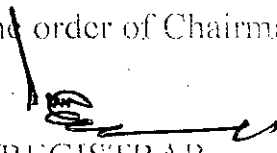


FORM OF ORDER SHEET

Court of

Case No. -

868/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/04/2023	<p>The appeal of Mst. Shabeena Saeed presented today by Mr. Azad Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on-</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

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

Service Appeal No. 868 /2023

Mst Shabeena Saeed

Appellant.

**Versus**

Government of Khyber Pakhtunkhwa and others.

Respondents.

**INDEX**

S. No.	Description	Annexures	Pages
1.	Memo of appeal with certificate.		1-5
2.	Affidavit.		6
3.	Address of the parties.		7
4.	Petition of suspension		8-9
5.	Order copy dated 01.11.2014 of Applicant.	A.	10-12
6.	Copy of transfer application.	B	13-14
7.	Order copy dated 09.12.2022.	C	15
8.	Order copy of respondent No 4	D	16
9.	Copy of departmental appeal and order	E&F	17-19
10.	Copy of departmental appeal to director of education & secondary education (female)	G&H	20-21
11.	Copy of complaint	I	22
12.	Order copy of director E&SE Peshawar	J	23-24
13.	Wakalatnama		

Appellant Through Counsel

Azad Khan advocate High Court.

**Azad Khan Advocate**

High Court M.A.L.L.B

Distt: Court Timergara &

Chakdara Distt: Dir Lower

(1)

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

Service Appeal No. 868 /2023

Mst Shabeena Saeed daughter of Saeed Khan wife of Azad Khan resident  
of Shawa, Tehsil Adenzai District Dir Lower... (Appellant)

**Versus**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & secondary Education, Khyber Pakhtunkhwa at Peshawar.
2. Director Elementary & secondary Education, Government of Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer (Female) Temargara Dir lower.
4. Mst. Haseeba D/O Muhammad Uzair R/O ouch, Tehsil Adenzai.  
*Div lower - DM, G.G.H.S. Shah Alam Baba*  
*Div lower* (Respondents)

Service Appeal Under Section 4 of

**Service Tribunal Act, 1974.**

**Prayer:**

On Acceptance of this regular service appeal against an impugned portion of order/ notification bearing Endst. No 8774-78 dated 09.12.2022, upto the extend serial No 9 under section 4 of service tribunal act 1974 read with all those other enabling and applicable provision of law governing the subject matter coupled with policy of the provincial government in field. And the respondents no 1,2 & 3 may please be directed to transfer the appellant from GGMS Mator Asbanr to GGHSS Shah Alam Baba. Any other relief no specifically prayed but this August Court deems proper may also be granted.

Respectfully sheweth;

1. That the appellant is bonafied resident of Shawa, tehsil adenzai, District Dir Lower and was appointed as DM at Government Girls Middle School, Mator, Asbanr vide order dated 01.11.2014. (Order copy dated 01.11.2014 is annexure A.)
2. That the appellant came to know that the DM post is vacant post in GGHSS shah alam baba. So appellant initiate application for transfer her post from GGMS Mator, Asbanr to GGHSS Shah Alam baba. (Application copy is annexure B.)
3. That merit wise the appellant was better putting than the private respondents no 4, but due to her influential approach, preference was given to her, as a political consideration though an impugned portion of order/notification bearing No 9 dated 09/12/2022. (Order copy is annexure C.)
4. That the initial appointment order/notification of the appellant as DM post is 01/11/2014 while that of private respondent no 4 is 19/03/2019 which not only shows the date of their respective appointment, but also the tenure of job in a hard area of distt: Dir lower. (appointment/Order Copy of respondent no 4 dated 01.03.2019 is annexure D.)

- 30
5. That the appellant submits a department appeal against the order dated 13.12.2022 to the district education officer female, which is still pending before DEO (Female) without any taking any action. (copy of departmental appeal is annexures E.)
  6. That the appellant than after submitted another departmental appeal dated 19/12/2022 to the Director of Elementary and Secondary Education Peshawar. (copy of departmental appeal is annexure F.)
  7. That the Director of Elementary and Secondary Education Peshawar directed the DEO Female to cancel the order dated 09.12.2022 and ensure the justice. (Copy of order is annexure G.)
  8. That after the order of the Director of E & S.E Peshawar, no action has been taken by EDO Female. The appellant makes a written complaint to Director E & SE Peshawar for the non-compliance of his order dated 19.12.2022. The Director E & SE Peshawar directed the DEO Female Dir lower through a written order dated 09.02.2023 to decide the case / appeal as per merit / tenure policy under intimation of this office. (Copy of Written complaint is annexure H, and written order of Director E & S.E Peshawar is annexure I.)
  9. That being aggrieved and having no other remedy, the appellant earlier preferred a regular service appeal on

CW

01/03/2023 against an impugned portion of order/notification dated 09/12/2022 but was returned being pre mature and now the appellant wants to prefer the instants regular service appeal on the following grounds.

