

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR**  
**AT CAMP COURT SWAT.**

Service Appeal No. 7798/2021

Date of Institution ... 18.11.2021

Date of Decision ... 05.04.2023

Nusrat Bibi (PST), R/O Village Kankoway, Kowga Tehsil Mandanr District  
Bunir.

... (Appellant)

**VERSUS**

District Education Officer (Female) Bunir and one another.

... (Respondents)

-----  
MR. SHAMS-UL-HADI,  
Advocate

--- For appellant.

MR. MUHAMMAD JAN,  
District Attorney

--- For respondents.

MR. KALIM ARSHAD KHAN  
MR. SALAH-UD-DIN

--- CHAIRMAN  
--- MEMBER (JUDICIAL)

**JUDGMENT:**

SALAH-UD-DIN, MEMBER:- Precise facts surrounding the instant appeal are that departmental action was taken against the appellant on account of her absence from duty and she was awarded major penalty of removal from service vide impugned order bearing endorsement No. 11047-52 dated 30.08.2012. The appellant challenged the order of her removal from service by way of filing of departmental appeal on 15.08.2021; however the same was not responded within the statutory period of 90 days, hence the instant service appeal.

2. On admission of the appeal for regular hearing, notices were issued to the respondents, who contested the appeal by way of

filing of reply, wherein they refuted the assertion raised by the appellant in her appeal.

3. Learned counsel for the appellant argued that she was granted leave without pay with effect from 04.04.2010 to 31.03.2011 and in the meanwhile she shifted to Karachi due to some domestic problems; that later on the appellant applied for further extension of her leave but her leave application was not properly processed and she was under the impression that the same has been allowed; that the procedure as prescribed in Rule-9 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011 was not complied with and the appellant was condemned unheard; that the appellant was not provided any opportunity of self defense or personal hearing and she has been treated by the respondents with discrimination; that the impugned order being wrong and illegal is liable to be set-aside and the appellant is entitled to be reinstated in service with all back benefits.



4. On the other hand, learned District Attorney, while controverting the arguments of learned counsel for the appellant, contended that the appellant was though granted leave without pay with effect from 04.04.2010 to 31.03.2011 but she did not turn up for joining of her duty after the expiry of her leave; that the appellant had not filed any application for extension of leave and remained willfully absent from duty despite several notices being issued to her; that the appellant

was issued notice through registered A.D, however she did not tune up for duty, therefore, notice was issued to her through publication in two daily newspapers but even then she did not turn up for joining her duty; that the appellant had not even bothered to contact her high-ups and remained absent from duty for almost ten years without any sanctioned leave or permission of the competent Authority; that the considerable long absence of the appellant from duty would show that she was not at all interested to perform her duty; that all legal and codal formalities were complied with and the appellant has rightly been removed from service; that the departmental appeal of the appellant was badly barred by time, therefore, the appeal in hand is liable to be dismissed on this score alone.



5. We have heard the arguments of learned counsel for the parties and have perused the record.

6. A perusal of the record would show that the appellant was proceeded against departmentally on the allegation of her absence from duty and she was awarded major penalty of removal from service vide the impugned order dated 30.08.2012, which was required to have been challenged within 30 days. The appellant, however remained in deep slumber and filed departmental appeal on 15.08.2021 i.e after a delay of about nine years. The departmental appeal of the appellant was thus badly time barred. It is settled proposition of law that when the appeal of an employee was time barred before the appellate

Authority, then her appeal before the Tribunal was not competent. Reliance is placed on 2007 SCMR 513, PLD 1990 S.C 951 and 2006 SCMR 453. Furthermore, august Supreme Court of Pakistan in its judgment reported as 1987 SCMR 92 has held that when an appeal is required to be dismissed on limitation, its merits need not to be discussed.

7. Consequently, it is held that as the departmental appeal of the appellant was badly time barred, therefore, the appeal in hand being not competent is hereby dismissed. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

05.04.2023



(KALIM ARSHAD KHAN)  
CHAIRMAN  
CAMP COURT SWAT



(SALAH-UD-DIN)  
MEMBER (JUDICIAL)  
CAMP COURT SWAT

ORDER  
05.04.2023

Learned counsel for the appellant present. Mr. Muhammad Jan,  
District Attorney for the respondents present. Arguments heard and  
record perused.

Vide our detailed judgment of today, separately placed on  
file, it is held that as the departmental appeal of the appellant was  
badly time barred, therefore, the appeal in hand being not competent  
is hereby dismissed. Parties are left to bear their own costs. File be  
consigned to the record room.

ANNOUNCED  
05.04.2023

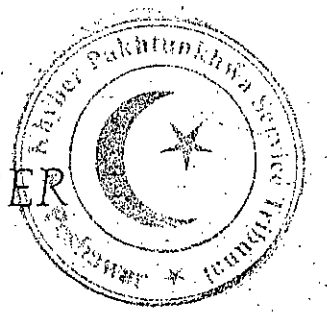


(Kalim Arshad Khan)  
Chairman  
Camp Court Swat



(Salah-Ud-Din)  
Member (Judicial)  
Camp Court Swat

①



BEFORE THE SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR

Service Appeal No. 1108 of 2017

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1045

Dated 06-9-2017

Ahwal Ali Khan S/o Hazir Khan R/o Koza Hujra, Chakesar, Ex-Clan IV  
Government Primary School, Belo Chakesar, District Shangla.

Appellant

VERSUS

1. Director Elementary & Secondary Education K.P.K Peshawar.
2. District Education Officer Female District Shangla.
3. District Education Officer District Shangla.
4. Sub-division Education Officer Female Primary Education District Shangla. Respondents

Appeal U/s 4 of service tribunal Act, 1974, against  
the impugned order dated 08-08-2017 whereby the  
departmental appeal of the appellant was dismissed  
by respondent No. 1, which was filed against the  
illegal order dated 16-12-2013 of removal from  
service of the appellant.

PRAYER:

On acceptance of the instant service  
appeal the orders passed by respondent No. 2 dated  
16-12-2013 & the order passed by respondent No.  
1 dated 08-08-2017 being arbitrary, illegal and  
based on malafide may kindly be set-aside and the  
appellant may please be reinstated on the post of  
Charokidar in Education Department with all back  
benefits.

Any other remedy which is just  
appropriate may also be awarded though not  
specifically prayed for.

Filed to-day

Registrar

6/9/17

Re-submitted to-day  
and filed.

Registrar

9/10/17

ATTESTED  
[Signature]

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**  
**AT CAMP COURT, SWAT.**

Service Appeal No.1108/2017

Date of Institution ... 06.09.2017  
Date of Decision ... 06.10.2021



Ahwal Ali S/O Hazir Khan R/O Koza Hujra, Chakesar, Ex-Class-IV  
Government Primary School, Belo Chakesar, District Shangla.

(Appellant)

**VERSUS**

Director Elementary & Secondary Education Khyber  
Pakhtunkhwa, Peshawar and three others.

(Respondents)

Shamsul Hadi,  
Advocate

For appellant.

Asif Masood Ali Shah,  
Deputy District Attorney

For respondents.

Rozina Rehman

Member (J)

Atiq Ur Rehman Wazir

Member (E)

**JUDGMENT**

Rozina Rehman, Member(J): Facts gleaned out from the memorandum of appeal are that appellant was appointed as Chowkidar at Government Girls Primary School Belo Chakesar in the year 1996. He was proceeded against departmentally on the allegations of willful absence and was removed from service vide order dated 16.12.2013. He filed departmental appeal which was rejected, hence, the present service appeal.

2. We have heard Shamsul Hadi Advocate for appellant and Asif Masood Ali Shah learned Deputy District Attorney for the respondents

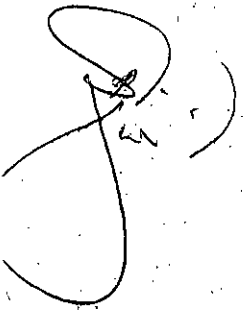
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and have gone through the record and the proceedings of the case in minute particulars.

