

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT ABBOTTABAD

Service Appeal No. 868/2015

Date of Institution... 03.06.2015

Date of decision... 21.08.2017

Hajra Junaid W/O Junaid R/O Sialkot, District, Abbottabad. ... (Appellant)

Versus

1. District Education Officer (Female) District Batgaram (Respondents)
and another -----

MST. CHAND BIBI,

Advocate ...

For appellant.

MR. MUHAMMAD BILAL

Deputy District Attorney ...

For respondents.

MR. NIAZ MUHAMMAD KHAN, ...

CHAIRMAN

MR. MUHAMMAD HAMID MUGHAL ...

MEMBER

JUDGMENT

NIAZ MUHAMMAD KHAN, CHAIRMAN: - Arguments of the learned counsel for the parties heard and record perused.

FACTS

2. The appellant is aggrieved from the order dated 30.08.2014 on the basis of which entry was made in her service book whereby her absence from duty was converted into extra-ordinary leave without pay and penalty of recovery of a sum of Rs. 327120/- was also ordered against her. The impugned order dated 30.08.2016 was appealed against departmentally by the appellant first on 10.01.2014 and then on 02.04.2015. Thereafter, the appellant filed the present appeal on 03.06.2015.

ARGUMENTS

3. The learned counsel for the appellant argued that the appellant was not absent as alleged in the impugned order. That no enquiry was conducted against

the appellant. That the order of recovery is also illegal. That the order being void does not attract the period of limitation.

4. On the other hand the learned Deputy District Attorney argued that no departmental appeal, at all, has been filed by the appellant. That if it is presumed that departmental appeals were filed as alleged by the appellant then the present service appeal is time barred. He further argued that the appellant was proceeded against under the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011 and after issuance of show cause notice dated 04.06.2014, the advertisement was published in daily newspaper against many teachers including the present appellant. That the order of recovery has rightly been passed by the department,.

CONCLUSION

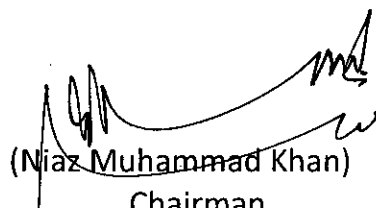
5. While perusing the impugned order, this Tribunal has reached the conclusion that para 3 of the order shows that the proceedings were initiated under Rule 9 of the Khyber Pakhtunkhwa Government Servants (E&D) Rules, 2011 but in concluding para, the penalty is imposed not under Rule 9 but under Rule 4 of the said rules. Had the proceedings been initiated under Rule 9 of the said rules the logical end would have been removal from service of the appellant but instead the authority under Rule 4 imposed minor penalty of recovery of some amount as mentioned above. Another paradoxical position is that the authority had converted the period of absence into leave without pay and at the same time imposed minor penalty of recovery of the amount. When any period is converted into any type of leave then no penalty under the disciplinary rules can be imposed upon the delinquent official. That minor penalty and major penalty can only be imposed when any of the grounds mentioned in Rule 3 is proved. But when the absence period is converted into leave then there was left no ground for proceedings under Rule 4 of the above mentioned rules. Another aspect of the case is that when the

department switched over to imposition of penalty under Rule 4 instead of Rule 9 then it was incumbent upon the department to have had ordered the issuance of charge sheet/statement of allegations and then appointment of enquiry officer etc. or could have dispensed with the enquiry through an order by giving specific reason. But while switching over to penalties under rule 4 none of the above steps have been taken by the department. It is crystal clear that the impugned order is void order and hence no limitation is attracted in the case nor the same order can be sustained on merit.

6. As a sequel to the above discussion, the impugned order is set aside. Parties are left to bear their own costs. File be consigned to the record room.



(Muhammad Hamid Mughal)
Member



(Niaz Muhammad Khan)
Chairman
Camp Court, A/Abad

ANNOUNCED

21.08.2017

868/15

25.05.2017

Since tour programme to camp court, Abbottabad for the month of May, 2017 has been cancelled by the Worthy Chairman, therefore, case to come up for the same on 21.08.2017 at camp court, Abbottabad. Notices be issued to the parties for the date fixed accordingly


Registrar

21.08.2017

Counsel for the appellant and Mr. Muhammad Zubair, District Attorney alongwith Amir Muhammad, ADO for the respondents present. Arguments heard and record perused.


This appeal is accepted as per detailed judgment of today. Parties are left to bear their own costs. File be consigned to the record room.



Member

ANNOUNCED

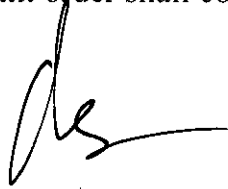
21.08.2017


Chairman
Camp court, A/Abad

21.09.2016

Appellant with counsel and Mr. Muhammad Jamil, Supdt. Alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Due to strike of the bar counsel for the appellant requested for adjournment. To come up for rejoinder and final hearing before the DB on 21.11.2016 at camp court, Abbottabad. The restraint order shall continue.

Member



Chairman
Camp court, A/Abad.

21.11.2016

Appellant in person and Mr. Amir Muhammad, ADO alongwith alongwith Mst. Bushra Bibi, Government Pleader for official respondents present. Rejoinder submitted. Counsel for the appellant is not in attendance and the Bench is also incomplete. Case is adjourned to 17.4.2017 for final hearing before D.B at camp court, Abbottabad. The restraint order shall continue.

Chairman
Camp court, A/Abad

17.04.2017

Counsel for the appellant and Mr. Amir Muhammad, ADO alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Rejoinder submitted. Due to incomplete Bench arguments could not be heard. To come up for final hearing before the D.B on 17.05.2017 at camp court, Abbottabad. The restraint order shall continue.

Chairman
Camp court, A/Abad

16.03.2016

Appellant in person and Mr. Attaullah, ADO alongwith Mr. Muhammad Saddique, Sr. GP for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 17.5.2016 at Camp Court A/Abad. The restraint order shall continue.


Chairman

Camp Court A/Abad

17.05.2016

Counsel for the appellant and Mr. Muhammad Siddique Sr.GP for the respondents present. Counsel for the appellant requested for adjournment. Adjourned for rejoinder and final hearing to 17.08.2016 at camp court, Abbottabad. The restraint order shall continue.


Member


Chairman

Camp court, A/Abad,

17.08.2016

Appellant in person and Mr. Muhammad Jamil, Supdt. official respondents present. Counsel for the appellant is not in attendance. Seeks adjournment. To come up for rejoinder and final hearing before the D.B on 21.09.2016 at camp court, Abbottabad. The restraint order shall continue.


Member


Chairman

Camp court, A/Abad.

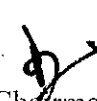
Appellant Deposited
Security & Process Fee

20.10.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as Head Teacher (BPS-15) when vide impugned order dated 30.7.2014 a penalty of recovery of Rs.327120/- was imposed against her for the alleged absence with effect from 1.12.2012 to 30.11.2013 and the said period was treated as EOL without pay. On coming to know of the said order appellant preferred departmental appeal on 2.4.2015 which was not responded and hence the instant service appeal on 31.7.2015.

