

28.04.2023

Appellant present through counsel.

Muhammad Jan, learned District Attorney for respondents present.

Learned Member Executive (Mr. Muhammad Akbar Khan) is on leave, therefore, case is adjourned. To come up for arguments on 19.05.2023 before D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar

Mutazem Shah



(Rozina Rehman)
Member (J)

19.05.2023

Learned counsel for the appellant present. Mr. Muhammad Nazir, ADEO alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

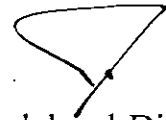
Learned counsel for the appellant requested for adjournment on the ground that he was not feeling well, therefore, he has not gone through the record. Adjourned. The appeal in hand pertains to the year 2014, therefore, learned counsel for the appellant shall positively argue the appeal on 02.06.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
KPST
Peshawar



(Muhammad Akbar Khan)
Member (E)

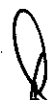
Naeem Amin



(Salah-ud-Din)
Member (J)

14th Dec. 2022

Due to strike of the Bar and Mrs. Rozina Rehman, learned Member (J) being on leave, this matter is adjourned to 21.02.2023 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.


(Fareeha Paul)
Member(E)

21.02.2023

Bench is incomplete, therefore, case is adjourned to 06.04.2023 for the same as before.


Reader

06.04.2023


Nemo for parties.


SCANNED
KPST
Peshawar


Asif Masood Ali Shah learned Deputy District Attorney for respondents present.

Preceding date was adjourned on a Reader's Note, therefore,

both the parties be put on notice for 28.04.2023 for hearing before D.B.


(Muhammad Akbar Khan)
Member (E)

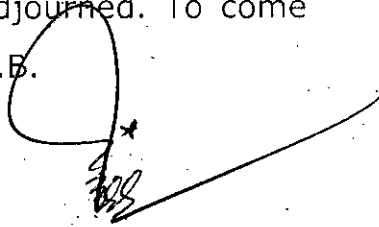

(Rozina Rehman)
Member (J)

On 19/04/23, the counsel was informed telephonically for the date fixed (28/04/2023)

Moharrir

19.09.2022

Learned counsel for the appellant present. Mr. Muhammad Nazir, ADEO (Litigation) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for official respondents No. 1 & 2 and counsel for private respondent No. 4 present.


Learned Member (Judicial) Mr. Salah-ud-Din is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 04.11.2022 before the D.B.


(Mian Muhammad)
Member (Executive)

4th Nov. 2022

Lawyers are on strike today.

To come up for arguments on 14.12.2022 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.


(Fareeha Paul)
Member(E)


(Kalim Arshad Khan)
Chairman


FRONT
19/09/2022

19/09/2022

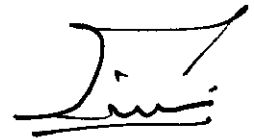
09.05.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for respondents present.

Learned counsel for the appellant again requested for adjournment on the ground that he has not made preparation for arguments. The appeal in hand pertaining to the year 2014, therefore, last opportunity granted. To come up for arguments before the D.B on 20.05.2022.



(Mian Muhammad)
Member(E)



(Salah Ud Din)
Member(J)

20.05.2022

Counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Due to paucity of time, arguments could not be heard. Therefore, case is adjourned. To come up for arguments on 19.07.2022 before the D.B.



(Rozina Rehman)
Member (J)



(Salah-Ud-Din)
Member (J)

19.07.2022

Appellant present through counsel.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General for respondents present.

Former made a request for adjournment as he has not prepared the brief. Adjourned by way of last chance. To come up for arguments on 19.09.2022 before D.B.



(Fareeha Paul)
Member(E)



(Rozina Rehman)
Member (J)

13.09.2021

Appellant present through counsel.

Asif Masood Ali Shah learned Deputy District Attorney for the respondents present.

Former made a request for adjournment. Request is accorded. To come up for arguments on 29.12.2021 before D.B.



(Rozina Rehman)
Member (J)



Chairman

29/12/2021.

Due to winter vacations the case is adjourned to 18/3/2022 for the same as before.



18.03.2022

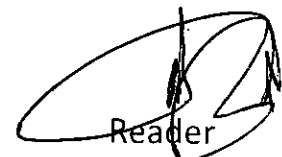
Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 09.06.2022 for the same as before.



Reader.

15.04.2022

As per directions of the worthy Chairman the instant case be refixed on 09.05.2022 instead of 09.06.2022. Notices of prosecution of appeal be issued to the parties for the date fixed.



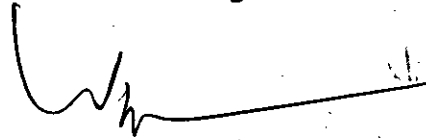
Reader

27.05.2021

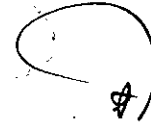
Appellant present through counsel.

Muhammad Adeel Butt Additional Advocate General
alongwith Muhammad Nazeer ADO for respondents
present.

Former requests for adjournment; adjourned to
13.08.2021 for arguments before D.B



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

13.08.2021

Appellant present through counsel.

Javid Ullah learned A.A.G for respondents present.

It has been pointed out by learned A.A.G that four other
appeals involving the similar questions of fact and law, are fixed for
13.09.2021. Let this appeal be posted for hearing alongwith other
appeals on 13.09.2021 before D.B.



(Rozina Rehman)
Member (J)

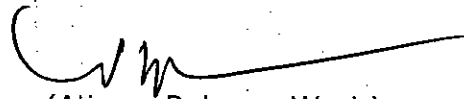


Chairman

13.01.2021

Counsel for the appellant and Addl. AG for the respondents present.

Former requests for adjournment as he is engaged before the Hon'ble High Court in various cases today. Adjourned to 19.02.2021 for hearing before the D.B.



(Atiq-ur-Rehman Wazir)
Member(E)



Chairman

19.02.2021

Counsel for the appellant and Addl. AG along with Muhammad Nazir, AD and Muhammad (Sagged) Litigation Officer for the respondents present.

Former requests for adjournment as the appellant could not turned up before the Tribunal today and submit the documents relevant to the appeal in hand. Adjourned to 23.04.2021 before the D.B.



(Mian Muhammad)
Member(E)



Chairman

28.4.2020

Due to COVID19, the case is adjourned to
8/7/2020 for the same as before.


Reader

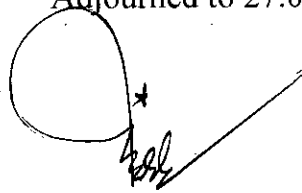
10.07.2020


Junior to counsel for the appellant present.

Addl: AG for respondents present.

Junior to counsel for the appellant seeks adjournment
as senior counsel is not available today.

Adjourned to 27.08.2020 for arguments before D.B.


(Mian Muhammad)
Member(E)


(Rozina Rehman)
Member(J)

27.08.2020

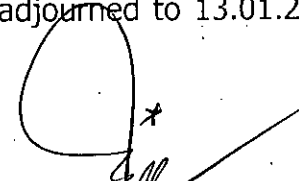
Due to summer vacation, the case is adjourned to
03.11.2020 for the same as before.


Reader

03.11.2020

Junior to counsel for the appellant and Addl. AG for
the respondents present.

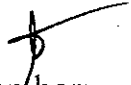
The Bar is observing general strike, therefore, the
matter is adjourned to 13.01.2021 for hearing before the
D.B.



(Mian Muhammad)
Member


Chairman

28.11.2019


Due to general strike of the Pakistan Bar Council, the case is adjourned. To come up on 24.01.2020 before D.B. Muhammad Nazeer ADEO representative of the respondent department present.



Member


Member

24.01.2020

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council learned counsel for the appellant is not available today. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Adjourned to 13.03.2020 for further proceedings/arguments before D.B.


(M. Amin Khan Kundi)
Member


(Hussain Shah)
Member

13.03.2020

Counsel for the appellant present. Mr. Muhammad Jan, DDA for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 28.04.2020 before D.B.


Member


Member

01.03.2019

Appellant in person and Addl. AG for the respondents present.

Due to general strike on the call of Bar Association instant matter is adjourned to 26.04.2019 before the D.B.



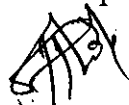
Member



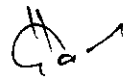
Chairman

26.04.2019

Due to general strike of the bar, the case is adjourned. To come up for arguments on 08.07.2019 before D.B.



Member



Member

08.07.2019

Counsel for the appellant and Addl: AG for respondents present. Learned counsel for the appellant seeks adjournment as he has not prepared the case. The case pertains to the year 2014, therefore, last opportunity granted for arguments. Case to come up for arguments on 24.09.2019 before D.B.



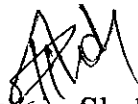
Member



Member

24.09.2019

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Mr. Muhammad Nazir, ADO for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned to 28.11.2019 for arguments before D.B.



(Hussam Shah)

Member



(M. Amin Khan Kundi)

Member

18.10.2018

Learned counsel for the appellant Mr. Zia Ullah learned Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for and arguments on 03.12.2018 before D.B.



(Hussain Shah)
Member


(Ahmed Hassan)
Member

03.12.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 23.01.2019 before D.B.



(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

23.01.2019

Uzma Said, Junior counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel for the appellant is busy before the Hon'ble Peshawar High Court, Peshawar and cannot attend the Tribunal today. Adjourned to 01.03.2019 for arguments before D.B.


(HUSSAIN SHAH)
MEMBER


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

13.08.2018

Mr. Amjid Khan, Advocate counsel for the appellant present. Mr. Muhammad Riaz Paindakhel, Asst: AG for respondents present. Learned counsel for the appellant stated that other connected appeals are fixed on 04.10.2018, as such the appeal in hand is adjourned to the said date i.e 04.10.2018 for arguments before D.B.



Member


Chairman

04.10.2018

Appellant absent. Learned counsel for appellant absent. Mr. Muhammad Jan learned Deputy District Attorney present. Adjourned. To come up for arguments on 18.10.2018 before D.B.

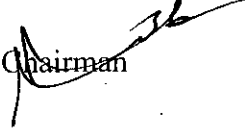

(Hussain Shah)
Member


(Muhammad Hamid Mughal)
Member

7.2.2018

Counsel for the appellant and Addl. AG for the respondents present. Due to shortage of time, arguments could not be heard. To come up for arguments on 28.02.2018 before the D.B.


Member


Chairman

28.02.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 11.04.2018 before D.B.



Member (Executive)



Member (Judicial)

11.04.2018

Learned counsel for the appellant and Mr. Kabir Ullah Khattak, learned Additional Advocate General alongwith Dil Jan Superintendent for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 22.06.2018 before D.B



(Ahmad Hassan)
Member



(Muhammad Hamid Mughal)
Member

22.06.2018

Counsel for the appellant present. Mr. Ziaullah, Deputy District Attorney for the respondents also present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 13.08.2018 before D.B.



(Ahmad Hassan)
Member

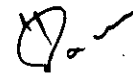


(Muhammad Amin Khan Kundi)
Member

21.09.2017


Junior to counsel for the appellant present. Kabir Ullah Khattak, Learned Assistant Advocate General for the respondents present. Junior to counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 16.10.2017 before D.B.

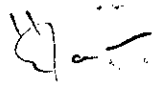

Member
(Executive)


Member
(Judicial)

16.10.2017

Counsel for the appellant present. Mr. Muhammad Jan Deputy District Attorney for the respondents present. To come up alongwith connected appeals for 21.12.2017 before D.B.


(Ahmad Hassan)
Member (E)


(Muhammad Hamid Mughal)
Member (J)

21.12.2017

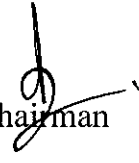
Due to Judicial Officer's Conference today, case is adjourned to 07.02.2018 for the same before the D.B.


Reader

24.01.2017


Agent to counsel for the appellant and Mr. Abdul Shakoor, Assistant Account Officer alongwith Addl: AG for respondents present. Agent to counsel for the appellant requested for adjournment as counsel for the appellant was busy before the Peshawar High Court, Peshawar. To come up for arguments on 20.06.2017 before D.B.


Member


Chairman

20.06.2017

Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 10.08.2017 before D.B.



(Muhammad Amin Khan Kundi)
Member


(Gul Zeb Khan)
Member

10.08.2017

Counsel for the appellant present. Mr. Kabirullah Khattak, Assistant AG for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 21.09.2017 before D.B.


(Muhammad Amin Khan Kundi)
Member (J)


(Muhammad Hamid Mughal)
Member (J)

SCANNED
K
Peshawar

22.07.2016

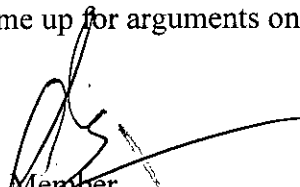
Counsel for the appellant and Mr. Pir Iqbal, Supdt. alongwith Assistant AG for respondents present. Assistant AG argued that the similar nature cases have already been fixed on 19.8.2016 therefore, the instant appeals may be clubbed ^{with} ~~on~~ other connected cases. To come for arguments on 19.8.2016.


