

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Case No. 5050

Dated 3/5/2023

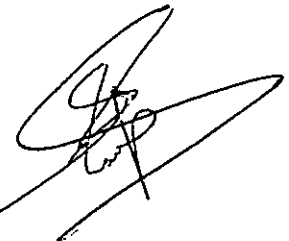
Appeal No 241/2023

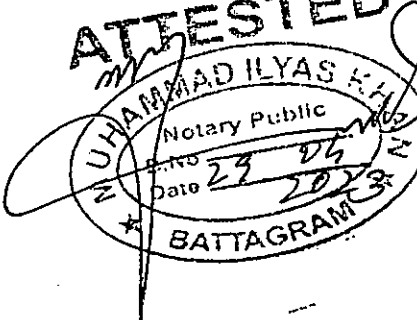
Miss ROOMA KHANAppellant

VERSUS

Govt of Khyber Pakhtunkhwa through Secretary Education, DEO
(F) and others..... Respondents

S.NO	Description/Documents	Annexure	Pages
1	Para wise Comments	1-3
2	Affidavit	4
3	Annexure	A1	5-8
4	Annexure	A2	9-18


Respondent

ATTESTED

UHAMMAD ILYAS KHAN
Notary Public
Date 29/06/2023
BATTAGRAM

①

BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR

Appeal NO. 241 /2023

Miss: Rooma Khan EX-PST.....Appellant

Versus

**Government of Khyber Pakhtunkhwa through Secretary
(E&SE) Peshawar and others _____ Respondents.**

**Para-wise comments /reply on behalf of
Respondents 1 to 3.**

Respectfully sheweth

That the respondents submitted as under:

Preliminary objections.

1. That the appellant has no cause of action/ locus standi to file the present appeal.
2. That the appellant has concealed the material facts from the honorable Tribunal.
3. That the appellant has not come to this honorable Service Tribunal with clean hands.
4. That the appellant has filed the instant appeal on malafide grounds.
5. That the appeal is against the prevailing law /rules.
6. That the appellant is estopped by his own conduct to file instant appeal.
7. That the instant appeal is not maintainable in its present circumstances of the issue.
8. That the appellant appointment order has been drawn due to provided of bogus documents i.e non married certificate as per TOR mentioned in appointment order at SNO 08 and 09
9. That the appeal is barred by law and limitation.
10. That this honorable court has got no jurisdiction to entertained the present appeal.

ON FACTS

- 1 Para No 1 pertains to record.
- 2 Para No 2 pertains to record.

- 3 Para No 3 pertains to record
- 4 Para no 4 pertains to record
- 5 Para No 5 is Incorrect ASDEO circle reported to the DEO that appellant was married and the non-marriage certificate provided by the appellant was fake and bogus the DEO (F) conducting inquiry against the appellant and nominated Mstt: Sajida Begum as inquiry officer vide office Endst: No. 3221 dated 05-11-2022. The inquiry officer submitted her detail report to the DEO Female Battagram Copy is attached is Annexure "A1" A2"
- 6 Para No. 6 Pertains to record.
- 7 The Para No. 7 is incorrect the appeal is not based on fact and hence should be dismissed.

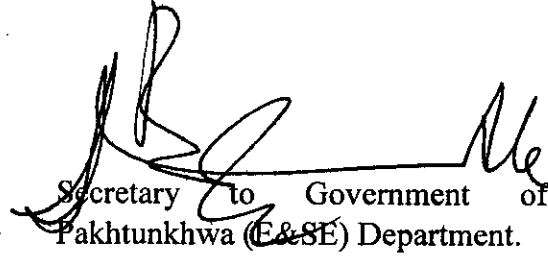
GROUND

- A. Ground "a: is Incorrect: The appellant provided bogus and fake document as per implemented policy and Rule of the KPK governments issued by Section Officer Policy Establishment and adminst4ration Department vide office letter No. 50(Policy)/E&AD/1-3/2015/APT rules dated 07-06-2018 in this regard the appointment order of the appellant has drawn as per appointment Rules mentioned in S.No. 8&9.
- B. Ground "b" is incorrect: Reply is given in ground A.
- C. Ground "c" is incorrect: Reply is given in ground A.
- D. Ground "d" is incorrect: the appointment order was withdrawal with in probation period mentioned at SNO, 2 of the Appointment order.
- E. Ground "e" is incorrect: inquiry Officer Personally visited to the school and witten question asked for from the appellant and get written reply from appellant inquiry officer mentioned in her report.
- F. Ground "f" is incorrect: reply is given in Ground A
- G. Ground "g" is incorrect: reply is given Para 5.
- H. Incorrect. Reply is given in Para 5
- I. That the respondents also seeks permission of this honorable service tribunal to agitate further points at the time of arguments.


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It is therefore, humbly prayed that on acceptance of above para wise comments, the service appeal of appellant may graciously be dismissed.


Respondent No. 01


Secretary to Government of Khyber
Pakhtunkhwa (E&SE) Department.

Respondent No. 02.


Director (E&SE) Khyber Pakhtunkhwa
Peshawar.

Respondent No. 03.


District Education Officer (F) Battagram

(4) ~~2~~

BEFORE THE HONORABLE SERVICE TRIBUNAL PESHAWAR

Appeal NO., 241/2023

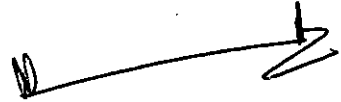
Mstt:Rooma Khan Ex- PST

Versus

**Government of Khyber Pakhtunkhwa through Secretary E&SE
Peshawar and other _____ Respondents**

AFFIDAVIT

1, **Rehana Yasmin District Education Officer (Female) Battagram**, do here by affirm and declared on the oath that contents of accompanying para wise comments on behalf of responding No 3 are true and correct to the best of my knowledge and belief that nothing has been concealed from this honorable service tribunal Peshawar.



DEFENDANT:

CNIC 1330203836012

(S)

AI



**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM**
(Phone # 0997-310460) E-mail: demisfbattagram@yahoo.com

NOTIFICATION

Mstt; Sajida Begum ASDEO Circle Battagram is hereby appointed as inquiry officer to confirm the marital status of Mstt: Rooma Khan D/O Muhammad Siraj Khan appointed as PST BPS-12 under deceased quota at GGPS Batian vide this office appointment order No. 3088-94/EB/PST/Deceased Dated 26.10.2022 as reportedly she has concealed the facts regarding her marital status and produced bogus certificates showing herself non married within two days positively and to submit detail report for further necessary proceedings.

D/C

**DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM**

Dated Battagram the 05/11/2022

Endstt: No 3221

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

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. Deputy District Education Officer (F) Local Office.
3. SDEO (F) Battagram.
4. Sajida ASDEO Circle Battagram.

D/C

**DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM**

05/11/2022

6

AI

DETAIL INQUIRY REPORT

The Teacher Roma Khan D/O Mohammad Siraj village Jalalkot P/O Bandigo District Battagram was appointed as a PST on deceased quota in GGPS Garang Battian dated 26/10/2022. The concerned teacher had been hidden her marital status at the time of hiring. Later on it was came to the notice of DEO(F) Battagram, that she is married and she has a new born baby, in this regard today dated 04/11/2022 I visited GGPS Garang Battian and inquire the matter in detail and also collect written statement from concerned teacher, head teacher and chowkidar of the said school.

Statement of Head Teacher:

I asked some written questions from head teacher, but her reply is contradiction to the actual situation. (Written statement attached as (Anex-A)

1. The head teacher was asked Do you Know the newly hired teacher?

She replied that I don't know her, later on during discussion the head teacher shared that she is the daughter of Mohammad Siraj Khan and living in Jalalkot. It means the teacher was already prohibited by someone to not show her identity.

2. Have you spoken to SDEO on PD day dated 01/11/2022, that a baby born to newly hired teacher that why she did not come to school?

She replied I don't know the teacher and nor I have the knowledge of her baby even she refused that I did not told to SDEO(F) about her delivery. The issue was highlighted by SDEO(F) Battagram in the meeting with DEO(F) Battagram dated 03/11/2022, that the head teacher GGPS Garang Battian told me on PD Day that teacher Roma Khan did not come to School and she is on maternity leave.

3. Does the newly hired teacher performing her duty regularly?

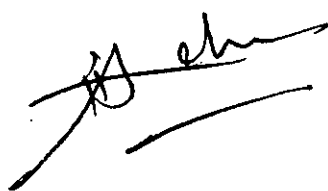
Yes she performing her duty regularly.

From the above statement it is concluded that the head teacher hid the factual position from inquiry officer which was already shared by her with SDEO.

Statement of Teacher Roma Khan:

The following written questions asked from the teacher and get written reply from her. (Written reply attached as (Anix-B)

- 1) Teacher Name Roma Khan.



(7)

A1

2) Teacher Father Name Muhammad Siraj.

3) CNIC No 13202-5264585-1.

4) Appointment order was not available with teacher.

5) The teacher refused that even she did not get engagement yet.

In CNIC the teacher registered with father, but there is a great contradiction in a reply to question asked about her engagement. Although telephonically it was declared by the fancy of teacher that we got engagement but we did not get marriage yet.

Statement of Chowkidar:

Written statement collected from Chowkidar as (Anex-C)

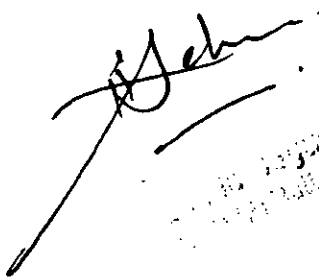
1) The Chowkidar stated that I don't know Roma Khan.

Ground Reality:

One day before on dated 03/11/2022 I telephonically asked from chowkidar about Roma Khan, he told me that she is the daughter of Mohammad Siraj Khan and daughter in law of Afreen Khan Lowgary. I asked from him are you sure that she is married he replied me yes I am sure. The next day when I visited to school he refused and given a false statement that I don't know her.

After confirming that she is married to Jawad Khan, I called to Secretary Village Council Dagai and Supervisor of UC Banian. (responsible for issuing Nikah Name). He told me that I know him and few months ago he has got marriage with daughter of Siraj Khan Jalal Kot and I made Nikkah Nama for him. Next day when I asked him to provide me a copy of that Nikkah Nama he made lame excuse and told me sorry I search in office record but I did not find it.

In a view to reach the ground reality and to collect some proof, I checked the facebook profile of Jawad Khan in which he has got marriage on 03/01/2022. He has received weeding congratulation message from friends. (Screen shot Anex-D)



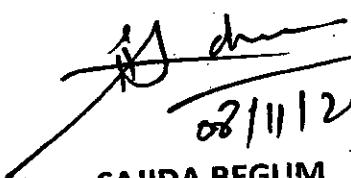
13/11/2022
13/11/2022

② A1

Conclusion:

From above facts, I am of the opinion that the teacher under inquiry got marriage on dated 03/01/2022 and she has delivered baby few days before from her appointment.

Furthermore it is stated that the teacher under question belong to non-Jo political background that why all the school staff including chowkidar and teacher hidden the factuality reality from inquiry officer.


08/11/2022
SAJIDA BEGUM
ASDEO CIRCLE BATTAGRAM
Sajida Begum, head
ASDEO (F) Battagram

(9)

A II

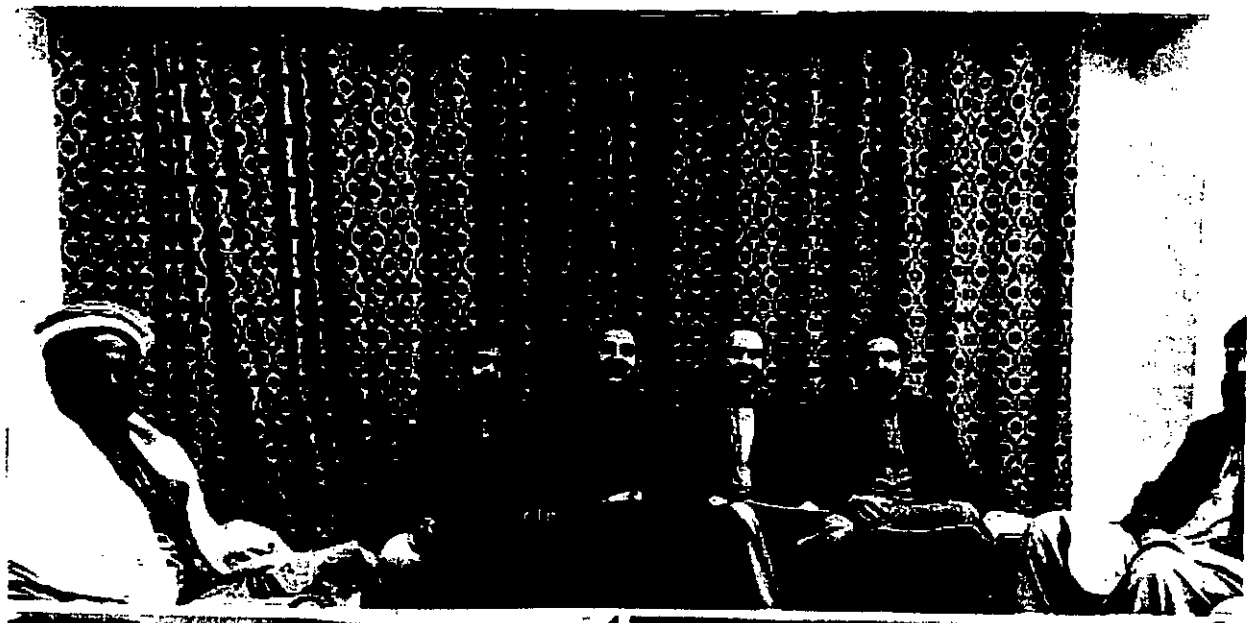


Saeed Ahmad Malkal is with Imad Khaan Dawarr and 5 others. ...

Jan 3 at 10:10 PM · 🌐

Anex-D

جواد خان اور یاسر خان لوگرے کے ولیمہ میں شرکت کی۔
شادی یقیناً ایک تحفہ بے مجھے امید اور یقین بے آپ دونوں
کو زندگی میں سکون اور خوشی ملے گی۔ اللہ سے دعا ہے کہ
اللہ آپ دونوں پر اپنا کرم کرے۔
مبارک ہو شادی ، میرے پیارے یاسر خان اور جواد خان۔
آپ دونوں کو انتہائی خوش اور مبارک شادی شدہ زندگی
مبارک ہو۔



10

~~Amex D~~

A2



Hayat Dawar Khan

Jan 3 at 9:41 PM · 🌐

...

Congratulations to cousins Yasir Ullah Khan and Jawad Khan on their wedding ...



👍👍 161

34 comments · 1 share

👍 Like

💬 Comment

➦ Share



Yasir Ullah Khan is with **Abdul Salam** and **2 others**.

...

(11) A₂ 145

LIST OF FAMILY MEMBERS / LEGAL HEIRS OF

Lal Baha BiBi PST Teacher GGPS Jalal Kot District And Tehsil Battagram

S. No	Name of Heir Member	Relation	CNIC#	AGE	Whether married of unmarried
01	Muhammad Siraj	Husband	13202-3744896-5	30-04-1958	Married
02	Muhammad Meraj ✓	Son	13202-5725699-1	13-04-1984	Married
03	Muhammad Sajjad Khan ✓	Son	13202-9734112-3	03-02-1987	Married
04	BiBi Zainab ✓	Daughter	13202-9933471-6	30-03-1992	Un Married
05	Iftikhar Khan ✓	Son	13202-3399384-3	04-09-1993	Married
06	Wajid Khan ✓	Son	13202-3494289-3	30-06-1996	Un Married
07	Hassan Khan ✓	Son	13202-8219172-9	01-05-1998	Un married
08	Rooma Khan	Daughter	13202-5264585-1	07-12-1999	Un married
09	Muhammad Saboor Khan	Son	1322-8304577-9	31-01-2003	Un married

I solemnly declare and affirm that the members / heirs of Mrs Lal Baha PST Teacher GGPS Jalal Kot is correctly as above.

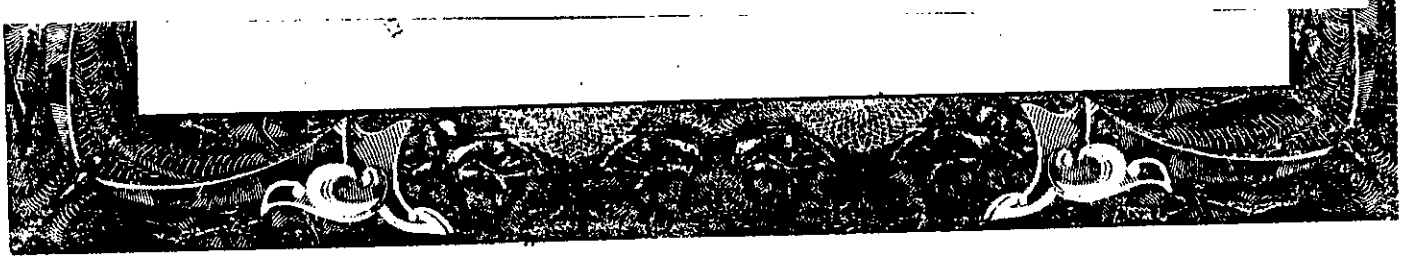
Signature

l.b.

Attested :

[Signature]

Signature & Stamp




Family Tree

Citizen Number 13202-3264583-1

Search

Close

Home Family Beta Family Gamma Family

Relation	Photo	Citizen Number	Type	Name	Father Name	Mother Name	DOB	Status
Self		13202-*****-1	Smart ID	دولت	محمد سراج	دل برهانی	7-12-1999	Processed

Details

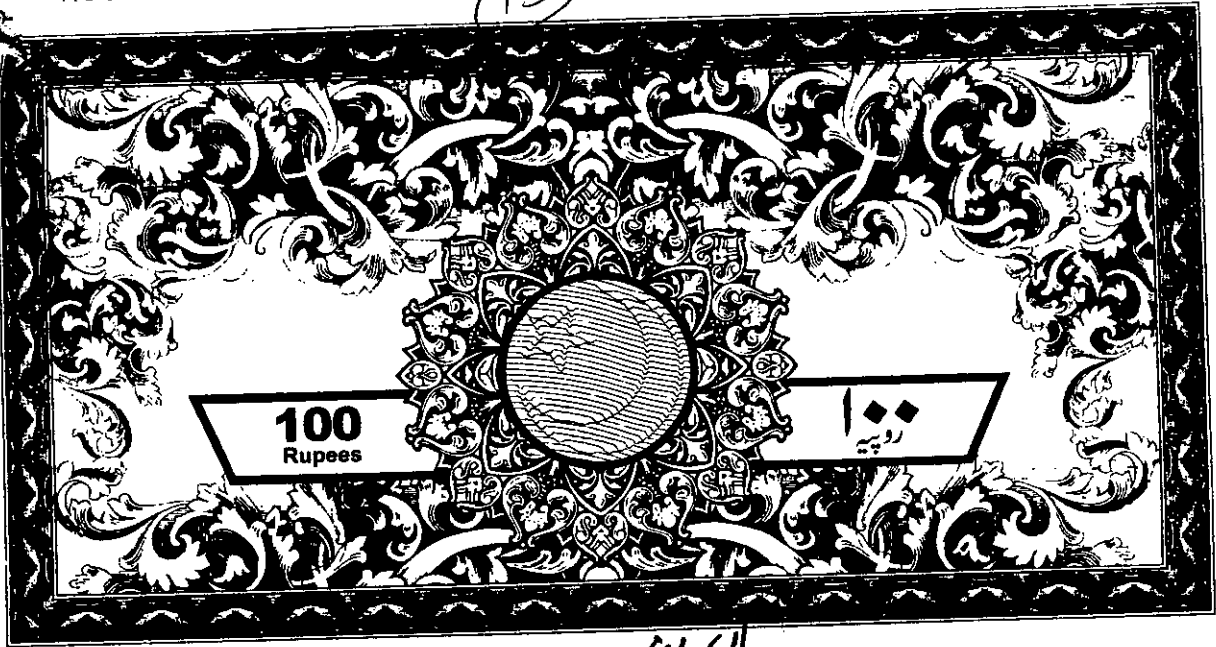
Disabled: No
 Last Status Update: 19/09/2018
 Head Citizen Number: 13202-*****-5
 Old Citizen Number:
 Gender: Female
 Marital Status: Unmarried
 Spouse Name:
 Spouse Citizen Number:
 Identification Mark: *فوتیسی*
 Place of Birth: *بگرام بگرام*
 Religion: Islam
 Mother Tongue: Pushto
 Status: Processed
 Present Address: *جلاں کوت، ڈاک خانہ، پتھر پور، باغی کو، تحصیل، ضلع بگرام*
 Permanent Address: *جلاں کوت، ڈاک خانہ، پتھر پور، باغی کو، تحصیل، ضلع بگرام*

Print Pushto

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12

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بیان ملکی

ملمانکہ محمد سراج فاضل صحابہ دل پنا - محمد سراج - محمد سجاد - افتخار - واہدہ -
 حسن - صہور پیران - مسحاتان بکابا زینب - رومافان دفتران مسابہ
 دل پنا سالکان جہل باندہ بھول شہل و نعل بھرم

ملتا پان کر کے مسابہ دل پنا جو کہ محمد بھلم میں بلور P.S.T پٹریشیا تھی
 جو کہ مہر پان بلور سے ذریعہ اس آہل ریشا تھوٹ گیا ہے

ملتا پان کر کے اس کو کہ میں کی بنا دیر مسابہ رومافان سے مذکورہ اسامی
 P.S.T کے ذریعہ لکھنا لگا ہے

ملتا پان کر کے اس کی بیکرا جملہ مفادات مندرجہ - اندر مسابہ رومافان
 دفتر دل پنا میں کوٹھ میں مذکورہ اسامی پٹریشیا تھی لکھنا لگا ہے

ہیں کوئی اعتراض نہ ہے
 بعد ازیں ملکی عدالت پٹری ہے

22.2.2022

محمد سراج 13202-3744896-5, 13202-5874411-4, 13202-5725669-1
 مسابہ دل پنا
 محمد سجاد 13202-9734112-3
 محمد سراج




افتخار 13202-3399384-3
 واہدہ 13202-3494289-3
 حسن 13202-8219172-9
 بلور 13202-8804577-9

13202-9933471-6
 مسحاتان زینب - مامتان مذکوران

146
 27.2.2022

PAKISTAN National Identity Card
FEDERAL BUREAU OF INVESTIGATION

Name: Roomia Khan
Father Name: Muhammad Sraif
Gender: Female
Country of Birth: Pakistan
Date of Birth: 07.12.1999
Identity Number: 13202-5264585-1
Date of Issue: 10.10.2018
Date of Expiry: 10.10.2028
Holder's Signature: *[Signature]*



A2

(113)

(14)

18

BOARD OF INTERMEDIATE AND
CBBO
Khyber Pakhtunkhwa
PROVISIONAL

13202-5264
پستال کورٹ، ڈاک خانہ ہائیڈرو، ہادی کوہ، تحصیل
ہشنگ نگرام



پستال کورٹ، ڈاک خانہ ہائیڈرو، ہادی کوہ، تحصیل
ہشنگ نگرام

101221324742

Lawrence K. Mehta
Registrar General of Pakistan

گمشدہ کارڈ ملنے پر قریبی لیو بکس میں ڈال دیں

Name :
Father's
Date

۱۹

۱۹

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR



17-

NOTIFICATION

Consequent upon the approval of the Appellate Authority, the appeal of Ms. Rameen Khan (SST, GPPS Garang District Battagram) is hereby rejected, under rules 17 (2) of the A.P. Rules, 2011.

DIRECTOR

Elementary & Secondary
Education Khyber Pakhtunkhwa

Dated Peshawar the 04-1-2013

File No. 327/appeal/Battagram

4933-35

Copy forwarded for information to the:-

1. District Education Officer (Female) Battagram, with the direction to inform the teacher concerned accordingly.
2. Appellate concerned.
3. P.A to Director Elementary & Secondary Education Khyber Pakhtunkhwa.

Assistant Director (Female)
Elementary & Secondary Education
Khyber Pakhtunkhwa

04/01/2013

Handwritten signature and initials

(16)

A2



(17) A2

~~B~~

~~S~~

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM**
(Phone # 0997-310460) E-mail: demisfbattagram@yahoo.com

APPOINTMENT ORDER.

Under the provision contained in sub Rules-(4) of Rules-10 of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules-1989, and as amended vide Notification No.SOR-VI/E&AD/1-3/2011/Voll:-III dated 31/8/2012 & amended vide Establishment Department regulation wing KP Notification No.SO(R-VI)E&AD/1-3/2015 Dated 19-04-2016, the following Candidates are hereby appointed as **Primary School Teacher (PST) (Under Deceased son quota)** as mentioned against their name against vacant posts in BPS-12 Rs:(19770-1430-62670) PM plus usual allowances as admissible to them under the rules in the interest of public service with effect from the date of taking over charge on the following terms and conditions:

S.No	Name	Father Name	Union Council	Date of Birth	Designation	Place of posting
1	Hunzala Rustam	Muhammad Rustam	Banian	08/08/1997	PST BPS-12	GGPS Zareen Abad Trand
2	Rooma Khan	Muhammad Siraj	Banian	07/12/1999	PST BPS-12	GGPS Garang

TERMS & CONDITIONS:

- 7/6/16/2016
1. Their services will be considered as regular in term of section 19 of the KP Civil servant act 1973 amended in 2013 issued vide Govt of KP Finance department (Regulation wing) No SOS R-III/FD/12-1/2005 dated 27-02-2013. They will be governed by such rules and regulations as may be prescribed by the Govt from time to time.
 2. The appointees will be on probation for a period of one year in terms of section 6(2) on NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.
 3. Their One month pay will be forfeited to Govt in case of resignation without prior notice. The period of giving notice is one month before the date of resignation.
 4. The appointees should join the post within 30 days failing which the appointment order will be treated cancelled automatically and no subsequent appeal will be entertained in this regard.
 5. The appointment is made subject to the condition that the appointees have domicile of District Battagram.
 6. The appointees are required to produce age & health certificate from the medical superintendent DHQ Hospital Battagram.
 7. The DDO is directed not to release their pay till the verification of all the academic/professional Documents from concerned board/universities, and



(18) A2

AF

[Signature]

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM**
(Phone # 0997-310460) E-mail: demisfbattagram@yahoo.com

NOTIFICATION

Whereas Mstt: Rooma Khan D/O Muhammad Siraj Khan applied to this office for appointment against the post of PST BPS-12 under deceased quota on the basis of her mother retirement on medical ground as PST from GGPS Jalalkot issued vide this office Endstt: No.1196-98 Dated 07.03.2014.

And whereas her application was processed in the light of required documents provided by her.

And whereas she provided non marriage certificates from NADRA office Battagram and secretary of concerned union council.

And whereas she was appointed against the post of PST BPS-12 under the said quota vide serial No. 02 of the appointment order issued vide this office order No. 3084-94 Dated 26.10.2022.

And whereas after the issuance of her appointment order the SDEO (F) Battagram reported that she is married and the non-marriage certificates provided by her are fake and bogus.

And whereas Mstt: Sajida ASDEO Circle Battagram was appointed as inquiry officer vide this office notification No. 3221 Dated 05.11.2022 to probe in to the matter and submit detail report within two days for further proceedings.

And whereas Mstt: Sajida ASDEO Circle Battagram in compliance with the order of this office conducted proper inquiry and submitted detail report alongwith documentary proof and confirmed that she has got married on 03.01.2022 and also born a baby few days before the issuance of her appointment order.

Now therefore I Mstt: Rehana Yasmin Abbasi, the District Education Officer (F) Battagram being competent authority withdraw serial No. 02 of the appointment order issued vide this office Endstt: No. 3088-94 Dated 26.10.2022 from the date of its issuance as per serial No. 07 of 2022. Rooma Khan D/O Muhammad Siraj Khan is no longer PST at the strength of this office as she has concealed the facts and provided bogus documents with regard to her marital status as she being married is not eligible for appointment under the said quota as per policy of the government issued by Section Officer (Policy) Establishment and administration Department vide her office letter No. SO(Policy)/E&AD/1-3/2015/APT Rules Dated 07.06.2018.

The rest of the order will remain intact.

DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM

Battagram the 10 /11.2022

Endstt: No. 3268-73

A copy of the above is forwarded for information and n/a to the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar
2. District Accounts Officer Battagram.
3. DMO EMA Battagram.
4. SDEO (F) Battagram.
5. EMIS Local Office.
6. Rooma Khan D/O Siraj Khan.

DISTRICT EDUCATION OFFICER

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD,
PESHAWAR.

No. *20*

Appeal No. *241* of 20 *23*

Miss Rooma Khan Appellant/Petitioner

Sey ESSE Peshawar Respondent

Respondent No. *(3)*

Notice to: *DEO (F), District Battagram.*

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on *20/03/2023* at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition. ✓

Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this office Notice No.....dated.....~~

Given under my hand and the seal of this Court, at Peshawar this *18*

Day of *Mar* 20 *23*

Per Rept
302
17/3/23

[Signature]

ADAO Khyber Pakhtunkhwa
[Signature]

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.**

APPEAL NO. 241 /2023

MISS ROOMA KHAN

VS

EDUCATION DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Appeal with Affidavit	1-3
2.	Copy of the retirement order dated 07.03.2014	A	4
3.	Copy of the appointment order dated 26.10.2022	B	5-6
4.	Copies of the Medical Certificate, list of family members and charge assumption report	C, D & E	7-10
5.	Copy of daily attendance register	F	11-13
6.	Copy of the impugned notification dated 10.11.2022	G	14-
7.	Copies of departmental appeal and appellate notification dated 04.01.2023	H & I	15-17
8.	Vakalatnama		18

APPELLANT

THROUGH:

**NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT**

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR**

APPEAL NO. _____ /2023

Miss Rooma Khan, Ex-PST (BPS-12),
GGPS Garang, District Battagram.

..... **APPELLANT**

VERSUS

- 1- The Secretary Elementary & Secondary Education, Department, Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary & Secondary Education, Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The District Education Officer (F), District Battagram.

..... **RESPONDENTS**

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 10.11.2022 WHERRBY THE APPOINTMENT ORDER DATED 26.10.2022 HAS BEEN WITHDRAWN AND AGAINST THE APPELLATE ORDER/NOTIFICATION DATED 04.01.2023 WHEREBY THE DEPARTMENTAL APPEAL HAS BEEN REJECTED ON NO GOOD GROUNDS.

PRAYER:-

That on acceptance of the instant service appeal the impugned notification dated 10.11.2022 and 04.01.2023 may very kindly be set aside and the appellant may please be re-instated with all back benefits. Any other remedy which this august Tribunal deems fit that may also be awarded in favor of the appellant.

Respectfully Sheweth:

- 1. That mother of the appellant was and employee of the respondent department and was retired on medical ground from service w-e-f 26.02.2014 vide order dated 07.03.2014. Copy of the retirement order dated 07.03.2014 is attached as Annexure**A.**
- 2. That in pursuance to the application for appointment under the Rule 10 (4) of (APT) Rules, 1989 the appellant was appointed as PST (BPS-12) in GGPS Garang, District Battagram vide order dated 26.10.2022. Copy of the appointment order dated 26.10.2022 is attached as Annexure**B.**

Portia
RS

- 2-
3. That in pursuance to the appointment order mentioned above the appellant after medically examination and she submitted her arrival report and took over the charge of her post on 27.10.2022. Copies of the Medical Certificate, list of family members and charge assumption report are attached as Annexure**C, D & E.**
 4. That the appellant started performing her duty regularly, punctually and to the entire satisfaction of her high ups. Copy of daily attendance register is attached as Annexure **F.**
 5. That during service without any prior intimation and notice the appointment of the appellant was withdrawn vide impugned notification dated 10.11.2022. Copy of the impugned notification dated 10.11.2022 is attached as Annexure**G.**
 6. That appellant feeling aggrieved from the impugned notification preferred departmental appeal before the appellate authority on 21.11.2022. That the said departmental appeal was rejected vide appellate notification dated 04.01.2023 with no good grounds. Copies of departmental appeal and appellate notification dated 04.01.2023 are attached as Annexure **H & I.**
 7. That having no other remedy the appellant file the instant service appeal on the grounds inter alia.

G R O U N D S:

- A-** That the impugned notification dated 10.11.2022 and appellate order dated 04.01.2023 are against the law, facts, norms of natural justice and materials on the record.
- B-** That the appellant has not been treated in accordance with law and rules by the respondent Department on the subject noted above and as such the respondents violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C-** That no charge sheet and statement of allegations what so ever have been served upon the appellant.
- D-** That no show cause notice has been issued to the appellant by the respondent department.
- E-** That no right of personal hearing and personal defense was given to the appellant.
- F-** That no regular inquiry has been conducted into the matter which is as per Supreme Court judgments is necessary in punitive actions against civil servants.

- G- That the respondents acted in arbitrary and mala fide manner while issuing the impugned notification dated 10.11.2022 and appellate order dated 04.01.2023
- H- That the appellant has been discriminated on the subject noted above and as such the respondents violated the principle of natural justice.
- I- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that the instant service appeal may kindly be accepted as prayed for.

Dated 26-01-2023

Roona
APPELLANT
MISS ROOMA KHAN

Through:
NOOR MUHAMMD KHATTAK
ADVOCATE SUPREME COURT
Kamran
KAMRAN KHAN
Waleed Adnan
WALEED ADNAN
Umar Farooq
UMAR FAROOQ
Muhammad Ayub
MUHAMMAD AYUB
& Khanzad Gul
KHANZAD GUL
ADVOCATE

AFFIDAVIT

I, Miss Rooma Khan D/o Muhammad Siraj, Ex-PST (BPS-12), GGPS Garang, District Battagram, do hereby solemnly affirm and declare on oath that the contents of this **Service Appeal** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble tribunal.

Roona
DEPONENT

"A"

-4-

(1)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PNY: BATTAGRAM.

SANCTION OF RETIREMENT.

Sanction is hereby accorded to the grant of retirement from the service on Medical ground w.e.f 26.02.2014. Alongwith L.P.R Encashment w.e.f 01.03.2013 to 20.11.2013 (294 days) on full pay in respect of Lal Paha Bibi P.S.T Govt; Girls Primary School Jalalkot as due and admissible to him under the rules.

Note; Necessary entry should be made in his original service book.

(REHANA YASMIN.)

DISTRICT EDUCATION OFFICER (FEMALE)
PRIMARY BATTAGRAM.

Enstt; No. 1196-98 / Dated: B/Gram the. 7/3 / 2014

Copy to the; .

- 1- District Account office Battagram.
- 2- Sub-Divisional Educa; officer (F) Battagram.
- 3- Office copy.

verified from
primary file 837 Bm
10/1

Muhammad
7/12/14

DISTRICT EDUCATION OFFICER (F)
PRIMARY BATTAGRAM.

Du for No 755
21/3/14



"B"
-5-

**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM**
(Phone # 0997-310460) E-mail: demisfbattagram@yahoo.com

APPOINTMENT ORDER.

Under the provision contained in sub Rules-(4) of Rules-10 of the Khyber Pakhtunkhwa Civil Servant (Appointment, Promotion and Transfer) Rules-1989, and as amended vide Notification No.SOR-VI/E&AD/1-3/2011/Voll:-III dated 31/8/2012 & amended vide Establishment Department regulation wing KP Notification No.SO(R-VI)E&AD/1-3/2015 Dated 19-04-2016, the following Candidates are hereby appointed as **Primary School Teacher (PST)** (Under Deceased son quota) as mentioned against their name against vacant posts in BPS-12 Rs:(19770-1430-62670) PM plus usual allowances as admissible to them under the rules in the interest of public service with effect from the date of taking over charge on the following terms and conditions:

S.No	Name	Father Name	Union Council	Date of Birth	Designation	Place of posting
1	Hunzala Rustam	Muhammad Rustam	Banian	08/08/1997	PST BPS-12	GGPS Zareen Abad Trand
2	Rooma Khan	Muhammad Siraj	Banian	07/12/1999	PST BPS-12	GGPS Garang

TERMS & CONDITIONS:

- 46/11/2013
1. Their services will be considered as regular in term of section 19 of the KP Civil servant act 1973 amended in 2013 issued vide Govt of KP Finance department (Regulation wing) No SOS R-III/FD/12-1/2005 dated 27-02-2013. They will be governed by such rules and regulations as may be prescribed by the Govt from time to time.
 2. The appointees will be on probation for a period of one year in terms of section 6(2) on NWFP Civil Servant (Appointment, Promotion & Transfer) Rules, 1989.
 3. Their One month pay will be forfeited to Govt in case of resignation without prior notice. The period of giving notice is one month before the date of resignation.
 4. The appointees should join the post within 30 days failing which the appointment order will be treated cancelled automatically and no subsequent appeal will be entertained in this regard.
 5. The appointment is made subject to the condition that the appointees have domicile of District Battagram.
 6. The appointees are required to produce age & health certificate from the medical superintendent DHQ Hospital Battagram.
 7. The DDO is directed not to release their pay till the verification of all the academic/professional Documents from concerned board/universities, and

-6-

release of pay order will be issued by this office. In case of producing fake/ bogus degrees/certificates and detected latter on, their appointment order will automatically be cancelled from the date of its issuance and will be reported to the law enforcing agencies for further action.


8. Their services shall be terminated at any time , in case their performance is found unsatisfactory at any stage during their service. In case of misconduct, they will be proceeded under the rules.
 9. The competent authority reserves the right to rectify the errors and omissions if pointed out at any stage in the instant order.
 10. Charge report should be submitted to all concerned.
 11. Before handing over charge once again their documents may be checked if they were not the required relevant qualification they may not be handed over charge.
 12. They will have to receive Nine (09) Months mandatory training from DPD/RPD etc as, when and where scheduled.
 13. The appointees will get salary against the sanction post in the budget.
 14. The appointment will be treated as cancelled if the said quota has already been availed by any son/ daughter/widow of the deceased.
- No TA/DA is allowed.

(Rehana Yasmeen)
DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM

Endstt: No. 3088/44 /EB /PST/Deceased/Dated Battagram the 16/10/2022.

Copy to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Battagram.
3. SDEO (F) Battagram.
4. DMO/EMA Battagram.
5. DEMIS Local Office.
6. Official Concerned.
7. Office Copy.


DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM
16/10/2022

DISTRICT HEAD QUARTER HOSPITAL BATAGRAM "C"



7-



MEDICAL CERTIFICATE

Name of Official Rooma Khan
Caste of Race Swati
Father Name/D/W Muhammad Siraj
Resident of Village Jalal Kot Bandigo, Tehsil & District Battagram
Exact Height by Measurement 05 ft 03" inch
Date of Birth 07.12.1999
Personal Mark of Identification mark on left side of face
Signature of Official Rooma

Signature /Seal of the Office

It is certified that I have examined Ms. Rooma Khan who is the candidate for employment of job/service in the office of Education department Battagram. She has no disease whether communicable or non communicable or other constitutional deformity except Nil

She is medically & physically fit for job in any department. I do not consider this as disqualification for employment in the office of as above. Her age according to her own statement 23 appearance about 23 (Twenty Three years)

CNIC No 13202-5264585-1

Eye Vision 6/6 both without glasses

LEFT HAND THUMB AND FINGER IMPRESSION.....



Medical Superintendent
DHQ Hospital Battagram
27/10

"D"

-8-

LIST OF FAMILY MEMBERS / LEGAL HEIRS OF

Mrs Lal Baba Bibi PST Teacher GGPS Jalal Kot District And Tehsil Battagram

S. No	Name of Heir Member	Relation	CNIC#	AGE	Whether married or unmarried
01	Muhammad Siraj	Husband	13202-3744896-5	30-04-1958	Married
02	Muhammad Meraj ✓	Son	13202-5725699-1	13-04-1984	Married
03	Muhammad Sajjad Khan ✓	Son	13202-9734112-3	03-02-1987	Married
04	Bibi Zainab ✓	Daughter	13202-9933471-6	30-03-1992	Un Married
05	Irtikhar Khan ✓	Son	13202-3399384-3	04-09-1993	Married
06	Wajid Khan ✓	Son	13202-3494289-3	30-06-1996	Un Married
07	Hassan Khan ✓	Son	13202-8219172-9	01-05-1998	Un married
08	Roona Khan	Daughter	13202-5264585-1	07-12-1999	Un married
09	Muhammad Saboor Khan	Son	1322-8304577-9	31-01-2003	Un married

I solemnly declare and affirm that the members / heirs of Mrs Lal Baba PST Teacher GGPS Jalal Kot is correctly as above.

Signature

Attested :

Signature & Stamp

Family Tree

Close

Search

Citizen Number 13202-5264385-1

Relation Photo Citizen Number Type Name Father Name Mother Name DOB Status



Self 13202-*****1 Smart ID 7-12-1999 Process

Details

Disabled:	No	Last Status Update:	19/09/2018
Head Citizen Number:	13202-*****5	Old Citizen Number:	
Gender:	Female	Marital Status:	Unmarried
Spouse Name:		Spouse Citizen Number:	
Identification Mark:	لا تيس	Place of Birth:	بجرم بريم
Religion:	Islam	Mother Tongue:	Pushto
Status:	Processed		
Present Address:	پلا کت اراکت بجرم بريم کابل افغانستان		
Permanent Address:	پلا کت اراکت بجرم بريم کابل افغانستان		

5-

Correct name is 5264385-1



27/10
S

ASST. REGISTRAR D/O
Mudonwadi Sing
PST (R.P.-11) G.P.O. Gangan

Date: 27/10/2022

on 27th October 2022 at (Gangan)

I AM Registrar D/O Mudonwadi Sing
C No. # 1322-5264585-1, R/o Village Jataket P/O Budge
Taluk & District Bahadranagar, hereby assumed charge
of the Post Primary School (PST) at
Gangan (G.P.O.) Gangan Taluk
Gangan District Bahadranagar.

vide appointment order bearing Encl. No. 32/2022
dated 27/10/2022 at Bahadranagar.

Change Assumption Report

-10-

NE

BETTER COPY

CHARGE ASSUMPTION REPORT

Vide appointment order bearing Endst No.
3088/94/EB/PST/Deceased/Dated 26-10-2020 of District Education Officer
(Female) Battagram.

I Mst Rooma Khan D/o Muhammad Siraj bearing CNIC 13202-5264585-1, R/o
Village Jalal KOt P/O Bandigo Tehsil & District Battagram, hereby assumed
charge of the post Primary School Teacher (PST) at Government Girls
Primary School (GGPS) Garang today on 27th October 2022 at (forenoon).

Dated 27/10/2022

Mst Rooma Khan D/o Muhammad Siraj
PST (BPS-12) GGPS Garang.

"F"

-11-

رجسٹر حاضری مدارس سین پر امریکی سٹیٹ کالج

2022

آبیتا، آستونہ

ایرومان فان	سٹیٹ کالج	سین پر امریکی سٹیٹ کالج
P.S.T	P.T.C	P.S.H.T

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		1:30	8:30	P	P	1:30	8:30						
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		12:00	3:00	P	P	12:00	8:30						
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		1:00	8:30	P	P	leave							
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		12:00	3:30	P	P	12:00	8:30						
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Handwritten notes and signatures on the left side of the page, including names like 'M. S. Khan' and 'M. S. Khan'.

			(S) 1:30	(S) 8:30	P	-	-	-	1:30	8:30	11
			(S) 1:30	(S) 8:30	P	-	-	-	1:30	8:30	12
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			(S) 1:00	(S) 8:00	P	-	-	-	1:30	8:30	17
			(S) 1:00	(S) 8:00	P	-	-	-	1:30	8:30	18
			(S) 1:00	(S) 8:00	P	-	-	-	1:30	8:30	19
			(S) 1:30	(S) 8:00	P	-	-	-	1:30	8:30	20
			(S) 1:00	(S) 8:00	P	-	-	-	12:00	8:30	21
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			(S) 1:00	(S) 8:30	P	-	-	-	A	8:30	23
			(S) 1:30	(S) 8:00	P	-	-	-	leave	8:30	24
R 1:30	R 8:30		(S) 1:30	(S) 8:00	P	-	-	-	1:30	8:30	25
R 1:30	R 8:30		(S) 1:30	(S) 8:30	P	-	-	-	1:30	8:30	26
R 1:30	R 8:30		(S) 1:30	(S) 8:30	P	-	-	-	1:30	8:30	27
			(S) 1:30	(S) 8:30	P	-	-	-	12:30	8:30	28
			(S) 1:30	(S) 8:30	P	-	-	-	1:30	8:30	29
R 11:30	R 8:30		(S) 1:30	(S) 8:00	P	-	-	-	1:30	8:30	30
			(S) 1:30	(S) 8:00	P	-	-	-	1:30	8:30	31

میزان	سابقه	حال	میزان	سابقه	حال	میزان	سابقه	حال	میزان	سابقه	حال



"5"
-14-

OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM
(Phone # 0997-310460) E-mail: demisfbattagram@yahoo.com

NOTIFICATION

Whereas Mstt: Rooma Khan D/O Muhammad Siraj Khan applied to this office for appointment against the post of PST BPS-12 under deceased quota on the basis of her mother retirement on medical ground as PST from GGPS Jalalkot issued vide this office Endstt: No.1196-98 Dated 07.03.2014.

And whereas her application was processed in the light of required documents provided by her.

And whereas she provided non marriage certificates from NADRA office Battagram and secretary of concerned union council.

And whereas she was appointed against the post of PST BPS-12 under the said quota vide serial No. 02 of the appointment order issued vide this office order No. 3084-94 Dated 26.10.2022.

And whereas after the issuance of her appointment order the SDEO (F) Battagram reported that she is married and the non-marriage certificates provided by her are fake and bogus.

And whereas Mstt: Sajida ASDEO Circle Battagram was appointed as inquiry officer vide this office notification No. 3221 Dated 05.11.2022 to probe in to the matter and submit detail report within two days for further proceedings.

And whereas Mstt: Sajida ASDEO Circle Battagram in compliance with the order of this office conducted proper inquiry and submitted detail report alongwith documentary proof and confirmed that she has got married on 03.01.2022 and also born a baby few days before the issuance of her appointment order.

Now therefore I Mstt: Rehana Yasmin Abbasi, the District Education Officer (I) Battagram being competent authority withdraw serial No. 02 of the appointment order issued vide this office Endstt: No. 3088-94 Dated 26.10.2022 from the date of its issuance as per serial No. 07 of its terms and conditions and Mstt: Rooma Khan D/O Muhammad Siraj Khan is no longer PST at the strength of this office as she has concealed the facts and provided bogus documents with regard to her marital status as she being married is not eligible for appointment under the said quota as per policy of the government issued by Section Officer (Policy) Establishment and administration Department vide her office letter No. SO(Policy)/E&AD/1-3/2015/APT Rules Dated 07.06.2018.

The rest of the order will remain intact.

DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM
Battagram the 10 / 11.2022

Endstt: No. 3268-73
A copy of the above is forwarded for information and n/a to the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar
2. District Accounts Officer Battagram.
3. DMO EMA Battagram.
4. SDEO (F) Battagram.
5. EMIS Local Office.
6. Rooma Khan D/O Siraj Khan.

DISTRICT EDUCATION OFFICER

THE UNITED STATES OF AMERICA

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C.

REPORT OF SPECIAL AGENT IN CHARGE

DATE

REPORT MADE AT
REPORT MADE ON

REPORT MADE BY

"H" "Q"

**APPEAL/PRESENTATION BEFORE THE WORTHY DIRECTOR
ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA, U/S
22(2) OF KHYBER PAKHTUNKHWA ESTA CODE WITH SERVICE LAWS,
AGAINST THE NOTIFICATION OF DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM:**

-15-

Respected Sir,

1. That, my mother namely Mst. Lal Baha Bibi was working in Education Department, Battagram as a Primary School Teacher PST (BPS-12), who got retired from her service on medical ground from GGPS Jalalkot, vide departmental order bearing Endstt: No. 1196-98 dated: 07-03-2014. Copy of the same is attached herewith as *(Annexure-A)*.
2. That, I did Matric in the year, 2015, from Board of Intermediate & Secondary Education (BISE), Abbottabad under Roll No. 166192 and secured 807 Marks out of 1100. Copy of DMC attached as *(Annexure-B)*.
3. That, in the year, 2017, I completed my FSC (Pre-Medical) from Board of Intermediate & Secondary Education (BISE), Abbottabad under Roll No. 86731 and secured 715 Marks out of 1100. Copy of DMC attached as *(Annexure-C)*.
4. That, I have completed my BSC major in Botany & Zoology from Hazara University Mansehra under Roll No. 6021 and secured 326 Marks out of 550. Copy of DMC attached as *(Annexure-D)*.
5. That, on 17-03-2022, I moved an application to District Education Officer (Female), Battagram for appointment as PST (BPS-12) under Deceased quota on the strength of my mother retirement on medical ground. Copy of Application is attached as *(Annexure-E)*.
6. That, along with application, I submitted following documents:
 - i. Copy of CNIC. Attached as *(Annexure-F)*.
 - ii. Domicile Certificate. Attached as *(Annexure-G)*.
 - iii. Affidavit from legal heirs in favour of me. Attached as *(Annexure-H)*.
 - iv. List of Family Members/Legal heirs, duly attested from Secretary Village Council concerned. Attached as *(Annexure-I)*.
 - v. Pension slip of my mother Mst. Lal Baha Bibi. Attached as *(Annexure-J)*.
 - vi. Educational documents as stated above.

After, complete and lengthy scrutiny process done by Female Education Department Battagram, The Hon'ble District Education Officer (Female), Battagram issued an appointment order bearing Endstt: No. 3088-94/EB/PST/Deceased/Dated Battagram the 26/10/2022, wherein, the competent authority appointed me as a Primary School Teacher PST (BPS-12) under deceased son quota at GGPS Garang. Copy of order attached as *(Annexure-K)*.

8. That, after receiving appointment order, my medical was conducted in DHQ Hospital, Battagram and thereafter, I assumed the charge of Primary School Teacher PST (BPS-12), in GGPS Garang on 27-10-2022. The charge report is duly signed and stamped by Head Teacher of GGPS Garang. Copy of Charge Assumption report is *(Annexure-K)*.

Appeal/Presentation before,
The Worthy Director Elementary & Secondary Education,
Khyber Pakhtunkhwa

9. That, after assuming charge, I regular attended my school and taught the students without a single leave. Copy of the attendance register is (Annexure-I).
10. That, SDEO (Female), verbally reported the matter to the Hon'ble District Education Officer (Female) that, I am married and non-marriage certificate provided by me along with my record is fake and bogus. To this effect that Hon'ble District Education Officer (Female) Battagram conduct an Inquiry and Mst. Sajida ASDEO Circle Battagram was appointed as Inquiry Officer.
11. That, after submission of Inquiry report by the Inquiry Officer, the Hon'ble District Education Officer (Female) Battagram, withdraw my appointment order vide notification bearing No. 3268-73 dated: 10-11-2022. Copy of the said notification is attached as (Annexure-M).
12. That, the said withdrawal notification handed over to me on 15-11-2022, and till 15-11-2022, I regularly attend my school, which is reflected from the presented copy of attendance register before your Honour.
13. The allegations levelled against me that, I concealed the facts and provided bogus documents regarding to my marital status, is against law and withdrawal notification of DEO(F) Battagram is baseless, which effects my rights because:
- I provided CNIC, which bearing my father name.
 - I provided list of family members/legal heirs, duly attested from Secretary Village Council Concerned, wherein, my status shows as un-married.
 - I provided Family Tree from NADRA (Annexure-N), wherein, my marital status clearly mentioned.
14. Despite the facts stated above, the Hon'ble District Education Officer (Female) illegally and without any registered documentary proof withdraw my appointment order.
15. Your good self is humbly requested that, the Notification of the Hon'ble District Education Officer (Female) Battagram bearing Endstt: No. 3268-73 dated: 10-11-2022 may kindly be set-aside and reinstate my appointment order from its original date.

Thanks

Dated: 21/11/2022

Your's Sincerely;

Rooma

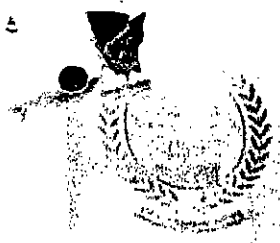
Rooma Khan

CNIC No. 13202-5264585-1

Jhal Kot, P.O. Bandigo

U.C. Baria, District Battagram

- 16 -



"9" ~~14/11~~

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

- 17 -

NOTIFICATION

Consequent upon the approval of the Appellant Authority, the appeal of Mrs. Rooma Khan Ex-PST, GGPS Garang District Battagram is hereby rejected, under rules 17 (2) of L&D Rules, 2011.

DIRECTOR

Elementary & Secondary
Education Khyber Pakhtunkhwa.

4933-35

Instt. No. 7F.No. 327/appeal/Battagram

Dated Peshawar the 04-1-2023

Copy forwarded for information to the:-

1. District Education Officer (Female) Battagram, with the direction to inform the teacher concerned accordingly.
2. Appellant concerned.
3. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa.

Handwritten signature/initials on the left side of the page.

Assistant Director (Female)
Elementary & Secondary Education
Khyber Pakhtunkhwa.

04/01/2023

Handwritten signature of the Assistant Director (Female).

BETTER COPY

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR.

NOTIFICATION

Consequent upon the approval of the Appellant Authority, the appeal of
Mst Rooma Khan Ex-PST, GGPS Garang District Battagram is hereby
rejected, under the rules 17 (2)(a) of E & D Rules 2011.

DIRECTOR

Elementary & Secondary Education
Khyber Pakhtunkhwa

Endst:No 4933-35/F.No327/appeal/Battagram

Dated Peshawar the 04-01-2023

- 12 -

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

APPEAL NO: _____ OF 20²³

Roona Klay

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Education Deptt

(RESPONDENT)
(DEFENDANT)

I/we Appellant

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** 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 cost. 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.

Dated. 28/6 /2022²⁰²³

CLIENT Roona

ACCEPTED

NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT

(BC-10-0853)

(15401-0705985-5)

KAMRAN KHAN

UMAR FAROOQ MOHMAND

WALEED ADNAN

&

MUHAMMAD AYUB
ADVOCATES

OFFICE:

Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)