That the appellant has neither been subjected to any inquiry nor any opportunity of hearing was afforded to her and the said order illegally passed.

Points urged need consideration. Admit, ~~order~~ Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply for 20.01.2016 before S.B at Camp Court A/Abad. Till further orders recovery shall not be made from the appellant.


Chairman
Camp Court A/Abad

20.1.2016

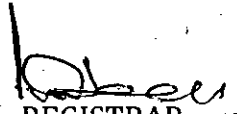



None present for appellant: Mr. Attaullah, ADO alongwith Mr. Muhammad Saddique, Sr.GP for respondents present. Requested for adjournment. To come up for written reply/comments on 16.3.2016 before S.B at Camp Court A/Abad. The restraint order shall continue.


Chairman
Camp Court A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 868/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	31.07.2015	<p>The appeal of Mst. Hajra Junaid resubmitted today by Mr. Shah Mohammad Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	10-8-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>11-8-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
3	11.08.2015	<p>None present for appellant. The appeal pertains to the territorial jurisdiction of Hazara Division. To come up for preliminary hearing at Camp Court Abbottabad on 17.9.2015 before S.B.</p> <p style="text-align: right;"> Chairman</p>
4	17.09.2015	<p>Mr. Ehtisham, son of the appellant, on behalf of the appellant present. Counsel for the appellant is not in attendance. Seeks adjournment. Adjourned to 20.10.2015 for preliminary hearing before S.B at Camp Court A/Abad.</p> <p style="text-align: right;"> Chairman Camp Court A/Abad</p>


This is an appeal filed by Mst. Hajra Junaid today on 03/06/2015 against the order dated 30.08.2014 against which she preferred/made a departmental appeal on 02.04.2015 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

- 1- Law under which appeal is filed is not mentioned.
- 2- Copy of recovery order mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- ③ Copy of order dated 30.8.2014 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 4- Annexures of the appeal may be attested.

No. 856 /ST,

Dt. 4/6 /2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Chand Bibi Adv. High Court

Resubmitted. The period of 90 days has been lapsed now. moreover all above deficiencies has been fixed.

Chand Bibi
Shah muhammad
Advocates HC
31/7/2015

BEFORE THE K.P.K. SERVICES TRIBUNAL

PESHAWAR KPK

Appeal no.-----8687/2015

HAJRA JUNAID W/O JUNAID R/O SIALKOT, DISTRICT ABBOTABAD

APPEALANT

VERSUS

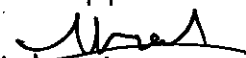
1. DISTRICT EDUCATION OFFICER (FEMALE)

RESPONDENTS

INDEX

S.No	Description of Documents	Annex	pages
01	Appeal along with affidavit		1-6
02	Impugned order dated 30.08.2014 passed by sub divisional education officer (female) Batagram	A	07
03	Copy of departmental appeal	B / 1 B / 2	08 09
04	Office order of sub divisional officer (female) primary batagram dated 27.08.2014	C	10

Appeallant


Through counsel

①

BEFORE THE K.P.K SERVICES TRIBUNAL
PESHAWAR KPK

Appeal no. --- ~~868~~ 868/2015

HAJRA JUNAID W/O JUNAID R/O SIALKOT, DISTRICT ABBOTABAD

APPEALANT

VERSUS

A.W.P. Provincial
Service Tribunal
Diary No. 638
Dated 03-6-2015

- 1. DISTRICT EDUCATION OFFICER (FEMALE)
DISTRICT BHATGARAM. MAIN BHATAGRAM
- 2. S.D.E.O DISTRICT BHATAGRAM, MAIN BHATAGRAM

RESPONDANT

APPEAL AGAINST THE IMPUGNED ORDER DATED
30/08/2014 AND TO RESTRAIN THE RESPONDANTS FROM
THE ILLEGAL DEDUCTION OF THEIR SALARY OF
APPEALANT AND TO START THE INCREMENTS ALONG
WITH ARREARS, v/s 4 of the KPK Service Tribunal
Act 1974

RESPECTFULLY SHEWETH:

1. That briefly stated the fact of the case are that the appellant have
joined the respondent department as teacher in BPS-15 from 31 July

1995.

Filed to-day
Registrar
3/6/15

Re-submitted to-day
and filed.

Registrar
3/7/15

2. That the appellant have been performing their duties from very first day to the satisfaction of their heads and still continue.
3. That one of the false and wrong press report has been published in news paper where the appellant was also include in the wrong statement of the news paper and on the basis of this false and fabricated story the respondent no.1 put the recovery of one year salary in the name of appellant without justifying any legal grounds.
4. That the respondent no.1 has started deduction from the salary of the appellant without giving any plausible reason to deduct said amount from the salary of the appellant.
5. That the respondent issued the letter dated 30.08.2014 and imposed the penalty without any legal justification because under the civil servant law once the employee receive the benefits from their department due to the fault of the department then the department cannot recover that amount.
6. That the appellant is a permanent employee of the respondent department the ACRs are good and there is no complaint against the appellant.
7. That the appellant are being discriminated and being deprived of their legal rights of payment of completes monthly salary. The

deducted amount is rs.5000/- per month which is against the civil servant rules and law. that the respondent no-1 are also stopped two complete salaries of appellant without explaining any legal ground.

8. That the respondents are under obligation to grant the deducted amount to petitioner and stop the further deduction but still the respondent failed to perform their legal duties for which they are bound to fulfill.
9. That the appellant had time and again requested for the cancellation of imposed penalty against appellant but the respondent did not adhere to request and turn deaf ear.
10. That all the acts, deeds and statements of the respondent are illegal and malafide towards the appellant.
11. That article-9 of constitution of the Islamic republic of Pakistan 1973 provides that no person shall be deprived of liberty save in accordance with law. the word life covers all facts of human existence. it does not mean nor can be restricted only to vegetables are animal life or mere existence from conception to death but include all such amenities and facilities which a person born in a free country is entitled to enjoy with dignity, legally and constitutionally.

4

Constitutional rights are higher than the legal rights conferred by law. The right to life includes the right to lawful occupation and livelihood (PLD 1994 SC 693).

12. that article-25 enjoins that all citizen are equal before law which encompasses the concept that all persons similarly circumstanced and liabilities imposed and there should be no discrimination on one citizen and another. (air 1953 sc 250, 1950 SCR 869, 1990 CLC 136, 1992 SCMR 563, 1995 MLD 15)

PRAYER

In the above circumstances it is humbly requested to cancelled the illegal order dated 30-08-2014 and restrain the respondent no-1 from the illegal deduction of 5000/RS from appellant salary and also clear the two complete salaries which the respondent no-1 illegally stopped.

That this honourable tribunal also gives direction to respondent no-1 to release the increments of the appellant for which she entitle under k.p.k service rules also clear the due increments.