3. Shamsul Hadi Advocate learned counsel appearing on behalf of appellant, in support of appeal contended with vehemence that impugned orders are illegal and void as the appellant was not treated according to law and rules. He argued that no regular inquiry was initiated against the appellant and that the appellant was condemned unheard. Further submitted that father of the appellant donated his landed property in favor of Government upon which G.G.P.S Belo District Shangla was constructed and that he served the Department for 17 years having unblemished record.

4. Conversely, learned D.D.A submitted that the appellant was proceeded against departmentally on the allegations of willful absence. He contended that all the codal formalities were complied with, where-after, the appellant was removed from service according to law and rules.

5. From the record, it is evident that appellant was appointed as Chowkidar in G.G.P.S Belo, Chakesar. The so called charge sheet and other documents regarding inquiry against the appellant, are available on file in shape of different proformas and is silent in respect of the name of any Inquiry Officer. There is nothing on file which could show that charge sheet and statement of allegations were properly served upon appellant in accordance with law. Inquiry report is not available on file and the procedure adopted by the competent authority for initiation of departmental proceedings against the appellant is also not in accordance with law as two different laws have been mentioned therein in shape of Khyber Pakhtunkhwa Removal



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JUNIOR  
Khyber Pakhtunkhwa  
Removal  
Commission

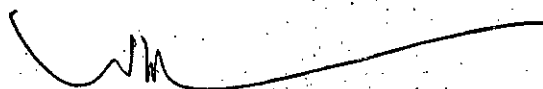


from Service (Special Powers) Ordinance, 2000 and Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 1973. The respondents have candidly violated the set norms & rules and conducted the proceedings in an authoritarian manner. The appellant has served the Department for 17 years and has an unblemished record which was not denied.

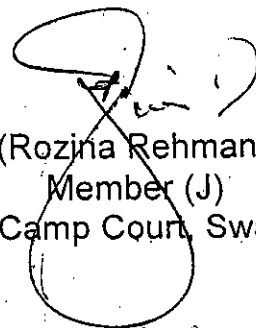
6. For what has been discussed above, we allow this appeal, set aside the impugned order of the authority. Appellant stands reinstated into service, however, intervening period be treated as leave without pay. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED.

06.10.2021



(Atiq Ur Rehman Wazir)  
Member (E)  
Camp Court, Swat



(Rozina Rehman)  
Member (J)  
Camp Court, Swat

Certified to be true copy

**EXAMINER**  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

Date of Presentation of Application 20/10/2021  
Number of Words 1600  
Copying Fee 18.00  
Urgent —  
Total 18.00  
Name of Copyist —  
Date of Completion of Copy 21-10-2021  
Date of Delivery of Copy 21-10-2021

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**BEFORE THE KHYBER PAKHTOON KHWA SERVICES**  
**TRIBUNAL, PESHAWAR**



Service Appeal No. 1175 /2019.

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1225

Dated 04/9/2019

**Muhammad Riaz (PST)**

R/O Village Marado District Bunir.....Appellant

**V E R S U S**

1. District Education Officer(male) Bunir.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.....Respondents

**APPEAL UNDER SECTION 4 OF KHYBER**  
**PUKHTUNKHWA SERVICES TRIBUNAL ACT**  
**1974 AGAINST THE IMPUGNED OFFICE**  
**ORDERS DATED:17.03.2017.**

**PRAYER IN APPEAL:**

*On acceptance of this appeal the impugned Order dated: 17.03.2017 regarding major penalty i-e Removal from service of appellant may kindly be set aside and the appellant may kindly be re-instated to his service with all back benefits of service.*

**Respectfully Sheweth:**

1. That initially the appellant joined the respondent/department since long as P.S.T and as such performed his duties with zeal and zest.

That during his service the appellant requested for Extraordinary leave with written application to respondent No.1 and as such extra ordinary leave without pay with effect from 01.05.2015 to 30.12.2015 was granted/sanctioned to appellant.(Copy of leave sanction notification is annexure-A)

Filed to-day

Registrar

4/9/19  
2.

Registrar  
Khyber Pakhtunkhwa Service Tribunal

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**  
**AT CAMP COURT SWAT.**



Service Appeal No. 1125/2019

Date of Institution ... 04.09.2019

Date of Decision ... 08.10.2021

Muhammad Riaz (PST) R/O Village Marado District Bunir.

... (Appellant)

VERSUS

District Education Officer (Male) Bunir and another.

... (Respondents)

MR. SHAMS-UL HADI  
Advocate

... For Appellant

MR. RIAZ KHAN PAINDAKHEIL,  
Assistant Advocate General

... For Respondents

**ROZINA REHMAN**  
**ATIQ-UR-REHMAN WAZIR**

... **MEMBER (JUDICIAL)**  
... **MEMBER (EXECUTIVE)**

JUDGMENT

ATIQ-UR-REHMAN WAZIR MEMBER (E):-

Brief facts of the case are

that the appellant joined education department as primary school teacher on 04-07-1993. The appellant requested for grant of extra ordinary leave, which was granted by the competent authority with effect from 01-05-2015 to 30-12-2015 vide order dated 22-10-2015. On expiry of leave, the appellant again requested for extension in his leave for a period of another year and the appellant was verbally assured that his leave request has been accepted and after expiry of one year, the appellant approached the concerned authority for joining his duty, but he was handed over his removal from service order dated 17-03-2017. Feeling aggrieved, the appellant filed

departmental appeal dated 02-05-2019, but the same was not decided within the

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**BY PAKHTUNKHWA**  
**SERVICE TRIBUNAL**  
**PESHAWAR**

statutory period, hence the instant service appeal with prayers that impugned order dated 17-03-2017 may be set aside and the appellant may be re-instated in service with all back benefits.

02. Learned counsel for the appellant has contended that the appellant has not been treated in accordance with law and rule, thus acted in violation of the relevant laws laid down for the purpose; that departmental proceedings were conducted on the back of the appellant and no opportunity of defense was afforded to the appellant; that no chance of personal hearing was afforded to the appellant and the appellant was condemned unheard; that the whole departmental proceedings against the appellant was based on personal ill will and the penalty so imposed is harsh, which does not commensurate with guilt of the appellant.

03. Learned Assistant Advocate General for the respondents has contended that after expiry of his leave, the appellant did not assume his duty and remained absent from his lawful duty; that three notices dated 06-01-2017, 21-01-2017 and 06-02-2017 were issued but the appellant did not respond, after which the same showcause notice was published in newspaper dated 02-03-2017, but again the appellant did not turn up, thereafter, major penalty of removal from service was imposed upon the appellant vide order dated 17-03-2017; that the appellant has been treated in accordance with law and no ill will or mala fide is involved on part of the respondents.

04. We have heard learned counsel for the parties and have perused the record.

05. Record reveals that the appellant was proceeded against in absentia and was not afforded opportunity to defend his cause. As per stance of the appellant, he was orally assured that his leave has been approved, upon which he proceeded on leave but on expiry of one year, he was handed over his removal from service order; that oral order of superior in relation to official business would be as good order as in

**ATTESTED**

**EXAMINER**

writing. Reliance is placed on 2008 PLC (CS) 428. It otherwise is a well settled legal proposition that regular inquiry is must before awarding major punishment. The respondents however proceeded the appellant under Rule-9 of E&D Rules, 2011, but the notice was published in only one newspaper, as well as it cannot be ascertained from record that such notices were served upon the appellant. in view of the incomplete proceedings, the penalty so awarded appears to be harsh, particularly looking into his more than 22 years of service.

