

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

Service Appeal No. 1309/2023

Shehnaz Begum

..... Appellant

Versus

Government of KPK and others

..... Respondents

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Appellant

Through

Nasir Mehmood

Advocate Supreme Court of Pakistan.

Office No.622 6th floor Pak-Medical
Center, Khyber Bazar, Peshawar.

Date of Hearing 23/06/2023

①

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

Service Appeal No. 1309 /2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 6143

Shehnaz Begum

..... Appellant

Dated 22/6/2023

V E R S U S

Government of KPK and others

..... Respondents

REPLY TO THE SERVICE APPEAL ON BEHALF OF
RESPONDENT No.4

Respectfully Sheweth:

PRILIMINARY OBJECTONS:

1. That appellant has got no cause of action and are no locus standie to file the instant appeal.
2. That the instant appeal is baseless, frivolous, vexatious and has been filed to harass the answering respondent.
3. That the present appeal is not maintainable in its present form hence liable to be dismissed.
4. That the appellant has not come up to this Honorable Tribunal with clean hands.
5. That the appellant has filed the instant appeal malafidely and to waste precious time of this Honorable Court.
6. That the answering respondent was also transferred by the authority's several times on the request of the appellant.

REPLY ON FACTS:

- I. Para 1 needs no reply.
- II. Para 2 pertains to record.
- III. In reply to para 3 it is submitted, that the appellant has divulged half-truth and not the whole truth. In-fact through general notification dated 22.09.2016 the answering respondent no.4 was transferred as SDEO (F)

Takht Nasrati and appellant was transferred as SDEO Karak. Then after a period of 9 months the appellant manages to transfer the answering respondent No.4 from Takht Nasrati and posted herself in the place of the answering respondent No.4 through notification dated 21.08.2017. The appellant remained for four years in Takhti Nasrati. It was after four years that answering respondent No.4 was transferred through General transfer order dated 07.10.2021 and was posted as SDEO at Takht Nasrati and the appellant was transferred to Serai Nourang Lakki Marwat. The appellant again manages to transfer herself through notification dated 06.12.2022 from Serai Nourang Lakki Marwat to Takhti Nasrati and the answering respondent No.4 was transferred from Takhti Nasrati to Serai Nourang Lakki Marwat, through transfer order dated 04.05.2023 the answering respondent No.4 was transferred from Serai Nourang Lakki Marwat to Takhti Nasrati and appellant was transferred from Takhti Nasrati to Serai Nourang Lakki Marwat then through subsequent order on the same date the above mentioned transfer order was withdrawn and on 26.05.2023 the appellant was transferred to Town 3 Peshawar and answering respondent was transferred from Serai Nourang Lakki Marwat to Takhti Nasrati. (Copies of the notifications dated 22.09.2016, 21.08.2017, 07.10.2021, 06.12.2022, 04.05.2023 and 26.05.2023 are attached herein as Annex-A, B, C, D, E and F)

IV. In reply to para 3,4 and 5. It is further submitted that it is the appellant who manages special transfer order on the basis of political consideration and on the other hand the answering respondent No.4 always been transferred through General Transfer Order. The appellant remained at Takhti Nasrati for roundabout to 4, 5 years and wanted to serve at Takhti Nasrati for the rest of her carrier.

V. Para 6 needs no reply.

VI. Para 7 is wrong and incorrect; appellant is not an aggrieved person.

GRUNDS:

A. Ground A is wrong and incorrect.

B. In reply to Ground B it is submitted, that appellant might be having a disable child but it does not mean that she would be posted at Takht Nasrati for rest of her carrier.

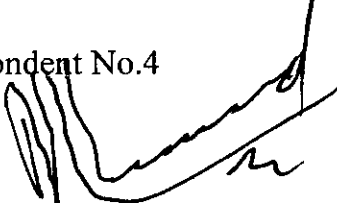
3

- C. Ground C is wrong and incorrect and it is further submitted that ban notification was issued on 29.05.2023 and transfer order were issued prior to imposition of ban. It is pertinent to mention here that the appellant was relieved from duty on 27.05.2023 but she has not disclosed this fact to the Honorable Tribunal and got restraining order. **(Copy of the relevant slip is attached herein as Annex-G)**
- D. Ground D is wrong and incorrect. No one is having grudges against the appellant.
- E. In reply to Ground E it is submitted, that the appellant herself manages her transfer order.
- F. Ground F is wrong and incorrect.
- G. Ground G is wrong and incorrect. The impugned transfer order was issued in public interest.
- H. Ground H is wrong and incorrect.
- I. In reply to the Ground I the answering respondent No.4 crave permission of this Honorable Tribunal to reply on other grounds at the time of arguments and produce any additional documents if required in support of instant petition.