Any other relief which this honorable court may deem fit kindly may be granted in the favour of appellant.

63076
APPELLANT

THROUGH


COUNSEL CHANDBIBI.

ADVOCATE HIGH COURT

SHAH MOHAMMAD 

ADVOCATE HIGH COURT

5

BEFORE THE FEDERAL SERVICES TRIBUNAL

PESHAWAR KPK

Appeal No. ___ P(CS)/15

HAJRA JUNAID W/O JUNAID R/O SIALKOT, DISTRICT ABBOTABAD

APPEALANT

VERSUS

1. DISTRICT EDUCATION OFFICER (FEMALE)
DISTRICT BHATGARAM. MAIN BHATAGRAM
2. S.D.E.O DISTRICT BHATAGRAM, MAIN BHATAGRAM

RESPONDANT

APPEAL AGAINST THE IMPUGNED ORDER DATED
30/08/2014 AND TO RESTRAIN THE RESPONDANTS FROM
THE ILLEGAL DEDUCTION OF TRHE SALARY OF
APPEALANT AND TO START THE INCREMENTS AND ALSO
CLEAR THE DUE INCREMENTS.

AFFIDAVIT

I hajra w/o junaid r/o sailkot, district abbotabad
do here by solemnly affirm and declare that the
contents of enclosed appeal are true and correct

to the best of my knowledge and belief and nothing has been concealed there from.

بجی ۵۰۲۶
DEPONENT

That the contents of above affidavit are true and correct to the best of my knowledge and BELIEF and nothing has been concealed there from.

بجی ۵۰۲۶
DEPONENT



Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Sec. 771	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government
Sr PST	BPS: 6.S.R.	-	8000	610	26350		
GGPS: TAMAI			13490	/ =		1-3 2013	Hajra
PSHT	BPS: 15:-	-	8500	700	29500		
GGPS: TAMAI			14100	/ =		1-3 2013	Hajra
-De-			14800	/ =		1-3 2013	
<p>The Competent authority is pleased to impose as pendency of Recovery of Rs 327120/- and her absent period welf 1-12-2012 to 30/11/2013 (12 months) is treated B.O.L with out pay vide DDO (F) Barhey rain office Enclsstt No 4948 dated 30/8/2014</p>							
<p>SUB DIVISIONAL EDUCATION OFFICER (FEMALE) BAITTAGRAJ</p>							
<p><i>Attest</i></p>							

محکمہ صحت جناب DEO (F) ایجوکیشن بیٹ کراچی K.P.K.

جناب عالیہ

صدریالہ التماس ہے کہ سائلہ کے خلاف 30/8/2014 کو ایک آرڈر پاس کیا گیا۔ جس کے تحت ایک سال کی ریٹرنری ڈال دی۔ جوڈسریا سزا ہے۔ سائلہ نے ایک درخواست تمام حاضری ریکارڈ کیا تو 15/10/2014 کو ڈی۔وی۔ای۔(F) کے آفس میں جمع کروادی تھی جس کا ڈائری نمبر 420 ہے۔ لیکن برہنہ سے اس پر کوئی عمل درآمد نہیں ہو سکا۔ صبراً جناب سے التماس ہے کہ سائلہ کے ساتھ انصاف کیا جائے۔ لہذا ریٹرنری معافی کرنے کے احکامات صادر کیے جائیں۔

الغرض

ناگہ خارجی بی بی PS

نوشیروہ صدیق بیٹ کراچی

مورخہ 2-4-2015

Attested
[Signature]

To

ANNEXURE B/2 (9)

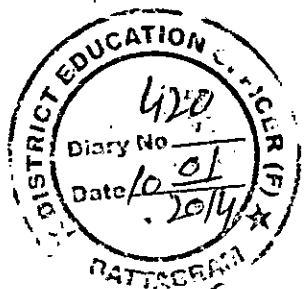
The D.C.O Sahiba

B.S. Se,

Ballegram

Madam, Sub:- { Clarification about the statement
in daily Meshriq about Hajira-Bibi }

With due respect it is stated that
I Hajira-Bibi performing my duties as
Female P.S.T BPS-15 in G.P.S. Matokar
regularly and honestly and there
is no objection or explanation or show
cause to me by any source but ~~the~~
to unknown reason my name is
come in the statement of newspaper.
The proof of my attendance is hereby
attached with this application form -
So in these circumstances you are requested
that please do not consider the newspaper
statement sufficient for disciplinary actions
against me while I am totally innocent.



By Hajira Bibi
G.P.S. Matokar
U.C. Agnera.
Hajira

ANNEX C^o

10

OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER (FEMALE) PRIMARY BATTAGRAM.

TRANSFER ORDER,

As approved by the competent authority the following Primary School Teachers are hereby transferred to the Schools mentioned against each their name with immediate effect in the intrest of public Service.

SNO.	NAME OF TEACHER	FROM	TO	Remarks.
1-	Hajira Bibi	GGPS Matoqar	GGPS Noshera Maidan	Ag; Post.
2-	Hamida Qazi	GGPS Kara Nara	GGPS Matoqar	Vice SNO 1
3-	Saifun Nisa	GGPS Joze	GGPS Kakarshang	Vice SNO 4
4-	Nasim Akhtar	GGPS Kakarshang	GGPS Joze	Vice SNO 3
5-	Shamim Un Nisa	GGPS Sum Randa	GGPS Kolai Ratamori	Ag; V/Post,

Note;.

- 1- Charge report should be submitted to all concerned.
- 2- Necessary entry Should be made in her original service Book.

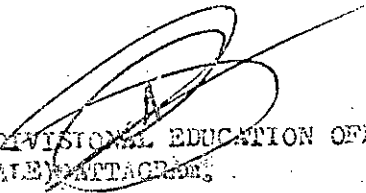
(REHANA YASMIN.)

DISTRICT EDUCATION OFFICER(F)
DISTRICT BATTAGRAM.

Endstt; No. 436-37 / Dated. 28/8/2014 / 2014

Copy to the;.

- 1- District Account office Battagram.
- 2- ASDEO(F) Local office Battagram.
- 3- Head Teacher concerned.
- 4- office copy.


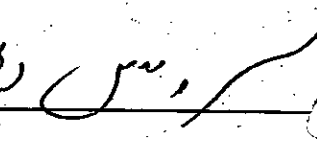

SUB-DIVISIONAL EDUCATION OFFICER
(FEMALE) BATTAGRAM.