Member


Member

19.08.2016

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 2-11-16.


Member


Member

02.11.2016


Counsel for the appellant and Asst:AG alongwith Mr. Hameed ~~Ur~~ Rehman, AD(Lit) and Dil Jan, Supdt for the respondents present. Learned Asst: AG requested for adjournment. To come up for arguments on 24.01.2017.


(ABDUL LATIF)
MEMBER


(PIR BAKHSH SHAH)
MEMBER

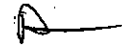
28.07.2015

Mr. Asmatullah on behalf of the appellant, M/S Amanullah, Supdt. and Khurshid Khan, SO alongwith Addl: A.G for respondents present. Comments on behalf of respondents No. 1 to 3 submitted. The learned Addl: A.G rely on the same on the behalf of the respondent No. 4. The appeal is assigned to D.B for rejoinder and final hearing for 25.11.2015.


Chairman

25.11.2015

Counsel for the appellant and Asst: AG for respondents present. Rejoinder submitted on behalf of the appellant which is placed on file. To come up for arguments on 31/3/16


Member

31.03.2016

Counsel for the appellant and Mr. Pir Iqbal, Supdt alongwith Asstt: AG for respondents present. Counsel for the appellant requested for adjournment. To come up for arguments on 22.07.2016.


MEMBER
MEMBER

8.

15.04.2015

Ms. Uzma Sayed, Advocate on behalf of counsel for the appellant, M/S Amanullah Khan, Supdt for respondent No.1 and Akram Marwat, Supdt for respondents No.3 and 4 alongwith Asstt: AG present. Counsel for the appellant is not in attendance due to strike of the Bar. Adjourned for preliminary hearing to 29.04.2015 before S.B.


Chairman

9

29.04.2015

Counsel for the appellant and Mr. Amanullah, Supdt. alongwith Assistant A.G for respondents present. Learned counsel for the appellant argued that vide impugned order dated 27.7.2012 appellant was terminated from service where-after she preferred departmental representation on 23.8.2012 and there-after she filed Civil Suit which was returned for want of jurisdiction and hence the instant service appeal on 29.5.2014.

That the services of the appellant were terminated on the ground of fake appointment on the basis of fake documents. That no inquiry whatsoever was conducted against the appellant.

Learned Assistant A.G refuted the arguments and argued that the very appointment of the appellant was based on fake documents.

In view of the afore-stated controversy, the appeal is admitted to regular hearing, subject to all just and legal exceptions. Security and process fee be deposited within 10 days, where-after notices be issued to the respondents for written reply for 28.7.2015 before S.B.


Chairman

2/1/15

Appellant Deposited
Security & Process Fee





17.10.2014

Counsel for the appellant and M/S Amanullah Khan, Supdt

for respondent No.1 and Akram Marwat, Supdt for respondent


No.3 and 4 with Mr. Kabirullah Khattak, Asst: Advocate General

for the respondents present. Preliminary arguments partly heard.

Representatives of the respondents are directed to submit

complete record of the appellant. To come up for further


preliminary hearing on 19.12.2014.


Member

6. Reader Note:

19.12.2014

No one is present on behalf of the appellant and Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Since the Tribunal is incomplete, therefore, case is adjourned to 03.03.2015 for the same.


Reader

7. 03.03.2015

Counsel for the appellant and Asst: AG for the respondents present. Learned Asst: AG requested for adjournment. Adjourned to 15.04.2015 for preliminary hearing before S.B.


Member

3,
11.08.2014

Counsel for the appellant present. Preliminary arguments partly heard. The matter required further elucidation, therefore, pre-admission notice be issued to the learned GP to assist the

Tribunal. To come up for preliminary hearing on 24.09.2014.

Proceedings

Member

4,
24.09.2014


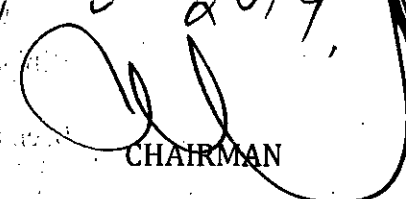
Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. The learned counsel for the appellant stated that similar nature of appeal No.540/2014 titled Mst. Shehnaz Bibi and appeal No. 541/2014, Mst. Sohila Zafar have already been admitted and pending before learned Bench-I on 24.12.2014, therefore, the same may also be admitted for regular hearing. The above mentioned service appeals may be requisition as well as the learned GP is also directed to produce complete record of the appellant. To come up for further preliminary hearing on 17.10.2014.

Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No.: 773/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	03/06/2014	<p>The appeal of Mst. Jamshed Bibi resubmitted today by Mr. Saadullah Khan Marwat Advocate, may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	9-8-2014	<p>This case is entrusted to primary Bench for preliminary hearing to be put up there on: 11-8-2014</p> <p style="text-align: right;"> CHAIRMAN</p>

SCANNED
KPST
Peshawar

THE STATE OF TEXAS
COUNTY OF [illegible]
I, [illegible], County Clerk of said County, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the records of said County.

ATTEST:
[illegible]
COUNTY CLERK

11-2-8-11


P-8-8-P

The appeal of Mst. Jamshid Bibi D/O Ghulam Nabi received today i.e. on 29.05.2014 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copies of reinstatement orders of the others ^{colleagues} of the appellant mentioned in para-10 (Annexure-M) are not attached with the appeal which may be placed on it.
- 2- Annexures of the appeal may be attested.
- 3- Annexures of the appeal may be annexed serial wise as mentioned in the memo of appeal.

No. 833 /S.T,

Dt. 29/5 /2014.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Saadullah Khan Adv; Pesh.

sc
Resubmitted after completion M.
ky

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S.A No. 773/2014

Jamshid Bibi

Versus

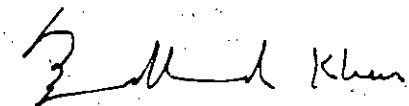
D.L.O & others.

I N D E X

S.#	Description of Documents	Annex	Page
1.	Memo of Appeal		1-3
2.	Educational Qualifications	"A"	4-5
3.	Advertisement, 11.05.2010	"B"	6
4.	Appointment order, 25.02.2011	"C"	7-8
5.	Charge Report 26.02.2011	"D"	9
6.	Attendance Register	"E"	10-19
7.	Civil Suit, 18.03.2012	"F"	20-22
8.	Order of Court, 21.05.2012	"G"	23-26
9.	Appeal to District Judge, 21.06.2012	"H"	27-28
10.	Termination order, 27.07.2012	"I"	29
11.	Representation, 23.08.2012	"J"	30-32
12.	Order of District Judge, 02.11.2012	"K"	33-34
13.	Returned Order, 02.11.2012	"L"	35
14.	Orders of Tribunal	"M"	36-37
15.	Application for delay		38

Appellant

Through


(Saadullah Khan Marwat)
Advocate
21-A Nasir Mension,
Shoba Bazar, Peshawar.
Ph: 0300-5872676

Dated: 29.05.2014

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S.A No. 773 2014

Jamshed Bibi D/o Ghulam Nabi,
PST, GGPS, Hameed Abad, Lakki Marwat Appellant

Versus

1. District Education Officer (Female),
Elementary & Secondary Education, Lakki
Marwat.
2. Director of Education, Directorate of
Elementary & Secondary Education, KPK,
Peshawar.
3. Secretary, Government of KPK, Elementary
& Secondary Education Department,
Peshawar.
4. District Accounts Officer, Lakki Marwat Respondents

⇔<=>⇔<=>⇔<=>⇔<=>⇔

**APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT
1974, AGAINST OFFICE ORDER NO. 5800-806,
DATED 27.07.2012 OF THE THAN R. No. 1,
WHEREBY SERVICES OF APPELLANT
ALONGWITH OTHERS WERE TERMINATED FROM
THE DATE OF THE APPOINTMENT.**

⇔<=>⇔<=>⇔<=>⇔<=>⇔

Respectfully Sheweth:

1. That appellant has at her credit the educational qualification of PTC and M.A (Islamiyat) passed with credit. The same were declared and verified as genuine. (Copies as annex "A")
2. That on 11.05.2010, R.No.3 flouted advertisement in Daily "AAJ" for appointment of PST/CT on merit. (Copy as annex "B").
3. That Test & Interview was conducted and thereafter, tentative open merit list of the competing candidates was prepared and after going

into the due process of selection, order of appointment of appellant was then issued vide order dated 25.02.2011. The name of appellant was placed at S.No. 09 (Female). (Copy as annex "C")

4. That on 26.02.2011, appellant assumed the charge of the post and started performances of the official duties. (Copy as annex "D")
5. That appellant used to attend the said school daily but she was not paid here monthly salaries for no legal reason. (Copies as annex "E")
6. That on 18.03.2012, appellant filed civil suit for payment of the monthly salaries before the court of Senior Civil Judge, Lakki Marwat which was decided on 21.05.2012 with direction to the department/respondents to make payment of the monthly salaries to appellant. (Copies as annex "F" & "G")
7. That feeling aggrieved of the aforesaid order of the court, department filed appeal before the court of District Judge, Lakki Marwat on 21.06.2012 to set aside the judgment and decree of the court below. (Copy as annex "H")
8. That on 27.07.2012, appellant was terminated from service from the date of her appointment by terming the academic/ professional certificates as bogus/ fake/ tempered by R.No.1. (Copy as annex "I")
9. That on 23.08.2012, appellant submitted representation before the authority stating therein that antecedents of the appellant has been already checked and verified and are quite genuine but the same met dead response till date. (Copy as annex "J")
10. That on 02.11.2012, the appeal of the department was accepted with direction to court below to returned the plaint to appellant to seek his remedy before the proper forum and then on the same date the plaint was returned to appellant for the said purpose. (Copies as annex "K" & "L")
11. That some other colleagues mentioned in the impugned order, having the same allegations were terminated and then reinstated by the respondents/Tribunal in to their services with all back benefits. (Copies as annex "M")

Hence this appeal, inter alia, on the following grounds:-

GROUND S:-

- a. That after completion of the due codal formalities, advertisement, test and interview, etc. appellant was appointed as such by the competent authority.

- b. That appellant assumed the charge of the said assignment and was performing her official duties to the best of her ability and without any complaint.
- c. That appellant was not confronted with the antecedents terming the same as bogus, etc.
- d. That R.No.1 was legally bound to serve appellant with Show Cause Notice and to associate her with the process of verification but R.No.1 at his own will termed the same as bogus, etc.
- e. That the certificates submitted at the time of appointment as PST Teacher to the respondents are quite genuine and real and if this hon'ble court deemed it proper, the same can be verified from the quarter concerned.
- f. That while terminating appellant from service on the alleged score, she was neither served with any notice nor any inquiry was conducted what to speak of association with the verification process.
- g. That order of termination dated 27.07.2012 is based on malafide and was ex-party as appellant was not succumbing to the ill wishes of R.No.1 for tainting money. No retrospective order could be effected.
- h. That other female colleagues, mentioned in the impugned order on the same allegations, were reinstated in services by the department and thereafter, they were paid all emoluments from the date of appointment.

It is, therefore, most humbly prayed that on acceptance of appeal, order dated 27.07.2012 of R.No.1 be set aside and appellant be reinstated into service with effect from 25.02.2011 with all service benefits, with such other relief as may be deemed proper and just in circumstances of the case.

Jumshad Bishi

Appellant

Through

Saadullah Khan Marwat

Saadullah Khan Marwat

Arbab Saif-ul-Kamal

Arbab Saif-ul-Kamal

&

Miss Robina Naz
Miss Robina Naz,
Advocates,

Dated: 29.05.2014

Serial No. 164043

Allama Iqbal Open University Islamabad



Certified that Mr/Ms JAMSHAD BIBI
Son/Daughter of GHULAM NABI
Registration No. 03 NLM 0256 Roll No. N 611597 having
completed the prescribed requirements in AUTUMN 2003 Semester, is awarded

Primary Teaching Certificate

Detail of courses is as under:

Course Code	Title of the Course	% Marks Obtained	Grade
613	Principles of Education	69	
614	Educational Psychology	55	
615	School Organization and Management	54	
616	School Community and Practical Arts	66	
617	Teaching of Urdu	56	
618	Teaching of Mathematics	62	
619	Teaching of Science and Physical Education	55	
620	Teaching of Islamiat and Social Studies	59	
611	Workshop and Teaching Practice	84	

Obtained/Total Marks: 560 / 900

He/she has secured 62 % marks and has been placed in grade B.

Result declared on: February 21, 2005

Date of issue: May 02, 2005

Prepared by: [Signature]

Checked by: [Signature]

[Signature]
Controller of Examinations

Note: This certificate is issued without alterations/erasure.