It is therefore, most humbly prayed that on acceptance of this reply the service appeal of the appellant may kindly be dismissed.


Answering Respondent No.4

Through


Nasir Mehmood
Advocate Supreme Court of Pakistan.
Office No.622 6th floor Pak-Medical
Center, Khyber Bazar, Peshawar.

(4)

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA,
PESHAWAR.

Service Appeal No. 1309/2023

Shehnaz Begum

..... Appellant

Versus

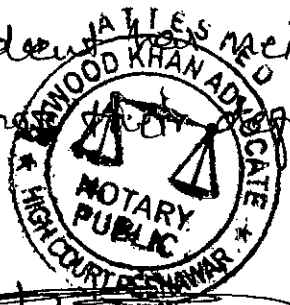
Government of KPK and others

..... Respondents

AFFIDAVIT

I do, hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

It is further stated on oath that in this ~~affidavit~~ appeal the answering respondent ~~has~~ ^{has not} been placed en-party ~~and~~ ^{and} no ~~objection~~ ^{objection} has been struck off.



22/06/2023

P/H (1)

(5)

Amer - A



GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

NOTIFICATION

Dated Peshawar the September 22nd, 2016

NO. SO(S/E)&SE/4-16/2016/Placement Committee: Consequent upon the recommendations of Placement Committee, posting/ transfer in respect of following female officers from management/ teaching cadre in the Elementary & Secondary Education Department are hereby ordered against the management posts noted against each in the interest of public service with immediate effect: -

| S# | Name of Officer | Proposed as | Remarks |
|-----|--|--|-------------------------------|
| 1. | Mst. Tujza ASDEO (F) BS-16 Bannu (Teaching cadre) | SDEO (F) BS-17 Lakki Marwat (in her own pay & scale) | Against newly sanctioned post |
| 2. | Mst. Fasteem Bibi H/M BS-17 GGHS Dagai Bunir (Teaching cadre) | SDEO (F) BS-17 Khadukhail Bunir | -do- |
| 3. | Mst. Rizwana Jabeen H/M BS-17 GGHS Daraban Kalan DIKhan (Teaching cadre) | SDEO (F) BS-17 Daraban DIKhan | -do- |
| 4. | Mst. Shakila Bano H/M BS-17 GGHS Khadakzai Dir lower | SDEO (F) BS-17 Dir Lower | -do- |
| 5. | Mst. Nasim Begum ASDEO (F) BS-16 Dir Lower | SDEO (F) BS-17 Balambat Dir Lower (in her own pay & scale) | -do- |
| 6. | Mst. Gul Farzana ASDEO (F) BS-16 Chitral (Management cadre) | SDEO (F) BS-17 Kal Kot Dir Upper (in her own pay & scale) | -do- |
| 7. | Mst. Zahida Khanum ASDEO (F) BS-16 Chitral (Management cadre) | SDEO (F) BS-17 Munda Dir Lower (in her own pay & scale) | -do- |
| 8. | Mst. Shakila Anjum ASDEO (F) BS-16 Chitral (Management cadre) | SDEO (F) BS-17 Khall Dir Lower (in her own pay & scale) | -do- |
| 9. | Shaheen SDEO (F) BS-17 Timer Garah Dir Lower | SDEO (F) BS-17 Adenzai Dir Lower | -do- |
| 10. | Mst. Shabana ASDEO (F) BS-16 Hangu (Management cadre) | SDEO (F) BS-17 Thall Hangu (in her own pay & scale) | -do- |