وکالت نامہ

قیمتی

کورٹ فیس

بعدالت جناب  سر  روبرو عدالت (10.10.10)

منجانب

مدرسہ اسلامیہ کالج (Madrassah Islamiyah College)


بنام

حاجہ کی بی

باعث تحریر آنکہ

مدرسہ اسلامیہ

دعویٰ یا جرم

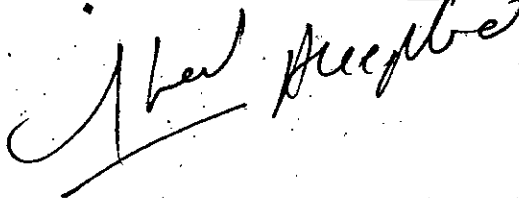
مندرجہ بالا عنوان میں اپنی طرف سے پیروی و جوابدہی مقام  پتہ

حاضر ہوں گا کہ بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص روبرو عدالت حاضر ہوتا ہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر جاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ یا کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل پیروی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام کچہری کے کسی اور جگہ سماعت ہونے پر یا بروز کچہری کے اوقات کے آگے یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھے کل ساختہ پرداختہ صاحب مثل کردہ ذات خود منظور و قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرانے کا ہر قسم کا بیان دینے اور سپرد دہاشی و راضی نامہ و فیصلہ برخلاف کرنے و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یک طرفہ درخواست حکم اتنا ہی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ پیروی مختار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا پیرسٹر کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو۔ پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی پیروی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے کہ سندر ہے۔ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ

حاجہ بی بی





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

Appeal No 868 of 2015.

Mst: Hajira Junaid Appellant

Versus

(1) District Education Officer (Female)

Battagram (Respondent No 1)

(2) S.D.E.O. Battagram (Respondent No 2)

INDEX OF PARAWISE COMMENTS.

S.No	Description	Annexure
1	Parawise reply/comments	
2	ASDEO circle report	A
3	ASDEO circle report	B
4	ASDEO circle report	C
5	ASDEO circle report	D
6	SDEO report	E
7	SDEO report	F
8	Final show cause	G
9	Notification	H

Respondent: _____

**District Education Officer (F)
Battagram**

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL CAMP COURT
ABBOTABAD

Appeal No 868 of 2015.

Mst: Hajira Junaid Appellant

Versus

District Education Officer (Female)

Battagram And others Respondents.

Respectfully shewith:-

PRELIMINARY OBJECTIONS:

- (1) That the appellant has no cause of action.
- (2) That the appellant has no locus standi to file the appeal.
- (3) That the appellant has not come to this Honorable Tribunal with clean hands.
- (4) That the appellant has cancelled the material facts from this Honorable Service Tribunal.
- (5) That the competent authority has imposed the Penalty recovery of absent Period (12 months) after fulfilling all the codal formalities. Hence appeal is liable to be dismissed without any further Proceeding.
- (6) That the appeal is barred by law, hence liable to be dismissed.
- (7) That the instant Appeal is not maintainable in its present form, hence liable to be dismissed.
- (8) That the instant Appeal is liable on the score of misjoinder and non-joinder of necessary parties.
- (9) That any other Ground and Case law will be submitted at the time of humble submission at the bar.

REPLY/COMMENTS ON FACTS:

- (1) Incorrect as stated the appellants has appointed as PST in BPS-7 but not in BPS-15.
- (2) Incorrect: The appellant was not performing her duties to the satisfaction of their heads. On account of her long and willful absence departmental proceeding were initiated against her. Reports of ASDEO circle regarding appellant absence from duty.

Dated 29-04-2012, 20-12-2012, 21-03-2013 and 10-10-2013 are attached as annexures "A", "B", "C" and "D". Report of Sub-Divisional Education Officer (F) Battagram on the basis of report of save the children and ASDEO circle regarding appellant absence from her duty dated 22-11-2013 is attached as annexure "E". The appellant name is at Sr. No 56.

Letter of SDEO (F) Battagram bearing No 320 dated 04-06-2014 for further proceeding to the competent is as authority is attached as annexure "F". In which the appellant is at Sr No 18.

3. Incorrect as stated the action was taken against appellant after fulfilling all the codal formalities. On account of her long and willful absence final show cause notice regarding absence of teacher was published in daily news paper. In final notice it was clearly mentioned that all absent teachers must give reason of their long absence and join the school, otherwise proceeding will be started against them but appellant failed to justify her absent period. Copy of final showcase in daily news paper is attached as annexure "G" in which the appellant name is at S. No 27

(4) Incorrect as stated detail has been given in Para 2 and 3. All the codal formalities have been fulfilled.

(5) Incorrect detail has been given in Para 2 and 3. The appellant has not been performed her duty and remained absent for which the action has been taken against.

6. correct to the extent that appellant is a permanent employee of the respondent department. The remaining para is incorrect. Report of the concerned officers are attached as annexures.

"A" "B" "C" "D" "E" "F" "G"

7. Detail has been give in para 2 and 3. The appellant have reportedly been absent from her duty since 1-12-2012 to 30-11-2013. Absence notice was served upon her by the circle ASDEO (F) Battagram. According to rule 9 of Khyer Pakhtunkhwa Govt Servants (Efficiency and discipline) rules 2011, a final show cause was published in two leading news papers daily "Aaj" and "Shamal Abbottabad. Dated 28-12-2013 with the direction to resume her duty within 14 days of the publication of the notice. The appellant submitted her reply and resume duty wef 01-

03-2014 at GGPS Matoqar. After through examination and perusal of documents and material on record, the competent authority not satisfied from her reply being her willfully been absent wef 1-11-2012 to 30-11-2013 (12 months)

Under section 4, of the Khyber Pakhtunkhwa of Khyber Pakhtunkhwa Govt servants removal from service (E&D) rule 2011, the competent authority imposed minor penalty of recovery of RS 327120/= on account of appellant long and willful absence. Copy of notification is attached as annexure "H"

8. Detail has been given in above paras.

9. Incorrect: The appellant has not been filed appeal to the higher authority. The penalty has imposed upon the appellant on 30-08-2014 and the appellant filed appeal before the Hon: Service Tribunal in Oct, 2015. Time barred, hence liable to be dismissed.

10. In correct and denied

11. In reply to Para No.11 it is pertinent to mention here that the apex courts has also ruled out that no work no pay and in presence of the aforementioned maxim the respondents are not duty bound to release the salary for the absence period rather they were under statutory obligation to deduct the salary from the appellant due to her willful absence from her duty. Further the right corresponds with duty, the clamant of a right has to perform his/her duty first.

12. In reply of Para No.12 it is stated that no discrimination has been made with the appellant. The action was taken against all those persons who were found absent from their duties.

PRAYER

In the light of above comments it is humbly prayed that the appeal of the appellant may

graciously be dismissed with cost please. Any other relief which this honorable court deems proper may also be granted.

1. District education officer (F) Battagram.

Respondent No. 1

2. SDEO (F) Battagram.

Respondent No. 2

Vetted
subject to corrections
& attestation of affidavit.

15.3.16
Additional Govt. Pleader
Abbottabad

BEFORE THE HONOURABLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWN CAMP COURT
ABBOTABAD

Mst: Hajira Junaid appellant


Versus

1. District education officer (F) Battagram.
2. SDEO (F) Battagram.

AFFIDAVIT

I Mst Abida Shaheen District Education Officer (F) Battagram do hereby solemnly affirm and declare that content of accompanying reply to the appeal filed by the appellant are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable court.