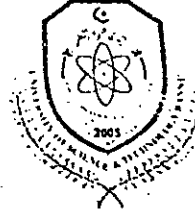
Attested
[Signature]

Serial No. 01,308

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

University of Science & Technology Bannu

M.T.F.P.



Pakistan

Provisional Certificate

Session 2007-2009

This is to certify that Mr./Miss. Jamshed Bibi S/D of Ghulam Nabi

a Student of Private Candidate

has passed MA Islamiyat(Annual) (Master in Islamiyat (Annual)) Examination

held in October, 2009. He/She was placed in 2nd Division/Grade/GPA securing 538 marks out of 1100

The Examination was taken as a whole / in parts As a Whole

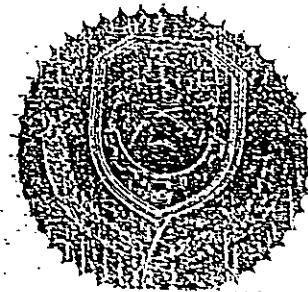
Roll No. 4390

Reg. No. 2007-UB-LP-14957

Issue Date 27-01-2010

Prepared by: [Signature]

Checked by: [Signature]



VERIFIED BANNU
[Signature]
Controller of Examinations
University of Science & Technology
Bannu

[Signature]
Controller of Examinations

Attested by [Signature]

C

7

25-2-11

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E.D.O.) & S.E. EDUCATION DEPT. LAKKI MARIAT
APPOINTMENT ORDER

Consequent upon the recommendations of District Selection Committee, the appointment of below named candidates are hereby ordered as Primary School Teacher (P) in BPS-07 (3530-190-9230) plus usual allowances as admissible under the rules on regular basis against vacant posts, under provision of Establishment & Administration Department circular bearing No. SOR-6(E&AD)13-01/2005 dated 10-08-2005 on the terms & conditions given below in the interest of public service from the date of taking over charge.

OPEN MERIT

S.No	Name	Father name & address	To be posted at	Remarks
1	Marwarida Bibi	Sahib Jan R/o Titter khel	GGPS Ghazi Khel	Court Case
2	Haseena Latif	Latifullah R/o Gandhi Khan Khel	GGPS Hafiz Mala Khel	Against vacant post
3	Shehla Mehmood	Mehmood Hashim R/o Tajazai	GGPS Khushdil Adamzai	-do-
4	Najma Naureen	Muhammadullah R/o Pahar Khel Thall	GGPS Wanda Khan Doran	-do-
5	Shakila Qayyum	Abdul Qayyum R/o Lakki	GGPS Mash Habibullah	-do-
6	Romana Gul	Saif Ur Rehman Shah R/o Marmandi	GGPS Qimat Manjiwala	-do-
7	Hussain Pari	Nawaz Khan R/o Gandhi Khan Khel	GGPS Azal Mir Bhattani	-do-
8	Sobia Gul	Gul Badshah R/o Lakki	GGPS Shamooni Khatuk Manzolali	-do-
9	Hamida Gul	Dilawar Khan R/o Gandhi Khan Khel	GGPS Gandhi Qamar Zaman	-do-
10	Robina Shaheen	Falak Naz R/o Lakki	GGPS Langer Khel Hindal	-do-
11	Sumia Rahim Qureshi	Abdur Rahim R/o Darra Pezu	GGPS Sanga Kheru Khel	-do-
12	Shehla Shaheen	Mir zali Khan R/o Dallo Khel	GGPS Wanda Kalan	-do-
13	Kanwal Urooj	Muhammad Ramzan R/o Lakki	GGPS Wanda Khan Doran	-do-
14	Farhat Nisa	Watan Khan R/o Lakki	GGPS Wanda Lughman	-do-
15	Rukhsana Hayat	Hayat Ullah Khan R/o Nar Abu Samand Begu Khel	GGPS Taxtail Mills	-do-
16	Nighat Sitana	Muhammad Bashir R/o UC Nar Abu Samand Begu Khel	GGPS Shakh Quli Khan No 2	-do-
17	Musarat Shaheen	Muhammad Nazir Khan R/o Serai Naurang	GGPS Saer Jan Abad	-do-
18	Zahreen Begum	Naseeb Ali Shah R/o Mama Khel	GGPS Kotka Madat	-do-
19	Farida Bibi	Muhammad Ghulam R/o Abdul Khel	GGPS Jiang Khel No.2	-do-
20	Hajra Musarat	Muhammad Ibrahim R/o Masha Mansoor	GGPS Biland Khel	-do-

UNION COUNCIL MERIT

S.No	Name	Father name & U/C	To be posted at	Remarks
1	Nadia Parveen	Allaf Khan UC Marmandi Azim	GGPS Nar Gul Hassan Shah	-do-
2	Romana Sohrab	Sohrab Khan UC Serai Mansoor	GGPS Kotka	-do-

Attended
LM

	Qamar Talat	Hamidullah UC Gandhi Khan Khel	GGPS Amia Jabu Khel	-do-
4	Zubaida	Gul Nawaz Khan UC Baist Khel	GGPS Harama Tala Wakil	-do-
5	Sadia Khan	Kalu Khan UC Ghazni Khel	GGPS Bai Khan Jabu Khel	-do-
6	Musarat Shaheen	Awal Khan UC Kheru Khel Pacca	GGPS Sheri Khel Faqiran	-do-
7	Najma Irum	Amanullah Khan UC Abdul Khel	GGPS Illawal Khel	-do-
8	Sakina Gul	Shah Alam Khan UC Titter Khel	GGPS Tabi Murad	-do-
9	Jamshid Bibi	Ghulam Nabi UC Lakki	GGPS Hamid Abad Lakki	-do-
10	Fehmida	Inayatullah Khan UC Isak Khel	GGPS Zer Janu	-do-
11	Fehmida Bibi	Amin Khan U/C Bego Khel	GGPS Foti Abad	-do-
12	Naureen Niazi	Abdul Ghafar U/C Dara Tang	GGPS WandaKhara	-do-
13	Gul Sham Bibi	Jan Gul U/C Bkhal Ahmad Zai	GGPS Khan Khel Mandozai	-do-
14	Shamim Begum	Ahmad Jan U/C Behram Khel	GGPS Khush Dil Adamzai	-do-

TERMS & CONDITIONS:

1. Their appointment will be considered without pension and gratuity in terms of section 19 of NWFP Civil Servant Act 1973, as amended vide NWFP Civil Servant (Amendment) Act, 2005 but the candidates already working as permanent Govt. Servants, will under take whether they want to continue the benefits of old service or new, they will however be entitled to contributory provident fund in such a manner and such a rate as may be prescribed by Govt.
2. In case of resignation without notice two months pay/allowance will be refunded to Govt.
3. Their services will be governed by such rules and regulations as may be issued by Govt time to time.
4. In case of misconduct they will be proceeded against the civil servant removal from service (special power) ordinance, 2000 and rules frame from time to time.
5. Charge reports should be submitted to all concerned.
6. No TA/DA is allowed.
7. The undersigned will check and verify the certificates/degrees of above candidates from concerned Boards/Universities before the drawl of their pay.
8. The appointment order is liable to termination, if the candidate failed to take over charge within 30 days of commencement date.
9. The undersigned reserve the rights of amendment in case of any mistake.
10. They are required to produce health and age certificate from medical superintendent DHQ hospital Lakki Marwat.

(Noor Hassan Khan)
Executive District Officer
Ele: & Sec: Education Deptt
Lakki Marwat

Endst No. 2074-79/PST(F)

Dated 25/2/2011

Copy to the

1. Director Ele: & Sec: Education Deptt Khyber Pukhtunkhwa, Peshawar
2. District Co-ordination Officer Lakki Marwat
3. District Officer female local office
4. District Accounts officer Lakki Marwat
5. Deputy District Officer (F) Primary local office
6. Head Teachress school concerned

Executive District Officer
Ele: & Sec: Education Deptt

Attended
M

D

9

26-2-11

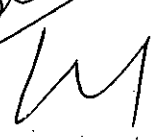
جاہد ریورٹ

ڈائریکٹر آرڈینری (P) آئی. اے. 79-2074 مورخہ 25-02-2011
 ڈائریکٹر ایجوکیشن ایسیر (F) آئی. اے. مورخہ 2-2-2011
 گورنر میڈیکل کالج، آئی. اے. مورخہ 2-2-2011

ع ۷۷

جاہد ریورٹ
 ڈائریکٹر ایجوکیشن ایسیر

جاہد ریورٹ
 Zubaida Khatoun
 Director of Education
 District Education Office
 District of ...

Attested


رئیس حاضری مدرسه کوردستان گرانیز پیرامندی سکول (مادری)

بابت ماه ابریل ۱۳۵۱

نام زینب خا	نام شهریار	نام پروین	نام مهسا	نام فاطمه
۰۰۳۰۸۱۵۳	۰۰۲۹۸۷۲۹۰	۰۰۳۰۸۱۵۲	۰۰۳۵۱۳۲۸	۰۰۳۵۱۳۲۸

تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی
-------	-----	-------	-------	-------	-----	-------	-------	-------	-----	-------	-------

۱
۲
۳
۴
۵
۶
۷
۸
۹
۱۰
۱۱
۱۲
۱۳
۱۴
۱۵
۱۶
۱۷
۱۸
۱۹
۲۰
۲۱
۲۲
۲۳
۲۴
۲۵
۲۶
۲۷
۲۸
۲۹
۳۰
۳۱

تعطیل بود

بهار

۸/۱۰

۱۱/۱۰

۸	۸	۱۱	۸	۸	۸	۸	۱۱	۸	۸
۹	۱۳	۱۳	۸	۸	۸	۸	۸	۸	۸
۱۰	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل
۱۱	۸	۱۱	۸	۸	۸	۸	۱۱	۸	۸
۱۲	۸	۱۱	۸	۸	۸	۸	۱۱	۸	۸
۱۳	۸	۱۱	۸	۸	۸	۸	۱۱	۸	۸
۱۴	۸	۱۱	۸	۸	۸	۸	۱۱	۸	۸
۱۵	۸	۱۱	۸	۸	۸	۸	۱۱	۸	۸
۱۶	۸	۱۱	۸	۸	۸	۸	۱۱	۸	۸
۱۷	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل
۱۸	۱۲.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰
۱۹	۱۲.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰
۲۰	۱۲.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰
۲۱	۱۲.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰
۲۲	۱۰.۳۰	۱۰.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۱۰.۳۰	۷.۳۰	۷.۳۰
۲۳	۱۲.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰
۲۴	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل
۲۵	۱۲.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰
۲۶	۱۲.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰
۲۷	۱۲.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰
۲۸	۱۲.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰
۲۹	۱۰.۳۰	۱۰.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۱۰.۳۰	۷.۳۰	۷.۳۰
۳۰	۱۲.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۷.۳۰	۱۲.۳۰	۷.۳۰	۷.۳۰
۳۱	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل	تعطیل

قسم هست	حال	سابقه	میزان	حال	سابقه	میزان	حال	سابقه	میزان	حال	سابقه	میزان	حال	سابقه	میزان
اتفاقیه	-	۵	۵	-	۷	۷	-	۷	۷	-	۵	۵	-	۷	۷
استثنای	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
بیماری	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
میزان کل	-	۵	۵	-	۷	۷	-	۷	۷	-	۵	۵	-	۷	۷

دستخط سرمد/بازنگر

Attested

حسرت خاقری کارکن

گورنمنٹ پریس جاب نمبر 31-8/1659 تعداد 23324 رجسٹر

ایبٹ آباد

2019

نمبر کارڈ 730377

روز	دستخط	روایتی	آمد	دستخط	روایتی	آمد	دستخط	روایتی	آمد	دستخط	روایتی	آمد
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												
16												
17												
18												
19												
20												
21												
22												
23												
24												
25												
26												
27												
28												
29												
30												
31												

رقم قرضت	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان	حالیہ	سابقہ	میزان
آفیس												
استحقاق												
بیماری												
میزان کل												

Attested

دستخط مہاراجہ

گوانت پریس جاب نمبر ۱۰۱/۱۵۵/۱۵۵/۱۵۵/۱۵۵/۱۵۵/۱۵۵/۱۵۵

حاضرین کی فہرست

بابت ماہ اپریل

۱۵۱۱

نام چیتھری بی بی صاحبہ
 نمبر ۵۵۹۹۳۵

نمبر	آگے	دستخط	روانگی	دستخط	آگے	دستخط	روانگی	دستخط	آگے	دستخط	روانگی	دستخط
۱												
۲												
۳												
۴												
۵												
۶												
۷												
۸												
۹												
۱۰												
۱۱												
۱۲												
۱۳												
۱۴												
۱۵												
۱۶												
۱۷												
۱۸												
۱۹												
۲۰												
۲۱												
۲۲												
۲۳												
۲۴												
۲۵												
۲۶												
۲۷												
۲۸												
۲۹												
۳۰												

نام	آگے	دستخط	روانگی	دستخط
۵۵۳۵				
۵۵۳۶				
۵۵۳۷				
۵۵۳۸				
۵۵۳۹				
۵۵۴۰				
۵۵۴۱				
۵۵۴۲				
۵۵۴۳				
۵۵۴۴				
۵۵۴۵				
۵۵۴۶				
۵۵۴۷				
۵۵۴۸				
۵۵۴۹				
۵۵۵۰				
۵۵۵۱				
۵۵۵۲				
۵۵۵۳				
۵۵۵۴				
۵۵۵۵				
۵۵۵۶				
۵۵۵۷				
۵۵۵۸				
۵۵۵۹				
۵۵۶۰				

سابقہ	میزان	سابقہ	میزان	سابقہ	میزان	سابقہ	میزان	سابقہ	میزان	سابقہ	میزان	سابقہ	میزان
۳	۴	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-
۳	۴	-	-	-	-	-	-	-	-	-	-	-	-
۳	۴	-	-	-	-	-	-	-	-	-	-	-	-

Alexander

دستخط

30-4

گرفتگی پرس بابت شماره 31-1559/تعداد 23324 رخصت

رخصت پرس بابت ماه

بابت ماه		بابت ماه		بابت ماه		بابت ماه		بابت ماه		بابت ماه		بابت ماه		بابت ماه		بابت ماه		بابت ماه		بابت ماه	
روز	روز	روز	روز	روز	روز	روز	روز	روز	روز	روز	روز	روز	روز	روز	روز	روز	روز	روز	روز	روز	روز
1																					
2																					
3																					
4																					
5																					
6																					
7																					
8																					
9																					
10																					
11																					
12																					
13																					
14																					
15																					
16																					
17																					
18																					
19																					
20																					
21																					
22																					
23																					
24																					
25																					
26																					
27																					
28																					
29																					
30																					
31																					
32																					
33																					
34																					
35																					
36																					
37																					
38																					
39																					
40																					
41																					
42																					
43																					
44																					
45																					
46																					
47																					
48																					
49																					
50																					
51																					
52																					
53																					
54																					
55																					
56																					
57																					
58																					
59																					
60																					
61																					
62																					
63																					
64																					
65																					
66																					
67																					
68																					
69																					
70																					
71																					
72																					
73																					
74																					
75																					
76																					
77																					
78																					
79																					
80																					
81																					
82																					
83																					
84																					
85																					
86																					
87																					
88																					
89																					
90																					
91																					
92																					
93																					
94																					
95																					
96																					
97																					
98																					
99																					
100																					

کوتاه کردن

کوتاه کردن

کوتاه کردن

کوتاه کردن

مستحق

مستحق

گرفت پریس بابت نمبر 31-A/1655 اعداد 23324 رجسٹر

رجسٹر حاضرین

تاریخ جمعہ ۳۱ مارچ ۱۹۳۹

۰۰۲۹۳۰۳۹

۰۰۳
لی

ردیف	نام	وقت آمد	وقت رفت	ردیف	نام	وقت آمد	وقت رفت
۱	...						
۲	...						
۳	...						
۴	...						
۵	...	۷:۳۰	۱۲:۳۰	۵	...	۷:۳۰	۱۲:۳۰
۶	...	۷:۳۰	۱۲:۳۰	۶	...	۷:۳۰	۱۲:۳۰
۷	...	۷:۳۰	۱۲:۳۰	۷	...	۷:۳۰	۱۲:۳۰
۸	...	۷:۳۰	۱۲:۳۰	۸	...	۷:۳۰	۱۲:۳۰
۹	...	۷:۳۰	۱۲:۳۰	۹	...	۷:۳۰	۱۲:۳۰
۱۰	...	۷:۳۰	۱۲:۳۰	۱۰	...	۷:۳۰	۱۲:۳۰
۱۱	...			۱۱	...		
۱۲	...	۷:۳۰	۱۲:۳۰	۱۲	...	۷:۳۰	۱۲:۳۰
۱۳	...	۷:۳۰	۱۲:۳۰	۱۳	...	۷:۳۰	۱۲:۳۰
۱۴	...	۷:۳۰	۱۲:۳۰	۱۴	...	۷:۳۰	۱۲:۳۰
۱۵	...	۷:۳۰	۱۲:۳۰	۱۵	...	۷:۳۰	۱۲:۳۰
۱۶	...	۷:۳۰	۱۲:۳۰	۱۶	...	۷:۳۰	۱۲:۳۰
۱۷	...	۷:۳۰	۱۲:۳۰	۱۷	...	۷:۳۰	۱۲:۳۰
۱۸	...	۷:۳۰	۱۲:۳۰	۱۸	...	۷:۳۰	۱۲:۳۰
۱۹	...	۷:۳۰	۱۲:۳۰	۱۹	...	۷:۳۰	۱۲:۳۰
۲۰	...	۷:۳۰	۱۲:۳۰	۲۰	...	۷:۳۰	۱۲:۳۰
۲۱	...	۷:۳۰	۱۲:۳۰	۲۱	...	۷:۳۰	۱۲:۳۰
۲۲	...	۷:۳۰	۱۲:۳۰	۲۲	...	۷:۳۰	۱۲:۳۰
۲۳	...	۷:۳۰	۱۲:۳۰	۲۳	...	۷:۳۰	۱۲:۳۰
۲۴	...	۷:۳۰	۱۲:۳۰	۲۴	...	۷:۳۰	۱۲:۳۰
۲۵	...	۷:۳۰	۱۲:۳۰	۲۵	...	۷:۳۰	۱۲:۳۰
۲۶	...	۷:۳۰	۱۲:۳۰	۲۶	...	۷:۳۰	۱۲:۳۰
۲۷	...	۷:۳۰	۱۲:۳۰	۲۷	...	۷:۳۰	۱۲:۳۰
۲۸	...	۷:۳۰	۱۲:۳۰	۲۸	...	۷:۳۰	۱۲:۳۰
۲۹	...	۷:۳۰	۱۲:۳۰	۲۹	...	۷:۳۰	۱۲:۳۰
۳۰	...	۷:۳۰	۱۲:۳۰	۳۰	...	۷:۳۰	۱۲:۳۰

۱۹:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۰:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰
۱۲:۰۰

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال
۱			۲			۱			۱			۱		

Alexander

رجسٹر حاضری کارکنین

2011ء

بابت 106 لکھ
نام جعفر علی بیگ صاحب پوسٹل نمبر 39-00293

تاریخ	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط	آمد	دستخط	روانگی	دستخط
1	8.00											
2	8.00											
3	8.00											
4	8.00											
5	8.00											
6	8.00											
7	8.00											
8	8.00											
9	8.00											
10	8.00											
11	8.00											
12	8.00											
13	8.00											
14	8.00											
15	8.00											
16	8.00											
17	C/Leave											
18	8.00											
19	8.00											
20	8.00											
21	8.00											
22	8.00											
23	8.00											
24	8.00											
25	8.00											
26	C/Leave											
27	8.00											
28	8.00											
29	8.00											
30	8.00											

Handwritten signature and initials in the middle of the table.

سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت
6	7	انتقال	3	5		6	2	3	7	میزان کل	6	1		

گورنمنٹ پریس جاہ نمبر 31-8/1655/23324

حصہ چھٹی

روزانہ		ہفت روزہ		ماہانہ		سالانہ		مجموعی	
نمبر	تاریخ	نمبر	تاریخ	نمبر	تاریخ	نمبر	تاریخ	نمبر	تاریخ
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									
31									

19-31-11

نمبر	تاریخ	نمبر	تاریخ	نمبر	تاریخ	نمبر	تاریخ
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							

Attended

گرفت پرس چاپ شماره 31-155/1654 تعداد 23324

حاضرین در کلاس

بابت ماه منور											
کلاس اول						کلاس دوم					
ردیف	نام	پدر	مادر	تلفن	آدرس	ردیف	نام	پدر	مادر	تلفن	آدرس
1	X					1	X				
2						2					
3						3					
4						4					
5						5					
6						6					
7						7					
8						8					
9						9					
10						10					
11						11					
12						12					
13						13					
14						14					
15						15					
16						16					
17						17					
18						18					
19						19					
20						20					
21						21					
22						22					
23						23					
24						24					
25						25					
26						26					
27						27					
28						28					
29						29					
30						30					
31						31					
32						32					
33						33					
34						34					
35						35					
36						36					
37						37					
38						38					
39						39					
40						40					
41						41					
42						42					
43						43					
44						44					
45						45					
46						46					
47						47					
48						48					
49						49					
50						50					
51						51					
52						52					
53						53					
54						54					
55						55					
56						56					
57						57					
58						58					
59						59					
60						60					
61						61					
62						62					
63						63					
64						64					
65						65					
66						66					
67						67					
68						68					
69						69					
70						70					
71						71					
72						72					
73						73					
74						74					
75						75					
76						76					
77						77					
78						78					
79						79					
80						80					
81						81					
82						82					
83						83					
84						84					
85						85					
86						86					
87						87					
88						88					
89						89					
90						90					
91						91					
92						92					
93						93					
94						94					
95						95					
96						96					
97						97					
98						98					
99						99					
100						100					

Handwritten signature and notes in the bottom left corner.

دستگاه چاپ شماره 31-155/1654

گورنمنٹ پبلک ہائی اسکول اسیفہر 1654/21-1

رجسٹر حاضری کلاس

بیت ماہ فروری
مدرسہ اسلامیہ کالج اسیفہر
آدم ڈیپارٹمنٹ
۰۰۲۹۳۰۳۹

روز	دستخط	آدم	دستخط	روز	دستخط	آدم	دستخط	روز	دستخط	آدم	دستخط
1	Tue		Tue	1	Tue		Tue	1	Tue		Tue
2	Tue		Tue	2	Tue	2.00	Tue	2	Tue	8.30	Tue
3	Tue		Tue	3	Tue	2.00	Tue	3	Tue	8.30	Tue
4	Tue		Tue	4	Tue		Tue	4	Tue		Tue
5	Tue		Tue	5	Tue		Tue	5	Tue		Tue
6	Tue		Tue	6	Tue	2.00	Tue	6	Tue	8.30	Tue
7	Tue		Tue	7	Tue	2.00	Tue	7	Tue	8.30	Tue
8	Tue		Tue	8	Tue	2.00	Tue	8	Tue	8.30	Tue
9	Tue		Tue	9	Tue	2.00	Tue	9	Tue	8.30	Tue
10	Tue		Tue	10	Tue		Tue	10	Tue		Tue
11	Tue		Tue	11	Tue		Tue	11	Tue		Tue
12	Tue		Tue	12	Tue		Tue	12	Tue		Tue
13	Tue		Tue	13	Tue	2.00	Tue	13	Tue	8.30	Tue
14	Tue		Tue	14	Tue	2.00	Tue	14	Tue	8.30	Tue
15	Tue		Tue	15	Tue		Tue	15	Tue		Tue
16	Tue		Tue	16	Tue		Tue	16	Tue		Tue
17	Tue		Tue	17	Tue		Tue	17	Tue		Tue
18	Tue		Tue	18	Tue		Tue	18	Tue		Tue
19	Tue		Tue	19	Tue		Tue	19	Tue		Tue
20	Tue		Tue	20	Tue		Tue	20	Tue		Tue
21	Tue		Tue	21	Tue		Tue	21	Tue		Tue
22	Tue		Tue	22	Tue		Tue	22	Tue		Tue
23	Tue		Tue	23	Tue		Tue	23	Tue		Tue
24	Tue		Tue	24	Tue		Tue	24	Tue		Tue
25	Tue		Tue	25	Tue		Tue	25	Tue		Tue
26	Tue		Tue	26	Tue		Tue	26	Tue		Tue
27	Tue		Tue	27	Tue		Tue	27	Tue		Tue
28	Tue		Tue	28	Tue		Tue	28	Tue		Tue
29	Tue		Tue	29	Tue		Tue	29	Tue		Tue
30	Tue		Tue	30	Tue		Tue	30	Tue		Tue
31	Tue		Tue	31	Tue		Tue	31	Tue		Tue

(Large handwritten signature)
 01/03/12
(Signature)
 01/03/12

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال
			2	1	1	3	-	3			
			-	-	-	-	-	-			
			-	-	-	-	-	-			
			2	1	1	3	-	3			

Handwritten signature/initials

Subas da Khat o... دستخطیہ

31
 003
 دستخط
 3
 3
 3

18-3-12 لعدالت جناب سید رسول ج صاحب صلح علی ہدوت

جشنیدی دستبرد میں - شہلیہ قیوم دختر عبدالقیوم محلہ سیدان (مناخل صلح علی ہدوت)

12-3-12
M. J. ALI
Senior Civil Judge/Additional
Sessions Judge, Laksharwat

- 1- حکومت ہونہ خیر بختون خواہ ندوہ مسکنی ایجوکیشن لٹنار -
- 2- ڈسٹرکٹ کوارڈینیشن آفیسر صاحب صلح علی ہدوت -
- 3- ایگزیکٹو ڈسٹرکٹ آفیسر (E & E) ایجوکیشن ہدوت -
- 4- ڈسٹرکٹ ایگوانٹ آفیسر ڈسٹرکٹ کیمپلش تاحدیری ہدوت -
- 5- ڈسٹرکٹ ایجوکیشن (E & E) لٹنار -
- 6- ڈسٹرکٹ آفیسر (F) صلح علی ہدوت -
- 7- ہیڈ ماسٹر لیس گورنمنٹ گرنر برائری سکول جسدا آباد نزد گراہن ہدوت -
- 8- ہیڈ ماسٹر لیس گورنمنٹ گرنر برائری سکول متش جیش (لٹنار) -

جزو الف) دعویٰ ملنے ڈٹری اسٹیمپ حق جم مدعیان کے خلاف مدعیہ علیہم بدین امر میں جم مدعیان کو رقم 79-79-79 PST (F)

مورخہ 25/2/2011 ایگزیکٹو ڈسٹرکٹ آفیسر ہدوت، گورنمنٹ گرنر برائری سکول جسدا آباد نزد گراہن ہدوت (مناخل صلح علی ہدوت) نے گورنمنٹ گرنر برائری سکول مانڈہ متش جیش لٹنار (مدعیہ علیہ) (پور (P.S.T. (F) ٹیکری ہونہ لیباز حصول ہیڈ لکل فٹنس سرٹیفکیٹ متعلقہ سکول کی ہیڈ ماسٹر لیس مسان کو پیارچ رپورٹ کرنے کے باقاعدہ چارج حاصل کر چکی ہیں۔ اور باقاعدگی سے ماہانہ تنخواہ کی وصولی کی ذمہ دار ہیں۔ اور مدعیہ علیہم کو جم مدعیان کی تنخواہ جاری کرنے اور ماہانہ تنخواہ جم مدعیان سے ادا کرنا ہی حاصل نہیں ہے۔ اور مدعیہ علیہم جم مدعیان کی ماہانہ تنخواہ جاری کرنے اور اس کی ادائیگی کے حکم پابند ہیں۔ تمام غیر قانونی افعال و احکامات جو جم مدعیان کی تنخواہ کی ادائیگی میں رکاوٹیں پیدا کرنے و تنخواہ جاری کرنے اور اس کی ادائیگی میں رکاوٹ کرنے و دیگر غیر قانونی احکامات جاری کرنے پر جم مدعیان کے حقوق کو کالعدم اور غیر موثر ہیں اور قابل منسوخ ہیں۔

دعویٰ ملنے ڈٹری حکم اتنا ہی دوامی مالک کی از قسم حکم حق جم مدعیان کے خلاف مدعیہ علیہم بدین قانون رقم 79-79-79 کو منسوخ فرمایا جائے۔ کہ وہ جم مدعیان کی ماہانہ تنخواہ کی ادائیگی میں رکاوٹیں پیدا نہ کریں، وغیرہ۔ دیگر غیر قانونی افعال و احکامات جاری کرنے سے باز رہیں۔ جم مدعیان کی ادائیگی ماہانہ تنخواہ پورا تر انداز میں۔

Attested M

ATTESTED
JUDICIAL OFFICER
& Sessions
Laksharwat

G

23

21-5-12

IN THE COURT OF MUHAMMAD ASGHAR, CIVIL JUDGE / JUDICIAL
MAGISTRATE-I, LAKKI MARWAT.

Jamshed Bibi & Shakila Qayyum.....versus.....Secretary Education & Others.

Order.....11
21/05/2012.

21 5 183 81
12 2 12 19 1000

[Handwritten signature]

Plaintiffs through attorney present. Defendants through representative present.

This order is directed to dispose of an application filed by plaintiffs for the grant of interim injunction and also to pass an order as to whether the instant suit is maintainable or not? Keeping in view the facts and circumstances of the case and arguments of the learned counsels for the parties, this Court has also to see as to whether this Court can dispose of the instant suit under Order 15 Rule 1 of Civil Procedure Code, 1908.

Brief facts of the instant case are that plaintiffs were appointed as School Teacher vide order bearing Ends No.2074-79/PSI(F) dated 25/02/2011 issued by defendant No.3 and they were posted in Government Girls Primary School, Hamid Abad and Government Girls Primary School Mash Habibullah respectively. After they were medically examined and submitted their medical fitness certificates to the quarter concerned, plaintiffs took charge in the said Schools on 26/02/2011 and 28-02-2011 respectively. Since then they are performing their duties regularly in the said schools as is evident from the attendance registers copies of which are placed on file. Copies of order of appointment, medical fitness certificates and charge assumption reports are placed on file. Since the dates they have taken their charge in the said schools, defendants have refused to release their salaries, hence the instant suit.

Arguments of learned counsel for the plaintiffs and learned Government Pleader have already been heard on the preceding dates of hearings. Learned counsel for the plaintiffs stated at the bar that plaintiffs were duly appointed by the competent authority in accordance with law and they are performing their duties as Primary School Teachers since the dates they have taken their charge in the schools. They have not yet been paid their salaries, which is one of their fundamental rights. Learned counsel also stated at the bar that many other cases of similar nature have been disposed of by different other Civil Courts at Lakki Marwat and plaintiffs may also be placed on equal footing with them by enforcing their Civil Right against the defendants.

Learned Government Pleader stated at the bar that not only the appointment of the plaintiffs is illegal but there are so many other candidates whose appointment is also illegal as the posts against which they have taken their charge are not sanctioned by the competent authority. Learned Government Pleader further submitted that defendants had taken a departmental action against the persons appointed against the

[Handwritten signature]
21/05/12

[Handwritten signature]

[Handwritten signature]
21-5-12

unsanctioned posts and inquiry has been concluded and is pending decision before the competent authority with recommendation that all illegal orders of appointment issued on or after 11/05/2010 may be cancelled forthwith and recovery of pay and allowances may be made from Mr. Noor Hasan Ex-EDO and the drawing and disbursing officer concern. Learned Government Pleader finally stated that Section 17 of the Civil Servants Act, 1973 deals with pay which falls within the terms & conditions of the services of the Civil Servants contained in chapter 2 of the said Act and by virtue of Article 212 of the Constitution of Islamic Republic of Pakistan read with N.W.F.P Civil Servant Act, 1973 and N.W.F.P Service Tribunal Act, 1974, the jurisdiction of the subject matter without any doubt falls with service tribunal and plaintiffs have no right to approach the Civil Court for redressal of their grievances. Learned Government Pleader placed his reliance on PLD 2001 SC 1032.

Keeping in view the facts and circumstances of the case, record of the case perused. Plaintiffs have sought relief for the release of their salaries since the dates they have taken charge in the schools as teacher and they are performing their duties regularly. The plea of the defendants is that the appointment of the plaintiffs is illegal hence their salaries can't be released. Under these circumstances there are few legal questions before the Court for decision / adjudication without recording evidence of the parties being legal in nature. The questions are as under;

1. Whether the plaintiffs being Civil Servants while performing their duties regularly are entitled to their salaries?
2. Whether the appointment of the plaintiffs is illegal and against the law?
3. Whether defendants are legally empowered to refuse the salaries of the plaintiff?
4. Whether this court has got jurisdiction to entertain the instant suit?

So for as the question of salaries of the plaintiffs is concerned, every Civil Servant is entitled to his / her salary in accordance with law. Plaintiffs being Civil Servants are definitely entitled to draw their salaries till the time they are in service and perform their duties regularly. The order of appointment of plaintiffs is still intact and has not yet been cancelled/withdrawn so for or otherwise the services of the plaintiffs are not terminated by competent authority. As for as the contention of the defendants that appointment of plaintiff is illegal, is concerned, this issue is pending decision before the competent authority and no adverse order against the appointment of the plaintiffs is yet passed. The above said inquiry was concluded on 23/06/2011 since then a sword is hanging on the heads of the plaintiffs having apprehension of termination of service on one side and on the other side their salaries are refused by defendants. This is in a sense a kind of double jeopardy for the plaintiff and reflects clear malafide on the part of defendants. In such like situations, civil courts will have to interfere for the enforcement of civil rights of the people.

ATTESTED

[Signature]
 District Sessions Judge

[Signature]
 21/05/11

[Handwritten mark]
 21/05/11

The contention of the defendants is that the appointment of the plaintiffs is illegal and inquiry has been concluded the report of which is submitted to the competent authority for final decision in the matter. Of course it is the prerogative of the defendants to take legal action in the matter but no adverse order is yet passed against the plaintiffs and they are performing their duties since the time they have taken their charge in the above said schools. The moment any adverse / termination order is passed by competent authority against the plaintiffs in the light of recommendations of the inquiry report dated 23-06-2011, they will no more be entitled to draw their salaries but in the presence of any termination order, plaintiffs are entitled to draw their salaries with effect from the date they have taken charge as School Teachers and more importantly, their order of appointment is still intact and holds the field.

As for the question as to whether defendants can legally refused the salaries of the plaintiffs is concerned, N-W.F.P Civil Servant Act, 1973, governs the matters relating to the services of Civil Servant. Even under the N-W.F.P Government Servants (Efficiency and Discipline) Rules, 1973/2011, the salary of the Civil Servant can't be stopped / refused once a Civil Servant enters into a service and so long he/she remains in service. Same is the case over here. Plaintiffs are still in service and perform their duties and in such a situation, their salaries can't legally be refused by the defendants. Admittedly, the salaries of some teachers appointed with plaintiff through the same order have been released by defendants through orders of the Civil Courts at Lakki Marwat. Denial of release of plaintiffs salaries would definitely amount to discrimination and the order would be against the constitutional principle of equality before law and equal treatment by law carried in Article 4 of the constitution of the Islamic Republic of Pakistan, 1973.

The question of jurisdiction in the instant case by this Court is very simple to be determined. The basic question before this Court is in fact release of salaries of civil servants which are refused by persons who are under the law not authorized to do so. Till the time plaintiffs are in service and perform their duties regularly, they are entitled to draw their salaries which are one of their Civil Right enforceable through Civil Courts particularly in a situation where there is clear malafide / discrimination on the part of defendants. The moment plaintiffs are terminated from their service, they will no more be entitled to draw their salaries and in such an eventuality; plaintiffs will have to approach to Service Tribunal for redressal of their grievances.

In the light of above detail discussion, this Court has reached to the conclusion that there is no need to frame issues in the instant case and direct the parties to lead their evidence. The instant suit is hereby disposed of under Order 15 Rule 1 CPC with observation that plaintiffs being Civil Servants are entitled to draw their salaries with effect from the date they have taken charge against their posts and till the time they

*Amu-
11/05/12*

*Attended
M*

*AT LAKKI MARWAT
District & Sessions Judge
Lakki Marwat*

remains in service and perform their duties regularly in accordance with law. Their order of appointment is still intact and holds the field; therefore, defendants are directed to release the salaries of the plaintiffs immediately. This order shall not effect / pre-judice the decision of the competent authority on the recommendation of the inquiry report dated 23/06/2011. The competent authority has to determine as to whether the appointment of the plaintiff along with other candidates is in accordance with law or not and whether the services of all the candidates can be terminated or not particularly in the light of the inquiry report dated 23/06/2011. With these observations, the instant suit is disposed of. Copy of this order shall be forwarded to Secretary Education at Peshawar for information/consideration. There is no order as to cost. File is consigned to the record room after its necessary completion and compilation.

Order Announced.
21/05/2012.

[Signature]
21/05/12
Muhammad Asghar,
Civil Judge / Judicial Magistrate-I,
Lakki Marwat.

2832
22-5-12
25-5-12
14 great
286/12
25-5-12
25-5-12

Attended
[Signature]

[Signature]
25-5-12
District & Sessions Judge
Lakki Marwat

لس عدالت جناب ڈسٹرکٹ جج صاحب ضلع لکی مروت

- 7
- x1 حکومت خیبر پختون خواہ بذریعہ سیکرٹری ایجوکیشن پشاور
 - x2 ڈسٹرکٹ کوآرڈینیشن آفیسر (D.C.O.) لکی مروت
 - x3 ایگزیکٹو ڈسٹرکٹ آفیسر (E+se) ایجوکیشن لکی مروت
 - x4 ڈسٹرکٹ اکاؤنٹ آفیسر لکی مروت
 - x5 ڈائریکٹر ایجوکیشن پشاور
 - x6 ڈسٹرکٹ آفیسر (F) (E+se) ایجوکیشن لکی مروت
 - x7 D.D.O. زنانہ ہائر ایجوکیشن ملدار لکی مروت

جسٹس جی بی
 District & Sessions Judge
 Larkana

بنام

جسٹس جی بی رشید شکیہ توہم دعوہ محمد سیدان فیاض لکی مروت

عنوان : اپیل بہ ناراضگی فیصلہ تنازعہ مورخہ 21/5/12 مصدرہ

جناب سول جج صاحب لکی مروت بمقدمہ نمبر 8/11 رجوعہ 12/3/12 جسکی رو سے دعویٰ ریسیانڈنٹ منظور کرتے ہوئے فیصلہ تنازعہ سنایا ہے۔ جو کہ ایپلینٹس کے حقوق پر کالعدم اور غیر موثر ہے۔

اسد گائے اپیل

بمنظوری اپیل ختم مشورخ فرمائے فیصلہ مورخہ 21/5/12 ماتحت عدالت نیز تا تصفیہ اپیل معطل فرمائے فیصلہ تنازعہ مورخہ 21/5/12 اور خارج فرمائے جانے دعویٰ ریسیانڈنٹ، دلائل جانے خرچہ/پرچہ یا دیگر دادرسی جو قریب انصاف ہو دلائل جاوے۔

اسد گائے
 M

- 1- یہ کہ فیصلہ متنازعہ مورخہ 21/5/12 خلدف قانون ، خلدف پالیسی اور خلدف ریمڈیا مل ہے جو قدرتی انصاف کے منافی ہے اور قابل منسوخی ہے۔
- 2- یہ کہ فاضل عدالت ماتحت فیصلہ متنازعہ / حکم مورخہ 21/5/12 مبنی بر مفروضات اور Non speaking order ہے۔
- 3- یہ کہ فاضل عدالت ماتحت نے دعویٰ ریسیانڈنٹ سرسی انداز میں Reliance کرتے ہوئے فیصلہ متنازعہ سنایا ہے۔ جو کہ Perverse ، Captious ، without assigning reasons اور Mechanical ہے۔ بدین وجہ فیصلہ متنازعہ عدالت ماتحت قابل منسوخی ہے۔
- 4- یہ کہ من ایپلینٹس / درعا علیہم کو کوئی نوٹس زیر دفعہ (ا) 80 مجموعہ ضابطہ دیوانی حکومت خیبر پختون خواہ و دیگر پبلک افسران کو نہیں دیا گیا ہے۔ اور نہ ہی بعد دائری دعویٰ (بلا نوٹس) فاضل عدالت ماتحت بموجب ضابطہ تین ماہ کی مہلت برائے جواب دعویٰ دی ہے۔
- 5- یہ کہ فاضل عدالت ماتحت نے شہادت فریقین ریکارڈ کے بغیر فیصلہ متنازعہ سنایا ہے۔
- 6- یہ کہ ریسیانڈنٹ کی اس قسم کے دعویٰ کیلئے Proper Forum سروکس ٹریبونل خیبر پختون خواہ ہے۔ جبکہ ماتحت عدالت / سول کورٹ Improper Forum ہے۔ کیونکہ تنخواہ بشمول پنشن و مزہ Terms & Conditions کے زمرے میں آتی ہے۔
- 7- یہ کہ عدالت ماتحت نے Respondant کی درخواست عرفی دعویٰ ، جواب درخواست ، جواب دعویٰ اور فیصلہ متنازعہ عدالت ماتحت ہمراہ لف ہے۔
- 8- یہ کہ عدالت ماتحت نے Respondant کی درخواست کو مکمل طور پر Non read اور Mis read کرتے ہوئے فیصلہ متنازعہ سنایا۔
- 9- یہ کہ اپیل بڑا انداز میں جمع ہے۔ اور کورٹ فیس جمع ہے۔
- 9- یہ کہ دوران بحث ایپلینٹس کے وکیل کو اہم نکات پر مزید بحث کرنے کی اجازت دینے کی استدعا ہے۔

اسیذا استدعا کیجاتی ہے کہ وجوہات بالا و دیگر اپیل خذا کو منظور کرتے ہوئے عدالت ماتحت کے فیصلہ متنازعہ مورخہ 21/5/12 کو set aside کرنے کا حکم صادر فرمایا جاوے۔

21/6
 مدعا علیہم
 محکمہ تعلیم
 خیبر پختون خواہ
 Government of Khyber Pakhtunkhwa
 Department of Education
 Peshawar

27/6/2012
 فیصلہ عدالت
 علم و یقین کی درود اور ہم ہیں
 اللہ سبحانہ و تعالیٰ

I

29 27-7-12

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION LAKKI MARWAT

OFFICE ORDER:-

Consequent upon the verification of Academic/Professional Certificates by the concerned Board i.e (BISE) Bannu and found bogus/Fake/tempered, the services of the following primary school teachers (Female) are hereby terminated from the date of their appointment.

S. No	Name	Father Name	Place of appointment	Order issued vide/No. and dated
1	Shamim Begum	Ahmad Jan	GGPS, Khushdii Adamzai	2074-79/PST(F) Dated 25-02-2011 at S.No.14
2 ✓	Jamshed Bibi	Ghulam Nabi	GGPS, Hameed Abad, Lakki	2074-79/PST(F) Dated 25-02-2011 at S.No.9
3	Rukhsana Hayat	Hayat Ullah	GGPS, Textile Mills	2074-79/PST(F) Dated 25-02-2011 at S.No.15
4	Fahmida Bibi	Amin Khan	GGPS, Tooti Abad	2074-79/PST(F) Dated 25-02-2011 at S.No.11
5	Nusrat Shaheen	Awal Khan	GGPS, Sheri Khel Faqiran	2074-79/PST(F) Dated 25-02-2011 at S.No.6
6	Noureen Niazi	Abdul Ghafoor Niazi	GGPS, Wanda Khara	2074-79/PST(F) Dated 25-02-2011 at S.No.12

Executive District Officer
(E&S) Education Lakki Marwat

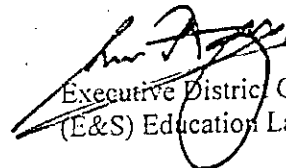
Endst: No. 5800 - 806

Dated. 27-7-2012

Copy to the:-

1. Secretary to Government of Khyber Pakhtunkhwa (E&S) Education Department, Peshawar.
2. Director, Elementary & Secondary Education Department Khyber Pakhtunkhwa.
3. Honorable District Session Judge, Lakki Marwat.
4. District Coordination Officer, Lakki Marwat.
5. District Officer (F) local office.
6. District Accounts Officer, Lakki Marwat.
7. Deputy District Officer (F) local office.

Attended
M


Executive District Officer
(E&S) Education Lakki Marwat

J 30 23-8-12
BEFORE THE DISTRICT COORDINATION OFFICER
LAKKI MARWAT

Subject: Representation / Departmental Appeal.

Respectfully Sheweth:

In your Honor, It is stated:

1. That, EDO Education (E&S) Lakki Marwat advertised certain vacant teaching posts including PSTs. Petitioner applied against the PST post amongst those vacant posts. On fulfilling the criteria and being from the eligible/ deserved candidates, petitioner was appointed on dated: 25-02-2011 as PST after due observation of all codal formalities. Subsequently, on the next following day i.e. on 26th of Feb 2011, petitioner was entrusted with duty/ charge. Since that, petitioner entertained the Education Department in term of teaching services at GGPS Hameed Abad Lakki till 27th July 2012 (round about one and half year). Copies of Appointment order and Charge Report are annexed as Annexure "A & B" respectively.
2. That, as sequel to appointment, all the codal formalities including verification of documents, preparation of service documents like service book, issuance of Medical Fitness Certificate were observed and whole the process due for appointment and service was carried. No illegality or irregularity in the process and fakeness or tempering in the documents could be pointed out. Copies of testimonials and medical certificate are annexed herewith as Annexure "C & D".
3. That, on dated: 27-07-2012, the said EDO terminated the petitioner from the service without any rhyme and reasons. In connection to termination, petitioner was neither served with any notice as prescribed by the law and rules nor was given any chance to self-defense and testify/ clarification. In addition, all the documents were prepared and verified by the same authority (EDO) from whom petitioner is aggrieved.
4. That, as no illegality, irregularity and malafide has been observed throughout the appointment process as well as in duty. The termination of petitioner by the authority has been culminated purely on political pressure, malafide on the part of EDO concerned in order to vacate the post for filling by a favorite person.
5. That, the termination of petitioner is the result of political victimization and the said termination is against the norms of justice, Constitution of the Country, policy, rules and regulation. Petitioner has not been treated equally before the law and has been condemned unheard.

Attested
M

It is therefore, humbly prayed, that on acceptance of instant appeal, the petitioner may kindly be restored/ reinstated on the said post immediately from the date of termination along with all back benefits and any other remedy which deems fit.

Dated: 23-08-2012

Your Humble Petitioner

Jamshed Bibi
Jamshed Bibi

D/O Ghulam Nabi

UGC Lab-II, PST GGPS Hameed

Abad, Dist. Lakki Marwat

Through Counsel

Muhammad Tariq Qureshi
Muhammad Tariq Qureshi

Advocate High Court

Lakki Marwat

Attested
LM

32

OFFICE OF THE DISTRICT COORDINATION OFFICER LAKKI MARWAT.

No. 4588 /DCO/LM/IRDO/Appeal

Dated 20 -09-2012.

To

The Executive District Officer
(E&S) Education, Lakki Marwat.

Subject:- Representation/Departmental Appeal.

Enclosed find herewith a Representation/Departmental appeal submitted by Jamshade Bibi D/O Ghulam Nabi U/C Lakki PST Teacher GGPS Hameed abad through Counsel Mohammad Triq Advocate High Court Lakki Marwat (which is self explanatory).

Please look into the case and submit report along with your comments to this office. positively.

Encl: a.a.

District Coordination Officer
Lakki Marwat.

Even No. & date.

Copy to Jamshade Bibi D/O Ghulam Nabi U/C Lakki PST Teacher GGPS Hameed abad Lakki.

District Coordination Officer
Lakki Marwat.

AH ebed
M

33 2-11-12
Civil Appeal no. 27/13 of 2012

Govt: of Khyber Pakhtun Khawa through Secretary Education & others

Vs

Mst: Jamshid Bibi & Shakila Qayyum

Dated of Institution27/06/2012

Dated of Decision.....30/10/2012

JUDGMENT/ORDER

30/10/2012

Learned Govt: Pleader Mr. Tariq Aziz present. Asmatullah relative of respondents present.

This appeal is directed against the judgment and decree dated 21/05/2012 passed by learned Civil Judge-I, Lakki whereby the learned Civil Judge while disposing of the suit of the plaintiffs under Order 15 Rule 1 CPC held the plaintiff entitled to draw their salaries and directed the defendants to release the salaries of the plaintiffs immediately.

Plaintiffs Mst: Jamshid Bibi & Shakila Qayyum approached the Civil Court by filing a civil suit against defendants in order to get released their salaries on the plea that they were appointed as a Primary School Teachers by E.D.O, Lakki vide order bearing endst: No.2074-79/PST (F) dated 25/02/2011 and that they have also been regularly performing their duties as such however, the defendants are not willing to release their salaries.

Defendants contested the suit by filing written statement. The learned trial court while deciding the application of the temporary injunction filed by the plaintiffs, disposed off their suit under Order 15 Rule 1 CPC in the terms as mentioned above. This led to the present appeal by the defendants.

Arguments of learned Govt: Pleader and learned counsel for the respondents heard. File perused.


Main thrust of the arguments of learned Govt: Pleader was that the learned civil court had got no jurisdiction in the matter and as such wrongly entertained the suit of the plaintiffs, therefore the impugned judgment and decree is not maintainable. Conversely the learned counsel for the respondents controverted the arguments of learned Govt: Pleader and defended the impugned judgment on the grounds mentioned therein.

Cont:

Plaintiffs by averring to be legally appointed Primary School Teachers / Civil Servants in BPS-7 sought the release of their salaries by filing the civil suit under appeal. Proviso of salary to the civil servant has been laid down in N.W.F.P Civil Servants Act, 1973, as such the matter relating to the salary of the civil servant has a direct nexus with the terms and conditions of his/her service. It is settled that Service Tribunal alone is appropriate forum having jurisdiction to deal with matters relating to the terms and conditions of civil servants. The contention of learned Govt: Pleader as to the bar of jurisdiction of the Civil Court in entertaining the suit under appeal carries weight and such objection of the learned Govt: Pleader goes to the very root of the case. Consequently in the given facts and circumstances of the case when the Civil Court had got no jurisdiction to entertain the suit of the plaintiffs, the impugned judgment and decree of the learned civil court is not tenable.

As a sequel to above the present appeal is allowed, the impugned judgment and decree is set aside and it is directed that the plaint be returned to the plaintiffs. The court of learned Civil Judge-I is lying vacant, the plaintiffs to appear before the court of learned Senior Civil Judge, Lakki on 02/11/2012 for further proceeding / receiving back the plaint. Parties are left to bear their own costs. File be consigned to record room after its necessary completion and compilation.

Announced.
30/10/2012


(Muhammad Hamid Mughal)
District Judge, Lakki

Application No. 497
Application received on 26.10.12
Copying fee Deposited on _____
Next Date for Delivery of Copies 26.11.12
File received for copying _____
No. of sheets 9 sheets
_____ 10/ _____
_____ 32 _____
_____ 26.11.12 _____
Signature of _____ [Signature]

Attended
[Signature]
[Signature]

2-11-12

35

BEFORE THE COURT OF GHULAM ABBAS, SENIOR CIVIL JUDGE, LAKKI MARWAT

Mst Jamshed Bibi & Shakila Qayyum Vs Provincial Govt: etc (Civil Suit No.: /1- of 2012)

O ----- 01 02-11-2012

Case filed received back from learned court of Hon'ble District Judge, Lakki Marwat today. Be entered in relevant registered.

Plaintiffs appeared through her brother. It is observed that the plaintiffs had filed civil suit No. 81/1 of 2012, which was disposed off by learned Civil Judge-I, Lakki Marwat vide judgment dated 21-05-12. Appeal No.27/13 of 2012 was preferred, which was accepted vide judgment dated 30-10-12 and the decree was set aside and case was remitted to this court, being successor of the vacant court of learned Civil Judge-I with direction for return of the plaint.

Today, the plaintiffs appeared through her brother, in compliance of the directions of learned Appellate Court, the plaint is returned. Reader is directed to do the needful, as per rules. Case file be consigned to the record room after its completion.

ANNOUNCED

02-11-2012

Affixed
[Signature]

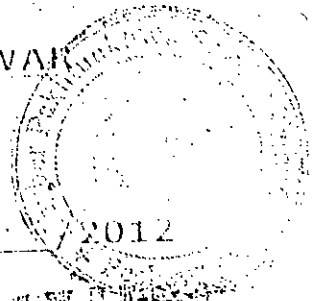
[Signature]
Ghulam Abbas,

Senior Civil Judge, Lakki Marwat
GHULAM ABBAS
Senior Civil Judge (Mag)
SSC-03, Deptt. L&D, Lakki Marwat

21

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

S.A No. 131 / 2012



Nusrat Shaheen D/o Awal Khan, Ex-PST,
GGPS, Wanda Faqiraa, Lakki Marwat

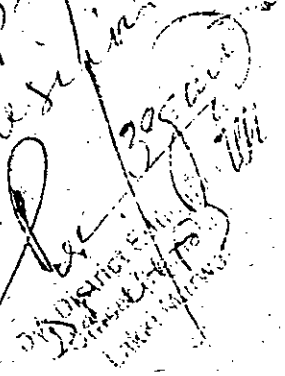
13/12/12
Appellant

Versus

1. Executive District Officer,
Elementary & Secondary
Education, Lakki Marwat.
2. Director, Elementary & Secondary
Education, Peshawar.
3. Secretary, Govt of KPK,
Elementary & Secondary
Education, Peshawar
4. District Coordination Officer, Lakki
Marwat.
5. District Account Officer, Lakki Marwat.

Respondents

*SDEO (E) Lakki Marwat
To comply with the
Court decision*



*Filed to-day
10/12/12
ATTESTED*

APPEAL AGAINST OFFICE ORDER
NO. 5800-806, DATED 27.07.2012
OF R.NO.1 WHEREBY APPELLANT
WAS TERMINATED FROM SERVICE
FROM THE DATE OF
APPOINTMENT FOR NO LEGAL
REASON.

Respectfully Sheweth:

*Shereed
by*

9/11/12

3.4.2013

Mst. Nisha...

Counsel for the appellant and Mr. Amit...

ADO for Respondent No. 1 present. Copy of order dated 28.12.2012 and letter dated 12.2.2013 placed on file. whereby the appellant has been reinstated in service. The respondent-department is directed to adjust the appellant forthwith against a vacant post for the purpose of pay and arrange for the pay as early as possible. Case adjourned to 24.5.2013 for compliance report further proceedings/PH.

sd/-
Member

Key Service... copy

Date of Presentation of Application 3.4.2013
Number of Petition 800
Case No. 6
U.O. No. 2
Page No. 8
Date of Filing 3.4.2013
Date of Hearing 3.4.2013

DEO (F)

I being representative of the department attend the Court of ST, Peshawar on 3.4.2013.

Hence in the light of directions implicit in report is required for the next date of hearing i.e. 24.5.2013.

Accepted in

To DEO (F)

PRINCIPAL
G.S. Date
10/11/2013

38

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S.A No. _____/2014

Jamshid Bibi

Versus

D.E.O & others

**APPLICATION FOR CONDONATION OF DELAY,
IF ANY.**

Respectfully Sheweth:

1. That the subject appeal is filed in this hon'able Tribunal.
2. That the delay was made in filing of the appeal not intentionally but being female, her brother was heart patient who was operated and was unable to move for long time.
3. That the apex Supreme Court held time and again in its judgments that vested rights shall not be killed on the score of limitation and cases be decided on merit.

It is, therefore, most humbly requested that delay, if any, be condoned in the best interest of justice.

Jamshid Bibi
Appellant

Through

Saadullah Khan Marwat
Saadullah Khan Marwat

Arbab Saif-ul-Kamal
Arbab Saif-ul-Kamal

&

Miss Robina Naz
Miss Robina Naz,
Advocates,

Dated: 29.05.2014

AFFIDAVIT

I, Jamshid Bibi D/o Ghulam Nabi, PST, GGPS, Hameed Abad, Lakki Marwat, Appellant, do hereby solemnly affirm and declare that contents of the Application are true and correct to the best of my knowledge and belief.

Jamshid Bibi
DEPONENT

بعد التّ جناب سرسٹریٹ ہونٹل سوہ سہ پشاور

مجناب ایڈووکیٹ

جناب جی بی بی نام

دعویٰ اسل

باعث تحریر یہ اینکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام پشاور کیسٹے سعید اڈا خان دس وقتے ایڈووکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور رضی دعویٰ اور درخواست ہر قسم کی تقدیر اور اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری بیکطرفہ یا اپیل کی برآمدگی اور تسویجی نیز دائر کرنے اپیل نگرانی و نظرتانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقدمہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر واختہ منظور قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التوا مقدمہ کے سبب سے ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المترقوم

العبد العبد العبد

11
ارباب سید اسماعیل
ایڈووکیٹ

سعید اللہ خان مروت
ایڈووکیٹ

Janshed Bili
جناب جی بی بی

من روپیہ تازہ
ایڈووکیٹ

Jamshid Bibi D/O Ghulam Nabi PST GGPS Hamid Abad Lakki Marwat

.....Appellant.

Versus

1. District Education Officer(Female) Elementary& Secondary Education
Lakki Marwat.
2. Director Elementary & Secondary Education, Peshawar.
3. Secretary Govt: of Khyber Pakhtunkhwa (E&SE) Deptt: Peshawar.
4. District Accounts officer Lakki Marwat .

..... Respondents.

Subject:- REPLY/COMMENTS ON BEHALF OF RESPONDENT NO.1,2 & 3

PRELIMINARY OBJECTION:-

1. The appellant has no cause of action.
2. The appellant has come to the tribunal with unclean hands.
3. The appeal in hand is not maintainable in the present form.
4. The appellant has concealed the real facts from the Honourable Tribunal.
5. The appeal in hand is badly time barred.
6. The appeal is liable to be dismissed due to mis-joinder of necessary parties and non-joinder of necessary parties.
7. The appellant is estopped by her own conduct to file the instant appeal.

COMMENTS OF FACTS:-

1. Pertain to record.
2. Pertain to record
3. Incorrect, the appellant had applied on fake/bogus SSC certificates, hence, selection on bogus testimonial was proved illegal due to deceiving the Department.
4. Incorrect. Charge assuming on fake documents is also illegal.
5. Incorrect, Monthly salary is paid to Govt: Servants after verification of documents from concerned Board and University. But appellant does not come to merit / criteria as her SSC certificate was declared fake and bogus. Moreover, appellant availed the said opportunity in shape of departmental appeal twice. *Copy of departmental appeal is Annexed as "A "*.
6. Incorrect. The decision of the Lower Court was set aside by District & Session Judge Lakki Marwat. and the appellant was directed to appear before the proper form to seek Justice.
7. Incorrect, The Deptt; was grived from the decision of the lower Court Lakki. hence, lodged appeal before District Judge Lakki which was accepted in favour of Department.
8. Incorrect, termination was legal on the basis of fake/bogus testimonial and appellant has no right for receiving monthly salary. because after issuance of appointment order of the appellant, documents of the appellant were sent for verification to BISE Bannu vide letter No.5045 Dated.14/06/2012 which was found fake and bogus due to tempering marks in SSC certificates. Therefore, after fulfilling all the codal formalities, the appellant was terminated vide order No.5800-806 Dated.27/07/2012, hence the appellant is not entitled for any salary. *Copy of verification letter to BISE Annex: "B" A reply of the BISE Bannu along with the bogus certificates are Annex, "C" and termination order is Annex,"D".*
9. *Incorrect, attendance on fake/bogus documents is quite illegal and can not be considered as right of appellant.*
10. Incorrect, the candidates who were re-instated in service, their documents were verified from the institutions and found correct, hence, they were paid salary.

COMMENTS OF GROUNDS:-

- a. Incorrect. The appellant had appeared before the Committee through fake/bogus testimonial so her appointment was illegal and bogus.
- b. As per para No.4 the assuming of charge on fake certificates and performing duty is totally illegal and does not come in the right of appellant.
- c. Incorrect. As replied above.
- d. Incorrect. The verification Agency is well known to each incumbent, i.e. BISE and University. The same were verified and proved bogus by the BISE, hence, further verification/show cause notices were not needed.
- e. Incorrect. The verifying of SSC certificate when proved bogus by the Board needs no verification by the Hon: Court, once approved Bogus can not be provided correct as the BISE is Final authority for verification .
- f. As per para "d".
- g. Incorrect, the statement of appellant is based on prejudice only.
- h. Incorrect, as already mentioned the co-appellant were re-instated because their re-instatement was based on the decision of Hon: Court. The appellant can not claim this action of Department as a right.

It is, therefore, humbly prayed that the appeal may kindly be dismissed because the re-instatement and paying of monthly salary to likewise appellant will open way for other illegal appointments.

Secretary to Government
Of Khyber Pakhtunkhwa Elementary & Secondary
Edu; Deptt; Peshawar
(Resp:No3)

Director Elementary & Secondary
Education Khyber Pakhtunkhwa
(Resp: No 2)

Bibi Razia
District Education Officer
(Female) Lakki Marwat
(Resp;No.1)

COUNTER AFFIDAVIT

I Mst; Bibi Razia District Education Officer (Female) Lakki Marwat solemnly affirm and declare oath that contents of instant reply /comments are true to the best of my knowledge and belief. Nothing has been concealed from this Honourable Tribunal.

Dated: _____/2015.

Bibi Razia
District Education Officer
(Female) Lakki Marwat

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION LAKKI MARWAT

No. 7751 / Complaint/ Dated Lakki Marwat the 02/10/2012

To

The Distric Coordination Officer
Lakki Marwat.

Subject: Representation/Departmental appeal

Memo: Reference Your Office No.4568/ Dated 26/9/2012 on the subject cited above
Detail report/comments are given as under:-

A):- JAMSHADA BIBI D/O GHULAM NABI

01)- Jamshada Bibi D/O, Ghulam Nabi has been appointed as PSI vide this office E.No.2074-79/Dated 25/2/2011(at S.NO.09) by the then Executive District Officer Lakki Marwat (Hoor Hassan Khan.)

02)- The undersigned submitted her Academic/ professional Certificate to the concerned agency vide this office No.5045 Dated 14/6/2012 (Photo copy attached)

03) In response of our memo: No Cited above, the Controller of the Examinations BISE, Bannu intimated vide his No.1081 Dated 15/6/2012 the HSSC of the above named candidate is correct(verified) while the Certificate of SSC has declared as bogus

04)- In the light of report of Controller of Examinations BISE, Bannu the undersigned has issued termination order of Jamshad Bibi with 05 others vide this office No.5800-806 Dated 27/7/2012 (Photo Copy is attached.)

Report is submitted Please


Executive District Officer
(E&S) Education Lakki Marwat

11/10/12

Annex 5 A

OFFICE OF THE DISTRICT COORDINATION OFFICER LAKKI MARWAT.

(a) No. 4588 /DCO/LM/HRDO/Appeal

Dated 20-09-2012.

To
The Executive District Officer
(E&S) Education, Lakki Marwat.

Subject:- Representation/Departmental Appeal.

Enclosed find herewith a Representation/Departmental appeal submitted by Jamshade Bibi D/O Ghulam Nabi U/C Lakki PST Teacher GGPS Hameed abad through Counsel Mohammad Triq Advocate High Court Lakki Marwat (which is self explanatory).

Please look into the case and submit report along with your comments to this office, positively.

Encl: a.a.

District Coordination Officer
Lakki Marwat.

Even No. & date

Copy to Jamshade Bibi D/O Ghulam Nabi U/C Lakki PST Teacher GGPS. Hameed abad Lakki.

District Coordination Officer
Lakki Marwat.

Annex (A)

BEFORE THE DIRECTOR EDUCATION GOVT OF KPK PESHAWAR

Subject: Representation / Departmental Appeal.

Respectfully Sheweth:

In your Honor, It is stated:

1. That, EDO Education (E&S) Lakki Marwat advertised certain vacant teaching posts including PSTs. Petitioner applied against the PST post amongst those vacant posts. On fulfilling the criteria and being from the eligible/ deserved candidates, petitioner was appointed on dated: 25-02-2011 as PST after due observation of all codal formalities. Subsequently, on the next following day i.e. on 26th of Feb 2011, petitioner was entrusted with duty/ charge. Since that, petitioner entertained the Education Department in term of teaching services at GGPS Hameed Abad Lakki till 27th July 2012 (round about one and half year). Copies of Appointment order and Charge Report are annexed as Annexure "A & B" respectively.
2. That, as sequel to appointment, all the codal formalities including verification of documents, preparation of service documents like service book, issuance of Medical Fitness Certificate were observed and whole the process due for appointment and service was carried. No illegality or irregularity in the process and fakeness or tempering in the documents could be pointed out. Copies of testimonials and medical certificate are annexed herewith as Annexure "C & D".
3. That, on dated: 27-07-2012, the said EDO terminated the petitioner from the service without any rhyme and reasons. In connection to termination, petitioner was neither served with any notice as prescribed by the law and rules nor was given any chance to self-defense and testify/ clarification. In addition, all the documents were prepared and verified by the same authority (EDO) from whom petitioner is aggrieved.
4. That, as no illegality, irregularity and melafide has been observed throughout the appointment process as well as in duty. The termination of petitioner by the authority has been culminated purely on political pressure, melafide on the part of EDO concerned in order to vacate the post for filling by a favorite person.
5. That, the termination of petitioner is the result of political victimization and the said termination is against the norms of justice, Constitution of the Country, policy, rules and regulation. Petitioner has not been treated equally before the law and has been condemned unheard.

Annex - (A)

It is therefore, humbly prayed, that on acceptance of instant appeal, the petitioner may kindly be restored/ reinstated on the said post immediately from the date of termination along with all back benefits and any other remedy which deems fit.

Dated: 23-08-2012

Your Humble Petitioner

Jamshed Bibi
Jamshed Bibi

D/O Ghulam Nabi

U/C Lakki, PST GGPS Hameed
Abad, Distt: Lakki Marwat

Muhammad Tariq Qureshi
Muhammad Tariq Qureshi
Advocate High Court
Lakki Marwat

Annex (B)

No. 5045

Dated 14/08/12

From

Executive District Officer
(E&S) Edu: Lakki Marwat

To

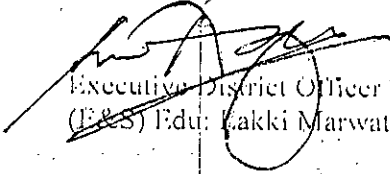
Controller of Examination

Subject: VERIFICATION OF SSC & HSSC

Memo;

Please find herewith SSC / HSSC (Photocopy) of following for verification and return please. Necessary fee in shape of bank draft/receipt is attached herewith.

S.No.	Name	R.No.	Session	Certificate/Degree
1	Fehmida	50979	2005A	SSC
2	Fehmida	18329	2007A	HSSC
3	Jamshed Bibi	50285	1975B	SSC
4	Jamshed Bibi	1586	2002 S	HSSC
5	Shamim Begam	26902	2006A	SSC
6	Shamim Begam	34286	2010 A	HSSC


Executive District Officer
(E&S) Edu: Lakki Marwat

Annex - C

Board of Intermediate and Secondary Education, Bannu.

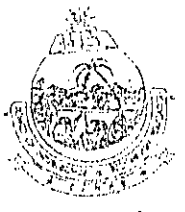
Dated 15-6-12

No. 1081 / Certificates / BISE, Bannu.

To

Executive Distt Officer,
F and S Edu Bannu

(8)



Subject: VERIFICATION.

I am directed to refer to your letter No. 5045-5046-5047 dated 14-6-12-

on the subject noted above and to inform you that photocop (y) (ies) of Original / Provisional Certificate (s) of the following candidate (s) enclosed with the above mentioned letter have thoroughly checked and found as detail given below:

S.No.	Roll No	Name	Father's Name	Session	Remarks
1	34286	Shamim Begum	Ahmad Jan	Autu A-2010	Boys
2	50285	Zainab Billo	Ghulam Nalei	SSE S-915	Boys
3	1580	Zainab Billo	Ghulam Nalei	Autu 2002	Boys
4	51373	Rukhsana Hayat	Hayat Ullah	SSE A-2005	Boys
5	808	Gulshan Billo	Jan Gul	S-2003	Boys
6	50931	Fahmida Billo	Amin Jan	SSE A-2005	Boys
7	1301	Noureen Zigi	Abdul Rafoq Nigri	S-2006	Boys
8					
9					
10					
11					
12					
13					
14					
15					

Rolls 1, 2, 4, 6 and 7 are Boys

(Assistant Secretary)
Board of Intermediate &
Secondary Education, Bannu
15/6/12

Annex (C)

46 6

S.No. 000190

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

Roll No. 50285

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION

Bannu N.W.F.P. Pakistan

Secondary School Certificate Examination

PROVISIONAL CERTIFICATE

Session 1984-85 Annual/Supplementary



Handwritten signatures and scribbles

THIS IS TO CERTIFY THAT

Son/Daughter of Jamshed Bibi

is a candidate of M.A. Lakki

has passed the Secondary School Certificate Examination of the

Board of Intermediate and Secondary Education, Bannu held on October 25

as a Regular/Private candidate. He/She obtained 366 Marks out of 850 and has

been prescribed in Grade B representing 366

The Candidate passed in the following subjects.

1. English	3. Islamiyat	5. Urdu	7. <u>93</u>
2. Urdu	4. Pakistan Studies	6. <u>15</u>	8. <u>EM</u>

Internal assessment Grade awarded by the Institution concerned (EM)

Date of birth according to admission form is 07-6-1976

one thousand nine hundred and seventy six

Prepared by [Signature]

Checked by [Signature]

Date of Preparation 4/1/85

[Signature]
Lecturer
Govt. Degree College

[Signature]
Joint Secretary (Certificates)
B.I.S.E. Bannu

SECRETARY
G.C.M.B.
Lakki Marri

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION LAKKI MARWAT

OFFICE ORDER:-

Consequent upon the verification of Academic/Professional Certificates by the concerned Board i.e (BISE) Bannu and found bogus/Fake/tempered, the services of the following primary school teachers (Female) are hereby terminated from the date of their appointment.

S. No	Name	Father Name	Place of appointment	Order issued vide/No. and dated
1	Shamim Begum	Ahmad Jan	GGPS, Khushdil Adamzai	2074-79/PST(F) Dated 25-02-2011 at S.No.14
2	Jamshed Bibi	Ghulam Nabi	GGPS, Hameed Abad, Lakki	2074-79/PST(F) Dated 25-02-2011 at S.No.9
3	Rukhsana Hayat	Hayat Ullah	GGPS, Textile Mills	2074-79/PST(F) Dated 25-02-2011 at S.No.15
4	Fahmida Bibi	Amin Khan	GGPS, Tooti Abad	2074-79/PST(F) Dated 25-02-2011 at S.No.11
5	Nusrat Shahheen	Awal Khan	GGPS, Sheri Khel Faqiran	2074-79/PST(F) Dated 25-02-2011 at S.No.6
6	Noureen Niazi	Abdul Ghafoor Niazi	GGPS, Wanda Khara	2074-79/PST(F) Dated 25-02-2011 at S.No.12

Executive District Officer
(E&S) Education Lakki Marwat

Lndst: No.

5800-806

Dated. 27-7-2012.

- Copy to the:-
1. Secretary to Government of Khyber Pakhtunkhwa (E&S) Education Department, Peshawar.
 2. Director, Elementary & Secondary Education Department Khyber Pakhtunkhwa.
 3. Honorable District Session Judge, Lakki Marwat.
 4. District Coordination Officer, Lakki Marwat.
 5. District Officer (F) local office.
 6. District Accounts Officer, Lakki Marwat.
 7. Deputy District Officer (F) local office.

Executive District Officer
(E&S) Education Lakki Marwat

1

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR

Jamsheda Bibi

Versus

S.A No. 773/2014

DEO & Others

REJOINDER

Respectfully Sheweth,

PRELIMINARY OBJECTION.

All the 7 preliminary objections are illegal and incorrect. No reason in support of the same is ever given as to why appellant has no cause of action, unclean hands, not maintainable, concealment of facts, barred by time, mis and non joinder of necessary parties and estopped by her own conduct.

ON FACTS

- 1-2. Pertains to record.
3. Not correct. Appellant had filed up "Form" for appointment as PST and details given in the same were quite correct. All the certificates have attached with the "Form". Every column of the Form was/is correct. No fake/bogus certificates was ever submitted to the department.
4. Not correct. The para of the appeal is correct.
As respondents, the then EDO, - S&SE with staff/representatives was minting money from candidates, so they themselves manipulated the certificates to oust appointed candidates and to appoint fresh over on considerations.
5. Not correct. The attached Form is the ample proof of genuineness. The respondents also declared the certificates of 33 PST, as fake/bogus but they were reinstated and are serving the department till date.

From this, it is quite clear that respondents are playing fraud with Hon'ble Tribunal and are not submitting the real facts for the reason to deceive the Hon'ble Tribunal, even in the appointment order of appellant too. (Copy as annex "R")

6. Not correct. The para of the appeal is correct, regarding filing of Civil Suit in Court of Civil Judge.
7. As above.
8. Not correct. As stated earlier, respondents along with representatives of the office manipulated the documents of appellant to make subsequent appointments on considerations. The certificates submitted with the Forms is the ample proof.
9. Not correct. No fake and bogus certificate was submitted to the department by appellant.
10. In this para, respondents denied the contents of appeal but in the precedings/subsequent paras, the same was admitted correct by reinstating other similarly placed teachers with all back benefits and were paid salaries too.

GROUNDS:

- a. Not correct. Appellant submitted "Form" for appointment as PST wherein every column was filled up. In every column of "Form" year of passing, marks obtained and the concerned Institutions is written. No manipulation was made therein and as stated earlier, over and above appointments than the sanctioned posts were made, so to clear way for others, such drama was staged by the then EDO/DEO, E&SED, Lakki Marwat with the help of the representative/staff of the department.

For their misdeeds, the then DEO, E&SED, Lakki Marwat was arrested by NAB & the staff who facilitated him in the misdeeds shall also are under investigation.
- b. Not correct. After assumption of the charge of the post, appellant used to perform her duties in GGMS, Khawaja Khel and gave good results to department. The school and her performances were checked and verified by the authorities every year and no such objections were ever raised.
- c. Not correct. Appellant was never associated with the process of verification of certificates nor she was served with any notice, so everything was done with ulterior motive.

- d. Not correct. No actual and real certificates of appellant was submitted to the Board/University but those who were tempered by the then DEO and his staff were declared as bogus. In Annexure "C" attached with reply, tempering the certificates of the teachers as fake were subsequently found as correct and genuine.
- e. Not correct. Respondents do not want to verify the certificates of appellant from the concerned quarter to not dig out their malpractices. If the Hon'ble Tribunal has any reservation about the genuineness of the certificates of appellant, the same shall be verified from the concerned quarters.
- f. Not correct. The ground of the appeal is correct regarding service of show cause notice and conduct of enquiry.
- g. Not correct. The ground of the appeal is correct regarding tainting money, and retrospective issuance of orders of appointments.
- h. Not correct. When certificates of co-employees were found fake and bogus, then why such fact was not brought to the notice of the Hon'ble Tribunal and why the certificates, after re verification, were found as correct.

It is, therefore, most humbly requested that the appeal be accepted as prayed for in the heading of the same.

Through
Dated: .11.2015

Appellant
Saadullah Khan Marwat
Arbab Saif Ul Kamal
Miss Rubina Naz
Advocates,

AFFIDAVIT

I, Jamshed Bibi D/o Ghulam Nabi, Appellant do hereby solemnly affirm and declare that contents of the **Appeal & rejoinder** are true and correct to the best of my knowledge and belief while that of the reply of respondents are illegal and incorrect.

I reaffirm the same on oath once again to be true and correct as per the available record.

DEPONENT