06. In view of the foregoing discussion, the penalty of removal from service is converted into compulsory retirement. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED  
08.10.2021

(ROZINA REHMAN)  
MEMBER (J)  
CAMP COURT SWAT

(ATIQU UR REHMAN WAZIR)  
MEMBER (E)  
CAMP COURT SWAT

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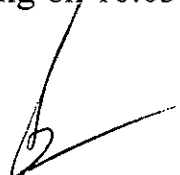
EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Date of Presentation of Application 20/10/2021  
Number of Words 1600  
Copying Fee 18/-  
Urgent -  
Total 18/-  
Name of Copyist -  
Date of Completion of Copy 21/10/2021  
Date of Delivery of Copy 21/10/2021

09.02.2023

Husband of the appellant present and requested for adjournment on the ground that learned counsel for the appellant is busy before Hon'ble Peshawar High Court, Mingora Bench (Dar-ul-Qaza), Swat. Adjourned. To come up for preliminary hearing on 10.03.2023 before S.B at camp court Swat.

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Peshawar

  
(Muhammad Akbar Khan)  
Member (E)  
Camp Court Swat

08.03.2023

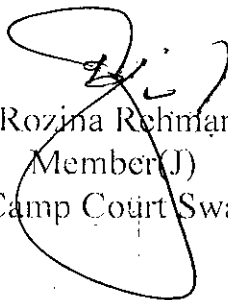
Counsel for the appellant present. Muhammad Jan learned District Attorney for respondents present. Written reply on behalf of respondents have already been submitted.

*Rs-100/-*  
Appellant Deposited  
Security & Process Fee  
*A. J. J. 20/3/23*

Preliminary arguments heard. Record perused.

Points raised need consideration. Instant appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security fee within 10 days. To come up for rejoinder, if any and arguments on 05.04.2023 before D.B at camp court, Swat. P.P given to the parties.

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Peshawar

  
(Rozina Rehman)  
Member (J)  
Camp Court Swat

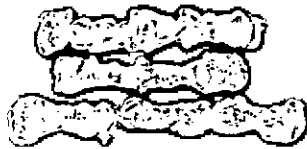
04.01.2023

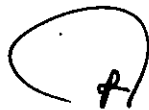
Junior to counsel for the appellant present.

Muhammad Riaz Khan Paindakhel learned Assistant Advocate General alongwith Iftikhar Ali ADEO for respondents present.

Naghmana Sardar (respondent No. 1) in person present and deposited cost of Rs. 10000/- receipt whereof was given to the DEO (F) with direction to Reader of the court to deposit it in Government Treasury in accordance with law and issue original receipt. Written reply/comments have already been submitted. Preliminary argument could not be heard as counsel for appellant is out of country. Adjourned. To come up for preliminary hearing on 08.02.2023 before S.B at camp court Swat.


**SCANNED  
KPST  
Peshawar**



  
(Rozina Rehman)  
Member (J)  
(Camp Court Swat)

08.02.2023

Mr. Sultan Hussain, husband of the appellant present and requested for adjournment on the ground that learned counsel for the appellant is busy in the august Supreme Court of Pakistan. Adjourned. To come up for preliminary hearing on 09.02.2023 before S.B at camp court Swat.

  
(Muhammad Akbar Khan)  
Member (E)  
Camp Court Swat

06.12.2022

Tour is hereby cancelled, therefore, the case is adjourned to 03.01.2023 for the same as before.

  
Reader

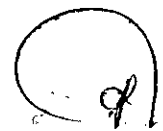
03.01.2023

Junior to counsel for the appellant present.

Muhammad Riaz Khan Paindakhel learned Assistant Advocate General alongwith Iftikhar Ali ADEO for respondents present.

From order sheet dated 08.11.2022 it is evident that last chance was given to respondents to submit written reply at the principal seat Peshawar and copy of the order sheet was sent to Director Elementary & Secondary Education Department as well as to Secretary Elementary & Secondary Education to take action against the then DEO (F) Buner and her salary was attached and cost of Rs. 10000/- was also imposed upon her. Today representative of the respondents attended the Tribunal and submitted copy of the comments which had already been filed at principal seat Peshawar on 02.12.2022 however, cost had not been paid by the then DEO (F) Buner (Naghmana Sardar). Case is adjourned to 04.01.2023 with direction to the then DEO (F) Buner to attend the Tribunal and deposit the cost.



  
(Rozina Rehman)  
Member (J)  
(Camp Court Swat)




08<sup>th</sup> Nov, 2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General alongwith Ms. Rukhsana Raheem, District Education Officer (Female) Buner for the respondents present.

District Education Officer (Female) Buner stated that she had been posted at the station on 25.10.2022 and was not aware about pendency of this appeal. Prior to her, Ms. Naghmana Sardar was posted here who had been transferred to Directorate of Elementary & Secondary Education, Peshawar, an intimation of this appeal was made to her by learned Assistant Advocate General. The District Education Officer (Female) Buner present in court seeks some time to prepare and submit the requisite reply/comments. She is given last chance to submit reply/comments within 15 days from today at the principal seat Peshawar. Copy of this order be sent to the Director Elementary & Secondary Education as well as Secretary Elementary & Secondary Education to take action against the then District Education Officer (Female) Buner under intimation to this Tribunal through its Registrar as to why she was so careless and irresponsible because not only her salary was attached but also cost of Rs. 10000/- was also imposed upon her. It is further directed that she should also deposit the cost before this Tribunal within a week of receipt of copy of this order at Principal Seat Peshawar. To come up for preliminary hearing on 06.12.2022 before the S.B at Camp Court Swat.

**SCANNED**  
**KPST**  
**Peshawar**

  
(Kalim Arshad Khan)  
Chairman  
Camp Court Swat

05.09.2022

Clerk of learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present and requested for further time for submission of reply. Clerk of learned counsel for the appellant also requested for adjournment on the ground that learned counsel for the appellant is not available today due to strike of lawyers. Adjourned. To come up for reply/preliminary hearing on 05.10.2022 before the S.B at Camp Court Swat.



(Salah-Ud-Din)  
Member (Judicial)  
Camp Court Swat

05.10.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for the respondents present and again sought time for submission of reply/comments.

Several opportunities have been given to the respondents for submission of reply/comments, however they have failed to submit reply, therefore, their salaries are attached till the further orders. Registrar of this Tribunal shall send copy of this order to Accountant General Office Khyber Pakhtunkhwa, Peshawar as well as District Accounts Officer Bunir for compliance. Last opportunity is given to the respondents for submission of reply/comments subject to payment of cost of Rs. 10000/-. Learned Assistant Advocate General shall intimate respondent No. 1 to personally appear before the Tribunal alongwith reply on the next date. Adjourned. To come up for reply as well as preliminary hearing on 08.11.2022 before the S.B at Camp Court Swat.

**SCANNED**  
**KPST**  
**Peshawar**



(Salah-Ud-Din)  
Member (J)  
Camp Court Swat

11.05.2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned Additional Advocate General shall contact the respondents to positively submit reply/comments on or before the next date and to come up for preliminary hearing on 08.06.2022 before the S.B at Camp Court Swat.

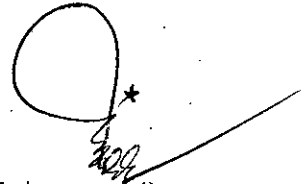


(Salah-Ud-Din)  
Member (J)  
Camp Court Swat

08.06.2022

Clerk of learned counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Learned Additional Advocate General seeks time to contact the respondents for submission of reply/comments. Granted. To come up for reply/comments as well as preliminary hearing on 06.07.2022 before the S.B at camp court Swat.



(Mian Muhammad)  
Member (E)  
Camp Court Swat

07.07.2022

Counsel for the appellant present.

Noor Zaman Khan Khattak, learned District Attorney present. Nemo for respondent Department.

Reply on behalf of respondents is still awaited. Notice be issued to all the respondents for submission of reply/comments and to come up for reply/preliminary hearing on 05.09.2022 before S.B at Camp Court, Swat.



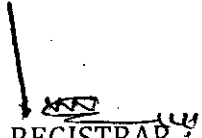


(Rozina Rehman)  
Member (J)  
Camp Court, Swat

Form- A

# FORM OF ORDER SHEET

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

Case No.- 7798/2021


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	29/11/2021	<p>The appeal of Mr. Nusrat Bibi resubmitted today by Mr. Shamsul Hadi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to touring S. Bench at Swat for preliminary hearing to be put there on <u>8-4-22</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>07.04.2022 This case was fixed for 08.04.2022 but on the request of learned counsel for appellant, case file was requisitioned.</p> <p>Let pre-admission notice be issued to respondents for reply. To come up for reply and preliminary hearing on 11.05.2022 before S.B at Camp Court, Swat.</p> <p style="text-align: right;"> (Rozina Rehman) Member (J) Camp Court, Swat</p>

The appeal of Nusrat Bibi, PST, R/O Village Kankoway, Kowga, Tehsil Mandanr and District Bunir received today i.e. on 18.11.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

1. Check list is not attached with the appeal.
2. Appeal has not been flagged/ marked with annexures marks.
3. Copy of charge sheet, statement of allegation, show cause notice and replies thereto in respect of the appellant is not attached with the appeal which may be placed on it.
4. Copy of leave application and sanction order in respect of appellant is not attached with the appeal which may be placed on it.

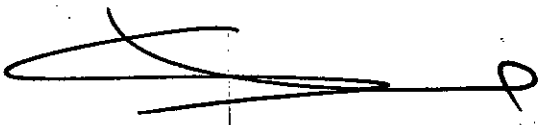
No. 2307 /S.T,

Dt. 18/11 /2021

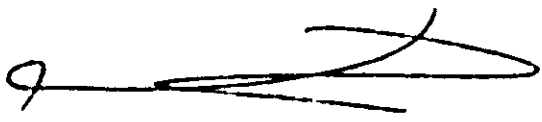
  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Shams Ul Hadi Adv. Swat

*Notice:- Objection No 3,4 in Reply that department not provided the relevant documents to the appellant for that reason not attached, the same may readily be detected by this Honble Tribunal to attached all the relevant records along with para wise comments of the instant appeal.*



Notes: - The above is a copy of the  
Department and provided the  
relevant documents to the  
for that reason and attached to  
the same copy could be checked if the  
relevant material is attached to the relevant  
copy of the relevant records of the  
relevant office.



# KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

## CHECK LIST

Nusrat PAB

**Versus**

DEO P

..... Appellant

..... Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>Shamsul Haq Advocate</u> Court	√	
2.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	√	
3.	Whether appeal is within time?	√	
4.	Whether the enactment under which the appeal is filed mentioned?	√	
5.	Whether the enactment under which the appeal is filed is correct?	√	
6.	Whether affidavit is appended?	√	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	√	
8.	Whether appeal/annexures are properly paged?	√	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	√	
10.	Whether annexures are legible?	√	
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/clear?	√	
13.	Whether copy of appeal is delivered to AG/DAG?	√	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	√	
15.	Whether numbers of referred cases given are correct?	√	
16.	Whether appeal contains cutting/overwriting?	✗	
17.	Whether list of books has been provided at the end of the appeal?	√	
18.	Whether case relate to this court?	√	
19.	Whether requisite number of spare copies attached?	√	
20.	Whether complete spare copy is filed in separate file cover?	√	
21.	Whether addresses of parties given are complete?	√	
22.	Whether index filed?	√	
23.	Whether index is correct?	√	
24.	Whether Security and Process Fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	√	
26.	Whether copies of comments/reply/rejoinder submitted? On _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:- \_\_\_\_\_

Signature:- \_\_\_\_\_

Dated:- \_\_\_\_\_

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE**  
**TRIBUNAL, PESHAWAR**

Service Appeal No. 7798 /2021.

**SCANNED**  
**KPST**  
**Peshawar**

**Nusrat Bi Bi** ..... Appellant

**V E R S U S**

District Education Officer (Female) Bunir and others.... Respondents

**INDEX**

S.N	Description of Documents	Annex	Pages
1.	Memo of Appeal.		1-3
2.	Affidavit.		4
3.	Addresses of the Parties.		5
4.	Copy of impugned office order dated:30.08.2012.	A	6-
5.	Copy of Departmental Appeal.	B	7
8.	Wakalat Nama		8

Appellant

Through

**Shams ul Hadi**

Advocate, Peshawar.

Dated: 17/11/2021.

Office: at Swat Shopping Mall, Opposite Peshawar  
High Court Mingora Bench, Swat.

Cell No.0347-4773440



BEFORE THE KHYBER PAKHTOON KHWA SERVICES TRIBUNAL,  
PESHAWAR

Khyber Pakhtunkhwa  
Service Tribunal

Service Appeal No. 7798/2021.

Diary No. 7915

**Nusrat Bi Bi (PST)**

Dated 18-11-2021

R/O Village Kankoway, Kowga Tehsil Mandanr District Bunir....Appellant

**VERSUS**

1. District Education Officer(Female) Bunir.
2. Director, Elementary & Secondary Education,  
Khyber Pakhtunkhwa Peshawar..... Respondents

**APPEAL UNDER SECTION 4 OF KHYBER  
PUKHTUNKHWA SERVICES TRIBUNAL ACT  
1974 AGAINST THE IMPUGNED OFFICE  
ORDERS DATED:30.08.2012.**

**PRAYER IN APPEAL:**

*On acceptance of this appeal the impugned Order dated:30.08.2012 regarding major penalty i-e Removal from service of appellant may kindly be set aside and the appellant may kindly be re-instated to his service with all back benefits of service.*

**Respectfully Sheweth:**

1. That initially the appellant joined the respondent/department since long as P.S.T and as such performed his duties with zeal and zest .

That during his service the appellant requested for Extra-ordinary leave (without pay) with written application to respondent No.1 and as such extra ordinary leave without pay was granted/sanctioned to appellant.

3. That after taking leave from department, due to some domestic problems the petitioner shifted to Karachi as his family members are residing in Karachi so latter on, through written

Filed to-day  
w.  
Registrar  
18/11/21

Re-submitted to -day  
and filed.

Registrar w.  
29/11/2021

application the petitioner requested for further extension of leave period and on personal visit to respondent's office, the appellant was assured that his further leave request has been accepted for the desired period but latter on, the application was not properly processed by the respondent's office but as the petitioner was also on leave so he was an impression that his leave extension application has been accepted.

4. That latter on the basis of absence from service, the appellant was removed from service through impugned office order dated:30.08.2012 that too without giving any notice or legal procedure.(Copy of impugned order dated:30.08.2012 is annexure-A)
5. That after completion of further one year leave period when the appellant approached the concerned authority for joining of his duties where the petitioner got knowledge of his removal order so against the impugned illegal order, the appellant filed departmental appeal before the competent authority but the same was not decided within statutory period.(Copies of departmental appeal is annexure-B)

That being aggrieved from the impugned order, the appellant approached this Hon'ble Tribunal on the following grounds amongst other inter alia:

**GROUNDS:**

- A. That the impugned office order is against the facts, law and procedure, hence, untenable being unjust and unfair.
- B. That the appellant was not treated in accordance with law and rules, thus acted in violation of the relevant laws laid down for the purpose.

- C. That the whole departmental proceedings against the appellant was based on personal ill will and with ill intention a harsh and illegal penalty was imposed on the appellant.
- D. That no opportunity in shape of personal hearing was afforded to the appellant nor the legal procedure was adopted while removing the appellant from service.

It is, therefore, most humbly prayed that On acceptance of this appeal, impugned Orders dated: 30.08.2012 regarding major penalty i-e Removal from service may kindly be set aside and the appellant may kindly be re-instated to his service with all back benefits of service.

Or

Any other relief which this Hon'ble Tribunal deems appropriate in circumstances of the case may kindly be awarded to the appellant.

Appellant,

  
Nusrat Bi Bi (PST)

Through

  
**Shams ul Hadi**  
Advocate, Peshawar.

Dated: 16/11/2021

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2021.

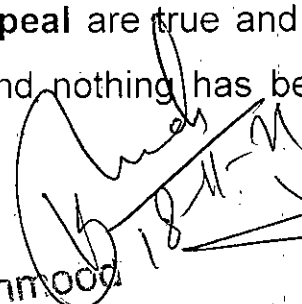
**Nusrat Bi Bi** .....Appellant

**V E R S U S**

District Education Officer (Female) Bunir and others... Respondents

**AFFIDAVIT**

I, **Shams ul Hadi**, Advocate, Peshawar do hereby as per information conveyed to me by my client solemnly affirm and declare that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

  
**Khalid Mahmood**  
 Oath Commissioner  
 Peshawar High Court

**A D V O C A T E**

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE  
TRIBUNAL, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2021.

**Nusrat Bi Bi** .....Appellant

**V E R S U S**

District Education Officer (Female) Bunir and others....Respondents

**ADDRESSES OF THE PARTIES**

**APPELLANT:**

**Nusrat Bi Bi (PST)**

R/O Village Kankway, Kowga Tehsil Mandanr District Bunir

Cell No.

**RESPONDENTS:**

1. District Education Officer(Female) Bunir.
2. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.

Appellant

Through

**Shams ul Hadi**

Advocate, Peshawar.

Dated: 17/11/2021

6

DAE (CF)

M

5/11/12

Annex

4 A

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY EDUCATION BUNER.

TERMINATION ORDER.

Where as Miss. Nusrat Bibi PST CGPS Kankowal remained absent from duty.

And where as she was directed to resume duty and explain her absences to immediate officer through various letters sent under registered covers.

And where as final absence notice was published in Daily Mashrafi & Pakistan on 16/08/2011. She was directed to resume duty within 15 days and explain her willful absence and where as she did not report in the stipulated period.

The Executive District Officer Elementary & Secondary Education Buner is pleased to order the removal from service of Miss. Nusrat Bibi PST CGPS Kankowal from 01/09/2011 because of prolong willful absence.

Sol-  
(Raj Muhammad Khan)  
EXECUTIVE DISTRICT OFFICER  
ELEMENTARY & SECONDARY  
EDUCATION BUNER

Indst. No. 11047-52 / Dated. 30/8/2012

Copy for information is forwarded to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Coordination Officer Buner
3. District Accounts Officer Buner at Deggur
4. Deputy District Officer (Female) Primary Buner w/r to Ltr No. 293 dated 16/08/2011
5. Head Teacher CGPS Kankowal Buner
6. Official Concerned.

*[Signature]*  
EXECUTIVE DISTRICT OFFICER  
ELEMENTARY & SECONDARY  
EDUCATION BUNER

C.T.C

*[Signature]*

Better copy of page No: 6

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION BUNER**

**TERMINATION ORDER.**

Whereas Miss. **Nusrat Bibi PST GGPS Kankowai**, remained absent from duty and where as she was directed to resume duty and explain her absences to immediate officer through various letters sent under registered covers.

And whereas final absence notice was published in **Daily Mashriq & Pakistan on 16/08/2011**. She was directed to resume duty within 15 days and explain her without absence and whereas as she did not report in the stipulated period.

The executive District Officer Elementary & Secondary Education is pleased to order the removed from service of Miss **Nusrat Bibi PST GGPS Kankowai from 04/04/2011** because of prolong willful absence.

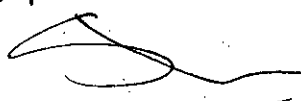
**(Raja Muhammad Khan)**  
**Executive District Officer,**  
**Elementary & secondary**

Endst No. 11047-52/dated 30/08/

Copy for information is forwarded to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Coordination officer Buner.
3. District Accounts Officer Buner at Daggar.
4. Deputy District officer (Female) Primary Buner w/r to No. 295 dated
5. Head Teacher GGPS Kankowai Buner.
6. Official Concerned.

**Executive District Officer,**  
**Elementary & secondary**

C.T.C.  






# بعدالت سروس لٹری بیفونل پیشاور -

قیمت ایک روپیہ		کورٹ فیس
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مورخہ  
مقدمہ  
دعوی  
جرم

۱۶ نومبر ۲۰۲۱ء منجانب  
لٹری بیفونل سروس لٹری بیفونل پیشاور  
بنام ڈی ڈی ای او وین

## باعث تحریر آنکہ

مقدمہ مندرجہ بالا میں اپنی طرف سے واسطے پیروی وجواب دہی و کل کاروائی متعلقہ آن مقام سروس لٹری بیفونل سروس لٹری بیفونل پیشاور مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زراس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ ڈائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے ہا گا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا ک سند ہے

المرقوم ۱۶ ماہ نومبر ۲۰۲۱ء

میں نے  
کا  
کو  
کا  
کا

العبد گواہ شہدہ العبد  
سروس لٹری بیفونل  
Attested by Shamsul-Hadi Adv.  
mob 03339337626

# بعدالت سروس کے بیونل پیشا در -

کوٹ فیس	قیمت ایک روپیہ
---------	----------------

مورخہ  
مقدمہ  
دعوی  
جرم

16 نومبر ۲۰۲۱ء منجانب

شرفی بی بی نام ڈی ڈی ای او وین

## باعث تحریر آنکہ

مقدمہ مندرجہ بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کاروائی متعلقہ آن مقام سروس کے بیونل کے شمس الہادی اور صاحب مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زرا اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ ڈائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ بصورت ضرورت مذکور کے نسل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اسکا ساختہ برواختہ منظور و قبول ہوگا اور دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے ہا گا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا ک سند ہے

المرقوم 16 ماہ نومبر ۲۰۲۱ء

دہر جانہ التوائے مقدمہ کے سبب سے ہا گا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا ک سند ہے

العبد گواہ شمس الہادی

Attested by Shamsul-Hadi Ad.   
 ۲۳۹۳۳۷۶۲۶

**BEFORE THE KHYBERPAKHTUNKHWA SERVICE TRIBUNAL CAMP**  
**COURT, SWAT**

SCANNED  
KPST  
Peshawar

Service appeal No. 7798/2021

Miss: Nusrat Bibi

.....Appellant

Versus

DEO (Female) Buner and other

.....Respondent

S.#	Description of Documents	Annexure	Page No.
1	Para wise comments		1-2
2	Affidavit		3
3	Copy of Service Book	A	4-12
4	Copy of Leave Sanction	B	13
5	Copy of notice in Newspaper	C	14
6	Removal Order	D	15
7	Authority Letter		16

*Spul*  
A DEO (F) Lūgān  
DEO (F) Buner

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 7798/2021

Miss. Nusrat Bibi

----- Appellant

**VERSUS**

1. District Education Officer (F) Buner & one other.

----- Respondents

PRELIMINARY OBJECTIVES

1. The appellant has got no locus standi to file this instant appeal.
2. **The instant appeal is badly time barred.**
3. That the appellant has concealed material facts from this honorable court.
4. That the appellant has not come to this honorable court with clean hands.
5. That the appellant just want to put extra pressure on the respondents.
6. That the appellant was quite for longer period of time and has approached this office after Nine Years.

REPLY OF PARA WISE COMMENTS ON BEHALF OF RESPONDENT NO. 1

& 2

Respectfully shewith

1. Agreed up to the extent that the appellant joined PST in this department but she did not perform her duty with zeal and zest. She remained on leave for most period of time.
2. Last leave without pay was sanctioned to appellant vide EDO Buner Endst: No. 2070 dated: 13/07/2010 w.e.f. 08/04/2010 to 31/03/2011 (359 days). **(Copy of Service Book is attached as annexure-A)**
3. **Incorrect hence denied:** The appellant ~~was~~ leave was extended for an year w.e.f 03-07-2008 to 02-07-2009 (365 days) vide this Office Endst: No. 10152-55 /EDO/DO/ADO Estab: dated: 06-10-2007 **(sanction order is attached as annexure-B)**. Later on another leave was granted to the appellant w.e.f 08-04-2010 to 31-03-2011 (359 days) vide this Office Endst NO. 2070 dated 13-07-2010 **(already attached as annexure-A)**. Then upon the completion of this leave period she was directed to resume her duty. Neither any such request has been submitted to the office for extension of leave nor she was given any sort of assurance by the office of undersigned. Rather the appellant was informed through this office notice No. 186 dated: 25/04/2011, office notice No. 220 dated: 14/05/2011, office notice No. 231 dated: 28/05/2011 and a final notice in the Daily Mashriq Newspaper

Dated: 16/08/2011 (**Copy of absent Notice published in Daily Mashriq Newspaper attached as annexure-C**) to resume her duty but no such response was given to the undersigned then she was removed from the service vide this office Order No. 11047-52 dated 30-08-2012 (**Copy of Removal from Service Order is attached as annexure-D**).

4. **Incorrect hence denied:** as explained in para No. 3 that the appellant has been removed from service after following all the legal procedures.
5. **Incorrect hence denied:** upon completion of One Year leave she had been informed through multiple notices to resume her duty but she failed to do so. She had been absent from duty since 2012 till date. Interestingly, the appellant claim that she has come to know about her removal from service after Nine Years and then submitted an application on dated: 15/08/2021 for reinstatement into service.

**GROUND:**

- A. Incorrect hence denied: That the removal order in respect of the appellant is according to the facts , law and procedure.
- B. Incorrect hence denied: That the appellant was treated in accordance with law and relevant rules.
- C. Incorrect hence denied: Being a Govt: Officer the undersigned perform her duty with honesty and there could not be any question of personal ill well with the appellant.
- D. Incorrect hence denied: explained in Para No. 3 and 4 of the Para wise Comments.

**PRAYER**

In light of the above mentioned facts it is kindly requested to this Honourable Court to dismiss this instant Service Appeal in favour of the Department please.

  
DISTRICT EDUCATION OFFICER (F)  
BUNER

  
DIRECTOR  
ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR

3

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL CAMP COURT SWAT**

**Service Appeal No. 7798/2021**

Miss. Nusrat Bibi

----- Appellant

VERSUS

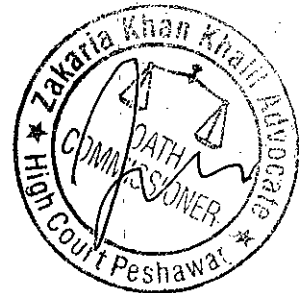
District Education Officer (Female) Buner & One Other-----Respondents.

**AFFIDAVIT**

I Iftikhar Ali ADEO Litigation O/O District Education officer (Female) Buner do hereby solemnly affirms & state on oath that the whole contents of the reply are true & correct to the best of my knowledge & belief & nothing has been concealed from this August Court.

SIGN

CNIC No: 514-8400542-1



(For use in Police Department only)

Name:—

- 1.
- 2.
- 3.

Verification Roll No.                      dated                      received back.

Passed SSC - Exam: From  
BISE Saidi Sharif in Session  
1993 (A) Under R. No 526  
Secured 452 marks

Passed PTC Exam  
from RDE in Session  
1998 Under 3552  
Secured 707 marks  
RD on 11-5-98

Left Thumb-Impression

Sub Divisional Education Officer (P)  
D. D. Dargah District Dargah

Sub Divisional Education Officer (P)  
D. D. Dargah District Dargah

Qualifications	Date	Qualifications	Date
Passed Intermediate Exam From BISE Saidi Sharif in Session 1997 (C) Under R. No. 202640 Secured 455 marks English Pushio		First Arts	
		B.L. or B.A.	
Urdu		Pledership Examination	
Plan-Drawing		Training School Final Examination	
Finger Print		Other Qualifications:—	
Drill Instructing			
Court Duties			
Reserve Duties			

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

C.T. G  
[Signature]

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

1. Name: Ausrat Biki

2. Race: Afghan

3. Residence: Vill. Kowga (Kankoi) Dist Buner

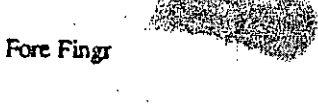
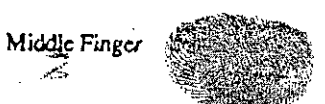
4. Father's name and residence: Shahzade

5. Date of birth by Christian era as nearly as can be ascertained: 17-7-1977 (Santauri July 17<sup>th</sup> 1977 d Santauri)


6. Exact height by measurement: 5-0

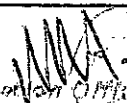
7. Personal marks for Identification: Wound mark on Right-Brow

8. Left hand thumb and Finger Impression of (Non-Gazetted) Officer.



*C.T.C. [Signature]*

9. Signature of Government Servant 

10. Signature and Designation of the Head of the Office, or other Attesting Officer.   
   
 Sub Divisional Education Officer  
 Buner District Buner



(6)

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Act. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of appointment	8 Signature of Government Servant
PTC Trainee			B.P.S. 7 = 1480 - 81 - 269.5				
QSPS Kadal	Sub/Per		1480/	Cutting allowed 15/12/99		15/12/99	N/A
do	do		1642/			15/12/99	N/A
do	do		1723/			1/12/2000	
do	do		1804/			1/12/2001	
do	do	Revised B.P.S. No. 7	2220 - 20 -	2220 - 20 -	5820		
do			Rs. 2700/			1/12/2001	
do			R. 2820/			1/12/2002	
Entries Revised w.e.f. 15/12/99							
PTC Trainee			B2-7, 1480 - 81 - 269.5				
QSPS Kadal	Sub/Per		1642/	1480/		15/12/99	N/A
do	do		1793	1561/		1/12/2000	N/A

CT-1

v. Datta: Officer  
Ju: (P/R) Byner

DEPARTMENT OF...

⊕

Signature of Government Servant	Date of termination of appointment	Reason for termination (retirement, promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Allocation of period of leave on average pay and leave months for which leave salary is payable to another Government	Signature of the head of the office or other attesting Officer	Reference to any record, book, list or other document of the Government Servant
<i>[Signature]</i>	18-12-79	2 line FA	<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	Appointed as Pte Teacher (D.P.T.) pay: Edu. P. order No. 653-82 dated
<i>[Signature]</i>	30-11-2000	A/S	<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	900 Divisional Education Officer Daggar District Buner
<i>[Signature]</i>	30-11-2001	Scale Revised	<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	Interim Leave sanctioned for period 27/2/2000 to 27/5/2000 Full pay with DDO (P) Buner No. 1463-65 dt 19-10-2000
<i>[Signature]</i>	30-11-2002	Am/ma	<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	900 Divisional Education Officer Daggar District Buner
<i>[Signature]</i>	30-11-2003		<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	Awarded 2 Adv. Grades Pass in PA, Exam: VI DDO (F) Mr. Buner on No. 1511-13 dt 15/11/2000
<i>[Signature]</i>			<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	900 Divisional Education Officer Daggar District Buner
<i>[Signature]</i>			<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	Service Verified 18-12-93 30-11 from the Acq. Roll and other records of this office.
<i>[Signature]</i>			<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	Sub Divisional Edu. office Daggar Distt. Buner.
<i>[Signature]</i>			<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	Service Verified w.e.f 1-12-2001 to 30-11-2002 from Acq. & other Record of this office
<i>[Signature]</i>			<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	Revised P7 in BPS 7 on 1-12-01 to 16-18-01
<i>[Signature]</i>			<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	Revised P7 in BPS 7 on 1-12-01 to 16-27-01
<i>[Signature]</i>			<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	
<i>[Signature]</i>			<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	
<i>[Signature]</i>			<i>[Signature]</i> Dy. Distt. Officer Edu. (F/P) Buner		<i>[Signature]</i>	

Wrong Entry

A H. H. H.

*[Signature]*

*[Signature]*  
Dy. Distt. Officer  
Edu. (F/P) Buner

*[Signature]*  
Dy. Distt. Officer  
Edu. (F/P) Buner

*[Signature]*  
Dy. Distt. Officer  
Edu. (F/P) Buner

*[Signature]*  
Dy. Distt. Officer  
Edu. (F/P) Buner

*[Signature]*  
Dy. Distt. Officer  
Edu. (F/P) Buner

*[Signature]*  
Dy. Distt. Officer  
Edu. (F/P) Buner

*[Signature]*  
Dy. Distt. Officer  
Edu. (F/P) Buner

*[Signature]*  
Dy. Distt. Officer  
Edu. (F/P) Buner

*[Signature]*  
Dy. Distt. Officer  
Edu. (F/P) Buner

*[Signature]*

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 374 C.S.R.	4 Pay in substantially the Post	5 Additional Pay for officiating	6 Other emolument falling under the term 'Pay'	7 Date of Appointment	8 Signature and name of the Head of the Office
PST Raidul	Sub PST	2820/-	2580/-		Officer Edu. (F/P) Buner	1/12/02	
PST Kankaha	Do	2940/-	2700/-		Officer Edu. (F/P) Buner	1/12/03	
<p>pay fixation is Revised B-7 w.e.f 8-10-05            B-7, 2555 - 140 - 6755</p>							
<p>Executive pay is B-7 on 7/10/2005 Rs 2940/-            pay fixed is Revised B-7 on 8/10/05 Rs 3395/-</p>							
<p>By: Dy. District Officer Edu. (F/P) Buner</p>							
<p><del>Do - Do - 3060/- 1/12/04</del></p>							
<p><del>B-7, 2555 - 140 - 6755 Resumed duty.</del></p>							
PST Kharclag	Do		3395/-			8/10/2005	
<p><del>By: Dy. District Officer Edu. (F/P) Buner</del></p>							

10	11	12	13		14	15	
			Period	Government to which debitable			
<p>Signature of the head of the office or other officer in charge of the Government</p>	<p>Date of termination of appointment</p>	<p>Reason of termination (such as promotion, transfer, dismissal, etc.)</p>	<p>Signature of the head of the office or other attesting Officer</p>	<p>Nature and duration of leave taken</p>	<p>Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government</p>	<p>Signature of the head of the office or other attesting officer</p>	<p>Reference to any recorded punishment or censure, or reward or praise of the Government Service</p>
<p>(F/P) Buner 11/03</p>	<p>11/03</p>	<p>Transfer to A/c</p>	<p>Dy: Distt: Officer Edu: (F/P) Buner</p>	<p>Service verified as of 1-12-2004/3/04 from Acc. Roll &amp; other Record of this office.</p>	<p></p>	<p></p>	<p></p>
<p>(F/P) Buner 03/04</p>	<p>03/04</p>	<p>proceed on leave</p>	<p>Dy: District Officer Edu (F) Distt: Buner</p>	<p></p>	<p></p>	<p>Dy: Distt: Officer Edu: (F/P) Buner</p>	<p></p>
<p>(2001) Office of the Accountant General N. W. F. P. Peshawar.</p> <p>Pay fixed in the revised basic pay scale 2001 of Rs. 2220-120-5820 (B-7) with next increment on 1-12-2002</p>	<p></p>	<p></p>	<p></p>	<p>① leave without pay w.e.f. 1-3-04 to 30-8-04) Six months sanctioned vide DCO Buner No: 6841-43/ dated 28/6/04</p>	<p></p>	<p>Dy: Distt: Officer Edu: (F/P) Buner</p>	<p></p>
<p>Account Officer Fixation Pesh N. W. F. P. Peshawar</p>	<p></p>	<p></p>	<p></p>	<p>② Extension to F.O. leave without pay w.e.f. 31-8-04 to 31-8-2005 i.e. 365 days is hereby accorded vide DCO Buner No 9397-99/Estab: 4-B Dated 17/8/05</p>	<p></p>	<p>Dy: Distt: Officer Edu: (F/P) Buner</p>	<p></p>
<p>Dy: Distt: Officer (F) Distt: Buner</p>	<p></p>	<p></p>	<p></p>	<p>③ Extension Extra ordinary leave without pay w.e.f. 1-9-2005 to 7-10-2005 (37 days) is hereby accorded vide EDO (S&amp;L) Buner No. 12296-99 Dated 2/16/12/05.</p>	<p></p>	<p>Dy: Distt: Officer Edu: (F/P) Buner</p>	<p></p>
<p>Dy: Distt: Officer (F/P) Buner</p>	<p>30/05</p>	<p>No. 1372 of 10/05</p>	<p>Dy: Distt: Officer Edu: (F/P) Buner</p>	<p>By and Allowances w.e.f. 8/10/05 to 31/05/06 adjustment order at 988/16th vide EDO (S&amp;L) Buner No. 12296-99 Dated 16/12/2005.</p>	<p></p>	<p>Dy: Distt: Officer Edu: (F/P) Buner</p>	<p></p>
<p>Dy: Distt: Officer Edu: (F/P) Buner</p>	<p></p>	<p></p>	<p></p>	<p>due adjustment of dates from leave</p>	<p></p>	<p>Dy: Distt: Officer Edu: (F/P) Buner</p>	<p></p>
<p>Dy: Distt: Officer Edu: (F/P) Buner</p>	<p></p>	<p></p>	<p></p>	<p></p>	<p></p>	<p>Dy: Distt: Officer Edu: (F/P) Buner</p>	<p></p>





9	10	11	12	13		14	15		
				Leave					
Signature of Government	Signature and office of the head of the office or other attesting officer in continuation of paras 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitible to another Government		Signature of the head of the office or other attesting officer	Reference to recorded punishment or censure, or for praise of Government
						Period	Government to which debitible		
						<p>④ Granted Leave w.r. 1-9-07 to 7-2-08 (60 days) with hal.</p> <p>8-2-08 to 2-7-08 (145 days) without pay wide EDO Sd/- Buner order No. 6375-78dt</p> <p><i>[Signature]</i> Distt. Officer (Sd/-) (F/P) Buner</p>			
						<p>⑤ Leave without pay w.r. 3-7-09 to 2-7-2009 Extended wide EDO, S Buner order No. 10152-55-dated 6-10</p> <p><i>[Signature]</i> Distt. Officer (Sd/-) (F/P) Buner</p>			
						<p>F 450 1481/2 Arrears of pay &amp; allowances w.e.f 03-7-2009 to 30-4-2010 (9 months &amp; 29 days) paid Rs. 73664/-</p> <p><i>[Signature]</i> DA 26/8/10</p>			
						<p>⑥ Leave without pay sanctioned wide EDO EV Buner No 2070 dated 13/7/2010 for the period 8-4-2010 to 31-3-2011 (359 days)</p> <p><i>[Signature]</i> Deputy District Officer (F) Primary School, Dargah</p>			

C.T. *[Signature]*

13

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY BUNER.

SANCTION ORDER: -

Sanction is hereby accorded to the grant of extension in leave without pay for the period of w.e.f 3/7/08 to 2/7/09 (365) days leave in respect of MST Nusrat Bibi PST GGPS kankowai as recommended by the DDO (F) Primary Buner vide No 1189 dated 06/10/2007 under the NWFP revised leave rules 1981, read with the District Govt rules of business 2001 and amendment made vide No. SO (LG-I) 3-196/EM/05 Dated 07/10/2005.

Necessary entries to this effect should be made in the service book of the official concerned.

(SULTAN ZEB)  
EXECUTIVE DISTRICT OFFICER  
SCHOOLS & LITERACY BUNER

Endst: No. 16152-55/EDO/DO/ADO (Estb) (F) Dated. 6 / 10 / 2007.

Copy of the above is forwarded to the: -

1. District Account Officer Buner.
2. Assistant District Officer (B&A) Local Office Buner.
3. Dy; District Officer (F)Pry; Buner.
4. Teacher concerned.

C.T. - c  
*[Handwritten signature]*

*Sultan Zeb*  
EXECUTIVE DISTRICT OFFICER  
SCHOOLS & LITERACY BUNER

\*Liqat J/C\*



124

### ریسرچ ٹیڈنگ کی 7 کلیمز اور ڈی کی ٹیڈنگ کی 3 کلیمز کا اعلان

ڈی کی (ریٹائرمنٹ) ڈیڈ لائن کے تحت ریٹائرمنٹ کے قابل کے سونچ برکلائز اور ڈی کی ٹیڈنگ کے سونچ برکلائز کے لیے ڈی کی ٹیڈنگ کی 7 کلیمز اور ڈی کی ٹیڈنگ کی 3 کلیمز کا اعلان کیا گیا ہے۔ اس کے تحت ریٹائرمنٹ کے قابل کے سونچ برکلائز اور ڈی کی ٹیڈنگ کے سونچ برکلائز کے لیے ڈی کی ٹیڈنگ کی 7 کلیمز اور ڈی کی ٹیڈنگ کی 3 کلیمز کا اعلان کیا گیا ہے۔

### کبل بانڈ میں 3 گاڑیوں کے مابین تصادم 4 بھائی زخمی

پشاور (پشاور پوسٹ) تحصیل کبل کے علاقے باڈی میں تین گاڑیوں کے مابین تصادم کے نتیجے میں 4 بھائی زخمی ہو گئے، گاڑیوں میں گزشتہ روز دو سو کاروں اور ڈی کی ٹیڈنگ کے مابین تصادم ہوا جس کے نتیجے میں 4 بھائی زخمی ہو گئے، بخت کرم، بخت نیر اور سید عالم زخمی ہو گئے۔

### پشاور میں ایک نیا شہر بنانے کا منصوبہ

پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔ اس کے تحت پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔ اس کے تحت پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔

### نوٹس فیئر حاضری

ایگزیکٹو ڈسٹرکٹ آفیسر پشاور ایڈمنسٹریشن ڈیپارٹمنٹ کے ذریعے اعلان کیا گیا ہے کہ اس کے تحت پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔ اس کے تحت پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔

1	186-7	25-4-11	2	220	14-5-11
3	231	28-5-11			

### پشاور میں ایک نیا شہر بنانے کا منصوبہ

پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔ اس کے تحت پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔ اس کے تحت پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔

## JOB OPPORTUNITIES

Directorate of Health Services FATA invites applications from the eligible candidates for filling of the vacant posts under ADP SCHEME "Health Management Information System in FATA".

Name of Post	Salary	Place of Duty	Domicile	Qualification
Data Manager	Rs. 30000/- per Month	Kurram Agency Orakzai Agency FR Peshawar/Kohat FR D.I Khan/Tank FR Bannu/Lakki	FATA/KPK	M.Sc Statistics Computer Skills Experience in Relevant field will be preferred

- Terms & Conditions:**
- Complete application must be submitted to Directorate Health Services FATA Warsak Road Peshawar along with attested academic documents, domicile and CNIC before 27/08/2011.
  - Candidates must mention their addresses and contact numbers in their applications.
  - Incomplete and after due date application will not be entertained.
  - Only short listed candidates will be invited for interview.
  - No TA/DA will be allowed for interview.
  - Preference will be given to the concerned Agency / FR domicile holders.

Director Health & Population Welfare  
FATA, Secretariat Warsak Road Peshawar

### پشاور میں ایک نیا شہر بنانے کا منصوبہ

پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔ اس کے تحت پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔ اس کے تحت پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔

### مشہوری ہوشیار باش

ہر خاص و عام کو مطلع کیا جاتا ہے کہ جائیداد نمبر 274111 مورخہ 217/05 واقع اندر مشہور ہوشیار باش کے تحت پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔ اس کے تحت پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔

### نوٹس فیئر حاضری

پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔ اس کے تحت پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔ اس کے تحت پشاور میں ایک نیا شہر بنانے کا منصوبہ تیار کیا گیا ہے۔

(15)

(6)

DAE (F)  
5/11/12  
Annex  
4

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY EDUCATION BUNER.

TERMINATION ORDER.

Where as Miss. Nusrat Bibi PST GGPS Kankowal remained absent from duty.

And where as she was directed to resume duty and explain her absences to immediate officer through various letters sent under registered covers.

And where as final absence notice was published in Daily Mashriq & Pakistan on 1/08/2011. She was directed to resume duty within 15 days and explain her willful absence and where as she did not report in the stipulated period.

The Executive District Officer Elementary & Secondary Education came to power to order the removal from service of Miss. Nusrat Bibi PST GGPS Kankowal from 01/08/2011 because of prolong willful absence.

Sol  
(Raj...)  
EXECUTIVE DISTRICT OFFICER  
ELEMENTARY & SECONDARY  
EDUCATION BUNER

Undst. No. 11047-52 / Dated: 30/8/2012

Copy for information is forwarded to:

1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. District Coordination Officer Buner
3. District Accounts Officer Buner at Degrar
4. Deputy District Officer (Female) Primary Buner W/ to P. No. 296 dated 1/8/2011
5. Head Teacher GGPS Kankowal Buner
6. Official Concerned.

*[Handwritten signature]*  
30/8/12

EXECUTIVE  
EDUCATION

C.T.  
*[Handwritten signature]*

C.T.A  
*[Handwritten signature]*

15 A

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND SECONDARY EDUCATION BUNER

TERMINATION ORDER.

Whereas Miss. Nusrat Bibi PST GGPS Kankowai, remained absent from duty and where as she was directed to resume duty and explain her absences to immediate officer through various letters sent under registered covers.

And whereas final absence notice was published in Daily Mashriq & Pakistan on 16/08/2011. She was directed to resume duty within 15 days and explain her without absence and whereas as she did not report in the stipulated period.

The executive District Officer Elementary & Secondary Education is pleased to order the removed from service of Miss Nusrat Bibi PST GGPS Kankowai from 04/04/2011 because of prolong willful absence.

C-7-4  
*[Handwritten signature]*

(Raja Muhammad Khan)  
Executive District Officer,  
Elementary & secondary

Endst No. 11047-52/dated 30/08/

Copy for information is forwarded to:

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Coordination officer Buner.
3. District Accounts Officer Buner at Daggar.
4. Deputy District officer (Female) Primary Buner w/r to No. 295 dated .
5. Head Teacher GGPS Kankowai Buner.
6. Official Concerned.

Executive District Officer,  
Elementary & secondary

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**AUTHORITY LETTER**

I hereby declare to authorize Mr. Iftikhar Ali ADEO (Litigation) to submit comments of the Department in Service Appeal No, 7798/2021 with the title Miss. Nusrat Bibi Versus DEO (Female) Buner & one others in Service Tribunal Camp Court Mingora Swat.

  
DISTRICT EDUCATION OFFICER (F)  
BUNER