Deponent


District Education Officer
(F) Battagram

Office of the Deputy District Officer (Female) Primary Battagram

Tour visit of Mr./Mst: Jukhola Begum

Name: _____

Designation: ADO (F)

Date of School Visit: 29-4-2012

Name of School Visit: LIGPS TAMU

Building: Rent Govt. Not available
Shelter Rooms

Basic Facilities: Water Electricity Sanitation
Boundary Walls Latrines

Staff Statement: Sanctioned Post: Working Conditions Vacant Post

Students Attendance: KG 1st 2nd 3rd
4th 5th

Academic Condition: دورانِ تعلیم کے دوران سکول بائیں درجے بلکہ پانچویں کلاس تک سکول بائیں درجے میں ترقی نہیں ہوئی ہے۔ ان بچوں میں سے بہت سے بچے تعلیم نہیں پاتے اور ان کی تعلیم پر فائدہ نہیں ملتا۔

General Remarks: یہ سہ ماہی کے دوران سکول بائیں درجے میں ترقی نہیں ہوئی ہے۔ ان بچوں میں سے بہت سے بچے تعلیم نہیں پاتے اور ان کی تعلیم پر فائدہ نہیں ملتا۔

Attested
Assistant District Officer
(F) (S & L) Battagram

Jukhola Begum
ADO (F)
29-4-2012

OFFICE OF THE DEPUTY DISTRICT OFFICER
(FEMALE) PRIMARY BATTAGRAM

Tour visit Month of: _____

Name: _____

ZUHIDA BEGUM

Designation: _____

ASDEO E. in D (BTM)

Date of School visit: _____

20 - 12 - 2012

Name of school visit: _____

Building

Rent

Govt

Not available

Shelter

Rooms

Basic facilities

Water

Electricity

Sanitation

Boundary Walls

Latrines

Staff Statement

Sanction post

 3

Working condition

 3

Vacant post

 2

Student attendance

KG

1st

2nd

3rd

4th

5th

Academic Condition

موسم صوف 12/20 کو ڈسٹرکٹ آفیسر نے سرکاری طور پر سرکھوٹا کر دیا ہے۔
تعمیراتی کاموں کا فنڈ بھی بند ہے۔ اس لیے اس وقت کوئی بھی کام نہیں ہو سکتا۔
اس وقت اس اسکول میں 300 سے زائد طلبہ ہیں۔

General Remarks

اسکول میں اساتذہ کرام کی تعداد 10 ہے۔ ان میں سے 6 اساتذہ کرام اس وقت سرکھوٹے ہیں۔
باقی 4 اساتذہ کرام بھی اس وقت سرکھوٹے ہیں۔
اسکول میں اساتذہ کرام کی تنخواہ بھی بند ہے۔

(Handwritten signature)

Deputy District Officer
FIS & L Battagram

MONTHLY REPORT OF PRIMARY GIRLS SCHOOL CIRCLE BATTAGRAM

Visit By Madam. ZUHIDA BELGIUM Designation ASDO F,

School Name LGPS TAMI Date/Day 21-3-2013

Union Council AIMERA

Head Teacher Name LUBNA

Total No. of Teachers 03 Present Teachers 01 onm/leave(01)

Absent Teachers 01 Proxy Teachers (if any) _____

SCHOOL FOUND: (Open/Close)

STUDENTS ATTENDANCE: (Total/ Absent)
KG 20 First 15 2nd 10 3rd 5 4th 9 5th 6

STAFF STATEMENT:

Sanctioned Posts 03 Working Conditions 03 Vacnat Post x

BUILDING:

Rent Govt: Not Available _____ Shelter _____ Rooms 2

BASIC FACILITIES:

Water Toilet Electricity Boundry Wall Play Ground _____

SCHOOL PROGRESS: Normal/Good/Excellent/In Progress

Academic condition _____

General Remarks
پہلے مورخہ 3/21 کو ٹیچر نے پرائمری سکول تاملی کا افتتاح کیا
معاہدہ کیا اور ان سے معاہدہ کیا گیا اور معاہدہ پر معاہدہ کیا گیا
قید سے برضا نے 3/25 تک صبح 7 بجے سے 10 بجے تک اور شام 4 بجے سے 6 بجے تک
درجہ اول سکول سے غائب رہے اور ان کے گھر پر جا کر ان کو سکول کا معاہدہ کرنے کو کہا
ظاہر ہے کہ اس معاہدہ سے سکول میں بہتری آئے گی اور یہ معاہدہ حتمی ہے
Signature _____ Dated _____

Put Up
پرائمری سکول تاملی میں معاہدہ شروع کیا گیا اور ان کے گھر سے معاہدہ کرنے کو کہا
پہلے مورخہ 3/25 تک صبح 7 بجے سے 10 بجے تک اور شام 4 بجے سے 6 بجے تک
درجہ اول سکول سے غائب رہے اور ان کے گھر پر جا کر ان کو سکول کا معاہدہ کرنے کو کہا
ظاہر ہے کہ اس معاہدہ سے سکول میں بہتری آئے گی اور یہ معاہدہ حتمی ہے

Remarks
معاہدہ کرنے کے بعد سکول میں بہتری آئے گی اور ان کے گھر سے معاہدہ کرنے کو کہا
پہلے مورخہ 3/25 تک صبح 7 بجے سے 10 بجے تک اور شام 4 بجے سے 6 بجے تک
درجہ اول سکول سے غائب رہے اور ان کے گھر پر جا کر ان کو سکول کا معاہدہ کرنے کو کہا
ظاہر ہے کہ اس معاہدہ سے سکول میں بہتری آئے گی اور یہ معاہدہ حتمی ہے

put up - copy to DEO (M&F) 2, copy to SDEO F,

Attested
Assistant District Office
(F)(S&L) Battagram

Office (BTM)

Office of the Deputy District Officer (Female), Primary Battagram

Tour visit of Mr/Ms: Zuhida Begum

Name: _____

Designation: ASDEO F, Circle Battagram

Date of School Visit: 10-6-2013

Name of School Visit: LALAPS TAMI

Building: Rent Govt. Not available
 Slaters Rooms

Basic Facilities: Water Electricity Sanitation
 Boundary Walls Latrines

Staff Statement: Sufficient Post: Working Conditions: Vacant Post:

Students Attendance: KG $\frac{5}{15}$ 1st $\frac{10}{15}$ 2nd $\frac{3}{10}$ 3rd $\frac{4}{7}$
 4th $\frac{2}{7}$ 5th $\frac{1}{7}$

Zuhida Begum
 Assistant District Officer
 (F) (S & L) Battagram

General Remarks:

میں نے فورم 6/2013 کا نو درجہ بانڈ سکول کا اچانک معائنہ کیا۔
 دوران معائنہ صیغہ تعلیم بہن حاضرہ در معروف کارڈ لایا گیا
 جو کنڈر ایچ آر گڈ ہیں حاضرہ پاپا گیا۔ تعلیم رضوانہ 6/2013
 سے چھٹی درجہ میں ہیں جب کہ سکول معائنہ کیے جاتی ہوں تو رضوانہ
 کہیں صیغہ تعلیم کی جمع ہر حوثی ہے۔ اور کہیں دوسری قسم کی
 نہ جو صیغہ کے بعد اس کا علم ہے اور نہ ہی اس بانڈ کا علم ہے کہ کوئی نہیں پڑھتا ہے
 اسکے معروضہ میں حاضرہ لایا 4/19 سے سکول 6/2013 میں معائنہ غیر حاضرہ
 پاپا گیا ہے۔ تعلیم حاضرہ کو صرف محکمہ کارڈ لایا گیا ہے۔
 اور حوثی طور پر ریسی جنسی اور بند کرنے کا حکم صادر فرمایا ہے (انفرین بائبل)
 ان کا پی ہر کے اظہار ڈی ای او سر دانہ در زمانہ حیدر میں بشترام
 ان کا پی ہر کے اظہار ڈی ای او زمانہ پیر اٹری آفس بشترام

Zuhida Begum
 ASDEO
 (F)

Annexure E

LIST OF ABSENT TEACHER ACCORDING TO THE REPORT OF SAVE THE CHILDREN, & ASDEO Report.

- 1- Walayat Shaheen
- 2- Ghazala Bibi PST GGPS Battian
- 3- Naheed Bibi PST GGPS Rajdari.
- 4- Sanawar Sultana PST Chino Rajdari.
- 5- Musarat Bagam. -do-
- 6- Chaman Pari Jozw.
- 7- Farhat Jehan Ajmera.
- 8- Rukhsana Bibi Ajmera.
- 9- Farah Naz GGPS Kocha Abdul Hai.
- 10- Jamila Bibi Malayno Piza.
- 11- Zakia Bibi GGPS Kalota.
- 12- Samina PST GGPS Ranja Pazzang.
- 13- Naz Gul PST GGPS Gangwal.
- 14- Nazia Hussain Khan GGPS ~~Soorgai~~ Soorgai.
- 15- Bibi Nasreen PST GGPS Soorgai.
- 16- Saeeda Bibi PST GGPS Kass Gangwal.
- 17- Sajida Khan -do-
- 18- Nazia Sardar GGPS Cheran Mattak.
- 19- Alia Qazi PST GGPS Socal Seri.
- 20- Gul Bibi PST GGPS Jangar Karso.
- 21- Mehnaz Yousaf PST GGPS Jangar Toba.
- 22- Bibi Sherin PST GGPS -do-
- 23- Zakia PST GGPS Jesole.
- 24- Hussan Bano -do-
- 25- Saeeda PST GGPS Deshar SaBargah.
- 26- Rukhsana PST
- 27- Amina Gul PST GGPS Kaktai.
- 28- Safia PST GGPS Jatyal.
- 29- Shabana Bibi PST GGPS Mera Ajmera.
- 30- Nasrat Bibi GGPS Mera Ajmera.
- 31- Rahat Naz PST GGPS ~~Masoom Abad~~ Masoom Abad.
- 32- Shamim PST GGPS Gangwal.
- 33- Jehan Pervaiz
- 34- Shahida Bibi PST GGPS Kocha Abdul Hai.
- 35- Shumaila Afzal Kaloota.
- 36- Asia Ismail PST GGPS Batkbi Kalay.
- 37- Zahida Bibi PST GGPS Kontar Gat.
- 38- Zakia PST GGPS Teloos.
- 39- Taj Bagam PST -do-
- 40- Saeena PST -do-
- 41- Shakila Naz. -do-
- 42- Zenat Bagam PST GGPS Jaba Asharband.
- 43- Rahat Bagam PST GGPS Tandool Bala.
- 44- Hussan Pari. -do-
- 45- Saima Bibi PST GGPS Raehang.
- 46- Bibi Shahida PST GGPS Pora Zardad.

- 47- Shamim Rehman PST GGPS Pora Zardad.
- 48- Roman Shah PST GGPS Lakhri Khwar.
- 49- Noshad Kanoor PST GGPS Gangwal Kass.
- 50- Naz Gul. PST -do-
- 51- Wahida PST GGPS Kassai.
- 52- Zenat Bibi PST GGPS Jaba Asharband.
- 53- Bibi Sherin PST GGPS Kannai.
- 54- Yasmin PST GGPS Kannai.
- 55- Shakila Bibi PST GGPS Kadlow.
- 56- Hajira Bibi PST GGPS Tamai. ✓
- 57- Asifa Rehman ~~PST~~ GGPS Banda Rupkani.
- 58- Nazish. PST GGPS Tranger.
- 59- Zahida PST GGPS Tranger.

List of Absent Teacher is are hereby submitted for farther necessary action
Please,

SUB-DIVISIONAL EDUCATION OFFICER
FEMALE PRIMARY BATTAGRAM.

Sun 22/12/13

*P.A
put up on file
to issue show
and initial
proceeding
EAD or
SDE
AK*

Anne wif

OFFICE OF THE SUB-DIVISIONAL EDUCATION OFFICER (FEMALE) BATTAGRAM.

NO. 320

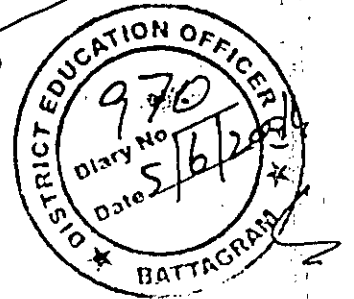
Dated. 4/6/2014

To, The District Education officer
Female Battagram.

Subject; SHOWCASE NOTICE.

Memo;. Enclosed please find herewith the reply of showcase notice of the following primary Schools Teachers(F) alongwith original application Service books attendance registers with comments of Circle ASDEO(F) and the undersigned for further the decession/process please,