Grounds:

- i. That the impugned portion of the order/notification up to the extent of respondent no 4 is prime facie, illegal, based on favoritism, and the result of pick and choose.
- ii. That as per rules/regulations governing the subject matter the DEO Female was bound to honor and obey the order and direction of her superior particularly when all were just and accordance with law, but not doing so specially malafide floating on the surface of the record, there fore required interference of this honorable forum.
- iii. That the order dated 09.12.2022 is illegal, unlawful and against the principle of justice to the stance of appellant And it must be set aside and the appellant be transferred from GGMS Mator Asbanr to GGHSS Shah Alam BaBa.

(5)

**Prayer:**

It is therefore, humbly prayed that with the acceptance of the instant appeal, the impugned portion of an order/notification bearing no 8774-78 dated 09.12.2022, up to the extents of serial no 9 may very graciously be set aside and the appellant be transferred from GGMS Mator, Asbanr to GGHSS Shah Alam BaBa.

Any other relief not specifically prayed but this august court deems proper may also be granted.

*Shahme*

Appellant Through Counsel

Azad Khan advocate High Court.

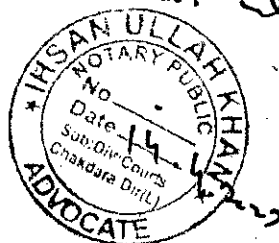
Azad Khan Advocate  
High Court M.A.L.L.B.  
Distt. Court Timergara,  
Chakdara Distt. Dir Lower

Dated:

**Certificate:**

As per instructions received from my client, it is certified that no such service appeal against the impugned orders, has been earlier before this August Court.

**ATTESTED**



*Shahme*

Appellant Through Counsel

Azad Khan Advocate High Court.

Azad Khan Advocate  
High Court M.A.L.L.B.  
Distt: Court Timergara &  
Chakdara Distt: Dir Lower

(6)

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

Service Appeal No. \_\_\_\_\_ /2023

Mst Shabeena Saeed

Appellant.

**Versus**

Government of Khyber Pakhtunkhwa and others.

Respondents.

**Affidavit**

I, Mst Shabeena Saeed daughter of Saeed Khan wife of Azad Khan advocate resident of Shapwa, Tehsil Adenzai District Dir Lower, do hereby solemnly affirm and declares on oath that all the contents of the accompanying service appeal are true and correct to the best of my knowledge and belief and nothing has been kept concealed or withheld from this August Court.

**ATTESTED**

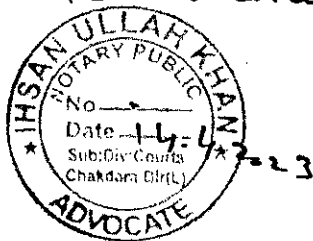
*[Signature]*

Deponent

*[Signature]*

Mst Shabeena Saeed

CNIC: 15307-7885545-8





(7)

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

Service Appeal No. \_\_\_\_\_ /2023

Mst Shabeena Saeed

Appellant.

**Versus**

Government of Khyber Pakhtunkhwa and others.

Respondents.

**Address of the parties:**

**Address of appellant.**

Mst Shabeena Saeed daughter of Saeed Khan wife of Azad Khan  
advocate resident of Shawa, Tehsil Adenzai District Dir Lower.

CNIC:15307-1885545-8

Cell no :0345-9523623

**Address of Respondents:**

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & secondary Education, Khyber Pakhtunkhwa at Peshawar.
2. Director Elementary & secondary Education, Government of Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer (Female) Temargara Dir lower.
4. Mst. Haseeba D/O Muhammad Uzair R/O ouch, Tehsil Adenzai

*Shelma*

Appellant Through Counsel  
Azad Khan advocate High Court.

8/

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

Mst Shabeena Saeed

Petitioner/Appellant.

**Versus**

Government of Khyber Pakhtunkhwa and others.

Respondents.

**Service Appeal Under Section 4 of**  
**Service Tribunal Act, 1974.**

**Petition for suspension of operation of impugned portion of order/notification bearing no 8774-78 dated 19/12/2022 up to the extent of S.NO 9 may till the final decision of the main case.**

Respectfully sheweth;

- i. That the petitioner have file aforementioned appeal wherein no date has yet been fixed.
- ii. That all the three ingredients like story prima facie case, balance of convenience and irreparable loss are best inclined in favor of the appellant.
- iii. That if the operation of an order/notification of to the extent of S.NO 9 is not suspended it will involve the petitioner into an endless litigations.

iv. That the ground taken in main appeal may kindly be considered as an integral part of this petition.

**Prayer:**

It is therefore, humbly prayed that with the acceptance of this petition, the impugned portion of order/notification bearing no 8774-78 dated 09.12.2022, up to the extents of serial no 9 may very graciously be suspended till the final decision of this case.

Any other relief not specifically prayed but this august court deems proper may also be granted.

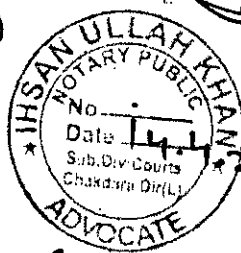
*Shabeena*  
Appellant Through Counsel  
Azad Khan advocate  
High Court.