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| S# | Name of Officer | Proposed as | Remarks |
|-----|--|---|-------------------------------|
| 11. | Mst. Hafat Younas SS BS-17 GGHSS Chapra Haripur (Teaching cadre) | SDEO (F) BS-17 Ghazi Haripur | -do- |
| 12. | Mst. Zufrana ASDEO (F) BS-16 Lakki Marwat (Teaching cadre) | SDEO (F) BS-17 Domail Bannu (in her own pay & scale) | -do- |
| 13. | Mst. Sughra Mehboob SS BS-17 GGHSS Behali Manshra (Teaching cadre) | SDEO (F) BS-17 Balakot Manshra | Against newly sanctioned post |
| 14. | Mst. Shazia Bibi SS BS-17 GGHSS Muradpur Manshra (Teaching cadre) | SDEO (F) BS-17 Ogi Manshra | -do- |
| 15. | Mst. Fozia Sultana H/M BS-17 GGHS Hisartang Nowshera (Teaching cadre) | SDEO (F) BS-17 Jhangira Nowshera | -do- |
| 16. | Mst. Faheem Afshan ADEO (F) BS-16 Nowshera | SDEO (F) BS-17 Pabbi Nowshera | -do- |
| 17. | Mst. Najma Khan (B-17) SS GGHSS Odigram Swat (Teaching cadre) | SDEO (F) BS-17 Alpuri Shangla | -do- |
| 18. | Mst. Naheed Anwar SS BS-17 GGHSS Kalu Khan Swabi (Teaching cadre) | SDEO (F) BS-17 Razzar Swabi | -do- |
| 19. | Mst. Bakht Bahar SS BS-17 GGHSS Matta Swat (Teaching cadre) | SDEO (F) BS-17 Bahrain Swat | -do- |
| 20. | Mst. Irshad Begum SS BS-17 GGHSS Tahir Abad Swat (Teaching cadre) | SDEO (F) BS-17 Barikot Swat | -do- |
| 21. | Mst. Shahnaz ASDEO (F) BS-16 Circle Charbagh Swat | SDEO (F) BS-17 Charbagh Swat (in her own pay & scale) | -do- |
| 22. | Mst. Bibi Yasmin H/M BS-17 GGHSS Khawazakhela Swat (Teaching cadre) | SDEO (F) BS-17 Khawazakhela Swat | -do- |
| 23. | Mst. Dur-e-Shawar H/M BS-17 GGHS Zarakhela Swat (Teaching cadre) | SDEO (F) BS-17 Kabal Swat | -do- |
| 24. | Mst. Zahida Qayum SST BS-16 GGHS Matta Swat (Teaching cadre) | SDEO (F) BS-17 Matta Swat (in her own pay & scale) | -do- |

P# (3)

(7)

| S# | Name of Officer | Proposed as | Remarks |
|-----|--|--|----------------|
| 25. | Mst. Gul Raj ADEO (F) BS-16 Peshawar | SDEO (F) BS-17 Town-II Peshawar (in her own pay & scale) | -do- |
| 26. | Mst. Hifza Gul (BS-17) Assistant Director Directorate E&SE (Management cadre) | SDEO (F) BS-17 Town-I Peshawar | -do- |
| 27. | Mst. Nizakat Tabassum ASDEO (F) BS-16 Peshawar | SDEO (F) BS-17 Town-IV Peshawar (in her own pay & scale) | -do- |
| 28. | Safia Amin SDEO (F) BS-17 Peshawar (Management cadre) | SDEO (F) BS-17 Town-III Peshawar | -do- |
| 29. | Nargus SDEO (F) BS-17 Lakki Marwat | SDEO (F) BS-17 Sarai Naurang Lakki Marwat | -do- |
| 30. | Sadia Aziz SDEO (F) BS-17 Battagram (Management cadre) | SDEO (F) BS-17 Havelain, Abbottabad | -do- |
| 31. | Sumera Sheraz SDEO (F) BS-17 Nowshelra (Management cadre) | Assistant Director (BS-17) Directorate E&SE | -do- |
| 32. | Mst. Rukhsana Rahim BS-17 SDEO F Swabi (Management cadre) | SDEO (F) BS-17 Katlang Mardan | -do- |
| 33. | Mst. Farhat Yasmin ASDEO (F) BS-16 Karak | SDEO (F) BS-17 Takht-e-Nasrati Karak (in her own pay & scale) | -do- |
| 34. | Mst. Shahnaz ASDEO (F) BS-16 Karak | SDEO (F) BS-17 Karak (in her own pay & scale) | -do- |
| 35. | Mst. Naila Naz ASDEO (F) BS-16 Topi Swabi | SDEO (F) BS-17 Topi Swabi (in her own pay & scale) | -do- |
| 36. | Mst. Shah Jehan BS-17 H/M GGHIS Lahor Swabi (Teaching cadre) | SDEO(F) BS-17 Lahor Swabi | -do- |
| 37. | Mst. Rehana Begum SS BS-17 GGHSS Kotha Swabi (Teaching cadre) | SDEO (F) BS-17 Swabi | -do- |
| 38. | Mst. Nighat Seema ASDEO (F) BS-16 Mardan (Teaching cadre) | SDEO (F) BS-17 Takhtbhai Mardan (in her own pay & scale) | -do- |
| 39. | Zuhra Jalul BS-18 (Teaching Cadre) Dy: District Education Officer (Female) Chitral | Dy: District Education Officer BS-18 (Female) Dir Upper with Additional Charge of DEO(F) | Vice S. No. 40 |

~~R/H/A~~

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| S# | Name of Officer | Proposed as | Remarks |
|-----|---|--|---|
| 40. | Bibi Halima BS-18 Dy: District Education Officer (Female) (Teaching Cadre) Dir Upper | Dy: District Education Officer BS-18 (Female) Chitral with Additional Charge of DEO(F) | Vice S. No. 39 |
| 41. | Nusrat Bib BS-18 Principal GGHSS Palai Malakand (Teaching Cadre) | Dy: District Education Officer BS-18 (Female) Dir Lower with Additional Charge of DEO(F) Dir Lower | A.Y.P |
| 42. | Ulfat Begum BS-18 (Management Cadre DDEO(Female) Peshawar with Additional charge of the post of DEO (F) Peshawar | Against the post of DEO (F) BS-19 Peshawar (in her own pay & scale) | Against vacant post already occupied by her |
| 43. | Surriya Begum BS-18 (Management Cadre) under transfer as Vice Principal GGBSHSS Peshawar | DDEO(F) (BS-18) Peshawar | Vice S. No. 42 |

2. No TA/DA allowed.

3. The order of officers at S. No. 4, 5, 6, 7, 8, 10, 12, 16, 21, 24, 25, 27, 33, 34, 35, 38 & 42 will be effective subject to the condition that they will give an undertaking/ Affidavit on legal/ stamp paper to Secretary E&SE/ Directorate E&SE Peshawar to the effect that they will not claim benefits of graded pay and seniority of the higher pay scale.

SECRETARY

Encls: of even No. & date:

Copy forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (F) concerned.
4. District Accounts Officers concerned.
5. In charge EMIS, E&SE Department for uploading at official website.
6. PS to Minister for E&SE Khyber Pakhtunkhwa.
7. PS to Secretary E&SE Department.
8. Officers concerned.
9. Office order file.

(LAL SAEED KHATTAK)

SECTION OFFICER (SCHOOLS/ FEMALE)

10

| No | Name & Address | To be posted as | Rem |
|----|--|--|--------------|
| 14 | Shehnaaz Begum BS-16 SDEO (I) Karak (Teaching Cadre) | 16 SDEO (I) BS-17 Takht Nusrate Karak in her own pay and scale | Vice S No |
| 15 | Sughra Mehboub BS-17 SDEO (I) Balakot Manselha (Teaching Cadre) | SS (I) Study BS-17 at GGHS Hehali Manselha | AV |
| 16 | Shazia Nawaz BS-17 SDEO (I) Waiting for posting (Management Cadre) | SDEO (I) BS-17 Darabul Dikhan | Vice S No |
| 17 | Rizwana Jabeen BS-17 SDEO (I) Draban Dikhan (Teaching Cadre) | Principal (BS-18) at GGHS Mithun in her own pay and scale | AV |
| 18 | Fahunda Begum BS-17 Headmistress GGHS Manu Malakand (Teaching Cadre) | SDEO (I) BS-17 Dargu Malakand | AVP |
| 19 | Mrs. Musarat BS-16 ASDEO (I) Wan Dir Upper (Teaching Cadre) | SDEO (I) BS-17 Wan Dir Upper in her own pay & scale | Vice S No 20 |
| 20 | Mrs. Hafiza Bibi TMT (BS-17) working against SDEO (I) BS-17 Wan Dir Upper (Teaching Cadre) | Headmistress (BS-17) at GGHS Akhgram Dir Upper | AVP |
| 21 | Khalida Shakir BS-17 Headmistress GGHS Surakh Dheri (Teaching Cadre) | SDEO (I) BS-17 Takht Dheri | Vice S No 22 |
| 22 | Negahi Seema SSI (BS-16) working as SDEO (I) Takht Dheri (Teaching Cadre) | Services placed at the disposal of HRD (I) Manu for further posting against SSI post | |

SECRETARY

Enlist of copy No. & date:

- Copy forwarded to the -
1. Accountant General Khyber Pakhtunkhwa, Peshawar
 2. Director E&SE Khyber Pakhtunkhwa, Peshawar
 3. Director DC TE, Khyber Pakhtunkhwa, Abbottabad.
 4. District Education Officers (Female) concerned
 5. District Accounts Officers concerned
 6. In-charge E&SE, Ed&SI Department for uploading at official website
 7. PS to Secretary E&SE Department, Peshawar.
 8. Officers concerned.
 9. Office order file

(Signature)
 23.08.2017
 (AL SAIED KHATTAK)
 SECTION OFFICER (SCHOOLS FEMALE)

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BETTER COPY

GOVERNMENT OF KHYBER PAKHTUNKHWA

ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

NOTIFICATION:

NO.SO/E&SED174-1-2017 Elementary Committee

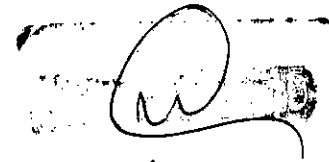
10 A

| Sr. No | Name of Officer | To be Posted as | Remarks |
|--------|--|--|-------------|
| 1. | Mst Razwina | | |
| 2. | Shabana Parveen | | |
| 3. | Syeda Anum | | |
| 4. | Zah un Nisa | | |
| 5. | Suman Akhtar | | |
| 6. | Shoukat Atta | | |
| 7. | Shabana Shaheen | | |
| 8. | Farzana Sardar | | |
| 9. | Mahar Un Nisa | | |
| 10. | Mst Najma Khan | | |
| 11. | Aaisha Gohar | | |
| 12. | Bakht Bahar | | |
| 13. | Mst Farhat Yasmeen MC BS-16, SDEO (F) Takhti Nasrati Karak (Teaching Carder) | SDEO (Female), BPS-17 in her own Pay scale and order | AVP |
| 14. | Mst. Shahnaz Begum MC SDEO (F) BS-17, Karak. (Teaching Carder) | SDEO (Female) BPS-17 Takhti Nasrati Karak in her own scale | Vice S.No.2 |
| 15. | Sughra Mehboob | | |
| 16. | Shahzia Nawaz | | |
| 17. | Rizwana Jabeen | | |
| 18. | Fehnnda Begum | | |
| 19. | Mst Musrat | | |
| 20. | Mst. Hifza Bibi | | |
| 21. | Khadija Shakir | | |
| 22. | Nighat Seema | | |

SECRETARY

Copy forwarded to:-

1. Accountant General KPK.
2. Director E&SE KPK.
3. Director DCET KPK Abbottabad.
4. District Education Female Concern.
5. District Account Officer Concern.
6. Incharge EMIS, E&SE Department.
7. PS to Secretary E&SE Department.
8. Officers Concern.
9. Officer Order File.



LAL SAEED KHATTAK
Section Officer (Schools Female)



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223588

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SND-188

Dated Peshawar the, October 07th, 2021

NOTIFICATION

No.SO(S/F) E&SED/4-16/2021/POSTING/TRANSFERS/MC: The Competent authority, in compliance with the decision of the Provincial Cabinet, is pleased to order the posting / transfers of the following Sub Divisional Education Officers (SDEOs BS-17) of the Elementary & Education Department, Khyber Pakhtunkhwa, in the public interest, with immediate effect: -

Annex - C

| Sr. No | Name & designation | From | To |
|--------|--|---|--|
| 1. | Mst. Shahida Parveen SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Peshawar Town-IV vice No-15 | Sub Divisional Education Officer (Female) Tangi Charsadda |
| 2. | Mst. Zeenat Begum SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Tangi Charsadda | Sub Divisional Education Officer (Female) Town-I Peshawar. |
| 3. | Mst. Maryam Rashid SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Town-I Peshawar. | Sub Divisional Education Officer (Female) Jehangira Nowshera. |
| 4. | Mst. Syeda Nasra Azam SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Jehangira Nowshera. | Sub Divisional Education Officer (Female) Lower Tanawal Abbottabad. |
| 5. | Mst. Naila Naz SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Swabi. | Sub Divisional Education Officer (Female) Chitral Lower. |
| 6. | Mst. Musarat Jamal SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Chitral Lower. | Sub Divisional Education Officer (Female) Torkhow Mulkhow Chitral Upper. |
| 7. | Mst. Arifa Bibi SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Torkhow Mulkhow Chitral Upper | Sub Divisional Education Officer (Female) Seo Kohistan Upper AVP. |
| 8. | Mst. Nancy Begum SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Topi Swabi | Sub Divisional Education Officer (Female) Haripur |
| 9. | Mst. Surriya-Taj SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Haripur | Sub Divisional Education Officer (Female) Pabbi Nowshera |
| 10. | Mst. Nazia Anjum SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Pabbi Nowshera | Sub Divisional Education Officer (Female) Balakot Mansehra. |
| 11. | Mst. Adeela Rani SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Balakot Mansehra. | Sub Divisional Education Officer (Female) Ghazi Haripur. |
| 12. | Mst. Saeeda Bano SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Ghazi Haripur. | Sub Divisional Education Officer (Female) Darband Mansehra. |
| 13. | Mst. Sajida Sakhi SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Darband Mansehra. | Sub Divisional Education Officer (Female) Pattan Kohistan Lower AVP. |
| 14. | Mst. Fozia Parveen SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Serai Naurang Lakki Marwat. | Sub Divisional Education Officer (Female) Takhti Nusrati Karak |

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GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223588

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| | | | |
|-----|---|---|---|
| 15. | Mst. Shahnaz Begum SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Takhti Nusrati Karak | Sub Divisional Education Officer (Female) Serai Naurang Lakki Marwat. |
| 16. | Mst. Bibi Arifa SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Mansehra | Sub Divisional Education Officer (Female) Serai Naurang Lakki Marwat. |
| 17. | Mst. Mehar Sanj SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Gaggra Buner. | Sub Divisional Education Officer (Female) Havellian Abbottabad. |
| 18. | Mst. Farhat Yasmeen SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Karak | Sub Divisional Education Officer (Female) Takhti Nusrati Karak. |
| 19. | Mst. Bibi Ayesha Naz SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Lower Tanawal Abbottabad. | Sub Divisional Education Officer (Female) Karak |
| 20. | Mst. Malak Taja SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Mardan. | Sub Divisional Education Officer (Female) Adezai Dir Lower. |
| 21. | Mst. Shabnam Bibi SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Adezai Dir Lower. | Sub Divisional Education Officer (Female) Timergara Dir Lower. |
| 22. | Mst. Shaheen Bibi SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Battagram | Sub Divisional Education Officer (Female) Kalkot Dir Upper AVP. |
| 23. | Mst. Shamshad Bibi SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Tank | Sub Divisional Education Officer (Female) Pharpur DI Khan |
| 24. | Mst. Sonia Nawaz SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Pharpur DI Khan | Sub Divisional Education Officer (Female) Tank |
| 25. | Mst. Naheed Fazal SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Abbottabad. | Sub Divisional Education Officer (Female) Sheringle Dir Upper AVP. |
| 26. | Mst. Anisa Jamshed SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Lora Abbottabad. | Sub Divisional Education Officer (Female) Kumbhar Dir Lower. |
| 27. | Mst. Nageena Bibi SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Havellian Abbottabad. | Sub Divisional Education Officer (Female) Kunda Kohistan Upper AVP. |
| 28. | Mst. Zahida Khanum SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Lakki Marwat. | Sub Divisional Education Officer (Female) Alai, Battagram AVP. |
| 29. | Mst. Nazma Shaheen SDEO (Female BS-17) | Sub Divisional Education Officer (Female) Khanpur Haripur | Sub Divisional Education Officer (Female) Barawal Dir Upper AVP. |
| 30. | Mst. Sobla Tabassum (MC BS-17) | Sub Divisional Education Officer (Female) DI Khan | Sub Divisional Education Officer (Female) Domel Bannu. |
| 31. | Mst. Farhat Yasmeen (MC BS-17) | Sub Divisional Education Officer (Female) Domel Bannu. | Sub Divisional Education Officer (Female) DI Khan |
| 32. | Mst. Rizwana Pari (MC BS-17) | Sub Divisional Education Officer (Female) Khadu Khel Buner | Sub Divisional Education Officer (Female) Karak |



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Phone No. 091-9223588

13

| | | | |
|-----|------------------------------------|--|---|
| 33. | Mst. Shagufta Noreen (MC BS-17) | Assistant Director, Directorate of E&SE KP | Sub Divisional Education Officer (Female) Garhi Kapoora, Mardan AVP. |
| 34. | Mst. Naseem Bukhari (MC BS-17) | Waiting for posting in Directorate of E&SE KP | Sub Divisional Education Officer (Female) Khyber AVP. |
| 35. | Mst. Azra Afridi, ASDO (BS16) | Assistant Sub-Divisional Education Officer (Female) Daggar Buner | Sub Divisional Education Officer (Female) Dagga Buner in OPS. |
| 36. | Mst. Salma ASDEO (BS-16) | Assistant Sub- Divisional Education Officer (Female) Batkhela. | Sub Divisional Education Officer (Female) Thana Baizai Malakand in OPS. |

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

Endst: of Even No & date

Copy forwarded for information to the :-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Female) concerned.
4. District Accounts Officers concerned.
5. Director EMIS, E&SE Department with the request to upload the posting/ transfer notification on the official website of the department.
6. PS to Chief Secretary, Khyber Pakhtunkhwa.
7. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
9. Officers concerned.
10. Master file.


(HAFEEZ UR REHMAN SHAH)
SECTION OFFICER (SCHOOLS FEMALE)

BETTER COPY

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
BLOCK "A" OPPOSITE MPA'S HOSTEL CIVIL SECRETARIAT PESHAWAR

Dated: 6th December 2022

NOTIFICATION:

No.SO (MC)E&SED/4-16/2022/Posting/Transfer/MC/TC: The following posting Peshawar are hereby ordered with immediate effect, in the best public interest.

| Sr. No | Name of Officer | From | To | Remarks |
|--------|--------------------------------|---|---|-------------|
| 1. | Mst. Shahnaz Begum MC BS-17 | SDEO (Female) Serial Naurang Lakki Marwat | SDEO (Female) Takht Nasrati Karak | Vice S.No.2 |
| 2. | Mst Farhat Yasmeen MC BS-17 | SDEO (Female) Takhti Nasrati Karak | SDEO (Female) Serai Naurang Lakki Marwat. | Vice S.No.1 |

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT**

Endst of Even No & Date:-

Copy forwarded for information to the:-

ATTESTED

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same of the cases website of the department.
4. District Education Officer (Female) Karak.
5. District Education Officer (Female) Lakki Marwat.
6. District Accounts Officer Karak.
7. PS to Minister E&SE Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department Khyber Pakhtunkhwa.
9. Master File.

**(NASEER ABBAS KHALIL)
SECTION OFFICER (MANAGEMENT)**

Amner - E (15)
GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Dated 4th 12

NOTIFICATION

NO(MC)E&SED/4-16/2023/Posting/Transfer/MC/TC: This Department's Notification number dated 04-05-2023 regarding postings / transfers in respect of Yasmeen and Mst. Shahnaz Begum is hereby withdrawn ab-initio.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
E&SE DEPARTMENT

List of even No. & date:

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the website of the department.
4. District Education Officer (Female) Karak.
5. District Education Officer (Female) Lakki Marwat.
6. District Accounts Officer Lakki Marwat/Karak.
7. PS to Advisor to Chief Minister on E&SE Khyber Pakhtunkhwa.
8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
9. Master file.


SECTION OFFICER



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
Block "A" Opposite MPA's Hostel, Civil Secretariat, Peshawar
Phone No.091-9210626

Amen - F

(16)

Dated Peshawar the 26th May, 2023

NOTIFICATION

No.50(MC)E&SED/4-16/PT/2023

The following posting / transfers are hereby ordered with immediate effect, in the best public interest:-

| S.No | Name of Officer | From | To | Remarks |
|------|---------------------------------|--------------------------------------|----------------------------------|---------------|
| 01. | Mst. Farhat Yasmeen (MC BPS-17) | SDEO (F) Serai Naurang, Lakki Marwat | SDEO (F), Takht-e-Nasrati, Karak | Vice Sr.No.02 |
| 02. | Mst. Shehnaz Begum (MC BPS-17) | SDEO (F), Takht-e-Nasrati, Karak | SDEO (F), Town-III, Peshawar | Vice Sr.No.03 |
| 03. | Mst. Rifat Banu (MC BPS-17) | SDEO (F), Town-III, Peshawar | SDEO (F), Jehangira, Nowshera | AVP |

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Endst.number & date even

Copy forwarded for information to:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar
2. Director, E&SE, Peshawar
3. Director, EMIS, Peshawar
4. District Education Officer (F) concerned
5. District Accounts Officer concerned
6. PS to Advisor to Chief Minister for E&SE Department.
7. PS to Secretary, E&SE Department

11/1/2023
26-5-2023
(IMRAN ZAMAN)

SECTION OFFICER (MANAGEMENT CADRE)

RELIEVING CHIT

Annex - G

17

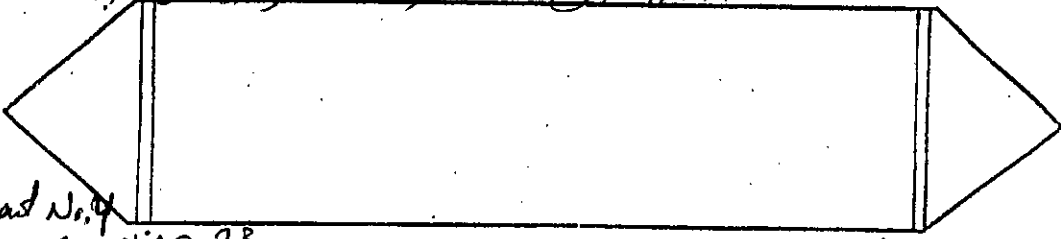
Mrs. Shahnaz Begum SDEO (F) Takht-e-Nasrati (Karak) you have been transferred To SDEO (F) Town III Peshwar Vide Secretary to the Government of Khyber Pakhtunkhwa No. SO(MC)E&SED/4-16/2022/PT/2023 Dated Peshawar, the 26.5.2023. You are hereby Relieved from your duty today on 27.5.2023 with direction to report to the station Concerned well in time.

Further, Mrs. Farhat Yasmeen has already taken the Charge of SDEO (F) Takht-e-Nasrati On 27.5.2023 with my signature.

~~Signature~~
District Education Officer,
(Female) Karak.
District Education Office
(Karak)

Signature

بعد التخصیص فیوچر سروسز ٹریبونل، سیکشن 19



Respondent No. 4

2023ء منجانب

شہناز بیگم
بنام گورنمنٹ آف پاکستان

موزخہ - 2023

مقدمہ - Law Appeal

دعویٰ - Section 4

جرم

nasir.mehmoodadv3@gmail.com

Saad.khan89.suh@gmail.com

باعث تحریر آئینکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام لہذا اور کیلئے بنام محمد رفیق مسعود الحسن ایڈووکیٹ

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے و تقرر حالت ہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری کی طرف بلا کیل کی برادگی اور منسوخی

نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور

کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لیا اپنے بجائے تقرر کا اختیار

ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ با اختیارات حاصل ہوں گے اور اس کا ساکتہ

پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوالیئے مقدمہ کے سبب سے ہوگا۔

کوئی تاریخ پیشی مقام دورہ نہ ہو یا حد سے باہر ہو تو وکیل صاحب یا وکیل کے کہ پیروی

مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند

المرقوم 20 23

واہ الب

بمقام شہناز بیگم کے لئے منظور ہے۔