SNO.	Name of Teachers	Name of School.
1-	Sumaila Afzal.	GGPS Kakarshang. ✓ P
2-	Bibi Shahida	GGPS Barpow Gijbori.
3-	Safia Bibi	GGPS Jatyal (Now Retired.) ✓ P
4-	Zenat Bibi	GGPS Asharband Now GGPS Karwar. ✓ P
5-	Zenat Bagam	GGPS Asharband Now GGPS Bansair. ✓ P
6-	Bibi Jamila	GGPS Malyano Now GGPS Battagram. ✓ P
7-	Rukhsana	GGPS Mera Ajmera. ✓ P
8-	Gul Bibi	GGPS Janger Karso. Now GGPS Shagai. ✓ P
9-	Saima Bibi	GGPS Rashang Now GGPS Chanjal. ✓ P
10-	Zakia	GGPS Jesole Qila X
11-	Chaman Pari.	GGPS Joze. ✓ Retire
12-	Naheed.	GGPS Rajdari. ✓
13-	Farhat Jehan	GGPS Mera Ajmera Now Retire. ✓
14-	Shakila Bibi	GGPS Kadlow. ✓ P
15-	Sanawar Sultana	GGPS Chino Rajdari. ✓ P
16-	Nusrat Bibi	GGPS Mera Ajmera. ✓ P
17-	Nurtat Shaheen	GGPS Chino Rajdari. ✓ P
18-	Hajira Bibi	GGPS Tamai. ✓ P
19-	Rahat Naz.	GGPS Masoom Abad. ✓ P
20-	Romana Shad.	GGPS Lakhri Khwar. ✓ P
21-	Naz Gul	GGPS Tarkhay.
22-	Bibi Sherin Talizar	GGPS Janger Toba.
23-	Gul Shahida	GGPS Karrag.
24-	Walayat Naheen ✓	GGPS Sultan Abad. ✓
25-	Bibi Nasren	GGPS Soorgai.
26-	Asia Ismail.	GGPS Batkol Kalay.
27-	Shakila Naz	GGPS Tailloos.
28-	Hussan Pari	GGPS Tandol Bala.
29-	Jehan Zari	GGPS Nogram.
30-	Noshad Kanowal	GGPS Gangwal.
31-	Amina Gul.	GGPS Kaktai.
32-	Ghazala Shaheen	GGPS Battian.
33-	Farah Naz	GGPS Kucha Abdul Hai.
34-	Wahida Bibi	GGPS Kassai.
35-	Sajida Khan	GGPS Gangwal.
36-	Taj Bagam	GGPS Tailloos.
37-	Bibi Zakira	GGPS Tailloos.
38-	Nazak Gul.	GGPS Ranja Pazang.
39-	Raheeda Bagam	GGPS Quntar Kat.
40-	Rahat Bagam	GGPS Tamai.
41-	Shamim.	GGPS Pora Zardad Now Retired. ✓
42-	Saeeda Bibi.	GGPS Gangwal Now Retired. ✓
43-	Shabana Bibi	GGPS Mera Ajmera (Retired on Medical ground)



Handwritten signature and initials, possibly 'Jib' and '40'.

SUB-DIVISIONAL EDUCATION OFFICER
FEMALE PRIMARY BATTAGRAM.



Annexure H.

OFFICE OF THE DISTRICT EDUCATION OFFICER (F)
NEAR SKY HAWK PUBLIC HIGH SCHOOL
AND COLLEGE BATTAGRAM
PH# 0997-310460

NOTIFICATION.

WHEREAS, Mstt: Hajira Bibi PST GGPS TAMAI have reportedly been absent from her duty since 1.12.2011 to 30/11/2013. An absence notice was served upon her by the Circle ASDEO (F) Battagram.

AND WHEREAS, A show cause notice was also served upon her by the competent authority vide her office Endstt: No, _____ Dated _____ / /2014.

AND WHEREAS, according to rule 9 of Khyber Pakhtunkhwa Government servants (Efficiency & discipline) Rules 2011, a final show cause notice was published in two leading newspapers daily "Aaj and Shamal Abbottbad" Dated 28.12.2013 with the direction to resume her duty within 14 days of the publication of the notice and she submitted her reply and resumed duty w.e.f. 01-03-2014 at GGPS Matogay

AND WHEREAS, after thoroughly examination and perusal of documents and material on record, the competent authority is not satisfied from her reply and she has willfully been absent w.e.f. 1.12.2012 to 30/11/2013 (12 Months)

1. NOW, THEREFORE, In the exercise of powers conferred under section 4, of the KHYBER PAKHTUNKHWA GOVERNMENT SERVANTS Removal from service (E&D) Rule 2011, the competent authority is pleased to impose minor penalty of recovery of Rs, 327120/2/- upon her on account of her willful absence w.e.f, _____ to _____ and her absence period is converted in to leave without pay. The recovery may either be at once or on monthly deduction basis from her monthly salary as convenient to her at the rate of not less than Rs, 5000/- per month. The amount deducted/recovered may be deposited in to government treasury through challan under intimation to this office and proper entry to this effect may also be made in her service book.

Sd

Rehana Yasmin.

District Education Officer (F)

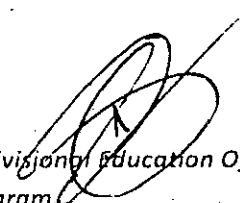
Battagram.

Dated Battagram the 30/8/05.2014

Endstt: No. 4948

Copy forwarded to the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Battagram.
3. PSHTs of concerned Schools.
4. PST Concerned.
5. PA to DEO (F) Local office.


Sub-Divisional Education Officer (F)
Battagram.

BEFORE THE FEDERAL SERVICES TRIBUNAL

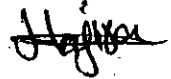
PESHAWAR KPK

Appeal no.----P(CS)/2015

HAJRA JUNAID W/O JUNAID R/O SIALKOT, DISTRICT ABBOTABAD

APPEALANT

VERSUS



1. DISTRICT EDUCATION OFFICER (FEMALE) RESPONDENTS.

APPLICATION FOR SUBMISSION OF REJOINDER IN ABOVE
APPEAL

PRELIMINARY OBJECTION.

1. Not correct.
2. Not correct.
3. Not correct.
4. Not correct.
5. Not correct.
6. Not correct.
7. Not correct.
8. No comments.
9. No comments.

REPLY PARA WISE.

1. Legal no comments.
2. Incorrect , appellat perform her duty to the satisfaction of their heads. And her duty roaster shows her appearance on duty and also clear the stance of the appellat.(ANX—A)
3. incorrect ,no codal formalities has been completed by the respondents against the appellat. No inquiry has been initiated against appellat before passing the penalties, and if there is any proper evidence on record than submit in the tribunal.
4. Incorrect.
5. Incorrect. Her attendance list attached with this rejoinder.



6. Incorrect.

7. Incorrect.

8. Incorrect.

9. Incorrect.

10. Incorrect.

11. Incorrect.

12. Incorrect.

PRAYERS.

It is humbly request to accept the rejoinder and cancelled the impugned order dated 30-08-2014.any other relief this hounrable tribunal may deem fit kindly be granted.



APPEALLANT THROUGH

COUNSEL

CHANDBIBI ADVOCATE HIGH COURT.

BEFORE THE FEDERAL SERVICES TRIBUNAL

PESHAWAR KPK

Appeal no.-----P(CS)/2015

HAJRA JUNAID W/O JUNAID R/O SIALKOT, DISTRICT ABBOTABAD

APPEALANT

Hajra Junaid

VERSUS

1. DISTRICT EDUCATION OFFICER (FEMALE)

RESPONDENTS.

2. APPLICATION FOR SUBMISSION OF REJOINDER IN ABOVE

APPEAL

AFFIDAVIT

I hajra junaid W/O junaid R/O sialkot, district abbotabad. do here by solemnly affirm and declare that the contents of the accompanying application are true and correct to the best of my knowledge and belief and nothing has been concealed or misstated there in.

Hajra Junaid
Deponent.