*Shabeena*  
Azad Khan Advocate  
High Court M.A.L.L.B  
Distt: Court Timergara &  
Chakdara Distt: Dir Lower

**Affidavit**

I, Mst Shabeena Saeed, do hereby solemnly affirm and declares on oath that all the contents of the petition are true and correct to the best of my knowledge and belief and nothing has been kept concealed or withheld form this August Court.

**ATTESTED**



Deponent

*Shabeena*  
Mst Shabeena Saeed

Dated: 16/04/2023.

NTS (D)

DEM female

Annexure "A"

District Education Officer (F) Dir Lower



PH No. 0945-9250082,

E-mail: emisdirlower@yahoo.com

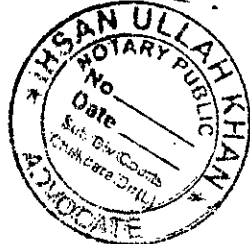
**OFFICE ORDER:**

Consequent upon the recommendation / approval of the District Selection Committee / District Promotion Committee Dir Lower in its meeting held on 10/10/2014, the following DM (Female) (School based) are hereby appointed in BPS-15 (Rs.8500-7000-29500) @ Rs. 8500/- fixed plus usual allowances as admissible under the rules on adhoc basis on contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and conditions given below:

S#	Name	Father Name	Address	Name of School	Score
1	SHEHLA BIBI	SahibZada Naveed Anjum	Village: and P.O Hayasari.	GGMS KHAN ABAD	101.16
2	NODIA	Siraj Uddin	Village: Basharo, P.O Ziarat Talash.	GGMS Soghalay	99.26
3	NAILA BEGUM	Gul Nawaz Khan	Village: & P.O Saddo, Timergara	GGHS BISHEGRAM	99.21
4	SEEMA GUL	Muhammad Nawaz Khan	Village: & P.O Odigram.	GGMS LAJBOOK	98.78
5	ADILA	Fazal Qahar	Village: Safary P.O Khall.	GGMS Khall Colony	97.31
6	NAGEENA BEGUM	Rahman Uddin	Village: Soghalay P.O Ziarat Talash	GGMS HANFIA	97.25
7	KHASHIA BEGUM	Irfan Ullah	Village: & P.O Munjai	GGMS DAROO MAJHAN	96.71
8	SAIMA	Ataf Hussain	Village: Mohi: Ghari P.O Chakdara.	GGHS INZARO	94.77
9	GHAZALA NAZ	Fateh Khan	Village: Gul Muqam P.O Chakdara.	GGMS Dara Ramor.	93.95
10	SUMAIRA BIBI	Gul Sahib Zada	Village: & P.O Hayasari	GGHS Zaimdara	93.14
11	ALIA BEGUM	Gul Nawaz Khan	Village: Shago Kass, P.O Bandugai	GGMS SADBAR KAT	92.66
12	RUQIA BEGUM	Zainul Abidin	Village: & P.O Khall	GGMS Seer Tormar	92.62
13	ASMA SHAHZADI	Abdul Ghafar	Village: & P.O Chakdara.	GGHS Tawda China	92.18
14	FAZILAT	Muhammad Satar	Village: & P.O Sharwa	GGMS JANGO	91.73
15	TAJ BEGUM	Mohammad Karim	Village: & P.O Danwa	GGMS Saligram	90.99
16	NAHIDA BEGUM	Khan Mula Khan	Village: Paloso Day P.O Khuzami	GGMS Maskini	90.93
17	MALAK FAKHRA NAZ	Malak Wazir Zada	Village: Charyari P.O Balambat	GGMS ATTO	89.63
18	FAZEELAT BIBI	Muhammad Wali	Village: Chino P.O Ziarat Talash	GGMS NIMAZ KOT	89.44
19	ZAINAB BEGUM	Muhammad Zamin Khan	Village: Khema P.O Timergara	GGMS SHAL KANDI	88.96
20	BUSHRA GHAFOOR	Muhammad Ghafoor Khan	Village: & P.O Timergara	GGMS Adam Dheri	88.74
21	RUKHSANA NASIR	Nasir Ul Haq	Village: & P.O Timergara	GGHS BEYARI	88.73
22	UZMA SUNDASS	Naveed Ahmad	Village: & P.O Saddo.	GGHSS SAMARBAGI	88.69
23	FAIZA FAIZ	Faiz Muhammad	Village: & P.O Manyal	GGMS KANDO MAC	87.25

Intikhab Photo State

Near National Bank Colony,  
Balambat Chowk, Timergara  
Ph: 0945-922991, Mob: 9300-939870



W

25	HIDAYAT BEGUM	Fateh Muhammad	Village; & P.O Munda	GGMS DHERI KAM AT	86.78
25	SHAZIA AZIZ	Aziz Ullah	Village; & P.O Khungi	GGHS Moranai	86.39
26	GHAUSIA KHAN	Qareeb Ullah Khan	Village; Pito P.O Khungi	GGMS KHAIR ABAI	84.68
27	SHABINA SAEED	Saeed Khan	Village; & P.O Tindodog.	GGMS MATOOR	84.62
28	SALMA ISRAR	Muhammad Israr	Village; Gul Muqam P.O Chakdara.	GGMS Bagh Kandi	84.37
29	LUBNA BEGUM	Mubarak Said	Village; & P.O Haji Abad	GGHS MANYAL	82.29
30	SALMA BIBI	Fath Ur Rehman	House No. 151 Muhalla Mufti Abad Peshawar.	GGMS MARKHANI	82.16
31	JAMILA BIBI	Shah Zamin Khan	Village; Khan Sari P.O Zairat, Talash	GGMS BARKHANA	81.95
32	ABIDA	Mohibullah	Village; Mohalla Delle, Mardan.	GGMS LIKOR KAM AT	81.69
33	UZMA BAIG	Amin Ul Haq	Village; & P.O Mian Banda	GGMS Toormang	81.61
34	SAMAN HUMA	Muzafar Said	Village; P.O Timergara	GGMS BANDAI MAIDAN	80.98
35	SAIQA	Shah Sawar	Village; Tora Tiga P.O Timergara	GGMS Tekni Bala	80.46
36	NAGINA BIBI	Amir Baz Khan	Village; Khan Sari P.O Zairat, Talash	GGMS Terona	78.87
37	SHABINA BIBI	Muhammad Wali	Village; Chino Talash P.O Zairat, Talash	GGMS GALKOH LUQMAN BANDA	78.51
38	SHAHEEN KANWAL	Riaz Muhammad	Village; & P.O Khanpur.	GGMS Tali Sia	77.74
39	UZMA BIBI	Sher Zaman Khan	Village; & P.O Balambat	GGMS Shagai	77.44
40	HINA BEGUM	Abdur Rauf	Village; & P.O Timergara	GGMS GALL	75.08
41	TAUID AHMAD	Ahmad Habib Ullah	Village; Palo Shah P.O Chakdara	GGMS Bumbal	71.21

**TERMS AND CONDITIONS:**

1. This order will commence from 01/11/2014 and shall continue til 31/10/2015 and this offer will, however, not construe in any form, either express or implied, any assurance for future employment with the Elementary and Secondary Education Department.
2. They will be entitled to emoluments of Rs. Rs. 8500/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract per month for one year and will be eligible for tax deduction (if any) as per prevailing government rules.
3. Their Pay will not be drawn until and unless a certificate to the effect by DDO (concerned) is issued that their certificates are verified.
4. They will produce Health and Age Certificate from the Medical Superintendent concerned before taking over charge.
5. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
6. Their services shall be terminated at any time, in case their performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rule framed from time to time.
7. Their appointment will be made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
8. The appointment of the candidates mentioned above is subject to the condition that they are domiciled in District Dir Lower.
9. NO TA/DA will be paid to them on joining the post.
10. Their age may not exceed 35 years or below 18 years.
11. Charge reports should be submitted to all concerned,

**LETTER** Intilhab Photo State  
 Near-National Bank Colony,  
 Balambat Chowk, Timergara.  
 Mob: 0300-9398707



22

- 12. Drawing & Disbursing Officers concerned are directed to collect photo copies of their testimonials along with verification fees and submit the same to the office of the undersigned for further verification from the institutions concerned.
- 13. This order is issued, errors and omissions accepted, as a notice only.
- 14. 40 % candidates have been initially recruited from amongst those candidates who have qualified NTS test for the purpose purely on merit.

(Zaib Un Nisa)  
 District Education Officer (F)  
 District Dir Lower

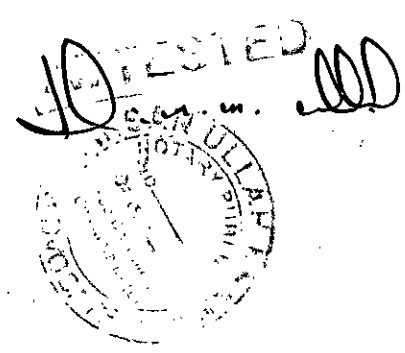
Endst. No. 2690-93

Dated Timergara the 01/11/11 A.D.

Copy of the above is forwarded to:

- 1. The Director (E&SE) Khuber Pakhtoon Khwa Peshawar.
- 2. The District Accounts Officer Dir Lower.
- 3. The Principals / Headmistresses of the institute concerned.
- 4. The Officals concerned.

*(Signature)*  
 District Education Officer (F)  
 District Dir Lower

10  
 NOT TESTED  
 11/11/11  


**Intikhab Photo State**  
 Near National Bank Colony,  
 Balambat Chowk, Timergara.  
 Ph: 0945-822994, Mob: 0300-9398707

(13)

*Shahab sb.*  
*14/12/2022*

The District Education Officer  
Tanjong Pagar District of Singapore

**Subject: APPLICATION FOR TRANSFER FROM GMS MAJLIS ANSARUL  
GURUSSEKHA AL HUDA**

With due respect it is stated that I am serving as DAI at GMS Majlis Ansarul  
14-2014 for being area from my home station. I have come to know that posts are given to newly  
recruited and promoted Higher Secondary School (GHS) Station Huda  
Therefore, it is requested that I may please be transferred to Station Student Huda  
at GMS Majlis Ansarul.

I thank you very much for your kind attention

*DY No. 3917*  
*14/12/2022*

*Forwarded in original to  
the District education officer (E)  
Dir (L) of Tanjong for favourable  
and sympathetic consideration pl.*

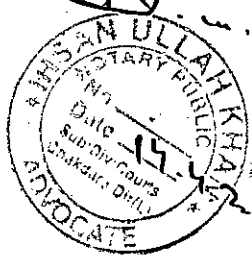
*Head Teacher  
GMS Majlis  
Tanjong Pagar*

Very Respectfully

*S. bin*  
Shahbena Saad

DEPUTY DISTRICT EDUCATION OFFICER

ATTESTED



*(Signature)*

To

19  
The District Education Officer (F)

District Dir (Lower)

Better copy

Subject: APPLICATION FOR TRANSFER FORM GGMS MATOOR ASBANR TO  
GGHSS SHALAM BABA

R.Madam,

With due respect that I am serving as DM at GGMS Mator Asbanr w.e.f 01-11-2014 in for flang area form my home station. I have come to know that ports are given to newly created and constructed higher secondary school GGHSS Shalam Baba.

Therefore, it is requested that I may please be transferred to GGHSS Shalam Baba from GGMS Mator Asbanr.

I will be very thankful for your this kindness.

Date: 14.02.2022

Yours obedient

Shabina Saeed DM

GGMS Mator Asbanr



TS

Annexure "D"

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DIR LOWER AT TIMERGARA.**  
**OFFICE ORDER.**

The transfer of the following mistresses is hereby ordered at the school noted against each in the interest of public service.

S#	Name of Teacher with Designation	From	To	Remarks
1	MUNIDA BIBI CT B-15	GGHSS ASBNAR	GGHS IANGO	A.V.P
2	HUZefa SAYED CT B-15	GGMS DHERAN	GGHSS ASBNAR	A.V.P
3	UZMA BIBI CT B-15	ASBNAR	GGHS DAMTAL	A.V.P
4	SAIMA AYOUB CT B-15	GGMS TAKAWRO	GGMS ADAM DHEERI	A.V.P
5	JANAT HURA CT B-15	GGMS HANFIA	GGMS KHALL PAYEEN	A.V.P
6	SOBIA ALI CT B-15	GGHS GAL KOR	GGMS TIKNI BALA	A.V.P
7	SHAMILA IKRAM CT B-15	GGHS GAL KOR	GGMS BAROON	A.V.P
8	NAFEES FAQIR CT B-15	GGMS SHALFALAM	GGHS KHAN ABAD	A.V.P
9	HASEEBA DM B-15	GGMS BABAGAM	GGHSS SHAH ALAM BABA	A.V.P
10	KALSOOM CT IT B-12	GGHS ZAIMDARA	GGHSS ZAIMDARA	A.V.P
11	AZRA CT IT B-12	GGHSS RABAT	GGHS OSAKAI	A.V.P

Note:

1. No TA/DA is allowed.
2. Charge Reported should be submitted to all concerned.

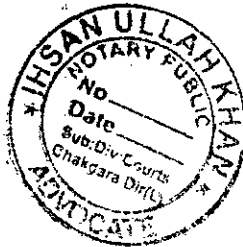
(SHAHEEN BEGUM)  
DISTRICT EDUCATION OFFICER  
(F) DIR LOWER AT TIMERGARA

Enst: No. 8774-78

Dated Timergara the 09/12/2022.

Copy of the above is forwarded to:

1. The District Accounts Officer Dir Lower.
2. The Principal/Head Mistress concerned.
3. The Supdt: Local Office.
4. The Teachers concerned.
5. Office Record.



18/12  
9/12/2022  
DISTRICT EDUCATION OFFICER  
(F) DIR LOWER AT TIMERGARA

(16)

Annexure 'B'



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) Dir Lower (Phone # 0945 9250023)

APPOINTMENT

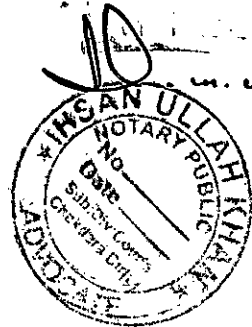
Consequent upon the recommendation of the Departmental Selection Committee, appointment of the following candidates is hereby ordered purely on merit against the vacant posts of Drawing Minister (DM) (Left Over) on Ad hoc School based in BPS: 15(Rs.16120-1330-56020/-) Fixed plus usual allowances as admissible to them under the Rules and existing policy of the Provincial Government on the terms & conditions given below with effect from the date of their taking over charge (01.03.2019) in the interest of public service.

Table with 7 columns: S.No, Name of candidate, Father's Name, School where appointed, D/O Birth, Score, Remarks. It lists four candidates: SHAISTA BEGUM, HASEEBA, ARFA SALEEM, and HINAZ IQBAL.

Terms & Conditions

- 1. No TA/DA is allowed.
2. Charge reports should be submitted to all concerned.
3. Appointment is purely on temporary & ad hoc basis for one year period with effect from 23-04-2019 to 22-04-2020.
4. They should not be handed over charge if their age exceeds 35 (Thirty Five) or below 18 years of age.
5. Appointment is subject to the condition that their certificates/documents must be verified from the concerned authorities, and anyone found producing bogus certificate/s or degree/s their appointment shall be cancelled and they will be reported to the Law enforcing agencies for further legal action.
6. Their services are liable to termination on one month's prior notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government treasury.
7. Pay shall not be drawn until and unless a certificate issued by this office that to the effect that their documents have been verified.
8. They should join their posts within 15 days after the commencement of their contract. In case of failure to join the post within 15 days of the issuance of this Notification their appointment shall stand expired automatically and no subsequent appeal etc. shall be entertained.
9. Health & Age Certificate should be produced from the Medical Superintendent before taking over charge.
10. They will be governed by such Rules and Regulations as may be issued from time to time by the Government.
11. Their services shall be terminated at any time in case their performance is found unsatisfactory during their service period. In case of misconduct, they shall be proceeded against under the relevant rules & regulations announced from time to time.
12. Their appointment is Ad hoc and school based. They shall have to serve at their place of posting and their services are not transferable to any other station save in case of consequential changes/adjustment (As per opted school) to be made in consequences of substitute appointment order/orders on posts left vacant by any of the above mentioned appointees.
13. Before handing over charge to them, their documents may be checked and if found bogus or fake they may be reported to this office for necessary action.

Handwritten signature



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DEO، 9-12-022 مسماة حسية زوجة آزاد خان ایڈووکیٹ سکندھ شہ  
 پر ایک جوہر نیچر مسماة حسية زوجہ آزاد خان ایڈووکیٹ سکندھ شہ کی حیثیت سے 01-9-2010 سے جاری شدہ  
 GGHSO شاہ عالم بابا کا آرڈر برائے جہازت کا منسوخ کیا گیا ہے۔ اس آرڈر کے تحت جہازت کے  
 DEO کے پاس آرڈر کے ساتھ ساتھ ایک کاپی بھی ہے۔ اس آرڈر کے تحت جہازت کے  
 آرڈر کیا ہے اور ایک ایئر بیور کا تبادلہ کرنے کے بجائے ایک ایئر بیور کا تبادلہ  
 کرنے کی ہے جو کہ قابل منسوخ ہونے کے ساتھ ساتھ غیر قانونی ہے۔  
 = کہ مذکورہ آرڈر بوجہ غیر قانونی و بغیر میرٹ پالیسی ہونے کے بنا پر کسی قابل منسوخ  
 ہے۔

کہ محققہ سکول GGHS شاہ عالم بابا پر ایپلنٹ کا تبادلہ کرنا نہایت ضروری اور  
 قرین انصاف ہے۔ کیونکہ ایپلنٹ بہ نسب مسماة حسية زوجہ آزاد خان ایڈووکیٹ سکندھ شہ  
 تقاضا اور جتنی بر میرٹ پالیسی ہونے حق بجانب ہے جو کہ گزشتہ 9 سالوں سے گھر کے  
 ذمہ داری سنبھال رہی ہے۔

محالات بالا استدعا ہے کہ منظور کی اپیل بذرا تخریہ 9-12-022 میں یہ  
 سیریکل نمبر 9 میں مسماة حسية زوجہ آزاد خان ایڈووکیٹ سکندھ شہ کی غیر اخلاقی و بغیر  
 میرٹ پالیسی ہونے منسوخ کیا جا کر ایپلنٹ کا تبادلہ GGMS ماتوڑ سے  
 بمقام GGHS شاہ عالم بابا کرنے کے احکامات صادر فرمائیں۔

مورخہ 13-12-2022

عریضہ!

العبد شہزاد خان

مسماة شہینہ سعید زوجہ آزاد خان ایڈووکیٹ سکندھ شہ



# Annexure E

*[Faint, illegible handwritten text, likely bleed-through from the reverse side of the page]*



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بخدمت جناب ڈائریکٹر ایملنسٹری اینڈ سیکنڈری ایجوکیشن خیبر پختون خواہ بمقام پشاور

Annexure

مسماة شبنہ سعید دختر سعید خان زوجہ آزاد خان ایڈوکیٹ ساکن شوہ، تحصیل ادینزئی، دیر (پائین)۔۔۔۔۔ (اپیلانٹ)

بنام

ڈسٹرکٹ ایجوکیشن آفسر (زنانہ) ضلع دیر (پائین) بمقام تیسر گڑہ۔۔۔۔۔ (رہسپانڈنٹ)

