18.02.2016

Mr. Khurshid Ahmed, bother of the appellant and Mr. Muhammad Saddique, Sr. GP for respondents present. Brother of the appellant submitted copy of office order dated 15.12.2015 according to which the appellant has been adjusted at GGPS Behali and requested for withdrawal of appeal.

In view of the afore-stated development, the appeal is dismissed as withdrawn. File be consigned to the record room.

ANNOUNCED 18.02.2016

Chairman Camp Court A/Abad 18.02.16.

20.10.2015

Mr. Khurshid Ahmad, brother of the appellant and Mr.Sakeenullah, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for official respondents present. Learned G.P submitted application alongwith copy of notification dated 25.8.2015 according to which the appellant is to be appointed in her own Union Council as per policy. The said office order has not yet been implemented as such request for adjournment on behalf of appellant was made. Adjourned for further proceedings to 14.12.2015 before S.B at Camp Court A/Abad.

714/2011

Chairman Camp Court A/Abad.

14.12.2015

Mr. Khurshid Ahmad brother of the appellant and Mr.Muhammad Siddique, Sr.G.P for respondents present. Brother of the appellant informed the Tribunal that the office order has not been implemented. It is directed that the respondents shall either implement the same or submit written statement without fail on 18.2.2016 before S.B at Camp Court A/Abad_i.

man Camp Court A/Abad

01.07.2015

Appellant Deposited Security & Process Fee Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was dismissed from service vide impugned order dated 3.3.2015 regarding which she preferred departmental appeal on 9.3.2015 which was not responded and hence the instant service appeal on 25.6.2015.

That the allegations of fake appointment were not enquired into and appellant was extended no opportunity of hearing.

Point 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 15.9.2015 before S.B at Camp Court. Abbottabad as the appeal pertains to the territorial limits of Hazara Division.

15.9.2015

1-7- 2011

Appellant in person and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Tahir Aurangzeb, G.P for respondents present. Requested for adjournment. To come up for written reply/comments on 20.10.2015 before S.B at Camp Court A/Abad.

Challrman Camp Court A/Abad

Form- A

FORM OF ORDER SHEET

Court of

Case No.___

714 /2015

| S.No. | Date of order Proceedings | Order or other proceedings with signature of judge or Magistrate |
|-------|------------------------------|---|
| 1 | 2 | 3 |
| 1 | 25.06.2015 | The appeal of Mst. Munaza Daud Faiz presented today by Mr. Muhammad Asif Yousafzai Advocate, may be entered in |
| | | the Institution register and put up to the Worthy Chairman for proper order. |
| | | REGISTRAR - |
| 2 | 30-6-15 | This case is entrusted to S. Bench for preliminary |
| | | hearing to be put up thereon $1 - 7 - 2015$ |
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 714 /2015

Munaza Daud Fiaz

V/S Education Department.

. INDEX

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| S.No. | Documents | Annexure | Page No. |
|-------------|-----------------------------------|----------|----------|
| 1. | Memo of Appeal | | 01-05 |
| 2. | Copy of Advertisement | - A - | 06 |
| 3. | Copy of Merit List | - B - | 07-08 |
| <u>.</u> 4. | Copy of Vacancy | - C - | 09-10 |
| 5. | Copy of Transfer Order. | - D - | 11 |
| 6. | Copy of Appointment | - E - | 12-15 |
| 7. | Copy of Charge report | - F - | 16 |
| 8. | Copy of Show Cause Notice | -G- | 17 |
| 9. | Copy of Reply | -4- | 18-22 |
| 10. | Copy of Impugned Dismissal order. | 1. | 23 |
| 11. | Copy of Departmental Appeal | J | 24-27 |
| 12. | Vakalat Nama | | 28 |

MUMAZA Daud APPELLAND Munaza Daud Fiaz

THROUGH:

(M. ASIF YOUSAFZAI) ADVOCATE, PESHAWAR.

And

(TAIMUR ALI KHAN) ADVOCATE, PESHAWAR.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Appeal No. 714 /2015

Munaza Daud Fiaz D/O M. Daud Fayyaz,

M.W.F. Province Borvice Tribunal Diary No.747 Band 9.5-6-2.5

Ex-PST GGPS, Binsian, Mansehra.
APPELLANT

VERSUS

- 1. The Secretary, Education (E&SE) Department, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2. The Director of Education (E&SE), Khyber Pakhtunkhwa, Peshawar.
- 3. The District Education Officer, E&SE, Female, Mansehra.

4. Nazima Bibi PST, GGPS, Jamal Naka, Behali Mansehra.

RESPONDENTS

The to Gir

APPEAL UNDER SECTION-4 OF THE **KHYBER** PAKHTUNKHWA, SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 03.03.2015 WHEREBY THE APPELLANT HAS BEEN DISMISSED FROM HER SERVICE ILLEGALLY AND IN-VIOLATION OF LAW AND RULES AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.

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PRAYER:

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4.

THAT ON ACCEPTANCE OF THIS APPEAL. THE ORDER DATED 03.03.2015 MAY BE SET ASIDE BEING ILLEGAL AND AGAINST THE LAW AND RULES AND THE APPELLANT MAY BE RE-INSTATED IN SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SHEWETH:

That the respondent department advertised some posts of different categories in the daily News-paper "Aaj". Copy of Advertisement is attached as Annexure-A.

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- 2. That the appellant appeared in test and qualified the test and got first position in the merit list for Union Council Behali. Copy of Merit list attached as Annexure-B.
 - That at the time of appointment there were 2 vacancies available at UC Bahali at GGPS Jamal Nakka. Copy of List is attached as Annexure-C.
 - That during the process of appointment, the EDO (E&SE) Mansehra transferred Ms. Sher Bano PST, GGPS Ashwal Union Council Balimung to GGPS Jamal Nakka Union Council Bahali against one of the vacant vacancy on 13.2.2012. Copy of Order is attached as Annexure-D.
- 5.

That against the illegal order, the appellant submitted an appeal to the competent authority. The concerned authority accepted the appeal of the appellant and appointed the appellant purely on merit being at Serial No.1 of the merit list in UC Bahali against the two vacant posts at GGPS Jamala Nakka on 18.05.2012. In the said order, the appellant posted/adjusted at GGPS Ashwal against the post of Ms. Sher Bano, PST who was transferred illegally and she was belonging to UC Balimung not Behali. Copy of Appointment Order is attached as Annexure-E.

That Ms. Nazma Bibi D/O Raja Khan Bahadar who was at Serial No.2 while the appellant was highly qualified throughout first divisions and on top in merit list, despite that the appellant adjusted/posted in far-flung area away from her village and Ms. Nazma Bibi who was at serial No.2 in merit list was adjusted in the same Union Council Bahali at GGPS Jamal Nakka.

That appellant submitted her charge report on 22.05.2012 at GGPS Ashwal and served the department for about 3 years honestly and with full devotion to the entire satisfaction of the department and there is no complaint against the appellant from the public and the department. Copy of Charge Report is attached as Annexure-F.

That after a passage of about 3 years the DEO (F) Mansehra issued an illegal, unlawful show cause notice on 29.09.2014 with the allegation of illegal appointment in other Union Council at GGPS Ashwal on the part of appellant. The appellant responded against the said illegal and unlawful show cause notice with full justifications and comprehensive detail reply submitted properly to the competent authority. Copies of Show Cause Notice and Reply are attached as Annexure-G and H.

That the DEO (F) Mansehra without considering the lawful and comprehensive reply of the appellant, imposed the major penalty upon the appellant and issued Notification regarding "Dismissal" from service of the appellant on 03.03.2015. Copy of Notification dated 03.03.2015 is attached as Annexure-I.

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Against the Illegal and Unlawful Dismissal Notification dated 03.03.2015, the appellant submitted her Departmental Appeal to the competent appellate authority on 09.03.2015 but despite of that the respondent department failed to reply within the statutory period of ninety days. The appellant having

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no other remedy, hence the present appeal on the following grounds amongst the others. Copy of Departmental Appeal is attached as Annexure-J.

GROUNDS:

- A) That the impugned order dated 03.03.2015 is against the law, rules, norms of justice and material on record, therefore, not tenable in the eyes of law.
- B) That the appellant has not been treated according to law and rules and has been punished for nothing.
- C) That no charge sheet, statement of allegations has been served on the appellant by the respondent department and as such mandatory provisions of law are violated.
- D) That neither any regular inquiry has been conducted against the appellant nor any statement has been recorded in the presence of appellant or any statements of the others colleagues have been given by the inquiry committee in the instant case which is the total violation of law and rules.
- E) That the appellant has not been associated with the inquiry committee nor chance of cross examination was provided to the appellant by the committee in fact no inquiry was ever conducted against the appellant.
- F) That the impugned order is politically motivated and has been passed to accommodate the blue eyed persons.
- G) That even no chance of personal hearing was provided before issuing the penalty order and as such golden principles of Audi Altram Partem was violated by the respondent No.3.
- H) That the impugned order has been passed after3 years and as such valuable rights under theprinciple of Locus Poenetentiae were created in

4

favour of appellant. Therefore the appellant cannot be removed from service in a slipshod manner.