CERTIFICATE

It is certified that, as per instructions of the appealant, no such application has earlier been filed in this Hon'ble tribunal nor in the supreme court.

Hajra Junaid
Deponent.

رقم 2 میسر
 6 جیٹا
 11/12/2012
 (A-A)
 ریجنل مینسٹر
 ڈائریکٹوریٹ برائے تعلیمات
 بابت ماہ ستمبر
 2012

پہلی شیفٹ		دوسری شیفٹ		P.S-T		P.S-T		رقم
1	1:00	8:30				1:00	8:00	
2	1:00	8:30	XXXX	XXXX	SUNDAY	XXXX	XXXX	
3	1:00	8:30				1:00	8:00	
4	1:00	8:30				1:00	8:00	
5	1:00	8:30				1:00	8:00	
6	1:00	8:30				1:00	8:00	
7	1:00	8:30				1:00	8:00	
8	1:00	8:30				1:00	8:00	
9	1:00	8:30				1:00	8:00	
10	1:00	8:30				1:00	8:00	
11	1:00	8:30				1:00	8:00	
12	1:00	8:30				1:00	8:00	
13	1:00	8:30				1:00	8:00	
14	1:00	8:30				1:00	8:00	
15	1:00	8:30				1:00	8:00	
16	1:00	8:30	XXXX	XXXX	SUNDAY	XXXX	XXXX	
17	1:00	8:30				1:00	8:00	
18	1:00	8:30				on Leave		
19	1:00	8:30				on Leave		
20	1:00	8:30				1:30	8:00	
21	1:00	8:30				1:30	8:00	
22	1:00	8:30				1:30	8:00	
23	1:00	8:30				1:30	8:00	
24						SUNDAY		
25								
26								
27								
28								
29								
30								
31								

che
 [Signature]

گورنمنٹ گرلز ہیرالمیری سکول تمامائی
 راجپوت حاضری مدرسہ

2013

بابت ماہ مارچ

پہلے وقت (8:30)		دوسرا وقت (1:30)		تیسرا وقت (P.T.C)		رقم
11:30	8:30	R.B	11:30	R.B	8:30	1
1:30	8:30	R.B	1:30	R.B	8:30	2
SUNDAY						
1:30	8:30	R.B	1:30	R.B	8:30	4
Absent Cleve		R.B	1:30	R.B	8:30	
1:30	8:30	R.B	1:30	R.B	8:30	
1:30	8:30	R.B	1:30	R.B	8:30	
11:30	8:30	R.B	11:30	R.B	8:30	
1:30	8:30	R.B	1:30	R.B	8:30	
SUNDAY						
1:30	8:30	R.B	1:30	R.B	8:30	
1:30	8:30	R.B	1:30	R.B	8:30	
1:30	8:30	R.B	1:30	R.B	8:30	
1:50	8:30	R.B	1:30	R.B	8:30	
1:30	8:30	R.B	11:30	R.B	8:30	
1:50	8:30	R.B	1:30	R.B	8:00	
SUNDAY						
1:30	8:30	R.B	11:30	R.B	8:00	
1:30	8:30	R.B	1:30	R.B	8:00	
1:30	8:30	M. K. K. K.				
1:30	8:30					
11:30	8:30					
SUNDAY						
1:50	8:30	R.B	1:30	R.B	8:00	
1:50	8:30	R.B	1:30	R.B	8:00	
1:30	8:30	R.B	1:30	R.B	8:00	
1:50	8:30	R.B	1:30	R.B	8:00	
11:30	8:30	R.B	1:30	R.B	8:00	
1:30	8:30	R.B	1:30	R.B	8:00	
SUNDAY						

etc

روزگار حاضری مدرسه
گورنمنٹ کالج برائے لڑکیاں سکول ٹائی

13/05/20

بابت ماہ اپریل

بابت ماہ اپریل		بابت ماہ اپریل		بابت ماہ اپریل		بابت ماہ اپریل		بابت ماہ اپریل		بابت ماہ اپریل	
Sunday											
1:30	8:30	R:B	1:30	R:B	8:30						
1:30	8:30	R:B	1:30	R:B	8:30						
1:30	8:30	R:B	1:30	R:B	8:30						
1:30	8:30	R:B	1:30	R:B	8:30						
1:30	8:30	R:B	11:30	R:B	8:30						
1:30	8:30	R:B	1:30	R:B	8:30	1:30	8:30				
Sunday											
1:30	8:30	R:B	1:30	R:B	8:30	1:30	8:30				
1:30	8:30	R:B	11:30	R:B	8:30	1:30	8:30				
1:30	8:30	R:B	1:30	R:B	8:30	1:30	8:30				
1:30	8:30	R:B	1:30	R:B	8:30	1:30	8:30				
1:30	8:30	R:B	11:30	R:B	8:30	11:30	8:30				
1:30	8:30	R:B	1:30	R:B	8:30	1:30	8:30				
Sunday											
1:30	8:30	R:B	1:30	R:B	8:30	1:30	8:30				
1:30	8:30	R:B	11:30	R:B	8:30						
1:30	8:30	R:B	11:30	R:B	8:30	1:30	2:00				
1:30	8:30	R:B	11:30	R:B	8:30	11:30	8:00				
1:30	8:30	R:B	1:30	R:B	8:00	1:30	8:00				
Sunday											
1:30	8:30	R:B	1:30	R:B	8:00	1:30	8:00				
1:30	8:30	R:B	1:30	R:B	8:00	1:30	8:00				

Handwritten signature or initials.

رجسٹر حاضرین مدرسہ سائنس

2013

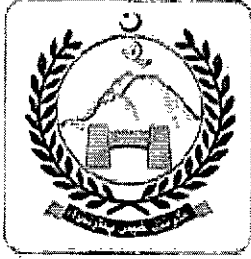
(17)

بابت ماہ

عامہ کلاس

روز		وقت		اساتذہ		اساتذہ		اساتذہ		رقم
16	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				16
SUNDAY										
17	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				17
18	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				18
19	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				19
20	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				20
21	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				21
SUNDAY										
22	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				22
23	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				23
24	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				24
25	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				25
26	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				26
27	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				27
28	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				28
29	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				29
SUNDAY										
30	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				30
31	11:30	8:30	R:B 1:30	R:B 8:30	1:30	8:30				31

C. Leave



KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

No. 1978 /ST Dated: 3/8 /2017

All communications should be addressed to the Registrar KPK Service Tribunal and not any official by name.

Ph:- 091-9212281
Fax:- 091-9213262

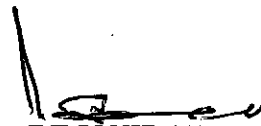
To,

The Sub Divisional Education Officer (Female),
Government of Khyber Pakhtunkhwa,
Bhatagram.

Subject: - **JUDGMENT IN APPEAL NO. 868/2015, MST. HAJRA JUNAID.**

I am directed to forward herewith a certified copy of judgment dated 21/08/2017 passed by this tribunal on the above subject for strict compliance.

Encl: as above


REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR