S.No. of	Date of Order	Order or other proceedings with signature of Judge or Magistrate and that of
proceedings	or proceedings.	parties where necessary.
1	2	3
•		
		KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR CAMP COURT ABBOTTABAD.
		SERVICE APPEAL NO 704/2015
, •		
		(Ms. Iffat Huma-vs-Secretary to Govt. Of Khyber Pakhtunkhwa Elementary and Secondary Education Department, Peshawar and others).
	16.02.2016	JUDGMENT
		MUHAMMAD AZIM KHAN AFRIDI, CHAIRMAN:
		Counsel for the appellant, Mr. Zahid Gul, ADO alongwith Mr. Muhamma
	-	Saddique, Senior Government Pleader for official respondents No.1 and 2 and
	·	counsel for private respondents No.3 and 5 present.
÷ u		2. Ms. Iffat Huma D/o Muhammad Ajab Khan, hereinafter referred to as th
		appellant, has preferred the instant appeal under Section-4 of the Khyb
	-	Pakhtunkhwa Service Tribunal Act, 1974 against the order 18.03.2015 vide which
\wedge		she was transferred from GGHS Kunj Abbottabad to GGHSS Richbin Abbottab
	16.	as Incharge Principal in her own pay scale.
X	V . O	3. During the course of arguments it was brought to our notice that the
,		above order will be effective if the appellant and one Mst. Sajida Aziz, SS priva
		respondent No.6 give an undertaking to the Secretary Elementary ar
		Secondary Education to the effect that they will not claim benefits of graded p
		and seniority of the higher pay scale.

4.

During the course of arguments learned counsel for the appellant, when

confronted with the afore-stated requirement, informed us that the appellant is

not willing to furnish any undertaking or affidavit as required of her in Para-2 of the impugned notification of transfer referred to above.

- 5. Since the afore-stated notification pertaining to transfer of the appellant is subject to undertaking/affidavit of appellant and is actionable subject to consent of appellant as such we do not see any reason to interfere with the same as the appellant is in a position to avoid its implementation by giving no undertaking.
- 6. For the afore-stated reason the appeal against the impugned order is not found competent. The same is, therefore, dismissed. No order as to costs. File be consigned to the record room.

(Abdul Latif) Member (Muhammad Azim Khan Afridi) Chairman

Chairman

ANNOUNCED 16.02.2016 19.01.2016

Counsel for the appellant and Mr. Zahid Gul, ADO alongwith Mr. Muhammad Saddique, Sr.G.P for official respondents present. Rejoinder submitted. Learned Sr.GP requested for adjournment. Adjourned for final hearing before D.B to 16.02.2016 at Camp Court A/Abad. Statusquo be maintained.

A

Member

Charman Camp Court A/Abad

17.11.2015

Counsel for the appellant, Mr.Zahid Gul, ADO alongwith Mr.Muhammad Siddique, Sr.G.P for official respondents and counsel for private respondents No.3 and 5 present. Undertaking by respondent No.3 submitted according to which she relies on the written statement submitted by respondent No. 1. Counsel for private respondent No.5 submitted Wakalat Nama and requested for adjournment. Last opportunity for submission of written statement granted to respondent No.5. None present on behalf of private respondent No.6. Proceeded exparte. To come up for written reply/comments on behalf of private respondent No.5 on 15:12:2015 before S.B at Camp Court A/Abad. Status-quo be maintained.

Charman Camp Court A/Abad.

15.12.2015

Counsel for the appellant, Mr.Zahid Gul, ADO alongwith Mr.Muhammad Siddique, Sr.G.P for official respondents No.1 and 2 and counsel for private respondents No.3 to 5 as well as counsel for private respondent No.6 present. Application for setting aside ex-parte proceedings alongwith undertaking by counsel for private respondent No.6 submitted. In view of the application and undertaking the ex-parte proceedings are set aside. According to undertaking private respondent No.6 has relied on the written statement of respondent No.1. Private respondent No.5 also submitted undertaking according to which she also relies on the written statement of respondent No.1. The appeal is assigned to D.B for rejoinder and final hearing for 19.01.2016 at Camp Court A/Abad. The restraint order to the extent of transfer of appellant shall continue.

Chairman Camp Court A/Abad 14.9.2015

Counsel for the appellant, Mr.Zahid Gul, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for official respondents No.1 & 2 and counsel for private respondents No.3 & 6 present. Requested for adjournment. To come up for written reply/comments on behalf of all respondents as well as reply to application and arguments on the same on 20.10.2015 before S.B at Camp Court A/Abad. Status-quo be maintained.

Chairman Camp Court A/Abad

20.10.2015

Counsel for the appellant, Mr.Zahid Gul, ADO alongwith. Mr.Muhammad Tahir Aurangzeb, G.P for official respondents No.1 & 2, counsel for private respondents No.3 and 5 and private respondent No.5 in person present. Written reply and reply to application by respondent No.1 submitted. The learned G.P rely on the same on behalf of respondent No.2. Counsel for private respondents No.3 & 6 requested for adjournment. To come up for written statement and reply to application on 17.11.2015 before S.B at Camp Court A/Abad. Statusquo be maintained.

Chai**l**nan Camp Court A/Abad. 4 22.7.2015

Counsel for appellant and Mr.Muhammad Tahir Aurangzeb, G.P for official respondents No.1 & 2 present. Though the case was fixed for hearing on 21.7.2015 which date was declared as gazetted holiday on the eve of Eid-ul-Fiter and therefore taken up today. None present for private respondents No.3 to 6. Fresh notices be issued to the said respondents. To come up for written reply/comments on 17.8.2015 before S.B at camp court A/Abad. Status-quo be maintained.

Chairman Camp Court A/Abad

17.08.2015

Counsel for the appellant and Mr. Zahid Gul, ADO (Lit) alongwith Mr. Muhammad Tahir Aurangzeb, GP for official respondents No.1 and 2 and counsel for private respondents No. 3 and 6 present. Wakalat Nama on behalf of private respondent No.6 submitted. Application submitted, notice whereof be given for 14.09.2015 for reply before S.B at camp court A/Abad. Statusquo be maintained.

Chayrman
Camp Court Abbottabad

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as Headmistress at (BS-17) at GGHS Kunj Abbottabad and that vide impugned order dated 18.3.2015 she was transferred as Principal against the post of BS-18 in her own pay scale i.e BS-17 at GGHSS Rich Bin Abbottabad. That the impugned transferred has been made in order to favour and accommodate Mst. Saira Parveen, private respondent No. 3, serving as Vice-Principal at adjacent school GGHSS Comprehensive Abbottabad. That against the impugned order appellant preferred departmental appeal on 21.3.2015 which was not responded and the appellant then preferred Writ Petition wherein directions were issued for deciding the departmental appeal within a month which was not decided in the prescribed period and hence the instant service appeal on 24.6.2015.

(3) (3) (1)

That despite the fact that the appellant is an aged ailing civil servant, she was transferred to a far-flung hard area where school is situated at a distance of 2/1-2 furlong to be covered on foot from the near by road. That according to para-2 of the impugned order the transfer is also made conditional with an object to deprive the appellant from the benefits of graded pay and seniority of higher pay scale. That the impugned order is a nullity in the eye of law as the same was made despite ban imposed by the Chief Minister.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 21.7.2015 at Camp Court Abbottabad as the matter pertains to the territorial limits of Hazara Division. Notice of stay application be also issued for the date fixed. Status-quo be maintained.

Chairman

Annellant Deposited

Form- A FORM OF ORDER SHEET

Court of	<u> </u>
Case No	704 /2015

	Case No	704 /2015			
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate			
1	2	3			
1	24.06.2015	The appeal of Mst. Iffat Huma presented today by Mr.			
	•	Ahmad Farooq Ahmad Khan Advocate, may be entered in the			
-		Institution register and put up to the Worthy Chairman for			
		proper order.			
		REGISTRAR			
2		This case is entrusted to S. Bench for preliminary			
		hearing to be put up thereon 2 4 . p 6.1).			
		CHAIRMAN			
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	•				

BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHWA PESHAWAR

Appeal no . 704/2015

Ms. IFFAT HUMA<u>APPELLANT</u>

VERSUS

SECRETARY TO GOVT OF KPK ELEMENTARY AND SECONDARY EDUCATION AND OTHERS.......RESPONDERS

SERVICE APPEAL

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S.No	Description of Documents	Annex	Pages
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3.	Addresses Of the Parties		8
4.	Copies of Medical Record	A&B	9-13
5.	Copies of Teaching Awards & Certificates	C&D	14-18
6.	Copy of Impugned Notification	E	- 19
7.	Copy of Departmental Representation	F	-20
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10.	Copies of the Departmental Circulars	K.	30-34
11.	Wakalat Nama		- 35

Date: 24-6-15

Appellant

Through

AHMED FAROOQ KHAN

Advocate, High Court.

BEFORE THE SERVICE TRIBUNAL KHYBER

PUKHTOONKHWA PESHAWAR

Appeal no. 704/2015 Ms. Iffat Huma D/O Muhammad Ajab Khan Cast: Swati, Headmistress GGHS Kunj Abbottabad......Appellan

VERSUS

- 1) SECRETARY TO GOVT. OF KHYBER PUKHTOONKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT PESHAWAR.
- 2) DIRECTOR & SECONDARY ELEMENTARY **EDUCATION** DEPARTMENT PESHAWAR.
- 3) Ms. Saira Parveen HM Working as I/C Vice Principal at GGHSS Comprehensive Abbottabad.
- 4) Ms. Naheed Begum HM GGHS Richbin Abbottabad.
- 5) Ms. Iffat Sultana Subject Specialist GGHSS Comprehensive Abbottabad.
- (6) Ms. Sajida Aziz Subject Specialist Islamiyat GGHSS Takht-e-Khurd Mansehra.Respondents

test when show ide. 8 dtiplingir.

APPEAL AGAINST THE ODER OF RESPONDENT NO.1 NOTIFICATION NO: SO(S/F)E&SE/4-16/2015/Principals/HMs/SSs Dated: March 2015 VIDE WHICH THE APPEALANT HAS BEEN TRANSFERRED/POSTED INCHARGE PRINCIPAL GGHS RICHBIN ABBOTTABAD AND RESPONDENT NO. 3 HAS BEEN POSTED IN PLACE OF APPELLANT.



PRAYER:-

By accepting this appeal, the impugned notification be set aside, being malafide, without lawful authority, illegal, based on discrimination, against the posting transfer policy of Govt. of KPK and based on political interference.

RESPECTFULLY SHEWETH:

The facts material to this appeal are as under:-

1. The Appellant is serving in the Education Department since June 1998 and is the resident of District Abbottabad.

2. The Appellant served and was posted in various remote areas and was adjusted on a vacant post at GGHS Kunj Abbottabad.

19

- 3. That Appellant has suffered from Osteoarthritis and Rheumatoid arthritis along with Heart Disease i.e. Atrial Fibrillation. Her medical record is attached as annexure A&B.
- 4. That Appellant has performed her duties to the best of her abilities and capabilities and received The Best Teacher Awards 2010 to 2014 and Certificate of Appreciation 2014. The copies of Certificates are annexure C&D.
- 5. Previously Respondent No: 3 was posted on her promotion as Head Mistress of GGHSS Sawan Maira District: Mansehra where she remained hardly for a few days. Respondent No.3 has maneuvered and due to her influence in Education Department she managed to get posting as Incharge Vice Principal at GGHSS Comprehensive Abbottabad although on merit she was not qualified to be posted as Incharge Vice Principal.
- 6. That Respondent No. 1 and Respondent No. 2 again adjusted Respondent No. 3 by posting the Appellant on a wrong post situated at a far flung, remote hilly area in order to accommodate and facilitate Respondent No.3 against the merits. Similarly Respondents No. 4-6 were also accommodated illegally. The copy of impugned notification is annexure E.
- 7. That Appellant preferred a departmental representation to the Respondent no. 1 which is still undecided. The copy is annexure F.
- 8. That the appellant challenged the impugned notification before the Peshawar High Court Bench Abbottabad on 31/03/2015. The impugned notification was suspended and on 19/05/2015 the appellant did not press her petition on the request that her departmental appeal be decided in accordance with Law and on merit basis and a directive was issued to the Respondent No.1 that the same be decided within 1 month. Copy of the writ petition and orders are annexure G, H & I respectively.
- 9. That the appellant seeks the gracious indulgence of this Honorable Tribunal inter-alia on the following amongst other grounds:

<u>GROUNDS</u>

a) That the impugned notification is illegal, without lawful authority against the merit policy and is void ab-initio.

- b) That the impugned notification is based on political interference, malafide, nepotism and discrimination.
 - c) That the impugned notification is also against the merit policy and has been issued during the period of complete ban on posting and transfers by the Govt. of KPK. The Honorable Chief Minister of KPK also directed an inquiry in the case of appellant transfer during the period of ban and Directives were issued to the Minster of Education KPK who sent the Directives to Respondent No. 1 but till now no inquiry has been conducted by the Minister of Education and Respondent No.1. Copy of the same is annexure J.
 - d) That Respondent No: 3 seemed to be the blue eyed of Authorities of Education Department and the impugned notification is a clear stance to accommodate Respondent No: 3 by disturbing the Appellant.
 - e) That the Appellant has been transferred to a wrong post which also is illegal and without lawful authority and of no legal effect and against the Govt. Policy. Moreover Appellant will further suffer in a month or two because regular list of BPS-18 is shortly to be announced and definitely a Head Mistress promoted in BPS-18 will be posted in place of the Appellant in GGHSS Richbin thus Respondents have deliberately made the Appellant a rolling stone.
 - f) That through the impugned notification Respondent No: 3-6 have been facilitated illegally whereas the appellant miseries have been multiplied.
 - g) That Appellant is suffering from two chronic diseases of Heart and Arthritis i.e. Chronic Atrial Fibrillation and Rheumatoid Arthritis with Osteoarthritis. GGHSS Rich Bin is located far away from the road on a steep slope and it is impossible for a Patient of Heart Disease and Arthritis to travel on foot to reach the school and that area also lacks Medical Facilities.
 - h) That Respondent No. 4 by getting promotion in BPS-17 in a High School situated in District Mansehra and thereafter managed to be appointed as Incharge Principal GGHS Richbin where she remained hardly for a short time and then managed with the blessing of Respondent No.1 & 2 to be appointed as Head Mistress GGHSS Gumanwan Abbottabad. Similarly Respondent

No.5 has been appointed as Vice Principal in GGHSS Comprehensive Abbottabad in the same School and the Respondent No.6 was also facilitated and only the appellant has been penalized through the impugned notification for the reason unknown.

- i) That the appellant has been transferred to a wrong, irregular Post and the condition mentioned in the impugned notification is also illegal, without lawful authority and against the principles of natural justice. A person posted on an irregular post is entitled to get all the pecuniary benefits of the graded pay and allowances.
- j) That the impugned notification is against the departmental circulars 29/75. Copies of the same are annexure K.
- k) Other grounds will be discussed at the time of Hearing.

It is, therefore, humbly prayed that on acceptance of this constitutional appeal this Honorable Tribunal may graciously be pleased to declare that:

- I. The transfer/posting order of Appellant by the Respondent No: 1 is based on malafide, political interference, misuse of authority, against the merit policy and ultra vires of the Constitution.
- II. That the impugned notification is base on discrimination, without lawful authority, nepotism and is void ab-initio.
- III. That the impugned notification has been issued during the period of complete ban on Posting and Transfers and is also against the merit policy just to illegally accommodate and facilitate Respondents No. 3-6 thus amounts to discrimination
- IV. That Appellant is suffering from two chronic diseases of Heart and Arthritis i.e. Chronic Atrial Fibrillation and Rheumatoid Arthritis with Osteoarthritis and therefore her case falls within the four corners of compassion and hardship and she is entitled for extraordinary relief.

Appellant

Through 🔑

AHMED FAROOQ KHAN,

Advocate, High Court.

Dated: 24-6-13

AFFIDAVIT

I, Ms. Iffat Huma D/O Muhammad Ajab Khan Cast: Swati, Headmistress GGHS Kunj Abbottabad do hereby solemnly inform and declare on oath that the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

DEPONENT



BEFORE THE SERVICE TRIBUNAL KHYBER PUKHTOONKHWA PESHAWAR

VERSUS

- 1) SECRETARY TO GOVT. OF KHYBER PUKHTOONKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT PESHAWAR.
- 2) DIRECTOR ELEMENTARY & SECONDARY EDUCATION DEPARTMENT PESHAWAR.
- 3) Ms. Saira Parveen HM Working as I/C Vice Principal at GGHSS Comprehensive Abbottabad
- 4) Ms. Naheed Begum HM GGHS Richbin Abbottabad.
- 5) Ms. Iffat Sultana Subject Specialist GGHSS Comprehensive Abbottabad.

APPLICATION FOR SUSPENSION OF IMPUGNED NOTIFICATION AND GRANT OF STATUS QUO

RESPECTFULLY SHEWETH:

- 1. That the Appellant has filed the above noted Appeal in this Honorable Tribunal the same be considered part of this application.
- 2. It is also prayed that the impugned notification is not only illegal but also unconstitutional and there is every likelihood that the impugned notification will be set aside by the Honorable Tribunal and that Appellant has Prima Facae case and the balance of convenience also heavily lies in favor of the Appellant in the maintenance of status quo ante.
- 3. It is further prayed that if the Respondents are not restrained from implementing the impugned notification, the Appellant will suffer irreparable loss as the said notification will also create further complications.

4. Any other remedy which deems fit by this Honorable.

Tribunal may also be granted in favor of the Appellant.

It is prayed till the final disposal of this appeal the impugned notification may be suspended and status quo may kindly be granted.

Appellant

Through,

AHMED FAROOQ KHAN,

Advocate, High Court.

AFFIDAVIT

Date: 2 4 - 6 - / /

I, Ms. Iffat Huma D/O Muhammad Ajab Khan Cast: Swati, Headmistress GGHS Kunj Abbottabad do hereby solemnly inform and declare on oath that the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

24-6-12

PUKHTOONKHWA PESHAWAR

VERSUS

- 1) SECRETARY TO GOVT. OF KHYBER PUKHTOONKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT PESHAWAR.
- 2) DIRECTOR ELEMENTARY & SECONDARY EDUCATION DEPARTMENT PESHAWAR.
- 3) Ms. Saira Parveen HM Working as I/C Vice Principal at GGHSS Comprehensive Abbottabad
- 4) Ms. Naheed Begum HM GGHS Richbin Abbottabad.
- 5) Ms. Iffat Sultana Subject Specialist GGHSS Comprehensive Abbottabad.

ADRESSES OF THE PARTIES:

APPELLANT

Ms. Iffat Huma D/O Muhammad Ajab Khan Cast: Swati, BAFFA HOUSE, STREET NO: 3, RAHE SAKOON HABIB ULLAH COLONY ABBOTTABAD.

RESPONDENTS:

- 1) SECRETARY TO GOVT. OF KHYBER PUKHTOONKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT CIVIL SECRETARIATE PESHAWAR.
- 2) DIRECTOR ELEMENTARY & SECONDARY EDUCATION DEPARTMENT PESHAWAR.
- 3) Ms. Saira Parveen HM Working as I/C Vice Principal at GGHSS Comprehensive Abbottabad.
- 4) Ms. Naheed Begum HM GGHS Richbin Abbottabad.
- 5) Ms. Iffat Sultana Subject Specialist GGHSS Comprehensive Abbottabad.
- 6) Ms. Sajida Aziz Subject Specialist Islamiyat GGHSS Takht-e-Khurd Mansehra

Through

AHMED FAROOQ KHAN,

Advocate, High Court.

Date: 24-6-1)



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Methotrexate 7.5 Mg

Folic Acid 5 Mg

Shifa International Hospitals Ltd.

Sector: H-8/4, Islamabad - Pakistan Tel: 051-8463000 Fax: 051-4863182 Cardiology Deptt.: 051-8463123, 8463124

Dr. Habib-ur-Rahman

M.D., F.A.C.C. (USA)

Diplomate, American Board of Internal Medicine and Subspecialty of Cardiovascular Diseases Consultant Cardiologist

أيك محمولي فتحايثان

أنيك تحولي روزانه

Mrs.	Iffat	Huma	54v	8m	Female

MR No 02-20-56

February 4, 2015

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COLL	plaints	

Left Pectoral Pain

Signs:

BP: 130/80 mm/Hg Pulse: 82 /min Weight: 84 Kg Chest Clear No Gallop

Investigation:

7/04/14 Echo LA 46 ,RA 44 Mild MR , LFT Normal 8/14 INR 1.8

Recent IND (1/15) 2.5

Diagnosis:

Atrial Fibrillation RA

Plan:

Patient needs long term use of above medications for at least one year.

براه کرم مشوره کے بغیر دوائی بند، کم ، یا تبدیل ندکریں پیاب ک سام لی

Doctor's Signature

Patient Medical Records Shifa International Hospitals Ltd.

Printed On Wednesday, February 4, 2015 @ 2:41 PM

Page 1 of 3

Prof. Zahid Aslam Awan

HMC-Peshawar.

Cardiologist/Electrophysiologist

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Shifa International Hospitals Ltd.

Sector: H-8/4, Islamabad - Pakistan

Tel: 051 8463123 3124

Mrs. Iffat Huma 53y 10m Female

02-20-56

Fox: 051-4863182

Dr. Yusuf Hassan (MD)

MBBS, MRCP (UK)

Diplomate American Board of Internal Medicine Diplomate American Board of Cardiology Diplomate American Board of Interventional Cardiology Board Certified Comprehensive Echocardiography Consultant Interventional Cardiologist

April 29, 2014

Warfin (Warfarin) 5 Mg

. Note ONE DAILY

Complaints:

MR No

Patient here for atrial fibrillation documented on the recent ECGs She says since 1995 some one had told her that she has rhythm issues with her heart She is asymptomatic and denies history of chest pain or shortness of breath

Complains of left sided neck and upper shoulder pain with numbness over the area\ No history of hypertension or diabetes No history stroke

Exam normal JVP with normal auscultation of heart |(atrial fibrillation with heart rate of over 90)

Signs:

Plan:

Patient is in permanent atrial fibrillation her CHAD-VASC score approars low (will oblain ocho to contian) Will start on lowplat plus Will also switch from beta blocker to herbesser Explained how rate control is appropriate as numerous trials have shown no benefit with rhythm control

براد كرم مثوره كے بغير دوائي بند ، كم ما تبديل ندكري

Doglor's Signature

Pằge 1 of 2

Solient Medical Records a katosiia dienaal Hospitads kiel





Shifa International Hospitals Ltd.

Sector : H-8/4, Islamabad - Pakistan

Tel: 051-8463123-3124 Fax: 051-4863182

Investigation:

Outside ECG Atrial fibrillation with heart rate of about 100

Diagnosis:

Atrial Fibrillation

Alberton 24-6-1

Dr. Yusuf Hassan (MD)

MBBS, MRCP (UK)
Diplomate American Board of Internal Medicine
Diplomate American Board of Cardiology
Diplomate American Board of Interventional Cardiology
Board Certified Comprehensive Echocardiography
Consultant Interventional Cardiologist

Patient Medical Records Shira International Hospitals Etd.

Printed On Saturday, June 28, 2014 @ 12:21 PM

Doctor's Signature

byde 5 ot 5

شفا الثرنيشنل صحبتال اسادع اباد

Shifa International Hospitals Ltd.

Sector: H-8/4, Islamabad - Pakistan

Tel: 051-8463012, 8463083

Fax: 051-4863182

Dr. Zafar Ullah mbbs, mrcp, mrcgp (UK) Specialty Certificate Rheumatology Associate Consultant Rheumatologist

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OF THE DISTRICT EDUCATION ON THE DISTRICT ED

CENTRALE OF APPRECIATION

Presented this Certificate of Appreciation to GGHS KUNJ in recognition of your valuable contribution.

During the visit of undersigned it was observed all staff was present including teaching and non teaching staff and teachers were found in their classes and busy in teaching learning process. School was neat and clean. Credit goes to headmistress, teaching non teaching staff and clerk. Hard work of all staff and dedication make our school better and contribute significantly to students and community satisfaction.

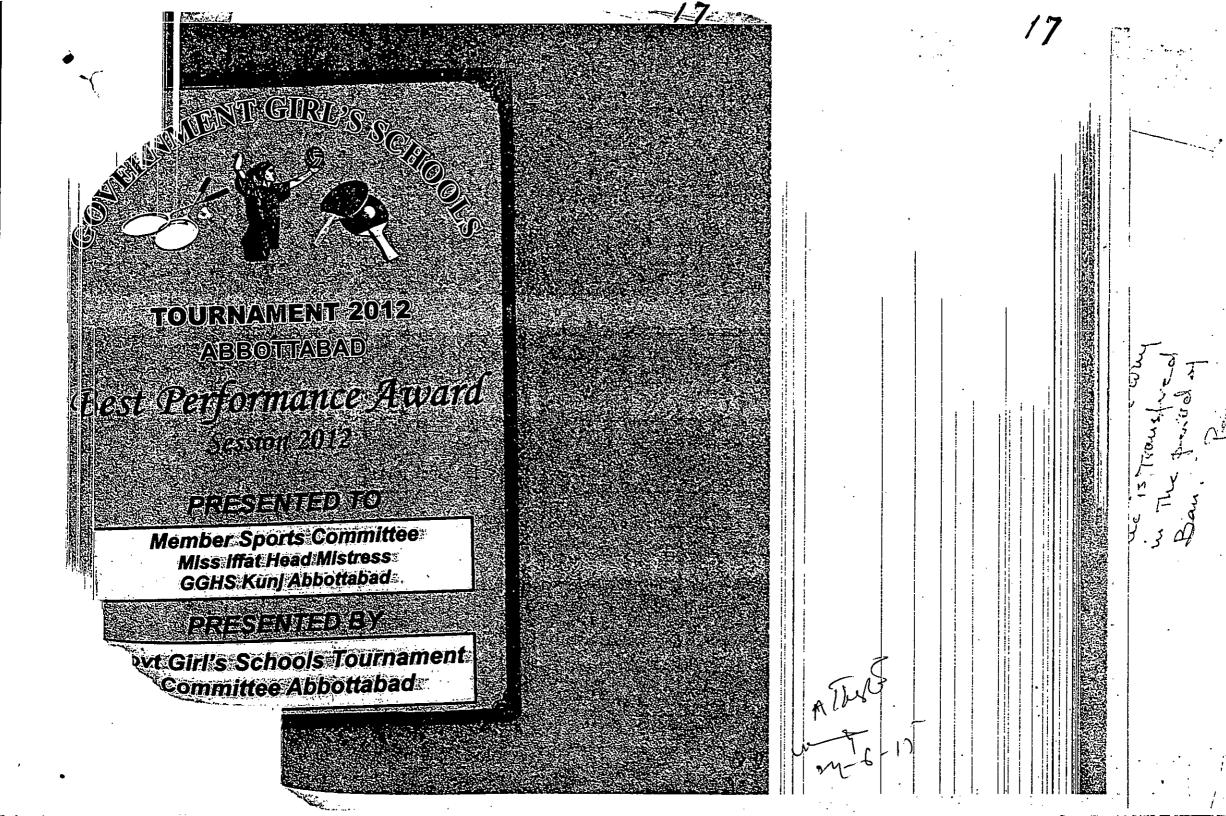
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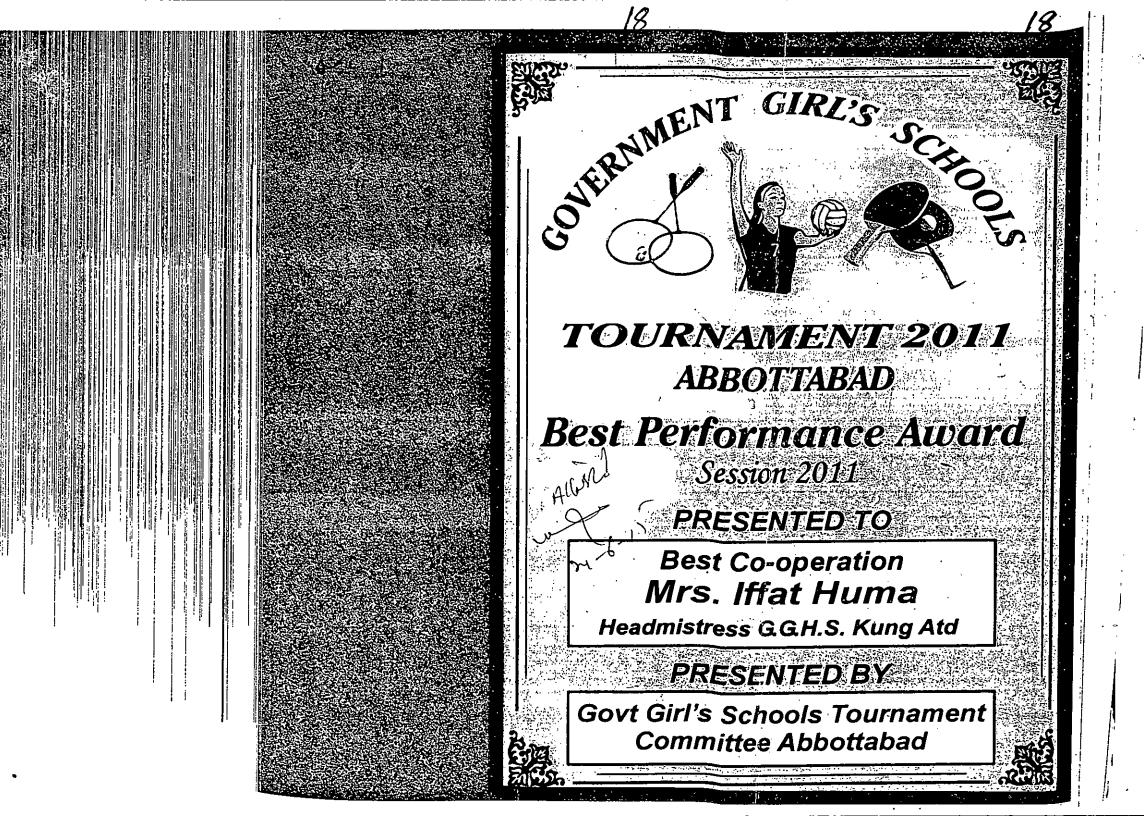
A162002



DISTRICT ABBOTTABAD

BESTEREDE DE SECONDARY SCHOOLS CO. CURRICULAR ACTURA DISTRICT ABBOTTABAD BEST PERFORMANCE CERTIFICATE Certified that Miss. 40 Designation Memb Co - Operated in a best Mainner Co - Cu Mrs. Hina Fatima Principal, GGCMHS, Nawanshehr, Atd. Sport Secretary Distt: Abbottabad







GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT



Dated Peshawar the, March 18, 2015.

NO.SO(S/F)E&SE/4-16/2015/Principals/HMs/SSs,: The following posting / transfer of female officers are hereby ordered with immediate effect:-

S.No	Name, Designation & place of posting	To	·
2	Ms. Iffat Huma Headmistress (BS-17) GGHS Kunj Abbottabad. Ms. Saira Parveen HM (BS-17) working as	I/C Principal (BS-18) GGHSS Rich Bin Abbottabad (in her own pay & scale)	Remarks Against vacant post
3.	Comp: Abbottabad (BS-18) at GGHSS	Headmistress (BS-17) GGHS Kunj, Abbottabad.	Vice S.No.1.
J.	Ms. Naheed Begum HM (BS-17) GGHS Rich Bin, Abbottabad (awaiting for posting)	Headmistress (BS-17) GGHS Gumanwan, Abbottabad	Against vacant post
4.	Ms. Iffat Sultana Subject Specialist Islamiyat (BS-18) GGHSS Comp: Abbottabad	Vice Principal (BS-18) GGHSS Comp: Abbottabad	Vice S.No.2
5.	y ====================================	I/C Subject Specialist (BS-18) GGHSS Comp: Abbottabad (in her own pay & scale)	Vice S.No.4

The above orders will be effective subject to the condition that Ms. Iffat Huma HM (S.No.1) & Ms. Sajida Aziz SS (S.No.5) will give an undertaking / Affidavit on legal / stamp paper to Secretary E&SE / Directorate E&SE, Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

No TA / DA allowed.

A There - 1)

SECRETARY

Endst.of even No & date

Copy forwarded to the:-

- Accountant General, Khyber Pakhtunkhwa Peshawar.
- 2. Director, E&SE, Peshawar.
- 3. District Education Officer (F) Abbottabad & Mansehra.
- 4. District Accounts Officer Abbottabad & Mansehra.
- 5. Incharge EMIS, E&SE Department.
- 6. PS to Secretary E&SE Department.
- Officer concerned.
- 8. Office order file.

(FØZIA NAZ)

SECTION OFFICER (S/F)

To.

The Secretary,

Govt of Khyber Pakhtunkhwa,

Elementary and Secondary Education Department,

Peshawar.

Through:-

District Education Officer,

(Female) Abbottabad.

Subject:

APPLICATION FOR WITHDRAWING THE NOTIFICATION NO.SO(S/F)E&SE/4-16/2015/Principals/HMs/SSs DATED 18.3.2015

Respected Sir,

The applicant submits as under:

- 1. The applicant is presently serving as Headmistress (BPS-17) GGHS Kunj Abbottabad and prior to that has served in the remote area and never at home station.
- 2. That according to the above notification applicant has been transferred to a wrong posting BPS-18 subject to furnishing affidavit and undertaking.
- 3. That the applicant requests for the withdrawal of above notification to the extent of applicant on following reasons:
 - i). Before present post, applicant served her entire service in remote and difficult areas.
 - ii) That applicant is a heart patient as well as suffering from Rheumatoid Arthritis with Ostio Arthritis due to which she cannot go upstairs and downstairs because her knees cannot bend since 2010. Medical record is attached for your kind consideration.
 - iii). That despite of her illness, the applicant performed to the best of her abilities and received compliments and certificates of appreciation from authorities (Copies attached).
 - iv). Due to health reasons applicant is incapable to travel long journey because GGHS Rich Bhen is situated far away in remote hilly area and school building is situated in a steep slope down from the road leading through narrow difficult way as the applicant's knees are unable to bend due to arthritis and it is impossible for applicant to reach the school building from road. As it is mentioned in the notification that it will only be effective when applicant submits affidavit and undertaking. So applicant is unwilling in the light of above submission to furnish affidavit and undertaking.

It is, therefore, requested that the above mentioned notification may kindly be cancelled / withdrawn on humanitarian grounds.

Allered 24-6-15

Yours Maithfully IFFAT HUMA, GGHS KUNJ, ABBOTTABAD

21-3-15

BEFORE THE PESHAWAR HIGH COURT, BENCH

ABBOTTABAD

w/ 304A/1-

Ms. Iffat Huma D/O Muhammad Ajab Khan Cast: Swati, Headmistress GGHS Kunj Abbottabad.......<u>Petitioner</u>

VERSUS

1) SECRETARY TO GOVT. OF KHYBER PUKHTOONKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT PESHAWAR.

2) DIRECTOR ELEMENTARY & SECTION DEPARTMENT PESHAWAR.

Writ petition under Article 199 of the Constitution of Islamic Republic of Pakistan 1973 for declaration to the effect that;

- A. The Notification NO.SO(S/F)E&SE/4-16/2015/Principals/HMs/SSs dated:

 18th March 2015 by respondent No:1 whereby the petitioner has been transferred to I/C Principal GGHSS Rich Bin Abbottabad is without lawful authority, based on malafide, political interference, nepotism, discrimination and of no legal effect being ultra vires of the Constitution of Islamic Republic Of Pakistan, 1973 as being void ab-initio.
- B. That petitioner is suffering from two chronic diseases of Heart and Arthritis i.e. Chronic Atrial Fibrillation and Rheumatoid Arthritis

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Certified to be True Copy

Abbottabad Bench

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with Osteoarthritis and therefore is medically disabled and her transfer is against the Govt. Policy, illegal and unconstitutional.

C. That petitioner has been transferred to a wrong post during the period of ban on posting and transfer by the Respondent No: 1 and the impugned notification is against the merit policy and just to illegally accommodate and facilitate Respondent No: 3 thus amounts to discrimination.

Respectfully Sheweth:

The facts material to this petition are as under:

- 1. The petitioner is serving in the Education Department since June 1998 and is the resident of District Abbottabad.
- 2. The petitioner served and was posted in various remote areas and was adjusted on a vacant post at GGHS Kunj Abbottabad.
- 3. That petitioner has suffered from Osteoarthritis and Rheumatoid arthritis along with Heart Disease i.e. Atrial Fibrillation. Her medical record is attached as annexure A&B.
- 4. That petitioner has performed her duties to the best of her abilities and capabilities and received The Best Teacher Awards 2010 to 2014 and Certificate of Appreciation 2014. The copies of Certificates are annexure C&D.
- 5. Respondent No: 3 has been posted through impugned notification as replacement of the petitioner. Previously Respondent No: 3 was posted as Vice Principal of GGHS Comprehensive Abbottabad on her promotion a few months ago whereas the petitioner has been wrongly posted to a far flung, remote hilly area in order to accommodate and facilitate illegally without merit Respondent No: 3. The impugned notification is

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without lawful authority and of no legal effect on the following grounds amongst others:

- a) That the impugned notification is ultra vires of the Constitution, void ab-initio patently unconstitutional and therefore, unsustainable.
- b) That the impugned notification is based on political interference, malafide, nepotism and discrimination.
- c) That the petitioner is medically disabled and it is the policy of Govt. that medically disabled shall not be disturbed.
- d) That the impugned notification is also against the merit policy and has been issued during the period of complete ban on posting and transfers by the Govt. of KPK.
- e) That Respondent No: 3 seemed to be the blue eyed of Authorities of Education Department and the impugned notification is a clear stance to accommodate Respondent No: 3 by disturbing the petitioner.
- f) That the petitioner has been transferred to a wrong post which also is illegal and without lawful authority and of no legal effect and against the Govt. Policy. Moreover petitioner will further suffer in a month or two because regular list of BPS-18 is shortly to be announced and definitely a Head Mistress promoted in BPS-18 will be posted in place of the petitioner in GGHSS Rich Bin thus Respondents have deliberately made the petitioner a rolling stone.
 - g) That through the impugned notification instead of facilitating Respondent No: 3 the petitioners miseries have been multiplied hence the notification is against the norms of Justice. The copy of the Impugned notification is annexure E.

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- h) GGHSS Rich Bin is located far away from the road on a steep slope and it is impossible for a Patient of Heart Disease and Arthritis to travel on foot to reach the school and that area also lacks Medical Facilities.
- i) That the petitioner has submitted a departmental appeal to the Respondent No: 1 along with all Medical and other necessary Documents. Copy of the same is annexure F.
- i) Other grounds will be discussed at the time of Hearing.

It is, therefore, humbly prayed that on acceptance of this constitutional petition this Honourable Court may graciously be pleased to declare that:

- I. The transfer/posting order of petitioner by the Respondent No: 1 is based on malafide, political interference, misuse of authority, against the merit policy and ultra vires of the Constitution.
- II. That the impugned notification is base on Discrimination, without lawful authority, nepotism and is void ab-initio.

INTERIM RELIEF:

Till the final disposal of this writ petition the impugned notification may kindly be suspended.

It is also prayed that the impugned notification is not only illegal but also unconstitutional and there is every likelihood that the impugned notification will be set aside by the Honorable Court and that petitioner has Prima Facae case and the balance of convenience also heavily lies in favor of the petitioner in the maintenance of status quo ante.

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It is further prayed that if the Respondents are not restrained from implementing the impugned notification, the petitioner will suffer irreparable loss as the said notification will also create further complications.

Any other remedy which deems fit by this Honourable Court may also be granted in favor of the petitioner.

Petitioner

Through

AHMED FAROOQ KHAN

Advocate, High Court.

Certified to be True Copy

Date: 28/03/2015

Abbottabad Bench

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PESHAWAR HIGH COURT ABBOTTABAD BENCH FORM 'A' FORM OF ORDER SHEET

Date					·		
		•					
1	Order of the Court with signature of Honourable Judge (s)					:	
19.5.2015	WP No. 304-A/2015						

Present:

Mr. Ahmed Farooq Khan advocate for the petitioner.

AAG for the respondents.

Learned counsel for the petitioner stated at the bar that he would not press the instant petition any more if directins are given to the respondent No. 1 to decide the departmental appeal filed by the petitioner for the redressal of his grievance.

2. In view of the above, this writ petition is dismissed as not pressed. However, respondent No. 1 is directed to decide the petitioner's appeal within one month positively on merit and in accordance with law.

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Abbottabad Bench

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SO: JUDGLES

BEFORE THE PESHAWAR HIGH COURT, BENCH ABBOTTABAD ABBOTTABAD

VERSUS

1) SECRETARY TO GOVE OF KHYBER PUKHTOONKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT PESHAWAR.

2) DIRECTOR ELEMENTARY & SECONDARY EDUCATION DEPARTMENT PESHAWAR.

Writ petition under Article 199 of the Constitution of Islamic Republic of Pakistan 1973 for declaration to the effect that;

A. The Notification NO.SO(S/F)E&SE/4-16/2015/Principals/HMs/SSs dated: 18th March 2015 by respondent No:1 whereby the petitioner has been transferred to I/C Principal GGHSS Rich Bin Abbottabad is without lawful authority, based on malafide, political interference, nepotism, discrimination and of no legal effect being ultra vires of the Constitution of Islamic Republic Of Pakistan, 1973 as being void ab-initio.

B. That petitioner is suffering from two chronic diseases of Heart and Arthritis i.e. Chronic Atrial Fibrillation and Rheumatoid Arthritis

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Abbottabad Bench

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PESHAWAR HIGH COURT ABBOTTABAD BENCH FORM 'A' FORM OF ORDER SHEET

,	FORM OF ORDER SHEET			
Date	Order of the Court with signature of Honourable Judge (s)			
1	2			
31.03.2015	WP No. 304-A/2015			
A Approximately and the second	Present: Mr. Ahmed Farooq Khan advocate for the petitioner.			
JE PESI	*****			
SEAL OF THE DESI	Contends, inter-alia that the petitioner has been discriminated. Further contends that petitioner is suffering from chronic			
* \ 8	diseases of heart and authorities and			
O ABAD I	flung area. The medical record has been annexed with the petition in support of her contention. Being hardhip case, notice be issued to the			
	respondents for 14.4.2015.			
	The learned AAG present in court in different mater			
ę <u>5</u>	accepts notice for the date fixed.			
	CM No. 259-A/2015			
r	Notice. In the meanwhile, operation of the impugned			
·	notification is suspended.			
·	So goves			
•	10 be True Copy Q1: 4:10			
Pesh Abb Ausonsed	OTTO COURT OTTO BERCH Index Seca75 Acts Ordrins			

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PESHAWAR HIGH COURT, <u>ABBOTTABAD BENCH</u>

Ph: 0992-9310058 Fax: 0992-9310055

No:	Dated Abbottabad 26/2 May, 2015
From	
1 . • • •	The Additional Registrar, Peshawar High Court,
· . ·	Abbottabad Bench.
To	
	The Secretary to Govt. of KPK, Elementary & Secondary Education, Peshawar.
Subject:	WRIT PETITION NO.304-A of 2015.
	Mst. Iffat Huma D/o Muhammad Ahab Khan Caste Swati Headmistres GGHS Kunj Abbottabad.
	Petitioner
	VERSUS
	Secretary to Govt. of KPK Elementary & Secondary Education Departmen Peshawar & others.
	Respondents.

Memo,

I am directed to forward herewith a copy of judgment dated 19.05.2015, passed by the Honourable Division Bench of this Court in the above noted case for information and compliance.

A1640 24-6-15

MUHAMMAD IQBAL KHAN (Additional Registrar)



CHIEF MINISTER'S SECRETARIAT KHYBER PAKHTUNKHWA

J

То

NO.SO-I /CMS/ KPK/2015/ Dated Peshawar 26th March, 2015/12.37

The Minister for Elementary & Secondary Education, Khyber Pakhtunkhwa.

Subject:

DEPARTMENTAL REPRESENTATION AGAINST THE TRANSFER ORDER NO.SO(S/F)E&SE/4-16/2015/PRINCIPALS/HMs/SSs DATED 18TH MARCH, 2015.

Dear Sir,

I am directed to refer to the subject noted above and to forward herewith an application in respect of Mrs. Iffat Huma, Headmistress, GGHS Kunj, Abbottabad. The Chief Minister, Khyber Pakhtunkhwa has been pleased to record remarks on the application as under:-

Minister Ed.

"Please inquire why she is transferred in the period of ban."

Necessary action as per remarks of the Chief Minister Khyber Pakhtunkhwa may kindly be taken under intimation to this Secretariat at the earliest please.

You fathfully

(Iffat Ambreen) 5 Section Officer-I.

Copy to:-

1. Mrs. Iffat Huma, Headmistrees, GGHS, Kunj, Abbottabad.

A/65h) m-6-15

2. PS to Principal Secretary to Chief Minister Khyber Pekhankhwa.

Section Officer-I.

Posting of Junior Officers on Posts in Higher Scale

This Department's Circular letter No.SORI(S&GAD)1-29/75(A), dated 13.2.1993, on the subject noted above and to state that it has been noticed that certain Provincial Government Departments are resorting to the practice of posting officers in a lower scale on posts in higher scales. This practice is against the provisions of NWFP Civil Servants Act, 1973 and rules made thereunder as well as the instructions of the Establishment Division reproduced below:-

"The grant of higher appointments to junior officers against senior posts amounts to accelerated promotion in view of the decision given by the Supreme Court of Pakistan in the case of Government of Pakistan Versus Qazi Abdul Karim. The Ministries/Divisions or Provincial Governments can only fill vacancies in a particular grade by officers of the same grade, and officers in a junior grade will not be appointed against a vacancy in a higher grade".

- 2. It may be pointed out that in the light of rule 9 of the NWFP Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, the methods prescribed for posting a junior officer to a higher post are restricted to the following only:-
 - Where the senior most officer in a cadre is otherwise fully eligible for promotion but does not possess the specified length of service, the competent authority may appoint him to the higher post on acting charge basis, but only on the recommendation of Departmental Promotion Committee/Selection Board and subject to the condition that such officer lacks the prescribed length of service not more than (one year).
 - ii) <u>CURRENT CHARGE APPOINTMENT OF A HIGHER POST</u>
 Only the senior-most officer of a cadre can be given current charge appointment of a higher post with the approval of the competent authority. However, this can only be an arrangement upto a maximum of six months.
 - iii) <u>ADDITIONAL CHARGE APPOINTMENT OF AN EQUIVALENT POST</u>

An officer can be given the additional charge of a second post but only of a post in an equivalent grade, upto a period of six months by the competent authority.

- 3. Adherence to the above rules is a legal requirement so that the actions taken by officers are not held at any stage to be irregular. Also, appointments in violation of the rules constitute administrative indiscipline.
- 4. I amy therefore directed to request that all such cases of irregular appointments (be reviewed and ensure not to resort to such appointments that violate the provisions) of the Civil Servants Act and the statutory rules framed thereunder.
- 5. I am further directed to request that these instructions may be brought to the notice of all concerned for strict compliance.

(Authority:Circular letter No.SORI(S&GAD)1-29/75(A), dated 5.7.1994).

Aland No Tomb-15

- xiii) While considering posting/transfer proposals all the concerned authorities shall keep in mind the following:
 - Performance Evaluation Report/annual confidential reports, past and present record-of-service, performance on post held presently and in the past and general reputation with focus on the integrity of the concerned officers/officials be considered.
 - b) Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.
- xiv) Government servants including District Govt. employees feeling aggrieved due to the orders of posting/transfer authorities may seek remedy from the next higher authority / the appointing authority as the case may be through an appeal to be submitted within seven days of the receipt of such orders. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/ transfer orders could be exercised only in the following cases:
 - i) Pre-mature posting/transfer or posting transfer in violation of the provisions of this policy.
 - ii) Serious and grave personal (humanitarian) grounds

81 Added vide Urdu circular letter No: SOR-VI (E&AD)/1-4/2005, dated 9-9-2005.

Alleres 34-6-15

Appointment in Higher Grades/Posts.

Instances have come to the notice where civil servants in lower grades have been appointed to higher posts but the posts have not been downgraded with the result that the concerned civil servants come up with requests for promotion benefits in view of the decision given by the Supreme Court of Pakistan in the case of Government of Pakistan Versus Qazi Abdul Karim'. This is in contravention of the above instructions which is not desirable administratively.

- 2. It appears that either the aforesaid instructions have been lost sight or these instructions have not been brought to the notice of all concerned. It is, therefore, reiterated that the Provincial Government can only fill vacancies in a particular grade by officers of the same grade and officers of junior grade will not be appointed against as yacancy in a higher grade. If it is necessary to do so, due to exigencies of service, the post should be downgraded with the approval in the first instance of the S&GAD who will seek approval of the Finance Department.
- 3. This issues with the concurrence of Finance Department.

(Authority:Letter No.SORI(S&GAD)1-29/75, dated 25.2.1986.)

A16565 24-6-1)

Unauthorised Appointments to Higher Posts.

This Department's Circular letter of even number dated 23.5.1988, on the subject cited above, which clearly provides that the appointments against the higher posts should be made in the manner prescribed in the rules for those posts. Notwithstanding this, instances have come to the notice that unauthorised appointments to higher posts without going through the prescribed selection process or obtaining approval of the competent authority are being made by Provincial Government Departments. This creates embarrassing position when the officers concerned prefer claim for pay of the higher posts.

2. I am directed to request you once again to strictly follow the instructions as referred to above while making appointments against higher posts. In future, no claim of pay of higher post in cases of unauthorised appointment will be considered by S&GAD.

(Authority: Circular letter No.SORI(S&GAD)1-29/75(A), dated 13.2.1993)

4 16 m 24-6-15

Irregular Appointments to various Posts/Services

NWFP Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 and other ancillary instructions issued by the Provincial Government provide that initial appointments to posts/services in various Departments, Attached Departments and subordinate offices shall be made keeping in view the following:-

- (1) A selected candidate must possess the qualifications and experience prescribed for the post under the relevant rules;
- (2) The vacancies in Grades 5 and above should be advertised in leading newspapers;
- (3) The Jappointment is to Ibe Imade on the recommendations I of Latbroad I based prescribed Departmental is election. Committee:
- (4) The zonal allocation formula prescribed vide S&GAD's Notification No.SOS.III(S&GAD)3-39/70,dated 2nd October,1973 as amended from time to time has to be followed;
- (5) The selection for appointment should be made with regard to the criteria for initial recruitment as laid down by the Government from time to time; and
- (6) An overage person should not be selected and appointed when a sufficient number of qualified and within age candidates are available.
- 2. It has, however, been observed from the report of the Committee appointed by the Government to probe the cases cited as subject that in almost all the departments, appointments to the various posts were made without application of the provisions of the relevant Service Rules and observance of the instructions issued thereunder.
- 3. It has, therefore, been decided by the Provincial Government that all appointments, promotion will, in future, be made by the competent authorities only after strictly observing all requisite codal formalities and the provisions of Rules of Business. 1985 in general and the sub-rules (5) and (6) of Rule 5 in particular, are strictly observed by all concerned in future.
- 4. It is requested to please ensure that all concerned abide by the aforesaid decision both in letter and spirit.

(Authority:-S&GAD's letter No.SORI(S&GAD)1-73/88, dated 23rd October, 1988).

A1646 my-6-17

1307 45. 0 661/6231 Name of Advocate General Secretary ی تر بر مر به ماعث تحريرة نكبه دریں مقدمہ عنوان بالا میں اپنی طرف سے برائے بیروی دجواب دہی بمقام م<u>رکہ ہے مرمر مرسیک</u> کر ہا (<u>سے ل</u>ے کو بدیں شرائط وکیل مقرر کیا ہے کہ میں ہر پیشی پرخودیا بذریعہ مختار خاص رو بروعدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے وکیل موصوف کو اطلاع ویکر حاضر کروں گا اگر کسی بیشی پرمظہر حاضر نہ ہوااور غیر حاضری کی وجہ ہے کسی طور پرمقدمہ میرے خلاف ہو گیا تو وکیل موصوف اس کے سی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل موصوف صدر مقام کچبری کے ملاوہ سی اورجگہ کچبری کےمقررہ اوقات سے پہلے یا بروز تعطیل بیروی کرنے کےمجاز نہ ہوں گے۔اگر مقدمہ مقام کچبری کےعلاوہ کسی اور جگہ تاعت ہوا یا پچہری کے اوقات کے آگے بیچھے تاعت ہونے برمظہر کوکوئی نقصان مینجے تو وکیل موصوف ذیمہ دار نه ہوں گے اور وکیل موصوف کوعرضی دعویٰ اور درخواست اجراء ذگری ونظر ثانی اپیل گلرانی وائر کرنے نیز ہوشم کی درخواست و بیان حلفی وتصدیق کرنے اور اسپر دستخط کرنے کا مجمی اختیار ہوگا۔اورکسی حکم یا ڈگری کے اجراء کرانے اور ہرفتم کا روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہرتسم کا بیان دینے اور سپر د ثالثی وراضی نامہ ورمتبر داری وا قبال دعویٰ کا اختیار بھی ہوگا اور بصورت اپیل وبرآیدگی مقدمه پامنسوخی ڈگری بیطرفه درخواست تھم امتناعی یا فیصلہ قبل از ڈگری اجرائے ڈگری ہجی وکیل موصوف کوبشرط ادائیگی علیحد ہمختانہ اداکرنے کا مجاز ہونگا اور بصورت ضرورت بدوران مقدمہ یا پیل ونگرانی کسی دوسرے وکیل یا بیرسٹر کو بجائے خودیاا ہے ہمراہ مقرر کریں اورا یسے مشیر قانونی کو بھی اس امر میں وہی اختیارت حاصل ہوں گے جیسے وکیل موصوف کو اوراگر پوری فیس تاریخ پیش سے پہلے ادا نہ کروں گا تو وکیل موسوف کو پوراا ختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اورالی حالت میں میرامطالبہ وکیل موصوف کے برخلاف نہیں ہوگا مجھے کل ساختہ پر داختہ وکیل موصوف مثل ذات خو دمنظور وقبول ہوگا۔ للبذاو کالت بنامه لکھ دیا ہے اور دستخط/ انگوٹھا ثبت کر دیا ہے تا کہ سند ہے ۔مضمون وکالت نامہ ن لیا ہے۔ اوراجیھی طرح سمجھ لیا ہے۔ ATURDA Ahmad Farooa Khar دا 20ء U 3.27 31 Advecate High Court District Courts Mansehr

مناب سروسر سر بیونل KPK کمپ کورو سام مرسری ونسکالم مروس ایس در فواست مراد مدور مام دالذار (علمه علم المدار (علمه علم الم سے جات شخد او سالم مناب عالى ورهاست فيل ي ا:- سي مر رسل عنوان ندمر بخد برا تخناب الرواسر o No b States grand. & Ving له سائله کی نفخواه گذشته ی ماه سے سلا سے ۔ اکانٹ آمن وابے سائلہ کو سخواہ 12) 03 Petitionales. Un Usli jan 2 ومكرد منوراه وصول كررس ين ٢: ١٠ ١ سائله كا زرىعم أ فدق ما سوالے نفذاف كوري بذي - ثني را من ملت سي سائله كو انتان منهم ماي والات كاسانسائ نونت رسائلمرس ونون احسن طرافته الم Release Olisi. E (vi a (15) موے سے متفرمہ ہم کوئی اینزیس ہوا Disignation in le imilia والدارمة فان كالكم صاديم فالما

DBA NO. <u> </u>	Head Clerk District Bart Association Apportable
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مناب مرولسر مر به مراه مل K.P.K به كور اميد أباد	بعدالت_
30 KPK Cis I che Ly Cisc	عنوان:
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منهرسامده عمر المنتجرات كه	منجانب:
	. T
مەمندرجە بالاعنوان ئىں اپی طرف سے داسطے پیردی دجوابد ہی برائے بیٹی یا تصفیہ مقدمہ بمقام معموم میں اسٹ کے لیے ا اس سال ماری میں اسٹ کے اسٹ کا میں	مقدم
ب دیل شرا کط پروکیل مقرر کیا ہے کہ میں ہر پیٹی پرخود یا بذریعہ مختار خاص روبر وعدالت حاضر ہوتار ہوں گا اور بروقت پکارے	<u></u>
ئے دیں مرا تطا پرویں سروسیا ہے نہیں ہر ہیں پر دوریا بعر رعیہ ضار تھا ہوں ہوں ہوں ہوں ہوں ہوں ہوں ہے۔ نے مقدمہ وکیل صاحب موصوف کواطلاع دے کر حاضر عدالت کروں گا۔اگر پیٹی پرمظہر حاضر نہ ہوااور مقدمہ میری غیر حاضری کی وجہ	
کے سیر میرے خلاف ہو گیا تو صاحب موصوف اس کے کی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے	•
ہ کسی جگہ یا بچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل ہیروی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ کچہری کے علاوہ کسی اور جگہہ ،	
، می ہدی پہرون کے دو او تات کے آگے پیچھے پیش ہونے پر مظہر کوکوئی نقصان پہنچے تو اس کے ذمہ داریا اس کے داسطے سے	
ے معاوضہ کے ادا کرنے یا مخانہ کے دالپس کرنے کے بھی صاحب موصوف ذ مہ دار نہ ہو نگے ۔ مجھ کوکل ساختہ پر داختہ صاحب موصوف	
۔ کر دہ ذات منظور ومقبول ہو گااور صاحب موصوف کوعرض دعویٰ یا جواب دعویٰ اور درخواست اجرائے ڈگری دنظر ثانی اپیل نگرانی و ہرتتم	
است پرد شخط وتصدیق کرنے کا بھی اختیار ہوگا اور کسی تھم یاڈ گری کرانے اور ہرتم کاروپیہ وصول کرنے اور رسید دینے اور داخل کرنے	
ہر ہرشم کے بیان دینے اوراس پر ثالثی وراضی نامہ و فیصلہ برحاف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات	
نہری صدرا پیل وبرآ مدگی مقدمہ یامنسوخی ڈگری بیکطرفہ درخواست حکم امتناعی یا قرقی یا گرفتاری قبل ازگرفتاری واجرائے ڈگری بھی صاحب	
وف کوبشرطادا ئیگی علیحد ہ مختانہ پیروی کا اختیار ہوگا۔اوربصورت صارت صاحب موصوف کور بھی اختیار ہوگا کہ مقدمہ مذکوریا اس کے	
ے۔ ی جزوکی کاروائی کے یابصورت اپیل کسی دوسرےوکیل کواپنے بجائے یااپنے ہمراہ مقرر کریں اورایسے وکیل کوبھی ہرامر میں	<u>-</u>
اورو پسے اختیارات حاصل ہو نگے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جاندالتوا پڑے گاوہ صاحب موصوف	
ں ہوگا۔اگروکیل صاحبِ موصوف کو پوری فیس تاریخ بیثی سے پہلے ادانہ کروں گا تو صاحبِ موسوف کو پوراا ختیار ہوگا کہ وہ مقدمہ 	
ہیروی نہ کریں اورالیں صورت میں میرا کوئی مطالبہ کمی قتم کاصاحب موصوف کے برخلاف نہیں ہوگا۔ رمست کا است میں ایک مطالبہ کمی تم کا صاحب موصوف کے برخلاف نہیں ہوگا۔	
اوكات نامد كلوديا ب كرسندر ب- مورخه: 17 / آفع برا مراح في الم	
ون وکالت نامہ سن کیا ہے اور اچھی طرح سمجھ کیا ہے اور منطور ہے۔ کون کم ماہ کسال	مظم
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR,

Service Appeal # 704/2015.

Secretary E&SE, Deptt: Govt: of Khyber Pakhtunkhwa & others...... Respondents

Parawise Comments on behalf of Respondent No.1

Respectfully Sheweth,

The Respondents submit as under:-

Preliminary Objections:-

- 1. The appellant has got no cause of action/locus standi.
- 2. The instant appeal is badly time barred.
- 3. The appellant has concealed the material facts from this Hon 'able Tribunal, hence is liable to be dismissed on this score.
- 4. The appellant has not come to this Hon 'able Tribunal with clean hands.
- 5. The appellant has filed the instant appeal with malafide intention just to pressurize the Respondent for gaining illegal service benefits.
- 6. The present appeal is liable to be dismissed for mis-joinder & non joinder of necessary parties.
- 7. The instant appeal is against the prevailing law and rules.
- 8. The appellant is estopped by her own conduct to file the instant appeal.
- 9. The instant appeal is not maintainable in its present form and also in the present circumstances of the issue.
- 10. That the Notification dated 18-03-2015 is legally competent and is liable to be maintained in favour of the Respondents.
- 11. That the appellant has been treated as per law, rules and discretionary powers conferred upon Respondent No. 1, under Section-10 of Civil Servant Act 1973.
- 12. That this Hon'able Tribunal has got no jurisdiction to entertain the instant service appeal, as no Departmental has been filed by the Appellant.
- 13. That the appellant is not an aggrieved person under the relevant Article-212 of 1973 Constitution of Pakistan.

FACTS.

- 1. Para-Ineeds no comments being relates to the Service record of the appellant.
- 2. Para-2 is correct to the extent that the appellant is actual an officer of teaching cadre in BS-17 and has been adjusted against the Headmistress post at GGHS, Kunj Abbottabad as an incharage. The appellant has been transferred vide the above mentioned notification dated 18-03-2015 on the arrival of proper man for proper place in BS-18 in shape of adjustment of Miss Iffat Sultana BS-18 in the above said school. Hence, the plea of the appellant is not only baseless but is also is liable to be dismissed in favour of the Respondents with

reference to Section -10 of Civil Servant Act 1973, which say, that civil servant shall have to serve wherever her services are required by the competent authority in the Province. (Copy of the Notification dated 18-03-2015 is Annex-A).

- 3. Para-3 is incorrect and denied. The appellant has not disclosed the facts regarding her illness prior to the issuance of impugned Notification dated 18-03-2015. Hence, the stand of the appellant is mainly based on malafide intention just to take shelter under the umbrella of her illness and to stick to the post of H/M at GGHS, Kunj Abbbottabad at the cost of deserving and illegible civil servants in the Respondent Department.
- 4. Para- 4 needs no comments, however, it is submitted that every civil servant under Section- 10 of Civil Servant Act 1973 is supposed to perform her delegated duties with utmost honesty and devotion.
- 5. Para-5 in incorrect and denied. The Respondent No. 1 has got jurisdiction to transfer and post a civil servant wherever, her services are required by the competent authority. Hence the stand here in this para of the appellant is baseless and without merit.
- 6. Para-6 is incorrect and denied. The Respondents have acted as per law, rules & Policy under the mandatory provision of Section-10 of the said Act in the case of the Appellant as mentioned in the foregoing paras, hence needs no further comments.
- 7. Para-7 is correct to the extent that the appellant has filed departmental appeal against her transferred vide Notification dated 18-03-2015 but the same Departmental Appeal could not be honourd on the grounds and facts as mentioned in the foregoing paras of the present reply on behalf of the Respondents No. 1 & 2.
- 8. Para-8 is correct to the extent that the writ petition No. 304-A/2015 of the appellant was dismissed vide judgment dated 19-05-2015 by Hon'able Peshawar High Court Peshawar in favour of the Respondents.
- 9. Para-9 needs no comments being legal. However, the Respondents No. 1& 2 further submit on the following grounds inter-alia.

GROUNDS.

- A. Incorrect, hence denied, The Notification dated 18-03-2015 is legal competent and is the result of the facts and circumstances of the case as mentioned in the foregoing paras issued by the Respondent No. 1 under the mandatory provision of Law. Hence, the same is liable to be maintained in favour of the Respondents.
- B. Incorrect and denied, The Notification dated 18-03-2015 is lawful having no question of politically motivation nor any aspect of malafide, nepotism and discrimination has been pointed out by the Appellant in the instant Notification.
- C. Incorrect and denied. The Notification dated 18-03-2015 is legally competent duly issued by the competent authority under the relevant provisions of law by keeping in view the facts and circumstances of the case in terms of the relevant policy.
- D. Incorrect & denied. Detailed reply has already been given in the above mentioned paras, hence needs no further comments.
- E. Incorrect and denied, The appellant has been treated as per law, rules and policy in the instant case.
- .F. Incorrect & denied. Detailed reply has already been given in the above mentioned paras, hence needs no further comments.
- G. Incorrect and denied, Detailed reply of this para has already been given in the foregoing paras. Hence no further comments.
- H. Incorrect hence denied. The appellant was adjusted at GGHS Kunj
 Abbottabad as an incharge Headmistress and from where she has been
 transferred and adjusted at GGHS, Rich Bin, Abbottabad vide Notification
 dated 18-03-2015 issued by the Respondent No. 1 with the conditions as
 mentioned vide S.No.2 of the said Notification that the above orders will
 be effective subject to the condition that Miss Iffat Huma & Miss Sajida
 Aziz will give an affidavit on stamp paper to the effect that they will not
 claim benefits of graded pay and seniority of the Higher Pay Scales in
 their respective place of postings. Whereas rest of the para is incorrect and
 denied.
- I. Incorrect and denied, The appellant has been treated as per Law, Rules & Relevant Policy vide the Notification dated 18-03-2015 as an incharge Headmistress against a BS-18 Post and upon the promotion of the Respondent No. 5, the appellant has been transferred and adjusted at GGHS, Rich Bin, Abbottabad againt the I.C, Principal for which she has been made not entitled for the grant of graded pay and seniority as an officer of BS-17 of teaching cadre.

- J. Incorrect and denied, Detailed reply has been given in the above mentioned paras. Hence no further comments.
- K. Legal, However, the Respondent No. 1 seeks leave of this Hon'able
 Tribunal to submit and advance additional record in case law at the time of arguments on main appeal on the dated fixed.

In view of the above made submissions, it is, therefore, most humbly prayed that this Honourable Tribunal may very graciously be pleased to dismiss the appeal in hand with cost in favour of the Respondent.

Secretary,

Elementary & Secondary Education, Department.



GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTARY & SECONDARY EDUCATION DEPARTMENT



Dated Peshawar the, March 18, 2015.

NOTIFICATION

NO.SO(S/F)E&SE/4-16/2015/Principals/HMs/SSs,: The following posting / transfer of female officers are hereby ordered with immediate effect:-

TIV	Name, Designation & place of posting	To	· · · · · · · · · · · · · · · · · · ·
	Ms. Iffat Huma Headmistress (BS-17) GGHS Kunj Abbottabad.	7) VC Principal	Remark
Ť .	Abbottabad.	GCTICO (BS-18)	Against
2		Kich p:	
2	Ms. Saira Parveen HM (BS-17) working as	& scale) (in her own pay	vacant po
	I/C Vice Principal (BS-17) working as Comp. Abbottabad	Headmistress (BS-17) GGHS	
2	Comp: Abbottabad (BS-18) at GGHSS	Kunj, Abbottabad.	Vice
3.	Ms. Naheed Begum Live	,	S.No.1
1	Ms. Naheed Begum HM (BS-17) GGHS Rich Bin, Abbottabad (awaiting 5)	Headmist	
	Rich Bin, Abbottabad (awaiting for posting)	Headmistress (BS-17) GGHS Gumanwan, Abbottabad	Against
4.	Ms. Iffat Sula	Abbottabad	vacant post
!	Islamiyat Occion Subject Specialist	Vice D:	post
	Abbottabad Comp:	Vice Principal (BS-18) GGHSS Comp: Abbottabad	Vice S.No.2
·)/ [Ms. Saiida Aci O	Description	wcc 3.140.2
	Ms. Sajida Aziz Subject Specialist Islamiyat (BS-17) GGHSS Takht-e-Khurd	I/C Subject 6	
	(BS-17) GGHSS Takht-e-Khurd, Mansehra	I/C Subject Specialist (BS-18)	Vice S.No.4
		GGHSS Comp: Abbottabad (in her own pay & scale)	00 3.140,4

- The above orders will be effective subject to the condition that Ms. Iffat Huma HM (S.No.1) & Ms. Sajida Aziz SS (S.No.5) will give an undertaking / Affidavit on legal / stamp paper to Secretary E&SE / Directorate E&SE, Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.
- No TA / DA allowed.

Endst.of even No & date

Copy forwarded to the:-

- Accountant General, Khyber Pakhtunkhwa Peshawar. 2. Director, E&SE, Peshawar.
- 3. District Education Officer (F) Abbottabad & Mansehra.
- 4. District Accounts Officer Abbottabad & Mansehra.
- 5. Incharge EMIS, E&SE Department.
- 6. PS to Secretary E&SE Department.
- 7. Officer concerned.
- 8. Office order file.

SECRETARY

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal # 704/2015

Secretary E&SE, Deptt: Govt: of Khyber Pakhtunkhwa & others...... Respondents

Parawise comments of the application for the suspension of operation of the impugned Notification dated 18-03-2015 on & for behalf of Respondents No.1.

Respectfully Sheweth,

The Respondents submit as under:-

Preliminary Objections:-

- 1. The appellant has got no cause of action/ locus standi.
- 2. The instant appeal is badly time barred.
- 3. The appellant has concealed the material facts from this Hon 'able Tribunal, hence is liable to be dismissed on this score.
- 4. The appellant has not come to this Hon 'able Tribunal with clean hands.
- 5. The appellant has filed the instant appeal with malafide intensions just to pressurize the Respondent for gaining illegal service benefits.
- 6. The present appeal is liable to be dismissed for mis-joinder & non joinder of necessary parties.
- 7. The instant appeal is against the prevailing law and rules.
- 8. The appellant is estopped by her own conduct to file the instant appeal.
- 9. The instant appeal is not maintainable in its present form and also in the present circumstances of the issue.
- 10. That the Notification dated 18-03-2015 is legally competent and is liable to be maintained in favour of the Respondents.
- 11. That the appellant has been treated as per law, rules and discretionary powers conferred upon Respondent No. 1, under Section-10 of Civil Servant Act 1973.
- 12. That this Hon'able Tribunal has got no jurisdiction to entertain the instant service appeal, as no Departmental has been filed by the Appellant.
- 13. That the appellant is not an aggrieved person under the relevant Article-212 of 1973 Constitution of Pakistan.

FACTS.

- 1. Para-1needs no comments.
- 2. Para-2 is correct to the extent that the appellant is actual an officer of teaching cadre in BS-17 and has been adjusted against the Headmistress post at GGHS, Kunj Abbottabad as an incharage. The appellant has been transferred vide the above mentioned notification dated 18-03-2015 on the arrival of proper man for proper place in BS-18 in shape of adjustment of Miss Iffat Sultana BS-18

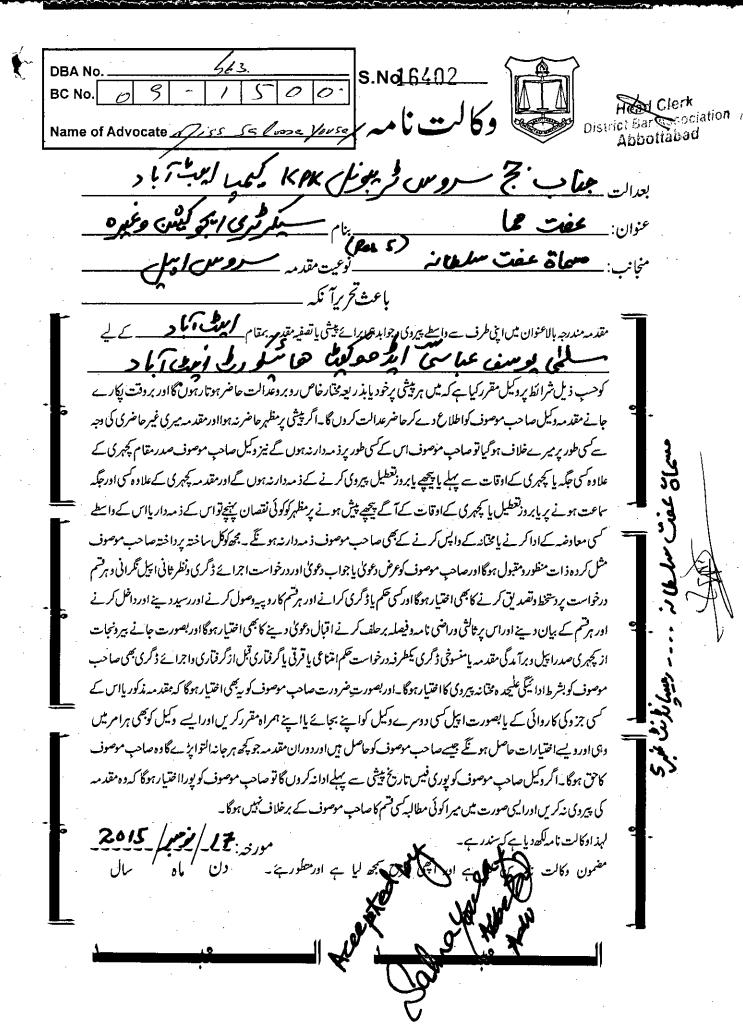
in the above said school. Hence, the plea of the appellant is not only baseless but is also is liable to be dismiss in favour of the Respondents w/r to Section 10 of Civil Servant Act 1973, which say that civil servant shall have to serve wherever her services are required by the competent authority in the Province. (Copy of the Notification dated 18-03-2015 is Annex-A).

- 3. Para-3 is incorrect and denied. The Respondents have acted as per law, rules & Policy under the mandatory provision of Section-10 of the said Act in the case of the Appellant. The Respondent No. 1 has got jurisdiction to transfer and post a civil servant wherever, her services are required by the competent authority. Hence, the stand of the appellant is mainly based on malafide intention just to take shelter under the umbrella of her illness and to stick to the post of H/M at GGHS, Kunj Abbbottabad at the cost of the deserving and eligible civil servants in the Respondent Department.
- 4. Para-4 incorrect and denied.

In view of the above made submissions, it is, therefore, most humbly prayed that this Honourable Tribunal may very graciously be pleased to dismiss the application for suspension of the operation of impugned Notification dated 18-03-2015 in favour of the Respondent.

Secretary,
Elementary & Secondary Education,
Department.

26, well established find from I wind with 1-5-1 Justine ? 4 (Buties ١٠ م كر رسل عنوان ما لا زارس عت عدالت حنوا مع. و سركر سالمه فقدم عنوان مس د سار شدف فر قر يا-3) 266 8/1/2/2/2/2/2013 30 Commants سافره کرون رسی ندین نی در در میراندی کرد A.



سر درونل جار بچو کو ای کیدای میداید. استو آباد سرعف نیا کی اور توج ورال مرطوم سرمال سال کارروال کا en 2 m clay Mening - Ewiberin Thee The destruction of the the Comment of the Comm 72-2015 6/ 2011 Shuring Bolom

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Name of Advocate District Bar Association Abbottabad
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الله سافيات كرانية من در در الله ما في الله الله الله الله الله الله الله الل
باعث تحريراً نكه
مقدمه مندرجه بالاعنوان میں اپنی طرف سے واسطے پیروی و جوابد بی برائے پیشی یا تصفیہ مقدمه بمقام رامند
ملاحد مدارجه بالأعوان عن الي مرف سے واسے پيرون و بوابد في برات يا ي الله علي مدارجه بالا عوال عن ال
کوحب ذیل شرا کظ پروکیل مقرر کیا ہے کہ میں ہر پیثی پرخود یا بذر کیے مختار خاص روبر دعد الت حاضر ہوتار ہوں گا اور بروقت پکارے
- عبانے مقدمہ وکیل صاحب موصوف کواطلاع دے کرحاضرعدالت کروں گا۔اگر پیشی پرمظہرعاضر نہ ہواا درمقدمہ میری غیرحاضری کی وجہ
سے کسی طور پرمیرے خلاف ہو گیا تو صاحبِ موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحبِ موصوف صدر مقام کچبری کے
علاوہ کی جگہ یا بچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیردی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ بچہری کے علاؤہ کسی اور جگہ
ساعت ہونے پر یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پرمظہر کوکوئی نقصان پہنچ تواس کے ذمہ داریااس کے واسطے
📆 کسی معاوضہ کے ادا کرنے یا مخانہ کے واپس کرنے کے بھی صاحب موصوف ذ مددار نہ ہونگے ۔ مجھ کوکل ساختہ پر داختہ صاحب موصوف
مثل کردہ ذات منظور ومقبول ہوگا اور صاحب موصوف کوعرض دعویٰ یا جواب دعویٰ اور درخواست اجرائے ڈگری ونظر ثانی اپیل نگرانی و ہرتتم
ورخواست پروشخط دتصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہرتسم کاروپیہ دصول کرنے اور رسید دینے اور داخل کرنے
- 🕦 اور ہرشم کے بیان دینے اوراس پر ٹالٹی وراضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کابھی اختیار ہوگا اور بصورت جانے بیرونجات
از کچهری صدرا پیل د برآیدگی مقدمه یامنسوخی ڈگری بکطرفه درخواست عظم امتناعی یا قرتی یا گرفتاری قبل از گرفتاری واجرائے ڈگری بھی صاحب
موصوف کوبشرطادا میگی علیحد ہمختانہ بیروی کا اختیار ہوگا۔اور بصورت ِضرورت صاحب موصوف کو پیھی اختیار ہوگا کہ مقدمہ مذکوریا اس کے
میں جزوکی کاروائی کے یابصورت اپیل کسی دوسرے وکیل کواپنے بجائے یاا پنے ہمراہ مقرر کریں ادرا پیے وکیل کوبھی ہرامر میں
وی ادرویسے اختیارات حاصل ہونگے جیسے صاحب موصوف کوحاصل ہیں ادردوران مقدمہ جو بچھ ہر جا ندالتو اپڑے گاوہ صاحب موصوف
کاحق ہوگا۔اگروکیل صاحبِ موصوف کو پوری فیس تاریخ بیشی سے پہلے ادانہ کروں گا تو صاحبِ موصوف کو پوراا ختیار ہوگا کہ وہ مقدمہ $\left(\bigcap_{i=1}^{\infty} \mathcal{N}_{i} \right)$
کی پیروی نہ کریں اورا لیمی صورت میں میرا کوئی مطالبہ کی شم کا صاحب موصوف کے برخلاف نہیں ہوگا۔
عور نے: <u>کوا کا ایک ایک ایک ایک ایک ایک ایک ایک ایک</u>
ابذاوکات نامد کھودیا ہے کہ سندر ہے۔ مضمون وکالت نامد من لیا ہے اور اچھی طرح سمجھ لیا ہے اور مطور ہے۔ ون ماہ سال
Astrem.

لعدالت جناب ج سروس فريبونل يمي ايدفي ال سِس عفت عا بنام سیرنبری ابونش وغیره در واست عداد التفاكرة مؤقف رسياندساند KPK 201. 5 2000 من عالی! در واست دیل عرفی می ا 1: - بركر ابر عنوان زير بخور عدالة تعذا هے جمعین امروز فاریخ بیشی را معیستان میں سائلہ مسلتے فتر رہے -2:- بيركم من سائله موقف ريساندن فنبر آسمر ري كورفنك مير ديختو كو اه المينزي ابكولين كم written Reply في التفا انحصار كرت مرة المسكور معتى تسليم أى حون اور موقف بى می جانا اور سمجها جائے اور اسی کی روشتی میں فیصلہ صا در فرط یا جائے۔ فیے کوئی اعتبر افن نہ سوگا۔

SUL LINE INSTANTANTE pletine le luciesis (fu! جودب منائن رسانزنك in Verlie Solice de to ville fire Living جور ب پر اکسارکرا 12 Jan 36/2000

> Vily so by on Z. in what بنام المراري الرائين وغيو درواست عمراد التفاكر فوقف رسيالمنظيراً KPK 31-7-16 1 - e , je de sturch worten state je cries. عن من سائلہ فوقت بسولیات طبر تا سیکری گرافت Willy written lepty Lind of Chick 1013 its sup الحماركم وعطية اسكويوت تسليم أي فون الارثواف عي مي جانا اور سجها ما تراور اسي کورونتي سي منظم الما دراور By: 00)26/3/2. 56

15 15 John in Color i

stilling of the word E. - in while بنام المرابي الجانسي وعيو درواست عملد النفاكر نه وقف رسياندسار KPK 25-16 16 - 2 with colors ! Le is - 2 , 3° de d'increwitten state d'incre عن من سائد فوق بسائل فرر تر سائل فرا کر مان کرونان perifor lept Lings with 1013 is suf الحماركر عيرة اسكورس تسلم الى فون الارتواف عي عی جانا اور مجا ما تر اور اسی ک دوشی می میدان دور - Bz : 001,201 35 2 - 2 6

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still si Jens Com En Lie was بنام المرادي المولين وعيو درواست عمل النفاكر فوقف رسياندسكا NPK 21-75-16 SAN - 2 with cillin illein 416 is 1 con the ist is it is -: 2 - e , p de d'un or written state de l'orige. a:- برأم من سائل موقف بسياطينك طبر السياري كورانك Willy written lepty I in 510 bich 1013 interpret الحصاركم عرفة اسكورس تسكم إلى حون اور توقف عى مي ماناور على ناور اسي ك دونتي سي منعد ملا در وا - Pricipal 3/2. 26

15 15 plus in the cias de 18 be son in the cia

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Iffat Huma, Headmistress, Government Girls High School Kunj, Abbottabad Petitioner

VERSUS

Secretary, Elementary & Secondary Education, Government of Khyber Pakhtunkhwa and othersRespondents

SERVICE APPEAL

REJOINDER ON BEHALF OF APPELLANT

Respectfully Sheweth!

The appellants submits as under: -

PRELIMINARY OBJECTIONS.

- 1. Para No.1 is incorrect. Appellant has got cause of action and locus standi.
- 2. Para No.2 is incorrect.
- 3. Para No.3 is incorrect.
- 4. Para No.4 is incorrect.
- 5. Para No.5 is incorrect.
- 6. Para No.6 is incorrect.
- 7. Para No.7 is incorrect.
- 8. Para No.8 is incorrect.

- 9. Para No.9 is incorrect.
- 10. Para No.10 is incorrect. Notification dated 18.03.2015 is based on malafide, against the merit policy and is totally based on discrimination hence, liable to be set aside.
- 11. Para No.11 is incorrect. The powers exercised by respondent No.1 in case of appellant are arbitrary, discriminatory, against the spirit of section-10 of Civil Servant Act, 1973.
- 12. Para No.12 is incorrect. Appellant did file the departmental appeal.
- 13. Para No.13 is incorrect.

FACTS.

- 1. Para No.1 of the comments is incorrect and that of appeal is correct.
- 2. Para No.2 of the comments is incorrect and badly misconceived. The appellant is from Headmistress cadre. Para No.2 of the facts is against the impugned notification, annexure "E" attached with the appeal the copy of notification on dated 23.06.2009 of promotion of

appellant as Headmistress is annexure "A".

- Para No.3 of facts is incorrect, 3. whereas para No.3 of appeal is correct. The appellant has suffered Heart diseases. (Atrial Fibrillation and osteo **Arthritis** alongwiht Rheumatoid Arthritis. Her medical records from 12.04.2011 to 01.08.2015 are annexed as annexure "B" to "F" respectively. No one is more deserving and eligible civil servant than the appellant on all scores including performance.
- 4. Para No.4 of facts is incorrect and that of para No.4 of appeal is correct. Appellant has also received Certificate of appreciation from respondent No.2 on august 14, 2015. The copy of the same is annexure "G", whereas the copies of best performance certificate are annexure "H","I" & "J" respectively.
- 5. Para No.5 of the fats is incorrect.

 Respondent No.1 discretion is subject to rules, regulations whereas in the case of appellant all rules, regulations have been Respondents No.3 to 6 have been

awarded their choice postings, whereas the appellant has been penalized for her dedication, performance, punctuality and achievements, inspite of her old age and ailingness. Attested copies of the result of the year 2015 is annexure "K".

- 6. Para No.6 of facts is incorrect and para No.6 of appeal is correct. Rich-Bin is a far flung hilly area. To reach the school one would go on foot through a hilly track from road. This hilly track is a very difficult path to be covered on foot by an aged ailing female.
- 7. Para No.7 is admitted upto the filing of appeal by the appellant, rest of the para is incorrect and not admitted.

 Moreover, appellant departmental appeal has not been decided on merit.
- 8. Para No.8 of facts is badly misconceived. Appellant has withdraw her writ petition No.304-A/15on the ground that respondent No.1 should decide the appellant departmental appeal on merit. But unfortunately the same has not been decided accordingly

and again injustice was done in case of appellant. Respondents No.3 to 6 were given illegal and undue advantage and appellant was treated

9. Para No.9 of the facts is not admitted, whereas para No.9 of appeal is incorrect.

GROUNDS

discriminatory.

- a. Para No.(a) of the grounds is incorrect, where that of appeal is correct.
- b. Para No.(b) of the grounds is incorrect. Whereas that of appeal is correct.
- c. Para No.(c) of the grounds is incorrect whereas that of appeal is correct, no posting, transfer can be ordered during the period of Ban. So on this score impugned notification is without lawful authority and of no legal effect.
- d. Para No.(d) of the grounds is incorrect. Whereas that of appeal is correct.

- f. Para No.(f) of the grounds is incorrect. Whereas that of appeal is correct.
- g. Para No.(g) of the grounds is incorrect. Whereas that of appeal is correct.
- h. Para No.(h) of grounds is incorrect.

 Appellant was posted as Headmistress at Government Girls High School Kunj, not as Incharge.

 Her transfer to Rich Bin in BS No.18 is also illegal, against the prevailing policy and dictum of Supreme Court of Pakistan, therefore, para No.H of appeal is correct.
- i. Para No.(i) of grounds is incorrect, badly misconceived. Respondent No.5 or any other person in BS-18 should have to posted as Principal at Government Girls High School Rich Bin instead of appellant. However, a person posted on an irregular post is entitled to all pecuniary benefits of the graded pay and allowances.

k. Para No.(k) is of grounds is incorrect that of appeal is correct.

It is, therefore, humbly prayed that appellant appeal alongwith prayers (i) to (iv) may kindly be allowed with cost against the respondents and any other relief which this Honourable Tribunal deem necessary may also kindly be granted to the appellant.

Dated 13.01.2016

Iffat Huma ...Appellant

Through

AHMED FAROOQ KHAN, Advocate High Court, Mansehra.

<u>AFFIDAVIT.</u>

I, Iffat Huma, Headmistress, Government Girls High School Kunj, Abbottabad, Appellant, do hereby solemnly affirm and declare on oath that the contents of the foregoing rejoinder are true and correct to the best of my knowledge and belief and nothing has been concéaled from this Honourable Court.

Dated 13.01.2016

Iffattiuma
(DEPONENT)



GOVERNMENT OF NWFP **ELEMENTARY & SECONDARY EDUCATION** DEPARTMENT

NOTIFICATION

Peshawar, Dated: 23-06-2009

NO.SO(PE)2-6/E&SE/DPCMEETING/LIB/09: Consequent recommendations of the Departmental Promotion Committee, the competent authority is pleased to promote the following Forty Seven (47) Female SET (BS-16) to the post of Headmistress (BS-17) according to their seniority on regular basis with immediate effect:-

S.No	Name of SET (Female)	Place of posting	Remarks
1.	Wigarun-Nisa SET GGMS Yarak D.I.Khan	HM GGHS Wanda Muazam D.I.Khan	Against vacant post
2.	Shamshad Begum SET GGHS No.2 A/Abad	HM GGHS Almaira A/Abad	Against vacant post
3.	Hasina Bano SET GGJMCS Budni Peshawar	Instructor GEC (W) Jamrud Khyber Agency	Against vacant post
4:	Hidayat Jan SET GGHS Landi Arbab Peshwar	SS(G) GGHSS Comp:/Peshawar.	Against vacant post
5.	Saeeda Nashat Akhtar ADO(F) Mardan	Deputy DO(F) Mardan	Against vacant post
6.	Rashida Perveen SET GGHS No.1 Haripur	HM GGHS No.2 Haripur	Vice Mst Shakila Amin who is going to retire 3-6-2009
7.	Mumtaz Bagum SET GGHS Gumbat Kohat	HM GGHS Togh bala Kohat	Against vacant post
8.	Shahida Nasreen SET GGHSS Baffa Mansehra	HM GGHS Gandian Mansehra	Against vacant post
9.	Tasneem Bibi SET GGHS Rich Bhen A/Abad	HM GGHS Richbhen Abbottabad.	Against vacant post
10.	Noor Jehan SET GGHS Chowki Jand Lakki	HM GGHS Dallo Khel Lakki Marwat	Against vacant post
11.	Abas Khela SET GGHSS Chowkara Karak	HM GGHS Bahadar Khel Karak	Against vacant post
12.	Naseem Akhtar SET GGHS Dhenda Haripur	HM GGHS Pand Kamal Haripur	Against vacant post
13	Razia Khateon SET GGHSS K.T.Ship Haripur	HM GGHS Kag Haripur	Against vacant post
14	. Sajjida Naqvee SET GGHS Kakul A/Abad	HM GGHS Pend Kargo Khan A/Abad	Against vacant post
15	. Pio Noor Zada SET GGMS Odin Shah Karak	HM GGHS Takhti Nasratti Karak	Against vacant post
16	. Taslim-un-Nisa SET GGHS Jhangi A/Abad	HM GGHS Mirpur A/Abad	Against vacant post
. 17	. Bibi Yasmeen Akhtar SET GGMS Mirkpur Haripur	HM GGHS Mang Haripur	Against vacant post
18	Rukhsana Yasmeen SET GGMS Upper Kehal A/Abad	HM GGHS Samandar Katta A/Abad	Against vacant post
	l. Shah Jehan SET GGHS Lahor Sharqi Swabi	HM GGHS Lahor Sharqi Swabi	Against vacant post
20	D. Saeeda Khatoon SET GGMS Zaryab Colony Peshawar	SS GG Comp: HSS Peshawar.	Against vacant post

Atlesteh Jaunda Son

Head Mistress

Dat. Girls High Scho barral Abbottabad

	·		,
	Safia Begum SET GGMS Bakri Banda Mardan	HM GGHS Saro Shah Mardan	Against vacant post
<u> </u>	Shuhrat Begum SET working as I/C HM GGHS Yar Hussain Swabi	HM GGHS Yar Hussain Swabi	Against vacant post
	Zuhra Jabeen SET GGMS Hayatabad Peshawar	HM GGHSS Hayatabad Peshawar	Against vacant post
	Nihayat Begum SET GGMS Sokai Mardan	HM GGHS Palo Dheri Mardan	Against vacant post
25.	Naeema Khattak SET GGHS Lund Khawar Mardan	HM GGHS Jalala Mardan	Against vacant post
	Zarina Begum SET GGHSS Jangal Khel Kohat	HM GGHSS Jangal Khel Kohat	Against vacant post
27.	Maira A/Abad	HM GGHS Ghar Pull Gram Abbottabad.	Against vacant post
	Shaheen Akhtar SET GGHS Lachi Kohat	HM GGHS Bori Saghari Kohat	Against vacant post
29.	No.2 Kohat	HM GGHS Ahmad Abad Karak	Against vacant post
30.	Kohat	HM GGHS No. 2 Karak	Against vacant post
	Nargas Rafi SET GGHS Latamber Karak Hameeda Bibi SET GGHSS	HM GGHS Latamber Karak	Against vacant post
	Havelian	SS(G) GGHSS(Comp.) Abbotabad.	Against vacant post
33.	GGHSS Pirpai Nowshera	HM GGHS Dak Baisood Nowshera	Against vacant post
34.	Tajwar Sultan SET GGHS Landi Arbab Peshawar	HM GGHS Malago Peshawar	Against vacant post
35.	No.2 Haripur	HM GGHS Basu Maira Haripur	Against vacant post
36.	Samina Jamal SET GGHSS Chamkani Peshawar	HM GGHS Shah Afzal Abad Charsadda	Against vacant post
37.	Dhobian Swabi	HM GGHS Dhobian Swabi	Against vacant post
38.	GGHSS Kulachi D.I.Khan	HM GGHS Kachi painda Khan D.I.Khan	Against vacant post
39.	GGMS Ambar Swabi	Instt: RITE (F) Swabi	Against vacant post
40.	Sajida Perveen SET GGMS Kaga wala Peshawar	HM GGHS Dosehra Charsadda	Against vacant post
41.	Farzana Begum SET GGHS Nauthia Peshawar	HM GGHS Matta Maghul Khel Shabqadar Charsadda	Against vacant post
42.	No.1 Mardan	HM GGHS Koper Mardan	Against vacant post
43.	Wazir Bagh Peshawar	HM GGHS Haji Jamroz Khan Charsadda	Against vacant post
44.	DO(F) Takht Bai Mardan	HM GGHS Garhi Daulat Zai Merdan	Against vacant post
45	Chitral	HM GGHS Broze Chitral	Against vacant post
46	GGHS Metha Pur D.I.Khan	HM GGHS Paharpur D.I.Khan	Against vacant post
47	Shehnaz Begum SET GGHS Shagi bala Peshawar	HM GGHS Daulat pura Charsadda	Against vacant post

2. Consequential posting/transfer of the following teacher is hereby ordered in public interest with immediate effect:-

1 Mst. Farah Deeba HM GGMS Zaryab Vice S.No. 20 ADO IF) Nowshera Colony Peshawar	S.No.	Name & Present Posting.	Place of Posting	Remarks
ADO IF) Nowshera Colony Peshawar	1	Mst. Farah Deeba	HM GGMS Zaryab	Vice S.No. 20
	1	ADO IF) Nowshera	Colony Peshawar	

AMAN

SECRETARY TO GOVT OF NWFP ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst; of even no. & date: Copy is forwarded to:-

- 1) Secretary to Govt of NWFP, Establishment Department, Peshawar.
- 2) Special Secretary (Regulation), Establishment Department, Govt of NWFP Peshawar.
- 3) Secretary to Govt. of NWFP, Finance Department, Peshawar.
- 4) Secretary to Chief Minister NWFP.
- 5) PS to Chief Secretary NWFP.
- 6) All Directors in Elementary & Secondary Education Department NWFP.
- 7) Executive District Officers Elementary & Secondary Education concerned.
- 8) The Accountant General NWFP.
- 9) District Accounts Officers concerned.
- 10) PS to Minister for Education (Elementary & Secondary) NWFP.
- 11) PS to Secretary / Special Secretary / Additional Secretary E&S Edu: Deptt Govt of NWFP.
- 12) PA to Deputy Secretary (Admn) Elementary & Secondary Edu: Department Govt of NWFP.
- 13) Officers concerned
- 14) Master file

(ARIF JAMIL)
SECTIONOFFICER (PRIMARY)

Attested Inseeda Salas

Head Mistress Govt. Girls High School Jamal Abbottabad

Almil



شفا انثرنيشنل هسيتال اسلام اباد

Shifa International Hospitals Ltd.

Sector : H-8/4, Islamabad - Pakistan Tel : 051-8463000 Fax : 051-4863182 Cardiology Deptt. : 051-8463123, 8463124

Dr. Habib-ur-Rahman

M.D., F.A.C.C. (USA)

Diplomate, American Board of Internal Medicine and Subspecialty of Cardiovascular Diseases
Consultant Cardiologist

Mrs. Iffat Huma 55y 2m Female MR No 02-20-56 Me do	Calina to six a	MM August 1,	2015
Complaints : Feeling of weakness			
Signs: BP: 100/70 mm/Hg	Herbesser 'SR 90 Mg Warfarin 5 Mg	ایک گولی گئا، شام ایک گولی شام	(36)
Pulse: 80 /min Weight: 82 Kg No Gallop Chest Clear	Methotrexate 7.5 Mg	7.5,ng Újá Ú	1 (12)
Investigation: 7/04/14 Echo LA 46 ,RA 44 Mild MR , LFT Normal . 8/14 INR 1.8 1/15 INR 2.5 Diagnosis: Atrial Fibrillation RA Plan:	Folic Acid 5 Mg	آئيک گولی روزان	NIC
Advised CBC with diff, TSH Monthly INR Target INR A A A A A A A A A A A A A	2 to 2-5		بدایات

Patient Medical Records Shifa International Hospitals Ltd.

Printed On Saturday, August 1, 2015 @ 4:40 PM

Page 1 of 1

برادكرمشوره كيغير دوائي بندوكم ويأتبد لل ندكرين

Doctor's Signature



شفا انش نیشنل هسیتال اسالام آباد

Shifa International Hospital Ltd.

Sector: H-8/4, Islamabad - Pakistan Ph : 051-

8463000Fax: 051-4863182

Dr. Zafar Ullah

MBBS,MRCP,MRCGP (UK) Speciality Certificate Rheumatology Associate Consultant Rheumatologist

Mrs. Iffat Huma 55y 2m Female

MR No 02-20-56

Complaints

Signs

BP: 130/80 Weight: 82 Temp: 37-RR: 20

Pulse: 80 SpO2: 95 Pain Scale: 2

Fall risk: Yes

Clinical Details

مالية، أم كلير الاربيني إدربيني الرار باكون المجاني العن المحي وأبيت عمل شُرِّنُ النَّهَاء عِلِينَهُ * كَالَ: ٥٠ وهادروووه كَ النَّهَاء، هَرَى مَهَالَتُ مَدِووَرَ بَكَرِي كَ وشيار

August 1, 2015

 \mathcal{P}_{i} :

and Ind

MBES



Shifa International Hospitals Ltd.

Sector: H-8/4, Islamabad - Pakistan

Tel: 051-8463123-3124 Fax: 051-4863182

Investigation:

Outside ECG Atrial fibrillation with heart rate of about 100

Diagnosis:

Atrial Fibrillation

Dr. Yusuf Hassan (MD) MBBS, MRCP (UK)

Diplomate American Board of Internal Medicine Diplomate American Board of Cardiology Diplomate American Board of Interventional Cardiology Board Certified Comprehensive Echocardiography

Consultant Interventional Cardiologist

Dr. Aasim Rehman, M.D.
Diplomate American Board of Internal Medicine
Diplomate American Board of Rheumatology

Associate Consultant Rheumatologist

18/1/18



شفا انترنيشنل هسيتال اسلاماباد

Shifa International Hospitals Ltd.

Sector: H-8/4, Islamabad - Pakistap

Tel: 051-4603666, 4603007 ____ (N603695)

Fax: 051-4863182

Mrs Iffat Huma

M-07-0G

-# 02-20-56

Dx. RA, OA

1/2×:

- O Methodroxate 15mp once a week -
- 3 Folic Acid Suy once a week (next day)
- 3 HCQ 200 m -> 1H
- 1 Maproxen 500mg 141 CEDING CIPMO
- @ Panadol 2ta -> d 5 m, c, pus
- © Galsan D. 141

3) Cartigen Plu - 1H

AASIN REHMAN, M.D. Associate Consultant Rheumatologist Shifa International Hospital Islamatiad, Pakistan - J CBC

-1 ESP

- V AUT /AST

-. I Creatione

After 3 months

AASIM REHMAN, M.D.
Associate Consultant Rheumatologist
Shifa International Hospital
Islamabad, Pakistan



شفاانثرنيشنل هسيتال اسلاماباد

Shifa International Hospitals Ltd.

Sector: H-8/4, Islamabad - Pakistan

Tel: 051-4603666, 4603007

Fax: 051-4863182

HUMA IFFAT

02-20.56

Ox. Rheumatord Athirtic

Rx.

O Methotrexate 20mg.

بنتے بس ایک با

2 Folic Acrd

3 Dellta cotril Sunp

- (Esomepvzzole 20mg.
- (S) adsan- D
- Celebex 100mg 1+1

Dr. Aasim Rehman, M.D.

Diplomate American Board of Internal Medicine Diplomate American Board of Rheumatology Consultant Rheumatologist

12/4/2011

AASIM REHMAN, M.D. Krativi Any in il.

Krativi Any il.

Krativi

- <BC. ابعی ادر - ALT/AST. 씨 깶 4 - BUM (Cr.

- ESR.] M zing 4

- BOTH HANDS & FEET - X MAY

2news.



Certificate of Appreciation

Me. Mr IFFAT HOMA HIM BYHS KUNI

District Education Office Abbottabad awards this Certificate to you on your best performance

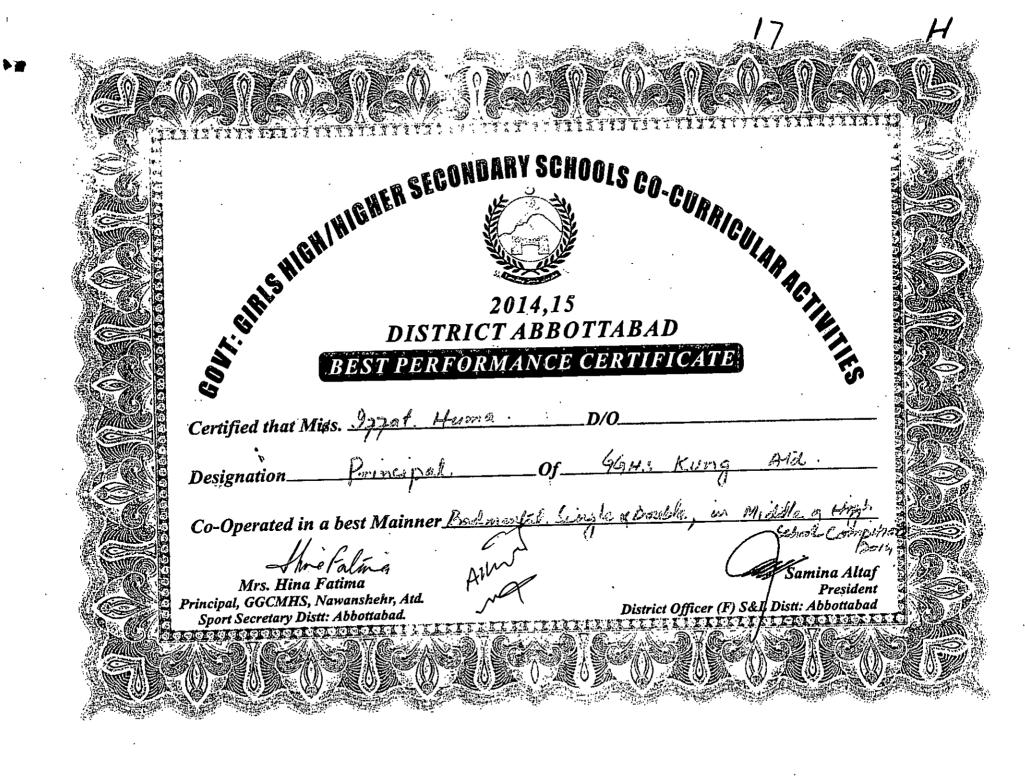
AM

Saminastay

District Education Officer (F)
District Abbottabad

Director Flementary & Secondary Edu

Director Elementary & Secondary Education Khyber Pakhtunkhwa



2014,15
DISTRICT ABBOTTABAD

BEST PERFORMANCE CERTIFICATE Certified that Miss. _ JANAX Designation. Co-Operated in a best Mainner of Junia

> Mrs. Hina Fatima Principal, GGCMHS, Nawanshehr, Atd. Sport Secretary Distt: Abbottabad.

Samina Altaf President District Officer (F)/S&L Distt: Abbottabad

SECONDARY EDUCATION AND SECOND

de le Hadas soons

Award of Co-operation



This Award is conferred upon
Mrs. Siffat Houma (Headmistiress)

I.I.H.F. Kainj Abbitiabad

in regard of the dedicated and devoted

cervice condered by bee during

Inch High Februk

Annual Fronts Sections 2015

Dixir Albeitabadi

20

INSTITUTION WISE RESULT PERCENTAGE SSC (10th) 2015

							17/10	'ISma.	واسوا	
School Name	Appeared	Pass	%age	A1	Α-	В		Ď	E, E	
GOVT. GIRLS HIGH SCHOOL BATTAL MANSEHRA	43	· 42	98	0	0	17/	23	.2	0	٠
GOVT. GIRLS HIGH SCHOOL BEHALI MANSEHRA	47	35	74	0	0	7	12	16	0	
GOVT. GIRLS HIGH SCHOOL BHZR KUND MANSEHR	110	29	26	0	0	8	20	1	0	
GOVT. GIRLS HIGH SCHOOL BIROTE ABBOTTABAD	46	22	48	0	. 0	1	15	6	0	ĺ
GOVT. GIRLS HIGH SCHOOL CHITTA BATTA MANSEHRA	29	23	79	1	4	7	11	0 -	0	
GOVT. GIRLS HIGH SCHOOL DATTA MANSEHRA	37	34	92	0	3	7	21	3	. 0	
GOVT. GIRLS HIGH SCHOOL DHODIAL MANSEHRA	79	57	72	0	5	11	35	6	0	
GOVT. GIRLS HIGH SCHOOL GANDHIAN MANSEHRA	68	68	100	2	10	42	13	1	. 0	
GOVT. GIRLS HIGH SCHOOL GHAZI HARIPUR	196	128	65	0	2	22	65	39	0	
GOVT. GIRLS HIGH SCHOOL GUDWALIAN HARIPUR	35	27	77	0	3	10	9	5	0	
GOVT. GIRLS HIGH SCHOOL HASSA BALAKOT MANSEHRA	47	19	40	0	1	8	10	. 0	0	
GOVT. GIRLS HIGH SCHOOL HATTAR HARIPUR	82	73	. 89	0	5	19	31	18	0	
GOVT. GIRLS HIGH SCHOOL JABRI HARIPUR	24 .	24	100	0	1	13	8	2	. 0	
GOVT. GIRLS HIGH SCHOOL JAREED MANSEHRA	33	6	18	0	0	0	4	2	0	
GOVT. GIRLS HIGH SCHOOL JHANGI ABBOTTABAD	5.7	.50	- 88	0	11	.13	29	7	0	
GOVT. GIRLS HIGH SCHOOL KAGHAN MANSEHRA	20	20	100	0	3	6	10	1	. 0	
GOVT, GIRLS HIGH SCHOOL KAHAL HARIPUR	. 78	44	56 ·	0	6	13	23	2	0	
GOVT. GIRLS HIGH SCHOOL KAKUL ABBOTTABAD	50	- 36	~~ 72 _. -	0	-0	4 '	23	9	0	
GOVT. GIRLS HIGH SCHOOL KANGRA COLONY HARIPUR	82	38	46	0	3	6	15	14	0	
GOVT. GIRLS HIGH SCHOOL KAWAI MANSEHRA	26	24	. 92 .	0	2	7	10	·5	· 0	
GOVT. GIRLS HIGH SCHOOL KERI RAIKI ABBOTTAB	51	. 33	65	0	2	8	14	, 9	0	
GOVT. GIRLS HIGH SCHOOL KHAWARI MANSEHRA	31	30	97	0	0	2	11	17	0	
GOVT. GIRLS HIGH SCHOOL KUNJ ABBOTTABAD	28	25	89	0	0	4	11	10	-0-	١
GOVT. GIRLS HIGH SCHOOL LASSAN NAWAB MANSEHRA	63	58	92	0	1	16	40	1	0	ľ
GOVT. GIRLS HIGH SCHOOL MANG HARIPUR	39	. 17	44	. 0	0	2	10	5	0	·
GOVT. GIRLS HIGH SCHOOL MANGLOOR MANSEHR	12	. 10	83	0	0	0	6	4	0.	
GOVT. GIRLS HIGH SCHOOL MANKARAI HARIPUR	13	. 7	54	0	0	4	3	0	0	
GOVT. GIRLS HIGH SCHOOL MIRPUR ABBOTTABAD	105	-76	72 ·	. 1	4	18	37	16	0	
GOVT. GIRLS HIGH SCHOOL NO. 2 MANSEHRA	125	100	80	0	7	38	45	10	0	
GOVT. GIRLS HIGH SCHOOL NO.2 ABBOTTABAD	144 _	_ 87	_60 ·	0	1-	- 9-	39	36	2	
GOVT. GIRLS HIGH SCHOOL NO.2 HARIPUR	202	180	89	4.	17	61	85	13	0	4
GOVT. GIRLS HIGH SCHOOL NOORDI HARIPUR	23	22	96	0	0	13	8	1.	0	
GOVT, GIRLS HIGH SCHOOL OGHI MANSEHRA	160	156	98	0	2	44	96	14	0	
GOVT. GIRLS HIGH SCHOOL PANIAN HARIPUR	91	56	62	1	9	15	17	14	- 0	ļ

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INSTITUTION WISE RESULT PERCENTAGE SSC (10th) 2015

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C (keDale) В **Pass** %age **A1 Appeared School Name** FUTURE PUBLIC SCHOOL NAWANSHER **ABBOTTABAD** FUTURE PUBLIC SCHOOL NAWANSHEHR **ABBOTTABAD** G.GIRLS H.S BEER HARIPUR G.GIRLS H.S HALLI HARIPUR <u>0</u> . Ō G.GIRLS H.S KALINGAR HARIPUR Ö <u>-</u>3 G.GIRLS H.S KALUPIND HARIPUR 0 / G.GIRLS H.S MIRPUR HARIPUR Ó G.GIRLS HIGH SCHOOL BANDI PHULLAN ABBOTTABAD T G.GIRLS HIGH SCHOOL DHODIAL ATD Ō GALYAT PUBLIC SCHOOL NAGRI BALA ABBOTTABA GALYAT PUBLIC SCHOOL NAGRI BALA ABBOTTABA GANDHARA SCIENCE SCHOOL KHALO GHAZI GANDHARA SCIENCE SCHOOL KHALO GHAZI HARIPUR 1. GARDEN P.H.S CGHI MANSEHRA GIRLS GARDEN PUBLIC HIGH SCHOOL DAB NO.1 MANSEH Ō GARDEN PUBLIC HIGH SCHOOL DAB NO.1 MANSEH O. GARDEN PUBLIC HIGH SCHOOL OGHI MANSEHRA GARNISH PUBLIC SCHOOL LASSAN NAWAB MANSEHRA GARNISH PUBLIC SCHOOL LASSAN NAWAB. MANSEHRA GARNISH PUBLIC SCHOOL THAKRA MANSEHRA GARNISH PUBLIC SCHOOL THAKRA MANSEHRA GATE WAY INTERNATIONAL P/S & COLLEGE ABBOTTABAD GATE WAY INTERNATIONAL P/S & COLLEGE **ABBOTTABAD** 8--0.▶ -8 GG CENTENNIAL MODEL S.S NAWANSHEHR
ABBOTTABAD .1 GG CENTENNIAL MODEL SCHOOL KOT NAJIBULLAH HR -21 0 · GG CENTENNIAL MODEL SECONDARY SCHOOL ABBOTTABAD 🗀 GG COMP HIGHER SECONDARY SCHOOL [']ABBOTTABAD --GG HIGH SCHOOL PIND KARGU KHAN ABBOTTABAL GGHS HAVELIAN VILLAGE ABBOTTABAD GGHS AJMERA BATTAGRAM GGHS BAND! ATTAI KHAN ABBOTTABAD GGHS BANDI MAIRA ABBOTTABAD -0-3 -GGHS BANDI MATRACH ATD.

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INSTITUTION WISE RESULT PERCENTAGE SSC (9th) 2015

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	School Name	Appeared	Pass	%age				- N C	D.	E
	GANDHARA SCIENCE SCHOOL KHALO GHAZI HARIPUR	4	0 1	7.0	101	. 0 (° * 21 2	101	¢0°	.0	0
. [GARDEN P.H.S OGHI MANSEHRA GIRLS	3	0	0 \$	χQ.	*0 **	, O.	0.	٥,	0.
	GARDEN PUBLIC HIGH SCHOOL DAB NO.1 MANSEH	94	93	99	0	0∜	101	, 0 ,	₃ 0	0
	GARDEN PUBLIC HIGH SCHOOL DAB NO.1 MANSEH	108	108	100	0	0	0	0,	Ö	0
	GARDEN PUBLIC HIGH SCHOOL OGHI MANSEHRA	16	1	6	0	0	.0	0	0	0
	GARNISH PUBLIC SCHOOL LASSAN NAWAB MANSEHRA	11	9	82	. 0	0	0	0	0	0
	GARNISH PUBLIC SCHOOL THAKRA MANSEHRA	19	19	100	0	0	0	0	0	0
Ì	GARNISH PUBLIC SCHOOL THAKRA MANSEHRA	16	16	100	.0	0	0	0	0	0
ا :	GATE WAY INTERNATIONAL P/S & COLLEGE ABBOTTABAD	17	15	88	0	0	.0	0 -	0	0.
	GATE WAY INTERNATIONAL P/S & COLLEGE ABBOTTABAD	34	28	82	0	0	0	0.	0	0
	GG CENTENNIAL MODEL S.S NAWANSHEHR - ABBOTTABAD	206	778	38	0	0	0	- O	0	0.
	GG CENTENNIAL MODEL SCHOOL KOT NAJIBULLAH	199	. 53	27	0	0	0	0	0	0
/	HR GG CENTENNIAL MODEL SECONDARY SCHOOL*	₹ - 201	114	57	- 0	~.0	0	0	ō	0
r	GG COMP HIGHER SECONDARY SCHOOL /	184	50	27	0	/ 0	0	0	0	0
	ABBOTTABAD GG HIGH SCHOOL PIND KARGU KHAN ABBOTTABAD	42	20	48	- 0	0	0	0	0	0
	GGHS HAVELIAN VILLAGE ABBOTTABAD	100.	63.	63	0	0	0	0	0	0
	GGHS AJMERA BATTAGRAM	19	19	100	0	.0	0	0	0	0
	GGHS BANDI ATTAI KHAN ABBOTTABAD	37	28	76	0	0	0	0	0	0
	GGHS BANDI MAIRA ABBOTTABAD	35	. 21	60	0	0	0	0	0	0
	GGHS BANDI MATRACH ATD.	18	. 4	22	0	0	0	0	0	0
	GGHS BANIAN BATTAGRAM	14	14	100	0	, 0	0	<u></u> 0	0	. 0
	GGHS BHERA HR	18	17	94	0	0	0	0	.0	0
	GGHS CHAPRA HARIPUR	62	31	50	0	0	0	0	0	0
	GGHS DANDA KHOLIAN MANSEHRA	20	19.	95	0	0	0	0	0	0
	GGHS DHARYAL MANSEHRA	26	5	19	0	0	0	0	0	0
	GGHS DOBANDI HARIPUR.	. 57	15	26	0	0	0	0	0	, 0
	GGHS DOGHA MA.	20	20	100	0	0	0	0	0.	, 0
	GGHS GHANDIAN HARIPUR	28	26	93	0	0	0	0	0	. 0
	GGHS GHANOOL MANSEHRA	38	26	68	0	0	0	0	0	0
	GGHS GUL MUHAMMAD CHAPPARGRAM BATTAGRA	9	9	100	0	0	0	. 0	0	0
	GGHS KAG HARIPUR	31	26	84	0	Ö.	0	0	0	0
	GGHS KHALABAT TOWNSHIP SEC NO. 3 HARIPUR	. 74	63	85	0	0	0	0	0	0
	GGHS KHANUSPUR AYUBIA ABBOTTABAD	29	28	97	0	0	0	0	0	0

INSTITUTION WISE RESULT PERCENTAGE

SSC (9th) 2015

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School Name	Appeared	Pass	%age	A1	Α	В	.dr	D D	∕ E	
GOVT. GIRLS HIGH SCHOOL BASSO MAIRA HARIPUI	35-	9	26	0	0	0	0	9/	0	
GOVT, GIRLS HIGH SCHOOL BATTAGRAM	50	43	86	O	0	0	0	6	Ò	
GOVT. GIRLS HIGH SCHOOL BATTAL MANSEHRA	81	. 79	98	0	0	0	0	Û	0	į
GOVT, GIRLS HIGH SCHOOL BEHALI MANSEHRA	46	16	35	0	- 0	0	0	C	0	
GOVT. GIRLS HIGH SCHOOL BHER KUND MANSEHR	129	10	8	0	0	υ	ō	Ö	0	
GOVT. GIRLS HIGH SCHOOL BIROTE ABBOTTABAD	41	15	37	C	0	0	0	0	0	
GOVT. GIRLS HIGH SCHOOL CHITTA BATTA MANSEHRA	33	32,	97	0	0	0	0	0	0	i.
GOVT. GIRLS HIGH SCHOOL DATTA MANSEHRA	56	36	64	0	Ç.	Ô	0	0	0	:
GOVT. GIRLS HIGH SCHOOL DHODIAL MANSEHRA	.79	48	61	0	0	0	Ō	0	0	:
GOVT, GIRLS HIGH SCHOOL GANDHIAN MANSEHRA	76	76	100	0	0	0	Ō	0	0	
GOVT. GIRLS HIGH SCHOOL GHAZI HARIPUR	212	75	35	0	0	0	0	0	0.	
GOVT. GIRLS HIGH SCHOOL GUDWALIAN HARIPUR	49	. 11	22	0	0	0	0	0	0	
GOVT. GIRLS HIGH SCHOOL HASSA BALAKOT MANSEHRA	35 ,	6	17	0	0	0	0.	0	0.	
GOVT. GIRLS HIGH SCHOOL HATTAR HARIPUR	104	44	42	0	. 0	0	0	0	0	
GOVT. GIRLS HIGH SCHOOL JABRI HARIPUR	45	. 36	80	0	0	0 ′	0	0.	0	
GOVT. GIRLS HIGH SCHOOL JAREED MANSEHRA	34	4	12	-0	0	0	0	0	0	
GOVT. GIRLS HIGH SCHOOL JHANGI ABBOTTABAD	101	. 70	69	0	0	0	0	0.	0	1
GOVT. GIRLS HIGH SCHOOL KAGHAN MANSEHRA	38	37	97	0 -	0	0	0	0	0	
GOVT. GIRLS HIGH SCHOOL KAHAL HARIPUR	57	25	44	.0	0	0	0	0	0	!
GOVT. GIRLS HIGH SCHOOL KAKUL ABBOTTABAD	46	29	63	0	0	0	0	0	0	
GOVT. GIRLS HIGH SCHOOL KANGRA COLONY HARIPUR	119	15	13.	0.	0	0	0.	0	0	i
GOVT, GIRLS HIGH SCHOOL KAWAI MANSEHRA	25	22	88	0	0	0	0.	0	0	
GOVT GIRLS HIGH SCHOOL KERI RAIKI ABBOTTAB	54	38	70	0	C	.0	0	0	† ö	
GOVT, GIRLS HIGH SCHOOL KHAWARI MANSEHRA	28	26	93	0	0	0	0	0	0	1
GOVT GIRLS HIGH SCHOOL KUNJ ABBOTTABAD	61	40	66	-0-	_o.	0	0	. 0	0	۱.
GOVT. GIRLS HIGH SCHOOL LASSAN NAWAB MANSEHRA	94	78	. 83	0.	0	0	0	0	0	
GOVT GIRLS HIGH SCHOOL MANG HARIPUR	52	6	12	0	0	0	0	.0	0	1
GOVT GIRLS HIGH SCHOOL MANGLOOF MANSEHR	13	9	69	0	0	0	n	0	-0	1
GOV! GIRLS HIGH SCHOOL MANKARAI HARIPUR	18	8	.44	0	Ō	Ö	0	0	0	ļ
GOVT GIRLS HIGH SCHOOL MIRPUR ABBOTTABAD	90	-75	83	0	0	0	0	0	0	
GOVT, GIRLS HIGH SCHOOL NO 2 MANSEHRA	152	60	39	; 0	0	0	0	.0	0	•
GOVT GIRLS HIGH SCHOOL NO.2 ABBOTTABAD	169	64	38	0	0	0-	,0	0	0	
GOVT GIRLS HIGH SCHOOL NO 2 HARIPUR	208	93	45	0	0	0	0	Ō	ō	
GOVT GIRLS HIGH SCHOOL NOORDI HARIPUR	26	22	85	0	. <u>. </u>	Ö	0	0	0	
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INSTITUTION WISE RESULT PERCENTAGE SSC (9th), 2015

School Name	Appeared	Pass	0/	<u> </u>				· · ·	
GOVT. GIRLS HIGH SCHOOL OGHI MANSEHRA	132	107	%age 81	A1	A	B	–⊢: <u> </u>	+=	↓ E
GOVT. GIRLS HIGH SCHOOL PANIAN HARIPUR	99	52	53	0	0	0			0
GOVT. GIRLS HIGH SCHOOL PARHINA MANSEHRA	28	28		0	0	0	0		0
GOVT. GIRLS HIGH SCHOOL PHULRA MANSEHRA	72		100	0	0	0	0	0	0
GOVT. GIRLS HIGH SCHOOL RAJOYA ABBOTTABAD		60	83	0	0	0	0	Ó	0
GOVT. GIRLS HIGH SCHOOL RICH BHEN ABBOTTAB		61	76	0	0	0	0	0	0
GOVT. GIRLS HIGH SCHOOL SAJIKOT ABBOTTABAD		4	11	0	, 0,	0	0	0	0
·	1 / 1 / T	20	18	0	0	0	0	0	0
GOVT. GIRLS HIGH SCHOOL SALHAD ABBOTTABAD	53	21	40	0.	0	0	0	0	0
GOVT. GIRLS HIGH SCHOOL SANGAR MANSEHRA	26	25	96	· 0	0,	0	0	0	0
GOVT. GIRLS HIGH SCHOOL SARAI NIAMAT KHAN. HARIPUR	108	77	· 71	0	0	0	.0	0	0
GOVT GIRLS HIGH SCHOOL SARAI SALEH HARIPUR	234	64	27	0	0	0	0	0	0
GOVT. GIRLS HIGH SCHOOL SHAMDHARA MANSEH	134	108	81		0	0			
GOVT. GIRLS HIGH SCHOOL SHERGARH MANSEHR	63	44	70	0			0	0	0
GOVT. GIRLS HIGH SCHOOL SHERWAN ABBOTTABA	60	36	· · ·	· -	0	0	0	0	0
GOVT. GIRLS HIGH SCHOOL SHINKIARI MANSEHRA			60	0	0	0	0	0	0
GOVT, GIRLS HIGH SCHOOL SIRIKOT HARIPUR	203	136	67	0	0	0	0	0	0
GOVT. GIRLS HIGH SCHOOL TALHATTA MANSEHRA	93	51	55	0	0	0	0.	0	.0
	54	49	91	0	0	0	0	0	0
GOVT. GIRLS HIGH SCHOOL TIKRI KHARARI BATTAGRAM	65	61 .	94	0	0	0	0	0	0
GOVT: GIRLS HIGH SCHOOL TRANGRI BALA MANSEHRA	85	48	56	- 0 -	0	0	0	0	0
GOVT. GIRLS HIGHER SECONDARY SCHOOL HAJIA	95	37	39	0	0	0	0	0	0
SOVT. HIGH SCHOOL AFZAL ABAD MANSEHRA	83	41	49	0	0	0	0	0	0.
GOVT, HIGH SCHOOL AHL MANSEHRA	75	38	51	0	0	0	0	0	0
GOVT. HIGH SCHOOL ALOOLI HARIPUR	117	86	74	0	0	0	<u> </u>	 	
SOVT. HIGH SCHOOL ATTAR SHISHA MANSEHRA	117	91	78	0			0	0	0
GOVT. HIGH SCHOOL BADHORA HARIPUR	53	32			0	0	0	0	Ó
GOVT. HIGH SCHOOL BAGAN ABBOTTABAD	80	[.	60	0	0	0	0	0.	0
GOVT. HIGH SCHOOL BAGH ABBOTTABAD		64.	80	0	0	0	. 0	0	0
GOVT, HIGH SCHOOL BAGH PUR DHERI HARIPUR	64	27	42	0	0	0	0	0	0
	29	16	55	0	0	0	0	0	0
OVT. HIGH SCHOOL BAI BOHAL MANSEHRA	26	22	85	0	0.	0	0	0	0
OVT. HIGH SCHOOL BAIDRA MANSEHRA	25	13	52	0	0	0	0	0	0
OVT. HIGH SCHOOL BAIL HARIPUR	20	5	25	0,	0	0	0	0	0
OVT. HIGH SCHOOL BAILA MANOOR MANSEHRA	42	16	38	0	0	0	0	ō	0
OVT. HIGH SCHOOL BAIT GALI HARIPUR	24	0	0	0	0	0			
OVT. HIGH SCHOOL BAJNA MANSEHRA	91	20					0 	0	0
		20	22	0	0.	0	0	0	0 ;

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INSTITUTION WISE RESULT PERCENTAGE SSC (10th), 2015

į	School Name	Appeared	Pass	%age	A1	Α	В	С	D	E
	GOVT. GIRLS HIGH SCHOOL PARHINA MANSEHRA	28	28	100	0	4	17	7	0	0
	GOVT. GIRLS HIGH SCHOOL PHULRA MANSEHRA	65	64	98	0	1,	32	28	3	0
	GOVT. GIRLS HIGH SCHOOL RAJOYA ABBOTTABAD	60	58	97	0	9	23	22	4	0
	GOVT. GIRLS HIGH SCHOOL RICH BHEN ABBOTTAB	44	16	36	0	0	. 0	11	5	0
	GOVT. GIRLS HIGH SCHOOL SAJIKOT ABBOTTABAD	86	48	56	2	6	22	15	3	0
•	GOVT. GIRLS HIGH SCHOOL SALHAD ABBOTTABAD	33	19	58	0	0	1	7	11	0
	GOVT GIRLS HIGH SCHOOL SANGAR MANSEHRA	19	19 🛴	100	0	- 3	11	5	0	0
-	GOVT. GIRLS HIGH SCHOOL SARAI NIAMAT KHAN HARIPUR	111	105	95	0	2	34	57	12	0
	GOVT. GIRLS HIGH SCHOOL SARAI SALEH HARIPUR	210	118	56	-1	8	34	56	19	0
	GOVT. GIRLS HIGH SCHOOL SHAMDHARA MANSEH	59	56	95	0	0	.9	29	18	0
	GOVT. GIRLS HIGH SCHOOL SHERGARH MANSEHRA	67	65	97	0	13	32	18	2	0
	GOVT. GIRLS HIGH SCHOOL SHERWAN ABBOTTABA	66	60	91	0	8	18	29	5	0
	GOVT. GIRLS HIGH SCHOOL SHINKIARI MANSEHRA	200	145	73	0	6	39	72	28	0
	GOVT. GIRLS HIGH SCHOOL SIRIKOT HARIPUR	94	85	90	0	9	18	37	20	. 1
	GOVT. GIRLS HIGH SCHOOL TALHATTA MANSEHRA	45	36	.80	. 0	2	19	15	0	0
	GOVT. GIRLS HIGH SCHOOL TIKRI KHÁRARI BATTAGRAM	63	59	94	0	9	34	15	1	0
	GOVT. GIRLS HIGH SCHOOL TRANGRI BALA MANSEHRA	78	73	94	0	3	22	43	5	0
	GOVT. GIRLS HIGHER SECONDARY SCHOOL HAJIA GALI ATD	60	37	62	0	6	14	16	1	0
	GOVT. HIGH SCHOOL AFZAL ABAD MANSEHRA	53	53	100	0	1	7	39	6	0
	GOVT. HIGH SCHOOL AHL MANSEHRA	52	31	60	0	2	12	13	4	0
	GOVT. HIGH SCHOOL ALOOLI HARIPUR	87	79	91	0	0	4	38	37	. 0
	GOVT. HIGH SCHOOL ATTAR SHISHA MANSEHRA	100	96	96	1	4	17	54	20	0
	GOVT. HIGH SCHOOL BADHORA HARIPUR	45	20	44	0	0	1	11	. 8	0
	GOVT. HIGH SCHOOL BAGAN ABBOTTABAD	63	59	94	0	3	14	30	12	0
	GOVT. HIGH SCHOOL BAGH ABBOTTABAD	32	22	69	0	0.	0	3	19	0
	GOVT. HIGH SCHOOL BAGH PUR DHERI HARIPUR	38	20	53	0	0	0	6	14	0 -
	GOVT. HIGH SCHOOL BAI BOHAL MANSEHRA	14	12	86	0	0	2	10	0	0
	GOVT. HIGH SCHOOL BAIDRA MANSEHRA	30	21	70	0	0	2	13	6	0
•	GOVT. HIGH SCHOOL BAIL HARIPUR	18	11	61	0	0	0	7	4	0
	GOVT, HIGH SCHOOL BAILA MANOOR MANSEHRA	32	11:	34	0	0	0	9	2	0
	GOVT. HIGH SCHOOL BAIT GALI HARIPUR	13	9	69	0	0	2	6	1	0
	GOVT. HIGH SCHOOL BAJNA MANSEHRA	69	49	71	0	1	5	31	12	0
	GOVT. HIGH SCHOOL BAKOTE ABBOTTABAD	71	29	41	0	0	3	15	9	2
,	GOVT. HIGH SCHOOL BANDA PIR KHAN	26	24	92	0	0	5	15	4	0
	ARROTTARAN			~~		~	1	١ ' '	~ .	

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

·No. 299 /ST

Dated 22 / 2 / 2016

To

The Secretary E&SE,

Peshawar.

Subject: -

Judgement.

I am directed to forward herewith certified copy of Judgement dated 16.2.2016 passed by this Tribunal on subject for strict compliance.

Encl: As above

REGISTRATE
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.