That even the authority has not passed dispensing with regular inquiry order and despite that a slipshod manner was adopted while dismissing the appellant from service which is the violation of mandatory provisions of law and rules. Therefore the impugned order is not sustainable in eyes of law.

That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant maybe accepted as prayed for.

APPELLANT Munaza Daud Fiaz

THROUGH:

(M. ASIF YOUSAFZAI) ADVOCATE, PESHAWAR.

(TAIMUR ALI KHAN) ADVOCATE, PESHAWAR

J)

I)

Annex A)

| الرك عد | إخرار | -1 | تاري ^ن اتروز | ليتعيل | -17 | SUTT | NY |
|---------------------|------------------------|----------------------|-------------------------|--------|--|----------------------|----------|
| | .t; | 311/ | l <u>'</u> | · . | | | <u> </u> |
| 718 (11-35 | GGHS No.2 Menselira | GHS NO,2 Mansehra | 2,7.2011 | 9 | لیات المال البراز) باسادی و کری کمی کم شلیم شوید بیندو می سے میسر جاری مرفقی بید باده مار و اور مان ای بیشن | کل (جرل) | |
| ۲۱۶ ۲۱۶ ۱۰۰۱۶ | . <i>ि</i> ग | ايت) | 6.7.2911 | 9 | لهاسته الجالس في باسارى ذكر كم مح مح مشلم شدوني ندوش من من مدم ايك منظر ونيتر في وسان فويتكم الميركي شي با آون من مع مسارى مرتبكيت ياويكر مساول قابيت | ບໍ່ປາປຸ | 2 |
| ניא גיאל | (191 | Ligt | 6.7/2=2011 | - | ۱ - از از بایندا و بان کن تن منظوم به دارد است. مدنها والعالیه کن ۱۳۳۰ : از انتسابه این الداری با یه با است. این منطقه از چن ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۱ - با ساله این است. از منابع الکام سکی تکنی تلیم شده ۱۴۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : ۲۰۰۲ : | (أل | 1 |
| tu: درمنی | 1. 1.21 | Ú. | 9,7.2011+ | ·' | میکرک از بیداندا تر آن ایرانی تسلیم شد واداد مدینه شرامت کی سند | تارل/ تاريد | 4 |
| ११६ १२३६ | اليرا | اينا | 11,7,2014 | 9 | لىات الجامان المسادق المركى كالمكالمي ومان للات سياك المسالية الجامد الالكار المراكي المركزي المحالي | (<u>ک</u> انج | 5 |
| ۲۱۶ ۲۱۶ تال | i Sul | (: <u>:</u> !" | 14,7,2011 | 15 | میتوک (شیاندا و باین) می محکم میتواند او است بود تبراه ۱۳۱۵ ایر. کی انگام امر بیده ۱۳۱۹ سام برسم مشتر تحکیم و این المرمادی (عرفی شده بیتان بجاری امرز اگری کی مستقد به زیروش سه - | اللكان | 6 |
| ۲۱۶ ۱۱۶ کال | נ <u>י</u> ע | بري . ت | 19-07-11 | 07 | ۱- ۱ مرد ، مرد سای مرتلک می گن تجدید مودند شده تا با اعمانی مرتز بار را دید از میکن کا متعاد از سبب ۱۷ مسل ایم ماد ترک می کا تم شود اور سیکن او داد باری مرک متع ۱۹ سر بر مدیک می کا تا با و ماده انجلز کا میکند | ن <i>ا</i> ريين م | 7 |

مسیسه و مدن مانسه اختلار () کان ⁵⁵ر این ⁵مهر نیم م^{ور} تراک مرد قرالی می طال این تش او کرند زار بر برگی (2) مانرمردی ماز مین مید نطب سند او نواست و بیان که بازیم از از نوایی 20 ایسد کو تیم بیسه من نیکه (Stanting Medical Boach) کام توکیف تیک ممالان ب از نواست و بیان که بازیم از از نوایی 20 ایسد کو تیم بیسه من نیکه (Stanting Medical Boach) کام توکیف تیک ممالان مرت م آخراسال سيدوار ول كالساد جمان اور سي سير تعدير لي كراني جاسة كل مريسكة تام يكن اخرابات امب داركوبر، وشت كرف ووتر - (7) لمريب دانتور وكيلية ترف واست بسيره تدانيا و كول ٢٨/٥/٨٦ أترى وإجارتها - (8) سرني المردية ت شكاء ومعسول اور الدوار الدوار المون في فرايا بات كار (9) ترما جون كالدرار ش كارت شي المركان به - (10) الدورة كالما المرد ماس سیام امال مید تاب از ایرک می ان کی این ان اوان و نیست ادائیز به شون کرد. مد (۱۱) افرس اخترار کی انامت ۲۰ او توکیر ان کرد بر برای سکر و تاکار از محدود اور ان کرد. جه برگال کی توسیس شود این سرمان کی کرد ک با بنده کی (12) عکم بخش کی اینا میزن کداختیار مامل و قالورد مامل از سیس بالار بسیا می این این کر سد AVA ST اليوالما (٦٦ ٣٦) تغوينهمانا تشيع المناجر المعاليات ال الموالله : كواست كانتركرور عامرت ماركوك ماتي المحرول اللاتينا را المكركون والماحد مرم وداري اما تذك تريان كيفة ETISA الميت إلى المادية الداليلية وراعيد المان جل (CT) في الكر (PII) في الدي تداوي المروان والمعادية المعاد المعادية ا (٨٢) ادر لي اليمان (٣٤٦) كاستسراد ... ال يجنبون كيلين درمواست وسيتكاد دو كمنظ مين ان مكر ليل ميندد والاسيد تا 100 مكراسة وترويتام ماسة وتاوكيله كان است كراب ل سنول تمريحه كمسموا الدموما المسيسية بالى ساول فون والمسمود فرق فرجيري المترم ووصا المسامرة والمراحية والمستود بالمستود المستداد الم مر - ET BA(I)(TAT-2) نسبت المام إن المراسة والت براسيداد تيك / 100 سيكارتك دوالت، مام المركز المراجز 1، من ال مرادي - (ETEA(2) لمست بس ال امرد ادة عد مدود بالايتون بالاورك ترب الدر ال مرد من عرو (1) بالم فالا 13) على الرواي الم (12) بالاف (12) ماد (2) ما الدوي الم (12) ما الدوي الم (12) ما الدوي الم (12) ما الدوي الم (12) من المرد الم لیون، ۲۸۲۰، الم المشار (۲۲۲ کارل الاس الدار السال (۸۲۷ کیلیکست ۲۰۱۶ والبول (۲۸۲۰ کی ۲۰۰۸) میردند. (۱) دادن الاتهان کرد. 2 مانت داده المبردار لمان بمولی اس که ناپاست می ایند که از ۲۰ سند در ۲۰ ۲۵ امید شد با اساب اور او اسام به ادار ایکوزان امیسان با است که از ۲۰ تا ۲۰ می ۲۰ مارد او است که از ۲۰ می ۲۰ مارد ایکوزان امیسان که از ۲۰ كول بالمراجعة ما مادين المراجعة المراجعة المراجعة المراجعة المراجعة المراجعة المراجعة المراجعة من المراجعة ال د موت الماري اليط مختلط من الميل الماري المحرف في والمراحة معادية في مارك موت ان أوجادي كو ميرت الماري من خيال أيا والمدارية و 10 - 10 مرت بالأمنة علوات كالمروت تتراها علودان أوالمدافع الدوانية بالت كالأس تتركي الأل القوارين كالباك تدرك المعلمة TRAP المسينة بالمستر بالكرد CP¹¹ 18F(P)4933_