محکمہ ایمل بنا راہنگی حکم / آرڈر DEO (زنانہ) ضلع دیر (پائین) بمقام تیسر گڑہ محررہ 09/12/2022 جس کی رو سے بہ سیریل نم (9) DEO صاحبہ زنانہ ایک غیر قانونی، غیر اخلاقی طور پر ایک جوئر ٹیچر مسماة حبیبہ بی بی دختر محمد عزیز کا تبادلہ GGHS زمکدارہ سے بمقام GGHS شامل بابا کر کے ایک سینئر ٹیچر مسماة شبنہ سعید / اپیلانٹ کو Drop کر کے غلط، بلا جواز آرڈر صادر فرمایا ہے جو کہ ہرگز قابل بحالی نہ ہے بلکہ قابل منسوخ ہے۔

استدعا اپیل! منظور ی اپیل ہذا آرڈر محررہ 09/12/2022 بہ سیریل نمبر 09 میں مسماة حبیبہ بی بی دختر محمد عزیز کا ٹرانسفر آرڈر منسوخ کیا جا کر سائیلہ / اپیلانٹ کا تبادلہ بمقام GGHS شامل بابا کر کے کے احکامات صادر فرمائی جائے۔

وجوہات اپیل:

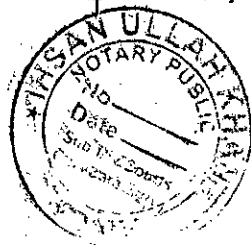
جناب عالی! وجوہات اپیل ذیل عرض ہے۔

(1) یہ کہ سائیلہ / اپیلانٹ کا تعلق موضع شوہ، تحصیل ادینزئی، دیر (پائین) سے ہے جس کی تعیناتی مورخہ 01/11/2014 کو ایک خالی پوسٹ پر ہو کر گزشتہ 9 سال سے GGHS ماتوڑا بسنوں میں MD کے پوسٹ پر ڈیوٹی سرانجام دے رہی ہے۔

(2) یہ کہ اپیلانٹ کو جب معلوم ہوا کہ GGHS شامل بابا میں MD کی پوسٹ خالی ہے تو اپیلانٹ نے بروقت درخواست بغرض تبادلہ GGHS ماتوڑا بسنوں سے GGHS شامل بابا داری کی۔

(3) یہ کہ اپیلانٹ کو بوجہ میرٹ پالیسی حقدارہ ہونے DEO صاحبہ زنانہ نے کئی مرتبہ تبادلہ کی نسبت اور بوجہ

سینئر ہونے سائیلہ کی تبادلہ GGHS شامل بابا کرنے کی یقین دہانی



4) یہ کہ مورخہ 09/12/2022 کو DEO صاحبہ زنانہ نے ایک غیر اخلاقی، غیر قانونی اور بلا جواز طور ایک جوئز ٹیچر مسماہ حسیبہ بی بی جس کی تعیناتی 01/03/2019 کو ہوئی تھی، متعلقہ GGHS شامل بابا پر تبادلہ کیا جو کہ ہرگز قابل بحالی نہ ہے بلکہ قابل منسوخی ہے۔

5) یہ کہ DEO صاحبہ زنانہ نے میرٹ کو پامال کرتے ہوئے مذکورہ غیر قانونی آرڈر صادر کر کے ایک سینئر ٹیچر کے بجائے ایک جوئز ٹیچر کا تبادلہ کیا جو غلط اور غیر قانونی ہے۔

6) یہ کہ متعلقہ سکول GGHS شامل بابا پر سائیلہ / اپیلانٹ کا تبادلہ نہایت ضروری اور قرین انصاف ہے کیونکہ اپیلانٹ بہ نسبت مسماہ حسیبہ بی بی زیادہ حقدارہ اور مہنی بر میرٹ ہوتے ہوئے حق بجانب ہے جو کہ گزشتہ 9 سال تک گھر سے دور ڈیوٹی سرانجام دے رہی ہے۔

7) یہ کہ مذکورہ آرڈر بوجہ غیر قانونی و بغیر میرٹ پالیسی ہونے قابل منسوخی ہے۔

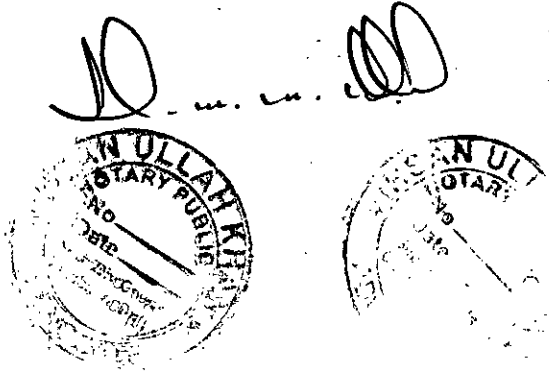
لہذا بوجوہات بالا استدعا ہے کہ بمنظوری اپیل ہذا حکم محررہ 09/12/2022 بہ سیریل نمبر 09 میں مسماہ حسیبہ بی بی کا آرڈر بوجہ غیر قانونی، غیر اخلاقی و بغیر میرٹ پالیسی ہونے منسوخ کیا جا کر اپیلانٹ کا تبادلہ GGHS اتوڑ سے GGHS شامل بابا کرنے کے احکامات صادر فرمائی جائے۔

المرقوم: 12/17

عریضہ:

العبد

مسماہ شبینہ سعید دختر سعید خان زوجہ آزاد خان ایڈوکیٹ ساکن شوہ



مسماة شبینہ سعید دختر سعید خان زوجہ آزاد خان ایڈوکیٹ ساکن شوہ، تحصیل ادینزئی، ویر (پائین)۔۔۔۔۔ (سائیلہ)

بنام

ڈسٹرکٹ ایجوکیشن آفسر (زنانہ) ضلع ویر (پائین) بمقام تیسر گرہ۔۔۔۔۔ (مسؤل ایلیا)

درخواست / کمپینٹ، ہمدانہ کرنے پاسداری حکم محررہ 19/12/2022 جاری شدہ دفتر ہذا / منسوخ  
کرنے حکم / آرڈر DEO زنانه محررہ 09/12/2022۔

جناب عالی! سائیلہ حسب ذیل عرض ہے۔

- 1) یہ کہ سائیلہ نے ایک اپیل محکمانہ در دفتر ہذا مورخہ 19/12/2022 کو دائر کی تھی جس پر دفتر ہذا نے DEO زنانه ویر لوز کو حکم جاری کرتے ہوئے Cancel the order and insure justice کے احکامات صادر کئے تھے۔ (نقل اپیل لف درخواست ہذا ہے)
  - 2) یہ کہ DEO زنانه ویر لوز نے تا حال سائیلہ کے اپیل و حکم دفتر ہذا پر کسی قسم کی کاروائی نہیں کی ہے اور آرڈر محررہ 09/12/2022 کو منسوخ نہیں کیا ہے۔
  - 3) یہ کہ DEO زنانه ویر لوز قصداً حکم محررہ 09/12/2022 کو منسوخ نہیں کرتا اور دفتر ہذا کی حکم کی پاسداری نہیں کرتی۔ حالانکہ میرٹ پر بھی سائیلہ کا حق بنتا ہے۔
  - 4) یہ کہ آرڈر محررہ 09/12/2022 کو منسوخ نہایت ضروری اور قرین انصاف ہے۔
- لہذا استدعا ہے کہ حکم محررہ 09/12/2022 بہ سیریل نمبر 09 میں مسماة حبیبہ بی بی کا آرڈر بوجہ غیر قانونی، غیر اخلاقی و بغیر میرٹ پالیسی ہونے منسوخ کیا جا کر سائیلہ کا تبادلہ GGHS ماتوڑ سے GGHS شامل بابا کرنے کے احکامات صادر فرمائی جائے۔

المرقوم: 06/01/2023

عریفی:

مسماة شبینہ سعید دختر سعید خان زوجہ آزاد خان ایڈوکیٹ ساکن شوہ





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Annexure H



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION,  
KHYBER PAKHTUNKHWA PESHAWAR

No. 7070 / F.No. 17/461-17 / Appeal/transfer Dated 07/07/2017

To

The District Education Officer,  
(Female) Dir Lower

Subject: APPEAL

Memorandum

I am directed to refer to the subject (in above) and to enclose herewith a copy of appeal of Mr. Shabzeed Saad and to ask you to decide the case on its merits and to forward the information to this office.

Assistant Director (Female)  
E&S, Khyber Pakhtunkhwa  
07/07/2017




Encl: 01

Copy of the above is forwarded to the  
PA to Director E&S, KPK Peshawar.

Assistant Director (Female)  
E&S, Khyber Pakhtunkhwa

PA to Director E&S, KPK Peshawar

10  
JUL 17 2017  
PA to Director E&S, KPK Peshawar

قیمت 50 روپے	64784			
ایڈوکیٹ: <u>اراز رضا انارکلی</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر: <u>10-0495</u>				
رابطہ نمبر: <u>9523623</u>				
<u>0325 857</u>				

بعدالت جناب: سروسز کے لیے درخواست (محکمہ) پشاور

منجانب: <u>ایس ایچ اے</u>	دعویٰ: <u>سروسز / اپیل</u>
	علت نمبر: _____
	مورخہ: _____
	جرم: _____
	تھانہ: _____
<b>باعث تحریر آگہ</b>	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی کارروائی متعلقہ  
 آن مقام سروسز کے لیے درخواست اراز رضا انارکلی کو کیل مقرر  
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو  
 راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق  
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز  
 دائرہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی  
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب  
 مقرر شدہ کو کوئی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پر اختیار منظور و قبول ہوگا  
 دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیش مقام دورہ یا حد سے  
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المقوم: 2023  
 PESHAWAR BAR ASSOCIATION  
 KHYBER PAKHTUNKHWA

مقام پشاور کے لیے منظور ہے

Attested & Accepted  
17/04/2023

سید سعید  
 0342523623  
 15707048814025-8

نوٹ: اس وکالت نامہ کی فونو کالی ناقابل قبول ہوگی۔