIRECTOR OF E&SE EDU. KPK PESHAWAR

①

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

SERVICE APPEAL NO. 1055/2014

Date of institution ... 19.08.2014
Date of judgment ... 12.10.2017



Jamroz Khan Son of Momin Khan
R/o Lakrai, Tehsil and District Nowshera

... (Appellant)

VERSUS

1. Senior District Accounts Officer Nowshera.
2. Executive District Education Officer Nowshera.
3. Sub-Divisional Education Officer (Female) District Nowshera.
4. District Education Officer (Female) Primary District Nowshera.
5. Director of Education (Female) Dabgari Garden, Peshawar.
6. Govt. of KPK through Secretary Education, Civil Secretariat, Peshawar.
7. Govt. of KPK through Secretary Finance, Civil Secretariat, Peshawar.
8. Accountant General, Accountant General Officer, Govt. of KPK, Peshawar.

... (Respondents)

APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST
THE RESPONDENTS WHEREBY THE DEPARTMENTAL
REPRESENTATION OF THE APPELLANT HAS NOT BEEN
DECIDED AND THE STIPULATED PERIOD HAS BEEN
PASSED.

Mr. Iftikhar Ali, Advocate.
Mr. Kabirullah Khattak, Additional Advocate General

.. For appellant.
.. For respondents.

Mr. MUHAMMAD AMIN KHAN KUNDI
MR. MUHAMMAD HAMID MUGHAL

.. MEMBER (JUDICIAL)
.. MEMBER (JUDICIAL)

ATTESTED

JUDGMENT

MUHAMMAD AMIN KHAN KUNDI, MEMBER: -

Our this single

judgment shall also dispose of service appeal titled Wakeel Khan-Versus-Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar and others bearing No. 1213/2013 and service appeal titled Amir Aman-Versus--Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar and others bearing

No. 1214/2013 being identical nature arising out from the same law, facts and circumstances.

2. This appeal has been filed under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the order dated 4.10.2013 whereby the appellant was retired from service on superannuation but without extending the benefits of pension. The appellant also filed departmental appeal on 14.05.2014 but the same was not responded hence, the present service appeal on 19.08.2014.

3. Learned counsel for the appellant contended that the appellant was appointed as Class-IV Chowkidar on pay of Rs. 1200/- per month on (fixed) on 12.10.1995 in Education Department. It was further contended that later on the service of the appellant was regularized on 30.07.2008. It was further contended that the appellant was retired from service on 04.10.2013 but benefits of pension etc was not extended to the appellant on the ground that length of the service of the appellant was less then qualifying service. It was further contended that the appellant filed departmental appeal for issuance of pension, gratuity and other benefits but the same was not responded. It was further contended that according to Rule 2.2 of West Pakistan Civil Services Pension Rules, 1963 the service of the government servant begin to qualify for pension when he takes over charge of the post to which he is first appointed. It was further contended that according to Rule 2.3 of the West Pakistan Civil Services Pension Rules, 1963 temporary and officiating service shall count for pension if he has rendered more than five years continuous temporary service for the purpose of pension or gratuity and temporary and officiating service followed by confirmation shall also count for pension or gratuity. It was further contended that the NWFP Civil Servant (Amendment Bill), 2005 was passed by the Provincial Assembly on 5th July 2005 and assented by the Governor of the Province on 12th July 2005 whereby section 19 was amended and all the employees of the Provincial Government selected for appointment in the prescribed manner to the post on or after 1st July 2001 but on contract basis were deemed to be appointed on regular basis. However, they were held disentitled for the pensionary benefits. It was further contended that section- 19 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 was further amended by the Khyber

Pakhtunkhwa Civil Servants (Amendment) Act, 2013 and the person selected for appointment on contract basis were declared to be deemed as regular employ and subsequently were held entitled for pensionary benefits. Therefore, it was contended that the service of the appellant will be considered from the date of appointment i.e 12.10.1995 and the same will be counted for pension and gratuity etc. The learned counsel for the appellant also relied unreported judgments of the Worthy Peshawar High Court in Writ Petition No. 1188 of 2014 decided on 09.09.2014 titled Baghi Shah-Versus-The State etc, Writ Petition No. 1590 of 2014 decided on 11.09.2014 titled Mst. Wajihat W/o Nisar Muhammad-Versus-Senior District Accounts Officer & others, Writ Petition No. 1659-P/2014 decided on 27.11.2014 titled Yaqoob Khan S/o Abdul Manan-Versus-Government of Khyber Pakhtunkhwa etc and Writ Petition No. 3394-P/2016 decided on 22.06.2017 titled Amir Zeb-Versus-The District Account Officer, District Nowshera etc. It was further contended that in the present service appeal the departmental appeal was filed after some delay but since the service appeal pertains to the matter of pay, pension and other emolument therefore, the limitation does not fore closed the right of the appellant accrued to him in such like matter the limitation does not run and relied in this regard on 2002 PLC (C.S) 1388 Punjab Service Tribunal and prayed that the appeal may be accepted and the department may be directed to consider the length of service of the appellant from the date of his appointment and pay pensionary benefits to the appellant.

4. On the other hand, the learned Assistant Advocate General Mr. Kabirullah Khattak opposed the contention of learned counsel for the appellant and contended that the appellant was appointed as Class-IV Chowkidar on pay of Rs. 1200/- per month on adhoc relief on (fixed) vide order dated 12.10.1995 and he was regularized vide order dated 30.07.2008 with effect from 01.07.2008. It was further contended that the appellant was retired on 04.10.2013 and the appellant served as regular employee only for five years hence, he is not entitled for pensionary benefits. In this regard he also relied on unreported judgment of the Worthy Peshawar High Court passed in Writ Petition No. 23-P/2015 decided on 24.06.2015 titled Sher Badshah S/o Amir Badshah-

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Versus- Senior District Accounts Officer Nowshera etc and PLD 1990 Supreme Court page 719 and prayed for dismissal of appeal.

5. We have heard the arguments and gone through the record available on file.

6. Perusal of the record reveals that the appellant was appointed as Class-IV Chowkidar on pay of Rs. 1200/- per month on fixed pay under relevant rules on 12.10.1995. The record further reveals that the service of the appellant was regularized on 30.07.2008. The record further reveals that the appellant was retired from service on 04.10.2013 but pension and gratuity was not extended to the appellant.

7. Regarding the question of entitlement of the appellant to the pension, we, would like to reproduce the relevant rules of the West Pakistan Civil Services Pensions Rules, 1963 below, as these would be advantageous in resolving the controversy:-

"2.2. Beginning of Service-

Subject to any special rules the service of Government servant begins to qualify for pension when he takes over charge of the post to which he is first appointed.

Rule 2.3 Temporary and officiating service— Temporary and officiating service shall count for pension as indicated below:-

- (i) Government servants borne on temporary establishment who have rendered more than five years continuous temporary service for the purpose of pension or gratuity; and
- (ii) Temporary and officiating service followed by confirmation shall also count for pension or gratuity.

8. The rules ibid reveal that the service of government servant begins to qualify for pension from the very first day of his/her taking over the charge, irrespective of the fact whether his/her appointment and entry in to service was temporary or regular. It is also clear from sub-rule (i) that continuous temporary service of a civil servant shall also be counted for the purpose of pension and gratuity and by virtue of sub rule (ii), temporary and officiating service followed by conformation shall be counted for pension and gratuity.

ATTESTED



9. We deem it appropriate to mention here that question of interpretation and true import to the term pension was raised before the august Supreme Court of Pakistan in case titled **"Government of NWFP through Secretary to Government of NWFP Communication & Works Department, Peshawar Vs Muhammad Said Khan and others (PLD 1973 Supreme Court of Pakistan 514)** wherein it was held that:

"It must now be taken as well settled that a person who enters government service has also something to look forward after his retirement to what are called retirement benefits, grant of pension being the most valuable of such benefits. It is equally well settled that pension like salary of a civil servant is no longer a bounty but a right acquired after putting a satisfactory service for the prescribed minimum period. A fortiori, it cannot be reduced or refused arbitrarily except to the extent and in the manner provided in the relevant rules."

10. In case titled **"Secretary To Govt: of the Punjab, Finance Department Vs M. Ismail Tayer and 269 others"** 2015 PLC (CS) 296, the august Supreme Court of Pakistan was pleased to held that the pensionary benefits is not a bounty or ex-gratia payment but a right acquired in consideration of past service. Such right to pension is conferred by law and cannot be arbitrarily abridged or reduced except in accordance with such law as it is the vested right and legitimate expectation of retired civil servant.

11. In the present case the appellant was initially appointed on 12.10.1995 followed by his regularization on 30.07.2008. Though the appellant has rendered temporary service for a continuous period of more than 12 years and 9 months service and regular service of more than 5 years and 2 months meaning thereby that as a whole he has more than 17 years service at his credit. By virtue of rule 2.3 as well as Chapter-IV rule 4.4 of the West Pakistan Civil Services Pensions Rules, 1963, he has qualified the prescribed service for pensionary benefits, therefore, the objections raised by the respondents is not tenable and not supported by any rule or regulation. Judgment of hon'ble Peshawar High Court in Mst. Wajihat case (Writ Petition No. 1590-P/2014), Baghi Shah's case (Writ

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Petition No. 1188-P/2014, Yaqoob Khan case's (Writ Petition No. 1659-P/2014) and in Amir Zeb case's (Writ Petition No. 3394-P/2016) may be quoted as a reference.

12. In the light of the above discussion we are constrained to accept the appeal and direct the respondent-department to finalize the pension case of the appellant and grant pensionary benefits to him. Parties are left to bear their own costs. File be consigned to the record room.

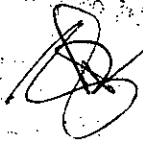
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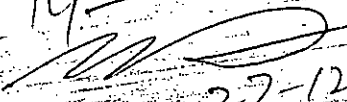
12-10-2017

Sd/- M. Amrin Khan Kundi,
Member;

Sd/- M. Hamid Mughal,
Member;

Certified to be true copy


M. Amrin Khan Kundi
Member

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