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| 1176 SHAREANA JEHANZEE CEILAU 09/10/1982 20/9/07 AIOU 174 16.533 513 250 0.05 569 1100 15 52 | |
| | 61 63.61 |
| 1 2420 BUSHRA GHULAM MUSTAFA V BHERKUMO 02/02/1580 17/00/2010 AIOU 184 24 533 607 630 112 100 100 100 100 100 100 | |
| 1 2442 (ADTREE | |
| ABOUL RASHID BHERKUID 15/2/79 20/9/07 AIOU 196 (28.133 549 650 9.69 (648 1100 17.57 238 530 / 2.35 / 2.35 | 54 13 |
| ALCU 172 22.933 595 250 10.5 653 1:00 17.81 318 550 2.09/07 ALCU 172 22.933 595 250 10.5 653 1:00 17.81 318 550 2.09/07 | 49,79 |
| 5 1 1471 / MIA RAIZ EHERKUND 11/05/1988 25/1/10 AIQU 120 16 707 1050 10 11 772 1100 21.05 250 250 2.630 | |
| 5 14/1 (2 F54 data 1 2 F54 data 1 2 700 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | 48 28 |
| - 077 0/0 45/1 F/AEEH MOHE/MASH M.KHAN EHERKUND 20/7/81 05/05/7/02 R Manselua 140 18 667 513 650 9 05 657 1100 17 92 261 550 2043 | 47.67 |
| E 60 (101/27)4 MEANOOO EHERKUND 12/09/1986 20/9/07 ANDEL 132 17.6 600 \$50 16.7 603/V100 16.61 320 550 20/9/07 | |
| E 2057 A LAN HAP 1011 M HARDON KHAN EHERKUND 01/01/1992 20/5/07 4/0/1 105 17.067 513 650 9 03 572 1100 155 268 550 2.436 515 1/0 | |
| 10 227 MURER TI AVAV M PEPVAIZ KHAU EHERKUND 23-1/80 23:6/05 4/00 128 17 0071 684 250 8.54 534 1100 14.30 200 200 200 200 200 200 200 200 200 2 | 1 2 44 45 25 1 1 |
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cademic Qualific: U/C of Decl: Name of M-Phi Name Address O/C Binh of Profe Father Name Mark Tot Ptag Plage Institution Plage Ptag Result Obt Tot Ptage Obt Tot Ptage, Obt Tot Obt 5 Tot | Plage Gbt 15 605 SJERA HAMAYUM 8 52 574 1100 292 M HAMAYUN T SABIR SHAH 11/12/1089 i7-S-10 AIOU 135 18.133 483 850 15 65 550 2,655 44,97 2846 HASHIN MUMIAE MUMTAZ KRAD T SABIR SHAH 01/01/1925 0.0/06/2007 AIOU 124 519 850 9,16 587 16.01 264 550 15.530 1100 44,10 и наматыл 15 1044 15月16日 11 T.SABIR SHAH 02/05/1985. 17/3/10 LIOU. 124 16 533 499 850 83: 561 1100 15.3 255 550 2 3 1 8 42.96 TALHATTA 1 1851 MOSCIEER BIDI ABDUL RAUF TALHAT14 04/12/1985 20/9/07 AIOU 120 16 483 850 8 52 620 1100 16.91 286 550 2.6 545 1100 2.48 46.51 2 00% SIF 19 SIA MOHD SULMAN TALHATTA 2/8/85/ AIOU 145 500 850 14/3/09 19 733 8-82 568 1100 15.49 462 1000 2 31 46 36 RAJA M AFZAL 2 570 RABIA BIBI TALHATTA 13/4/88 25/1/10 AIOU 120 16 665 1050 9.5 711 1100 19.39 44.89 1271 HAZHEN BAMYUN моно намуры UOIA TALHATTA 03/08/1974 14/04/2005 126 067 509 850 8.98 526 1100 14 35 615 900 3.417 43.81 1045 INADIA AMAN M HAMAYUN TALHATTA 05/05/1983 17/9/10 AIOU. 120 16 451 850 7.96 590 1100 16.09 249 550 2.264 42.31 (2-) 13> PRINCIPAL G. G. H. S. S Parhinna (Mansehra) Billie upa é 出 TANDA 244.44 1. 2122 Salibzadi Azzat Rasbani Do Ghulan Rabbani Bajong ATTESTED 02/10/1962 06/06/2092 L AIOU 1 124 1 AKOT 31

| | | OFFICE OF THE DY: DIS | | | |
|-------------|-----------------------|---|-----------------|----------------------|---|
| | | LIST OF V | ACANT POST UNIO | NCOLNOL WAR | ANSEHKA. |
| S.N | UNION COUNCIL | NAME OF SCHOL | NO OF VACANT | R COUNCIL WISE. | · · · · · · · · · · · · · · · · · · · |
| 0 | | THIND OF BOILDE | POST | Total No post in U/C | Reason of vacancy. |
| | · | | 1051 - | | |
| 1. | Shoukat Abad | GGPS Lanan Da Dara | | | |
| 1. | Shoukat Abau | GGPS Paniali | 2 | · 3 V | 1.Newly created post. |
| | | | 11 | | 2. due to death. |
| | Trangri Sabir Shah | GGPS Trangri Bala | 3 V | 31 | Newtowned |
| 2 | 1. | | | · · · · | Newly created post. |
| 3. | Behali | GGPS Jamal Naka | 2 1 | 2 | Newly created post. |
| 4 | Jaloo | GGPS Talian Di Kassi | 21 | 2 | Newly created post. |
| 5. | G.H.Bullaha | GGPS Batang | 2 2 | 2 | Newly created post. |
| | V | | | | rionij oroleta post. |
| 6. | Karnol | GGPS Bhuraj | $2 \vee$ | 2 | Newly created post. |
| 7. | Tanda | GGPS Bajna Mera | 2V | . <u>2</u> | Newly created post. |
| 8. | Nika Pani | GGPS Cham | 2 V | 2 2 | Newly created post. |
| .9 | Parhina | GGPS Phal Kot | 2 1 | 2 1 | Newly created post. |
| 1.0 | Hangri t | GGPS Kalas Ghanela | 2 2 | 2 | Newly created post. |
| <u>, 11</u> | Ichnik Hill Kol | GGPS Khan balimang | | 2 1 | Newly created post. |
| | 2 Bettel | GGPS Karmang Payeen | 22 | 2 4 | Newly created post. |
| 12 | Ichrhnico Mohandri | GGPS Ramshira | 21 | 2 1 | Newly created post. |
| 13 | Cashau | GGPS Baddal Gran | <u> </u> | 1 1 | Newly created post. |
| 13 N4 | Poffo | GGPS Kalas Nawaz Abad | 2 1 | 2 2 - | Newly created post. |
| 1 | | GGPS Kulhary Gharbi GGPS Baffa Khurd | | 2 | Out .DistrictTransfer |
| | | GOPS Balla Knuro | | | Due to retirement |
| 15 | Bherkund | GGPS Kehian | | | |
| 16 | Lassan Nawab | GGPS Sharotta | | 2 1 | Due to retirement |
| | - i) • | GGPS Khambian Payeen | IV | 2 V | Due to retirement |
| 17 | Phulra | 1.GGPS Gujar Gali | | 52 | Laying vacant prior to advertisement |
| | | 2.GGPS Dhaman | IL | . . | Laying vanct prior to advertisement. Laying vacant prior to advertisement. |
| | ; | GGPS Ghazi Kot | 21 | | Newly created post |
| Į | | GGPS Batangi | Ĩv | | Due to retirement |
| [| () | • | ÷ į | | Due to remembrin |

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| 19 | Shergarh | GGPS Parchian GGPS Gakhar Harian GGPS Shart Harian | 2 1 | 4 | Laving vacant minute |
|----|---|--|--|--------------|---|
| 20 | Karori | GGPS Shorlian GGPS Naryalla V GGPS Malhar V GGPS Fathi Bandi GGPS Thakra V GGPS Dhook V GGPS Seri Malwal | 1 V 2 V 2 V 1 V 1 V 2 V | 9 1 | Laying vacant prior to advertisement. Laying vacant prior to advertisement. Laying vacant prior to advertisement Laying vacant prior to advertisement. Laying vacant prior to advertisement. Laying vacant prior to advertisement Laying vacant prior to advertisement. Laying vacant prior to advertisement. Laying vacant prior to advertisement. |
| r. | Sawan Mera Bandi Shungli Jabbar Devli | GGPS Mohar GGPS Beer Bat GGPS Pagora <u>المنابا</u> × GGPS Basoo Manda Gucha GGPS Bela Manda Gucha GGPS Chungari | | 3 8 V | Due to retirement. Newly created posts. Laying vacant prior to advertisement. Laying vacant prior to advertisement. Laying vacant prior to advertisement. Laying vacant prior to advertisement. |
| | otal | GGPS Namshetwa Charlet Muhammad Haq Nawaz Khan | 61 | 61 1 | alas estt: |

Checked By:

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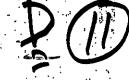
Muhammad Nazir, Head Clerk

for

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DY: DISTRICT OFFICER (F) E & S EDUCATION MANSEHRA



7.

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E & S) HDU: MANSEHRA. · Z. Y. - . . .

l TRANSFER ORDER

· ·i.: 38 A. - 1 Second States And As approved by the conjectent authority the following PST's teachers are hereby transferd on their own pay and grade in the interest of public service with immediate effect

·:

| | 2011年1月1日日本 | | ····· |
|-------------------------------|---------------|--------------------|---------------|
| S.No Name | From | | Remarks |
| 1. Sher, Bano. PST | GGPS Ashwal | GGPS Jamal Naka | A.N.C.Post |
| Nasreen PST | GGPS Bandian | GGPS Jamal Naka | Do |
| | Bedra | | |
| 3 Bushra Niazi | GGPS Debgran | GGPS Bandian Bedra | V N 2 |
| 4. Musarat | GGPS Dheri | GGPS Bhuraj | A.N.C.Post |
| | Shawai | l | · · · · · · · |
| 5. Samara | GGPS Jabba | GGPS Dheri Shawai | V.N.4 |
| 6 Gul Bibi PSt | GGPS Chandwel | GGPS Jaba | JV.V. S |
| <u>Y</u> , y, 1 <u>(1997)</u> | | | |

••• Note -1. Charge report should be submitted to all concerned.

2 No TA/DA is allowed to any one

• 5.0 'e diretar ve

EXECUTIVE DISTRICT OFFICER (L (L'&S) EDUCATION MANSEHRA 14 Endst: No 256-86 /PP-53/08/DDO(F)

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 Teacher concerned.

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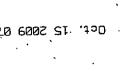
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Dated 1/3 /02/2012

DY: DISTRICT OFFICER (1) (E&S) EDUCATION MANSEHRA

FROM : LFAMANSEHRA

14 WASS: 10 6002 ST '100







OFFICE OF THE EXECUTIVE DISTRICT OFFICER E&S EDUCATION MANSEHRA

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Mansehra, the competent authority is pleased to appoint the following candidates as a Primary Schoc Teacher PST (Female) against newly created / resultant vacated posts in their relevant union councils i BPS 7 @ Rs.5800-320-15400 plus usual allowances as admissible under the rule on regular basis under the existing policy of provincial Government on the terms and conductions given below with immediate effect.

| | U/C BAFFA | • | · . |
|--------------------------------------|---------------------|--|--|
| 8# Name of Candidate | Father's Name | Home Address/ | Remarks |
| 1 Niaz Gul | Abdul Razag | Demiciied i//C | |
| 2 Sabia | Noor Hussain | Baffa | Own UC M/List . |
| | U/C BEHAL! | i Barra | Own UC Mi/List |
| 3 Munaza Daud | Daud | Behali | |
| 4 Nazma Bibi | | | Own UC M/List |
| | | Behali 👫 🖓 | |
| 5 . Shagufia Bibi | U/C Battal | · | · · · · · · · · · · · · · · · · · · · |
| | Munannad Shall Khan | Battai | Own UC M/List |
| 6 Shaista Jabeen | Muhammad Akbar | Kathai | From Adjacent UC |
| | U/C Bherkund | | Merit list |
| 7 Busina | Ghulam Minsiala | birekund | Own UC-M/List |
| 8 Naida AsiumF | U/C Gari Habib U | lah | |
| 9 Naida Ashraf 9 Gui Naz Bibi | Muhammad Ashrif Bag | Gari Habib Ullah | Own UC M/List |
| 9 Gui Naz Bibi | S. Qabal Shah | Gari Habib Ullah | Own UC M/List |
| | WC: Hilkot | | |
| 10 Bibi Asia | Abdul Ghafoor | Hilkor | |
| | U/C Hangrai | | Own UC M/List |
| 1 Irum Saeed | Seed Akhtar | | · |
| 2 Marium Bibi | | Hangrei | Own UC M/List |
| | Muhammad Younis | Hangrai | Own UC M/List |
| 3 Bibi Sajida | U/C Ichrian | · | ······································ |
| 4 Saima Ara | Saecd ur Rehman | Ichrian | Own UC M/List |
| | M.Fareed Khan | Ichrian | Own UC M/List |
| 5 Mah Jabeen | U/C Jabar Davel | · · · · · · · · · · · · · · · · · · · | |
| | Muhammad Faroog | Jabar Daveli | Own UC M/List |
| 6 Saba Tariq | Muhammad Tariq | Sachan | From Adjacent UCs Merit list |
| 7 Sobia Bibi | | ······································ | |
| Saima Naz | About Ghaloor | Jaloo | Own UC M/List |
| | Mir Afzal | Jaioo | Own UC M/List |
| 9 Fara Naz | U/C Karnoi | | |
| | Muhammad Khurshid | Karnol | Own UC M/List |
| D Nadia Rehman | Habib ur Rehman | Pairan | From Adjacent UCs |
| | U/C Karori | 1 | Merit list |
| Amrin Younis | Muhammad Younis | Karori | |
| Musrat Bibi | ElipH ur Rohmon | | Own UC M/List |
| Zenab | Alam Zeb | Karori | Own UC with list |
| Amrin Kusar | Muhammad Miskeen | Karori | Own UC M/List |
| Rukhsana Taj | Tai Muhammad | Karori | Own UC M/List |
| Rifat Bibi | Fageer Muhammad | Karori Shanaya | Own UC M/List From Adjacent UCs |
| Ashiya | Misri Khan | · · · · · · · · · · · · · · · · · · · | Merit list |
| Razia Bibi | | Shanaya | From Adjacent UCs Merit list |
| <u> </u> | Muhammad Zaman | Darband | From Adjacent UCs Merit list |

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| • | | | | (15) |
|-----|---------------------------------------|-----------------------------|--|--|
| | | U/C Lassan Naw | rab | |
| 29 | Sobia Arshad | Muhammad Arshad | Lassan Nawab | Own UC M/List |
| 30 | Rashida Bibi | M.Zahoor | Lassan Nawab | Own UC M/List |
| | | U/C Mohandar | | |
| 31 | Bibi Naseema | Ghulam Nabi | Mohandari | Own UC M/List |
| | · · · · · · · · · · · · · · · · · · · | U/C Nika Pani | | |
| 32 | Yasmeen Wahab | Abdul Wahab | Nika Pani | Own UC M/List |
| 33 | Neelam | Abdul Latif | Darband | From Adjacent U Merit list |
| | · · · · · · · · · · · · · · · · · · · | U/C Perhinna | | |
| 34 | Lubria Younis | M.Younis | Perhinna | Own UC M/List |
| | | | Perhinna | Own UC M/List |
| 35 | Zahida Bano | Ali Zaman U/C Phulra | | |
| 36 | Bibi Saleha | Abdula Jan | Pholra | Own UC M/List |
| 37 | Mehnaz Bibi | | Phulra | Own UC iM/List |
| | + | - M.Iqba! | | |
| -38 | Bibi Mewash | M.Naveed | Phulra | Own UC M/List |
| 39 | Farzona Yousef | M.Yousaf | Phulra | From Adjacent U |
| 40 | Bibi Sarah | Khurslad Khan | Sawan Maira | Merit list |
| | J | U/C Sachan Kai | an | |
| 41 | Bibi Salama | Shezada Khesro Faredon | Sachan Kalan | Own UC M/List |
| 42 | Bibi Norin | Rehmat Ullah | Sachan Kalan | Own UC M/List |
| | | UIC Sawan Mai | | |
| 43 | Tahira Jabeen | Muhammad Ayub | Sawan Maira | Own UC M/List |
| 44 | Safoora Farat | U/C Shanaya Abadul Razag | Shanaya | Own UC M/List |
| 45 | Irum Shaheen | Anwar Khan | Shanaya | Own UC·M/List |
| | I num Shaneen | U/C Shergarh | | |
| 46 | Saeeda Haidar | Mir Haidar | ······································ | Own UC M/List |
| 47 | Fozia Bibi | Sher Bahadar | Shergarh Shergarh | Own UC NI/List |
| 48 | Sadia Gul | M.Zamen | Shergarh | Own UC M/List |
| | | | | From Adjacent UC |
| 49 | Asma | Abdul Malik | Darband | Merit list |
| • | | U/C Shuakat Ab | ud | ······································ |
| 50 | Sadia Javed | Javed Khan | Shuakar Abad | Own UC M/Last |
| 51 | Sauera | M.Haroon | Shuakat Abad | Own UC M/List |
| 52 | Tabasam Rasinid | Abdul Rashid | Shuakat Abad | Gwn UC M/List |
| | | U/C Trangri Sabir | | |
| | Nabeela Giuncha Gul | Bashir Ahmad Khan | Trangri Sabir Shah | Own UC M/List |
| 54 | Khalida Bibi | M.Yousaf Khan | Trangri Sabir Shah | Own UC M/List |
| 55 | Sidra Hamayun | M.Hamayun | Trangri Sabir Shah | Own UC M/List |
| | <u> </u> | U/C Bandi Shun | <u>gii</u> | <u> </u> |
| 56 | Salma Javeci | Muhammad Javed | Darband | From Adjacen: UC Merit list |
| 57 | Nosheen Bibi | Fazal ur Rehman | Darband | From Adjacent UC Merit list |
| ••• | | U/C Tanda | | |
| 58 | Sahibzada Hazmat Rabani | Ghulam Rabani | Tanda | From Adjacent UC Merit list |
| 59 | Asma Noreen | Nawab Khan | Dhodial | From Adjacer' UC MeriClist |

ADJUSTMENT ORDER

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REFERENCES BUT AND

Consequent upon the above, the following adjustment are hereby ordered again, the posts mentioned against each.

| S# | Name | Father's Name | Alome Address/ Domiciled U/C | Pince of Foscing | Remarks |
|-----|----------------|---------------------|---------------------------------|------------------|---------------|
| 1 | Niaz Gul | Abdul Razaq | Baffa | GGPS Baffa Khurd | ···· A/W/Post |
| 2 | Sabia | Noor Hussain | Baffa | GGPS Kando Gali | A/V/Post |
| 3 | Munaza Daud | Daud | Behali | GGPS Asinval | A/V/I…st |
| 4 ~ | Nazma Bibi | R.Khan Bahdar | Behali | GGPS Jamai Nakka | A/V/Post |
| 5 | Shagufta Bibi | Muhammad Shafi Khan | Baitai | GGPS Karmang | |
| 6 | Shaista Jabeen | Muhammad Akbar | Kathai | GGPS Chandni | A/V/Post |

| | | | · . | - AE |) |
|---|--------------------------------|---------------------------|------------------------------|---|----------------------|
| Ā | Bushra | Ghulam Mustafa | () Displayed | (7) | · · · |
| .18 | Naida Ashraf | Muhammad Ashrif Bag | Gari Habib Ullah | GGPS Kehnian Mini GGPS Danna Ganaila | A/V/Post |
| 9 | Gul Naz Bibi | S. Qabal Shah | Gari Habib Ullah | | A/V/Post |
| 10 | | Abdul Ghafoor | | GGPS Chuntri | |
| 11 | | Saeed Akhtar | | GGPS Khan Balimang GGPS Kalas Ghanaila | A/V/Fost |
| | | | Hangrai | ·· | A/V/Post |
| 12 | | Muhammad Younis | Hangrai | GGPS Kalas Ghanaila | / A/V/Post |
| [13 | | Saced ur Rehman | tehrian | GGPS Karmang Payeen | A/V/Post |
| 14 | | M.Fareed Khan | Ichrian | GGPS Ramsera | A/V/Post |
| 15 | | Muhammad Farooq | Jabar Daveli | GGPS Baso Manda Gucha | |
| | | Muhammad Tariq | Sachan | GGPS Baso Manda Gucha | A/V/host |
| 17 | | Abdul Ghafoor | Jaloo | GGPS Talian Di Kasi | A/V/I |
| 18 | | Mir Afzal | Jaloo | GGPS Chor Banda | A/V/hist |
| 19 | | Muhammad Khurshid | Kamol | GGPS Bhorai | A/V/Post |
| <u>j 20</u> | | Habib ur Ronman | Pairan | GGPS Dheri Sohai | A/V/11- st |
| 21 | | Muhammad Younis | Karori | GGPS Seri-Malwal | A/V/Imat |
| 22 | Musrat Bibi | Khalil ur Rehman | Koveri | GGPS Malhar, | A/V/P |
| 23 | Zenab | Alam Zeb | Karori | GGPS Melhar | A/V/Post |
| 24 | Amrin Kusar | Muhammad Miskeen | Karori | | |
| 25 | | Taj Muhammad | | GGPS Fata Bandi | A/V/I t |
| 25 | Rifat Bibi | Fageer Muhammad | Karori | GGPS Fata Bandi | AJV/Fost |
| 27 | Ashia | Misri Khan | Shanaya | GGPS Naryala | |
| 28 | Razia Bibi | | Shanaya | GGPS Thakra | A/V/P at |
| 29 | | Muhammad Zaman | Derband | GGPS Dhok | A/V/Post |
| 30 | Sobia Arshad | Muhammad Arshad | Lassan Nawab | GGPS Sharota | A/V/i 1 |
| 31 | Rashida Bibi | M.Zahoor | Lassan Nawab | GGPS Chapra Bala | AZVII SL |
| 31 | Bibi Naseema | Ghulam Nabi | Mohandari | GGPS Badal Gran | A/V/I 1 |
| 32 | Yasmeen Wahab | Abdul Wahab | Nika Pani | GGPS Cham | |
| 34 | Lubna Younis | Abdul Latif | Darband | GGPS Cham | A/V/ |
| 35 | | M.Younis | Perhinna | GGPS Phalkot | A/V/P. |
| 36 | Zahida Bano. | Ali Zaman | Perhinna | GGPS Phalkou | A/V/I |
| | Bibi Saleha | Abdula Jan | Phulca | GGPS Ghazikot | A/V/I |
| 37 | Mehnaz Bibi | M.Iqbal | Phylra | GGPS Dhaman | |
| 38 | Bibi Mewash | M.Naveed | Phuica | | - |
| 39 | Farzana Yousaf | M. Yousaf | Phulra | GGPS Ghozikot | A/V/I ⁺ - |
| 40 | Bibi Farah | Khurshid Khan | Sawan Maira | GGPS Batangi | A/V/I? .1 |
| 41 | Bibi Salama | Shezada Khesro Faredon | Sachan Kalan | GGPS Gojar Gali GGPS Kalas Nawaz Abad | A/V/! |
| 42 | Bibi Norin | Rehmat Ullah | Sachan Kalan | GGPS Kalas Nawaz Abad | |
| 44 | Tahira Jabeen Safoora Farat | Muhammad Ayub | Sawan Maira | GGPS Mohar | |
| 45 | Irum Shaheen | Abadul Razaq | Shanaya | GGPS Numshera Shahkot | |
| 46 | | Anwar Khan | Shanaya | GGPS Numshera Shahkot | A/V/I |
| 40 | Saeeda Haidar | Mir Haidar | Shergarh | GGPS Gakharh | A/V/I |
| 48 | Fozia Bibi Sadia Gul | Sher Bahadar | Shergarh | . GGPS Perchaian | A/V/I |
| 49 | Asma | M.Zaman | Shergarh | GGPS Perchaian | A/V/I |
| 50 | Sadia Javed | Abdul Malik Javed Khan | Darband | GGPS Shorolian | A/V/P |
| 51 | Sabeen | M.Haroon | Shuakat Abad | GGPS Laian Da Darra | A/V/1* 1 |
| 52 | Tabasam Rashid | Abdul Rashid | Shuakat Abad Shuakat Abad | GGPS Chajar Bala | ATVII' |
| 53 | Nabeela Ghuncha Gul | Bashir Ahmad Khan | Trangri Sabir Shah | GGPS Paniyali | A/V/P |
| 54 | Khalida Bibi | M.Yousaf Khan | Trangri Sabir Shah | GGPS Trangri Bala GGPS Trangri Bala | A/V/P |
| 55 | Sidra Hamayun | M.Hamayun | Trangri Sabir Shah | GGPS Khati Paloi | <u>A/V/I</u> |
| 57 | Salma Javed Noshin Bibi | Muhammad Javed | Darband | -GGPS Pagera | A/V/P ; . |
| | Sahibzadi Azmat | Fazal ur Rehman | Darband | GGPS Beer Bat | A/V/P |
| 58 | _Rebani | Ghulam Rabani | Tanda | GGPS Talian Manda | A7V/I |
| 59 | Asma Noreen | | | Gucha | |
| <u>ــــــــــــــــــــــــــــــــــــ</u> | | Nawab Khan | Dhodial | GGPS Kothri | · A/V/P |
| | | · · | | | |

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1. Their appointments are purely on temporary basis and liable to terminution at any stage v assigning any reason/notice.

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They will be governed by such rules and regulations enforce and as may be prescribed by th Government from time to time for the category of the Government servants to which they belong.

- 3. In case they failed to assume the charge of their posts within 15 days of their appointment, candidature ship will be stand automatically cancelled.
- 4. Their services are regular but will not be entitled for pension/gratuity & they will not contribute an amount towards GP Fund however they will contribute CP fund on the prescribed rate & hal contribution will be made by the Government.

5. They will submit to this office, their all testimonial and domicile/ UC Certificate from the secretar concerned union councils along-with bank drafts in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.

6. The release of the pay by the concerned DDOs will be subject to the receipt of verified documents by the appointing authority / (EDO E&SE Manschra)

7. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.

- 8. Their services are liable to termination on one month prior notice from either side in case of resignation without prior notice, their one month pay/allowances if any shall be forficited to Government Treasury.
- 9. Their services can be terminated at any time in case their performance is found un-satisfactory; they will be proceeded against under the removal from service under E&D Rules 2011.

10. They should produce Age & Health Certificate from the MS DHQ Hospital Mansehra.

- .11. They may not be handed over the charge if their age is above 35 years and below 18 years.
- 12. The Candidates who are working as regular before 1st July 2001 in pervious post, their entitled for pension / gratuity etc.
- 13. No. TA/DA etc is allowed.

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14. Charge report should be submitted to all concerned in duplicate.

(Umar Khan Kundi) EXECUTIVE DISTRICT OFFICER E&S EDU: MANSEHRA

5.13

Endst: No. <u>5360-5384</u> /Estt: (F)Apptt:PET(F)/2011-12 Dated Manschra the 18th May, 2012 Copy to the:-

Secretary to Govt: of KPK E&SE Department Peshawar.

ATTED

- 2. Director E&SE Department KPK Peshawar.
- 3 District Accounts Officer, Mansehra.
- 4-5. District Officer (M&F) Local Office.
- 6 Deputy District Officer (Female) F&SE Manschra.
- 7. PA to District Coordination Officer. Mansehra.
- S. Budget & Accounts Officer, local office. Mansehra.
- 9-67 Candidates concerned.

EXECUTIVE DISTRICT OFFICER E&S EDU: MANSEHRA

- 4 -

طارج دلورط تر DD قلم الركوس مل المرم 44 BEDO 1384 - 0360 - 5386 EDO مور جده داری الا کے تحت آج نور مرام 2/5/25 کو ا in their frival Long ورط مافر صرت س أوإ بعدي 1 53 All 22-5-2012 Gps Ashwal 22-5-2012



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

No. 7749 / S. Cause Dated the /2014 SHOW CAU SE NOTICE

Email: <u>deofmansehra@yahoo.com</u> Phone & Fax: 0997-302518

I, Naghmana Sardar, District Education Officer (Female) Mansehra as Competent Authority under the Khyber Pakhtunkhwa Servant (Efficiency & Discipline) Rules, 2011, do hereby serve you Mst. Munazza Daud GGPS Ashwal Mansehra Show cause Notice as follows:

- 1) You were illegally appointed as PST at GGPS Ashwal vide defunct Executive District Officer (E&SE) Mansehra at S. No. 3, outside your U/C where you were stranger for recruitment process initiated through EATA. Acceptance of your appeal & subsequently your appointment order was the result of misuse of authority by the then EDO according to his sweet well& wishes against the recruitment rules, as per inquiry report received through Government of Khyber Pakhtunkhwa, Elementary & Secondary Education Department letter No SO(S/M)E&SED/4-17/2013 Umar Khan EDO BS-19 dated 25/08/2014 More over the then EDO(E&SE) has been removed from Government Service in connection with all such bogus appointment including yours made by him.
- 2) Going through the finding and recommendation of the inquiry committee, the material on record & other connected papers including your defiance before the inquiry committee:-

I am satisfied that you have committed the following acts/omissions specified in rules.

- a) Misconduct and dishonesty in getting bogus/faked appointment without due process of recruitment.
- b) Inflected huge financial losses to the Govt: Treasury receiving pay as result of bogus appointment.
- c) By snatching established rights of the deserving candidates due for appointment on merit. Cheating/canceling the facts for unlawful appointment with collusion of then EDO.
- 3) As a result thereof, I as competent authority have tentatively decided to impose upon you the major penalty of dismissal from services under rule 4 of the said rules.
- 4) You, are hereby, required to Show Cause as to why the aforesaid penalty should not be imposed upon you & also intimate where you desire to be heard in person.
- 5) If no reply to this notice is received within seven days or not more than fifteen days of its delivery, it shall be presumed that you have no defiance to put in and in that case an ex-party action shall be taken against you.
- 6) A copy of the finding inquiry committee related page is enclosed.

COMPETENTAUTHORITY

Lecie

<u>Mst. Munazza Daud</u>

GGPS Ashwal

The District Education Officer, (Female) Mansehra.

Subject:

To.

SHOW CAUSE NOTICE

Respected Madam,

Kindly refer to your office Memo NO.7749 dated 29/09/2014 received on 21/10/2014 during circle meeting through ASDEO(F) circle Mansehra at GGPS Chitti Dheri Mansehra on the subject cited above and regarding the same fact an application dated 23/04/2014 has also been filed by the replicant in your good office.

With utmost respect the requisite reply to the under reference show cause Notice is submitted as under:-

Para NO.1:

Para NO.1 is incorrect, hence denied. In reply to Para NO.1 it is stated that:

- (i) The replicant applied for appointment against PST (F) post as per advertisement dated 20/05/2011 "Daily Aaj".(copy of advertisement is appended herewith for your kind perusal please as annexure "A".As per referred advertisement the replicant deposited as test fee, appeared in ETEA Test at Thakra Stadium Mansehra,qualified the same,consequently appeared in the interview conducted by the Department at GGHS NO.2 Mansehra on the date fixed and also qualified the same.
- (ii)

In the light of the above stated recruitment process at last a final merit list was prepared by the Department and same was displayed on the Notice Board for candidates as well as for general public view.



- (iii) The answering replicant was shown at top of UC Behali Merit list at serial NO.1, whereas Nazma Bibi daughter of Raja Khan Bhadur was at serial NO.2 along with other 04 candidates who were low in merit list of the same UC.
- (iv) That there were two vacancies available at GGPS Jamal Nakka UC Behali at the time of appointment created vide Government of KPK Finance Department Peshawar NO.BOV/F.D/3-6/2009-10/Mansehra dated 7/02/2012.Copy of the sanction order is enclosed herewith for perusal please as annexure "B".
- (v) Meanwhile the then EDO (E&SE)Mansehra issued an illegal and unlawful/transfer order NO.256-66 dated 13/2/2012 through which he transferred Mst Sher Bano PST GGPS Ashwal UC Balimang to GGPS Jamal Nakka UC Behali Mansehra (against the vacancy of the replicant) in order to please the blue eyed person and filled up the aforesaid vacancies in violation of law, rules, policy of the Government and judgment of the August Supreme Court of Pakistan that "once the vacancies are advertised in press thereafter these vacancies cannot be filled up by transfer/ adjustment, promotion or by any method except by appointment". Copy of transferred order is annexed herewith for ready reference please as annxure "C".
- (vi) That the replicant lodged an appeal before the competent Authority stating there above referred position, the Authority concerned accepted the appeal partially and did not cancel the above stated impugned transferred order dated 13/02/2012,however appointed the replicant purely on merit being at serial NO.1 in merit list in UC Behali and again adjusted against the resultant PST post at GGPS Ashwal (Vacated by Mst. Sher Bano PST vide transfer order dated 13/2/2012) instead of GGPS Jamal Nakka UC Behali. Moreover the Authority concerned appointed Mst.



Nazma Bibi D/O Raja Khan Bahadur who was at serial NO.2 in UC Behali merit list at GGPS Jamal Nakka UC Behali and ignored the replicant who was at serial NO.1 in UC Behali Merit List with highest score. The replicant resumed the charge of her duty under protest at GGPS Ashwal on 22/5/2012 which was 100 kilometer away from the home of the replicant. The replicant is highly qualified having the qualification of M.Sc(Chemistry), PTC, B.Ed, M.Ed through out first division and has been running from pillar to post for justice. If I would have been so powerful then I should not be adjusted 100 kilometer away from my home. Actually I am a poor Lady teacher having no voice that is why I was adjusted so much far-flung and in such a hard area of the District. Therefore in the light of the above stated crystal clear position, it is respectfully prayed that replicant may not be tortured more. Copies of Academic documents duly verified by your office are attached herewith as annexure "**D**"

Para NO.2: Para NO.2 is not correct, hence denied. In reply to Para NO.2 it is submitted that keeping in view the above stated facts the replicant may please be exonerated from false charges and instant Show Cause Notice may please be withdrawn in the interest of justice as:

(a) I have never committed any misconduct and dishonesty and serving as PST in compliance with Office order NO.5360-5384 dated 18/5/2012 appointed at serial NO.3 UC Behali and again adjusted at GGPS Ashwal against vacant resultant post of Mst. Sher Bano who was transferred at GGPS Jamal Nakka UC Behali(against replicant post) and performing her duties regularly with excellent performance as no explanation, absent report is on my part, whereas I have participated fully in the recruitment process and was appointed purely on merit at serial NO.1 in the UC Behali merit . Copy of appointment



and adjustment order is annexure " $\mathbf{\tilde{E}}$ " where as merit list of UC Behali is lying with your good office.

(b)

- Para NO. (b) is totally incorrect, hence denied. The replicant is receiving her salary in lieu of proper and regular duty/ work on the basis of my appointment made purely on merit as comprehensively stated above.
- (c) Para NO."c" is also incorrect, hence denied. The replicant did not snatched the right of any candidate however my right of adjustment in my native union council had been snatched by Mst. Sher Bano PST GGPS Ashwal by getting herself transferred against my vacancy during the recruitment process against the law,rules, policy of the Government and verdict of the apex Court,whereas the replicant was appointed purely on merit bearing top in UC at serial NO.1 in the final merit list. In this regard detail reply is also given above. It is worth mentioning here that the enquiry officer did not take any notice of illegal and unlawful transfer order dated 13/2/2012 in respect of Mst. Sher Bano and other who snatched my right of adjustment during recruitment process whereas the replicant is being dragged without any fault at her part, for which the innocent replicant reserves the right to approach the competent Court of Law against this injustice.
- **Para NO.3**: Para NO.3 is totally incorrect, against the law ,rules and policy of the Government of KPK, hence denied. The replicant was appointed by the competent Authority after completing all the codal formalities purely on merit and the instant Show Cause Notice after passage of two and nearly half years is against the law, rules, policy of the Government of KPK, against the human rights against the public interest and against the natural justice as valuable rights of the replicant have been established.





Para NO.4: Para No.4 is not correct, hence denied. In the light of the above stated position it is humbly requested to be restrained from any cruel action and withdraw the instant Show cause Notice. It is also requested that the replicant desires to be hard in person.

Para NO.5:

In reply to Para NO.5 it is stated that the replicant received the Show Cause Notice on 21/10/2014 and replying the same on the top priority. Hence no ex-part action be taken against the replicant in the interest of the justice.

Para NO.6: Para NO.6 is also incorrect, hence denied. The replicant has received the only Show Cause Notice on 21/10/2014 and no finding enquiry committee report has been received by the replicant and it is requested to provide the same along with other office record such as copy of merit list etc. under RTI Act 2013. In the light of the above narrated humble submissions, it is respectfully prayed that the instant Show Cause Notice may please be withdrawn and the replicant may please be exonerated from the charges leveled against her in the interest of justice. The replicant would pray for your long life and sound health for your this act of kindness.

Dated <u>25</u>/10/2014

Yours sincerely

Muna 25 David

MUNAZA DAUD PST GGPS BINSIAN Ex-PST GGPS Ashwal



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

Where as Mst: <u>Munage Dawood</u> D/O <u>Daword</u> working as <u>La</u> GGHS/GGMS/GGP <u>Ashauna</u> was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice.

2:- And where as the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Ex- Executive District Officer Elementary and Secondary Education Mansehra.

i) Syed hidayat Jan, (PCS SG B-20) Agricultural Department Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)

ii) Mr. Akhalhaq Baig, Principal BS-20 RITE Male Haripur.

- 3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.
- 4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notices, is of the view that the charges against you have been proved.

5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhawa Govt: Servants(Efficiency and Discipline) Revised Rules 2011 the District Education Officer(Female) Mansehra , in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt: Services upon Mst. <u>MUMA2A</u> <u>Dawood</u>D/O <u>Paword</u> CT/PET/TT <u>DET</u> GGHS/GGM GGPS <u>Ashauwa</u>.

DISTRICT EDUCATION OFFICER

/2015.

Endst: No. <u>H866-75</u>/AE-___/Estab: dated Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunknawa, Peshawar.

2. Director Elementary and Secondary Education Khyber Pakhtunkhawa, Peshawar.

- 3. District Accounts Officer Mansehra.
- 4. District Monitoring Officer Mansehra.
- 5. Deputy Commissioner Mansehra.
- 6. Principal/Headmistress
- 7. SDEO(F) Mansehra.
- 8. Budget and Accounts Officer Local Office.
- 9. Mst:

10.Office File.

) DISTRICT EDUCATION OFFICER

The Director (E & S.ම),

Khyber Pakhtunkhawa,

Peshawar.

Subject: Departmental Appeal against the Notification, Endost; No. 1866-75, dated 3/3/2015 Respected sir,

With the utmost respect the appellant submits as under;

1. Appellant is M.Sc Chemistry with PTC, CT, B.Ed, M.Ed and has approximately 3 years service on PST post at her credit.

(Copies of duly verified testimonial by competent authority along with service book are annexed as annexure A)

- That the EDO E & S.E Mansehra advertised vacancies of different cadres including PST (F) in daily Aaj News paper dated 20/05/2011; (copy of the advertisement is annexed as annexure B)
- 3. That being eligible candidate in all respect the appellant applied for PST(F) post and deposited Rs 300/- in favor of Director ETEA as test fees subsequently appeared in ETEA test at Thakra Stadium Mansehra, qualified the very test, consequently appeared in the interview conducted by the department at GGHS No 2 Mansehra, on the date fixed and also qualified the same.
- 4. That in the light of above stated recruitment process at last a final merit list was prepared by the department and the same was displayed on the notice board for the candidates as well as for general public view.
- 5. That the applicant got first position in the merit of Union council Bahali which is evident in the final merit list prepared and displayed by the department on the notice board whereas Nazma bibi D/O Raja Khan Bahadar was at serial No 2 along with other 4 candidates who were low in merit list in the same Union Council.

6. That at the time of appointment there were 2 vacancies available at Union Council Bahali at GGPS Jamal Nakka.

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That during the recruitment process the then EDO (E& SE) Mansehra issued an illegal and unlawful transfer order Endost. No 256-66/PF-53/GB/DDO(F) dated 13/02/2012 under external influence through which he transferred Ms. Sher Bano PST GGPS Ashwal Union Council Balimung to GGPS Jamal Nakka Union Council Bahali (against the vacancy of the applicant) in order the please the blue eyed person and filled up the afore said vacancies in violation of law, rules, policies and judgment of August Supreme court of Pakistan.

"That once the vacancies are advertised in press thereafter these vacancies cannot be filled up by transfer/ adjustment/promotions or by any method except by appointment."

(Copy of the transfer order is annexed here as annexure c)

8. That the appellant lodged an appeal before the competent authority stating there the above referred positions. The authority concerned accepted the appeal and appointed the appellant purely on merit being at Serial No. 1 of merit list in Union Council Bahali against the two vacant posts at GGPS Jamal Nakka, u/c Behali.

Table of appointment order of different Union Councils of Mansehra district including Union council Bahali Selected candidates clearly shows that appellant is appointed according to the rules and regulation as well as union council policy of the Government in union council Bahali at serial No. 3, and appellant was not appointed in Union council Balimang.

| Serial no | Name of candidates | Father 's name | Home address | Remarks |
|-----------|--------------------|-----------------|--------------|-----------------|
| 3 | Munaza Daud | Daud | Behali | Own u/c merit |
| 4 | Nazma Blbi | R. khan Bahadar | Behali | • Own u/c merit |

U/C BEHALI

Whereas appellant appeal was partially accepted and EDO (E&SE) did not cancel the above stated impugned transfer order dated 13/02/2012, rather further adjusted against the resultant vacancy at GGPS Ashwal vacated by Ms Sher Bano PST transferred, vide order dated 13/02/2012 instead of GGPS Jamal Nakka, Union Council Bahali.

Table of adjustment order clearly shows that the appellant was adjusted against the vacated post of Ms. Sher Bano at GGPS Ashwal in Union Council Balimang. Whereas Nazma Bibi D/O R. Khan Bahadar who was in Serial No. 2 and low in merit than the appellant in U/C Behali was adjusted in her own union council, at GGPS Jamal Nakka being influential Table of adjustment order is as under:

| Serial no | Name | Father's name | Home address | Place of posting | Remarks |
|-----------|-------------|----------------|--------------|------------------|----------|
| 3 | Munaza Daud | Daud | Behali | GGPS Ashwal | A/V/post |
| 4 | Nazma Bibi | R khan Bahadar | Behali | GGPS Jamal | A/V/post |
| | | <u> </u> | | Nakka | |

(Copy of the appointment order is annexed as annexure D.)

VAKALAT NAMA

NO.

'20



That it is pertinent to mention here that the authority concerned appointed and adjusted Ms. Nazma Bibi D/O Raja Khan Bahadar who was at serial No. 2 consequently low in merit than the applicant in Union Council Bahali merit at GGPS Jamal Nakka U/C Bahali unjustly and ignored that appellant who was at serial No. 1 with highest score and qualification.

- 10. That the appellant resumed the charge of her duty under protest at GGPS Ashwal on 22/05/2012, which was 100 kilometers away from the home of appellant.
- 11. That the appellant was highly qualified having M.Sc Chemistry with PTC, CT, B.Ed, M.Ed throughout first divisions and has been running from pillar to post for justice. If I have been so powerful then I should not have been adjusted 100 kilometers away from my home. Actually, I am a poor lady teacher having no voice and I was adjusted in such a farflung and hard area of the district. On the other hand Ms Nazma Bibi D/O Raja Khan Bahadar who was at serial No. 2 and low in merit of Union Council Bahali was appointed and adjusted in the same Union Council Bahali with discrimination.
- 12. That the appellant has served the department for about 3 years honestly and with full devotion to the entire satisfaction of the department and there is no complaint against the appellant from the public and the department as wells?
- 13. That in spite of the above stated crueity of the department after a passage of about 3 years the DEO(F) Mansehra issued an illegal, unlawful show-cause Notice No. 7749 dated 29/09/2014 with the allegation of illegal appointment on the part of appellant. (Copy of the Show-cause Notice is annexed as annexure E).
- 14. That appellant responded the afore said illegal and unlawful show-cause Notice, against the fact with full and lawful justifications and comprehensive detail reply submitted properly to the competent authority. (copy of the reply to show-cause Notice is annexed as annexure F.)
- 15. That the DEO(F)Mansehra without considering the lawful and comprehensive reply of the appellant and without personal hearing and without opportunity of the defense dismissed the appellant illegally, unlawfully and unjustly.

GTTESTEN

16. That both the enquiry officer in the matter conducted the enquiry one sided and no opportunity of defense.

 1 17.It is worth mentioning here, the serial No. 2 in merit list with low score than the appellant is still working on her post even no show-cause Notice has been issued to her and even enquiry officers also showed their discriminatory treatment with the appellant and did not touch/discuss Ms Nazma Bibi appointment and adjustment and Ms. Sher Bano illegal, unlawful transfer order No. 256-66 dated 13/02/2012 during the recruitment process, and disturbed/tortured the appellant having highest qualification and score on merit list at serial No. 1 with no fault at her credit.

- 18. That the enquiry officers and competent authority both with collusion and mallafide intentions left no stone unturned in torturing the innocent appellant with no fault at her credit.
- 19. That almighty Allah is observing all the cruel illegal and unlawful actions of the DEO (F) and enquiry officers that serial No. 1 in the merit list has been dismissed where as serial No. 2 is still working without any disturbance.

In the light of above stated factual and lawful Submissions it is respectfully prayed that the impugned dismissal Notification No 1866-75 dated 13/03/2015 may graciously be withdrawn, and the appellant may be allowed to continue her service at GGPS Binsian, Mansehra with all back-benefits in the interest of justice.

Appellant

Mumaza paul 11/2015 Munaza Daud Fiaz D/O M.Daud Fazyua 2 PST GGPS Binsian, Mansehra Resident of Village and P/O Bahali, ·Via Qalander abad, Dist. & Tehsil Mansehra Cell No 0322-9206616

Dated 09/03/2015 90 days = 9-6-15 -

VAKALAT NAMA

NO.

IN THE COURT OF Sesure Tribunal, Peshawac Munaza David Fiaz (Appellant)

(Petitioner) (Plaintiff)

VERSUS

Education Depostment (Respondent) (Defendant) 12a David Fig?

I/We Munaza

Do hereby appoint and constitute **M.Asif Yousafzai, Advocate, Peshawar**, to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/ Counsel on my/our costs.

I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

/20

Dated

MUMAZa Daud (CLIENT,

ACCEPTED

YOUSÁFZAI

M. ASIF Advocate

TAIMUR ALI KHAN Advocate

M. ASIF YOUSAFZAI

Advocate High Court, Peshawar.

OFFICE:

Room No.1, Upper Floor, Islamia Club Building, Khyber Bazar Peshawar. Ph.091-2211391-0333-9103240

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.714/2015

Respectfully Shewth

- 1. That the services appeal No: 714/2015 in respect of MST: Munazza Daud is pending before this honorable court for reinstatement.
- 2. That reference director E & SE department notification Endst: No 4131-35/F.No79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been reinstated against the post of PST (Notification attached).

It is requested that the above mentioned appeal may kindly be dispose off please.

DISTRICT EDUCATION OFFICER

(FEMALE) MANSEHRA

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst Munaza Dawood, PST at Government Girls Primary School Ashawal District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1866-75 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

- She belongs to U/C Behali, where 02 posts were lying vacant. Her name was at S. 1. No. 01 of the merit list of her U/C. She was appointed in U/C Behali but wrongly adjusted in GGPS Ashwal U/C Hilkot vide a general order Endst No. 5360-5384 dated 18/05/2012 at S. No. 03.
- Appeal may be accepted as she was on merit and eligible for appointment in her own U/C but she was not appointed in her own U/C as per policy. She may be adjusted in her own U/C. However if she is comfortable with her posting at present school, she may be allowed to continue as usual.

NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 1866-75 dated 03/03/2015 and reinstate Ms. Munaza Dawood PST at Government Girls Primary School Ashawal District Mansehra with effect from the date of her dismissal with all back benefits.

ndst: No.

Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

Appeals Female MSR Dated Peshawar the 1/2015

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

- 1. District Education Officer (Female) Mansehra
- Sub Divisional Education Officer (Female) Mansehra 2.
- District Accounts Officer Mansehra ١.
- Appellants concerned
 - PA to Director E&SE KP, Peshawar Master File.

Deputy Director (Female)

Directoraté E&SE, KP Peshawar

BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

(Service Appeal No.714/2015)

Respectfully Shewth

- 1. That the services appeal No: 714/2015 in respect of MST: Munazza Daud is pending before this honorable court for reinstatement.
- That reference director E & SE department notification Endst: No 4131-35/F.No79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been reinstated against the post of PST (Notification attached).

It is requested that the above mentioned appeal may kindly be dispose off please?

DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst Munaza Dawood, PST at Government Girls Primary School ^{*} Ashawal District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1866-75 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

- 1. She belongs to U/C Behali, where 02 posts were lying vacant. Her name was at S. No. 01 of the merit list of her U/C. She was appointed in U/C Behali but wrongly adjusted in GGPS Ashwal U/C Hilkot vide a general order Endst No. 5360-5384 dated 18/05/2012 at S. No. 03.
 - Appeal may be accepted as she was on merit and eligible for appointment in her own U/C but she was not appointed in her own U/C as per policy. She may be adjusted in her own U/C. However if she is comfortable with her posting at present school, she may be allowed to continue as usual.

NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 1866-75 dated 03/03/2015 and reinstate Ms. Munaza Dawood PST at Government Girls Primary School Ashawal District Mansehra with effect from the date of her dismissal with all back benefits.

Endst: No. ____/F.No.

Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.

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

 $^{\text{A}}$ /Appeals Female MSR Dated Peshawar the \underline{J}

- 1. District Education Officer (Female) Mansehra
- 2. Sub Divisional Education Officer (Female) Mansehra
- 3. District Accounts Officer Mansehra
- 4. Appellants concerned
- 5. PA to Director E&SE KP, Peshawar
- 6. Master File.

Deputy Director (Female) Directorate E&SE, KP Peshawar FFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) MANSEHRA

MUTUAL TRANSFER

As approved by the competent authority, the following Mutual transfer of primary

school Teachers are hereby ordered on their own pay and grand in the interest of public service on their taking over charge.

| S.No. | Name of Teachers | From | То | Remarks |
|-------|--------------------|--------------|--------------|-------------|
| 1. | Akhter un Nisa PST | GGPS Behali | GGPS Binsian | Vice S.No.2 |
| 2. | Munaza Daued PST | GGPS Binsian | GGPS Behali | Vice S.No.1 |

Note: -

1, Charge report should be submitted to all concerned.

2. No TA/DA is allowed to any one.

Sd/-District Education Officer (Female) Mansehra

/2015

Endst: No. 959 ~ 63

Dated Mansehra the

Copy to the: -

- 1. District Education Officer Mansehra.
- 2. District Education Officer (Female) Mansehra.
- 3 ASDEO (F) Circle Concerned.
- 4. Teachers Concerned.
- 5. Office order File.

Sub-Divisional Education Officer (Female) Mansehra

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