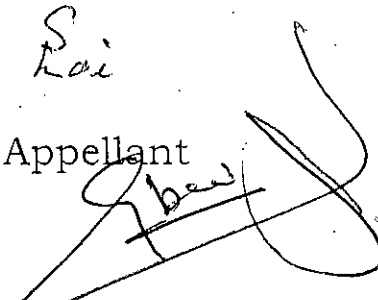


URGENT FORM
BEFORE THE COURT OF HON'BLE SERVICE
TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Appeal No. 820 / 2022

Mst Shah Begum.....Appellant
V E R S U S
Govt of KPK & others Respondents

1. Will you kindly treat the accompanying **Appeal** as urgent and in accordance with the provisions of Rules 9, Chapter 3-A, Rules orders of the High Court Lahore Volume V.
2. The Grounds of urgency are:
"That the respondents had illegally and unlawfully issued transfer order of the Appellant and depriving the Appellant from her legal and lawful rights, hence the case is of urgent nature and may kindly be fixed for early date of hearing."

Sai
Kai
Appellant
Through  21/12/2022
SAFDAR IQBAL KHATTAK
Advocate, High Court,
Peshawar

Date: 21.12.2022

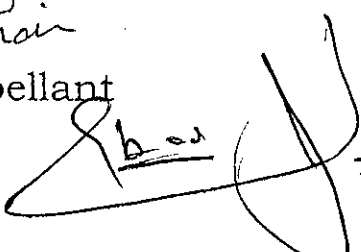
BEFORE THE COURT OF HON'BLE SERVICE
TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Appeal No. 820 /2023

Mst Shah Begum.....Appellant
V E R S U S
Govt of KPK & others Respondents

I N D E X

S.No.	Description of Documents	Annex	Pages
1.	Memo of appeal		1-6
2.	Affidavit		7
3.	Application for suspension		8-9
4.	Affidavit		10
5.	Copy of CNIC	A	11
6.	Copy of Appointment Order	B	12-15
7.	Copy of Impugned Transfer Order dated 08.12.2022	C	16-
8.	Copy of the departmental appeal	D	17-19
9.	Copy of resolution	E	20-21
10.	Wakalatnama		22

S
hair
Appellant
Through  21/12/2022

Date: 21.12.2022

SAFDAR IQBAL KHATTAK
Advocate, High Court,
Peshawar.

①

BEFORE THE COURT OF HON'BLE SERVICE

TRIBUNAL, KHYBER PAKHTUNKHWA

PESHAWAR

Appeal No. 820 /2023

Mst Shah Begum W/o Qudrat Ali R/o Section Spoi,
Metta Khan Khel, Palosai, District Orakzai, presently
Service as SST (G) GGMS Landa Ghar . Tehsil Lower
District Orakzai.

.....**Appellant**

V E R S U S

1. Government of Khyber Pakhtunkhwa through
Secretary Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (F) District Orakzai.
4. Salma Begum GGMS Stara Pakha District Orakzai.

.....**Respondents**

APPEAL UNDER SECTION 4 OF

KP SERVICES TRIBUNAL ACT

1974 AGAINST THE TRANSFER

ORDER NO. 1587-

94/TRANSFER/DEO(F) ORAKZAI

DATED 08.12.2022, VIDE WHICH
THE APPELLANT TRANSFERRED
FROM GGMS LANDA GHAR
LOWER ORAKZAI TO GGMS
STARA PAKHA LOWER ORAKZAI.

Prayer in Appeal:

On acceptance of this service appeal, the order dated 08.12.2022, of the respondents No. 3 may be set aside and the appellant may please be restore to her prior position as SST GGMS Landa Ghar District Orakzai.

Respectfully Sheweth:

1. That the Appellant is a peaceful and law abiding citizen of Pakistan and is entitled for all the legal and fundamental rights constitution of Islamic Republic of Pakistan 1973. **(Copy of CNIC is attached as annexure A)**
2. That the Appellant was appointed in the respondents department in the year 1999 and is presently serving as SST (G) BPS-16 in Teaching

Cadre at District Orakzai. **(Copy of Appointment Order is attached as annexure B)**

3. That the appellant has been performing her duties as SST with good performance in improving educational service, regularly, punctually and since then till date no complaint has been made out yet.
4. That inspite of good performance and fully satisfaction of the high-ups, the respondent No 3 had illegally and unlawfully issued the impugned transfer order NO. 1587-94/Transfer/DEO(F) ORakzai dated 08.12.2022, wherein the appellant was transferred from GGMS Landa Ghar to GGMS Stara Pkha without any justified and legal ground, which is illegal, against the rules and unlawful. **(Copy of Impugned Transfer Order dated 08.12.2022 is attached as annexure C)**
5. That the appellant aggrieved from the above mentioned order filed departmental appeal to the respondent No. 1 which was not decided yet and the respondents had illegally and unlawfully not issuing the rejection / dismissal order of the said Appeal to the Appellant. **(Copy of the**

departmental appeal is attached as Annexure-D)

6. That under the law the respondents are bound to disposed of the departmental Appeal of the Appellant within 14 days, but since then till date neither rejection nor acceptance order is issued.
7. That the appellant is aggrieved from the transfer order dated 08.12.2022, which is illegal, unlawful, void-ab-initio and liable to be set aside inter alia on the following grounds:

GROUND S:

- A. That the respondent No. 3 acted illegally and in violation of KPK Services Rules by issuing the impugned transfer order dated 08.12.2022.
- B. That the appellant is the employee of the respondents department in Teaching Cadre and transferred to new School without her consent which is against the rules and policy.
- C. That malafide and misuse of authority on the part of the respondents is very much clear that the impugned order is premature, as the appellant not passed her normal tenure.

- D. That the impugned order is illegal, unlawful and against the rules and policy as it is very much distance about 80 km from the appellant house.
- E. That the appellant has been subject to serve kind of discrimination and due to non-obeying the unlawful and un-constitutional orders of the some pressure groups and their alliance.
- F. That the said transfer order is pre-mature and against the posting, transfer policy.
- G. That the transfer is neither made on vacant post nor in the public interest.
- H. That the impugned order of the respondent No. 3 is illegal, unlawful and without lawful authority, liable to be set aside.
- I. That in this respect elders of the locality also passed resolution in favour of the appellant.
(Copy of resolution is attached as annexure E)
- J. That the counsel for appellant may kindly be permitted to explain his view on the points, which shall be raised at the time of arguments.

①

It is, therefore, most humbly prayed that
On acceptance of this service appeal, the
impugned order dated 08.12.2022 of the
respondents No. 3 may be set aside and the
appellant may please be restored to his prior
position as SST (G) GGMS Land Ghar Lower
Orakzai.

Any other relief may deemed fit in the
circumstances of the law may also be granted
in favour of the appellant against respondent.

Through

S. H. K.
Appellant

Safdar Iqbal Khattak
21/12/2022
SAFDAR IQBAL KHATTAK
Advocate, High Court,
Peshawar

Date: 21.12.2022

(7)

BEFORE THE COURT OF HON'BLE SERVICE
TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

Appeal No. _____/2022

Mst Shah Begum.....Appellant

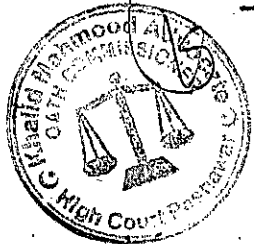
V E R S U S

Govt of KPK & others Respondents

AFFIDAVIT

I, Mst Shah Begum W/o Qudrat Ali R/o Khadezai, Tehsil & District Kohat, do hereby solemnly affirm and declare on oath that the contents of accompanying **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

[Handwritten Signature]
_____ 22
21/12/



[Handwritten Signature]

DEPONENT

CNIC # 14301-1885140-0

Cell # 0305-9382909

(8)

BEFORE THE COURT OF HON'BLE SERVICE
TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

CM No. _____/2022

In Re:

Appeal No. _____/2022

Mst Shah Begum.....Appellant

V E R S U S

Govt of KPK & others Respondents

APPLICATION FOR SUSPENSION OF THE
IMPUGNED TRANSFER ORDER NO. 1587-
94/TRANSFER/DEO(F) ORAKZAI DATED
08.12.2022, TILL THE FINAL DECISION OF
THE SERVICE APPEAL.

Respectfully Sheweth:-

1. That the above noted service appeal is being filed before this Honourable Tribunal, in which no date of hearing has yet been fixed.
2. That the facts and grounds of the service appeal may kindly be read as an integral part of this application.

9

3. That the applicant has got a good prima facie case in her favour, and is sanguine about its success.
4. That the balance of convenience also lies in favour of the applicant.
5. That if the transfer order dated 08.12.2022 not suspended, than the applicant would suffer irreparable loss.

It is, therefore, respectfully prayed that on acceptance of this application, the impugned transfer order dated 08.12.2022 may kindly be suspended, till the final decision of the case.

Through

Appellant


SAFDAR IQBAL KHATTAK

Advocate, High Court,
Peshawar

Date: 21.12.2022

10

BEFORE THE COURT OF HON'BLE SERVICE
TRIBUNAL, KHYBER PAKHTUNKHWA
PESHAWAR

CM No. _____/2022

In Re:

Appeal No. _____/2022

Mst Shah Begum.....Appellant

V E R S U S

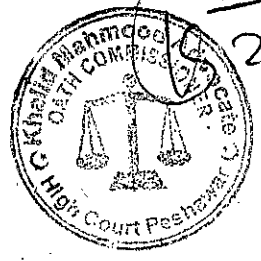
Govt of KPK & others Respondents

AFFIDAVIT

I, Mst Shah Begum W/o Qudrat Ali R/o Khadezai, Tehsil & District Kohat, do hereby solemnly affirm and declare on oath that the contents of accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

[Handwritten signature]
24-12-22

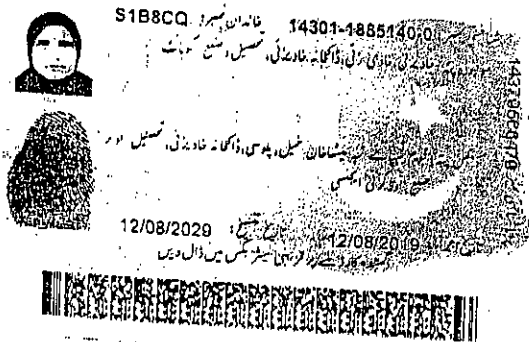
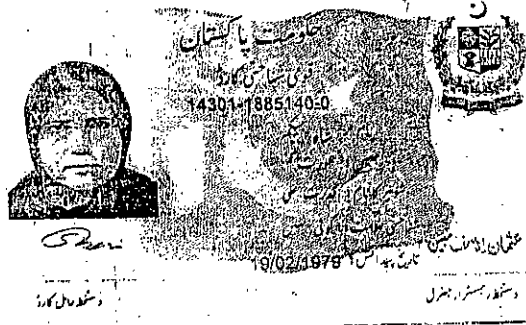
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DEPONENT

CNIC # 14301-1885140-0

Cell # 0305-9382909



OFFICE OF THE AGENCY EDUCATION OFFICER ORAKZAI AGENCY AT HANGU.

APPOINTMENT ORDER

Consequent upon approval of the Departmental selection committee the following appointment of PTC un-trained (Female) candidates of Orakzai Agency are hereby made in BPS-7 No. 1480/-PM fixed plus usual allowances admissible under the rules in the interest of public service with effect from 10.1-9-1999.

S/No	Name/Father's Name	From	To	Remarks
1	Hassan Zuhra D/O Muhammad Baqir Shah	Candidate CCPS, Saka Khuna		Against 6/Post
2	Shah Begum D/O Mahboob Ali	-do-	" Dowly	-do-
3	Gul Naz D/O Door Jaffar	-do-	" -do-	-do-

TERMS AND CONDITIONS:-

- Charge report should be submitted in duplicate to all concerned.
- The appointments are made purely on temporary basis and liable to termination at any time without assigning any reasons or prior notice. If they want to resign their duties they will have to give one month or notice or deposite one month pay.
- They will not be entitled to get pay unless their Domicile/NIC and the academic/professional qualification certificates are checked/get verified from the concerned officers/institutions for which the A.A.E.O's will be responsible.
- They should produce their age and health certificates from the Agency surgeon Orakzai Agency at Hangu.
- The pay scale and service rules should be subject to the revision in accordance with the order passed by the Govt: of NWFP, from time to time.
- They will not be handed over charge, if their age exceed 33 years or less than 18 years except those who have rendered Govt:/Agghan Refugees serv are entitled for relaxation equal to their service period upto the maximum of 10 years.
- If they failed to take over charge within 15 days their appointment will be automatically cancelled.

AGENCY EDUCATION OFFICER, ORAKZAI AGENCY AT HANGU.

Endst No. 1276-85 / PTC (F)

Dated 1-6-1999

Copy to the:-

- 2 A.A.E.O (F) concerned & pay clerk of the local office.
- Agency Accounts Officer Orakzai Agency at Hangu.
- Regional Director of Education (FATA) Kohat Region Kohat.
- Director of Education (FATA) NWFP, Peshawar.
- 6-9 Candidate concerned.

AGENCY EDUCATION OFFICER, ORAKZAI AGENCY AT HANGU.

SOHAN/ORK:

OFFICE OF THE AGENCY EDUCATION OFFICER ORAKZAI AGENCY AT HANGU.

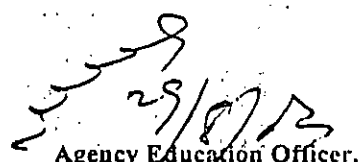
APPOINTMENT ORDER:-

Consequent upon approval given by the Departmental Selection Committee the following CT(F) Candidates are hereby appointed against vacant CT (F) post in BPS-09 (Rs. 2410-145-6760) for those candidates who are simple F.A or B.A 3rd Division and BPS-14 (Rs. 3100-240-10300) for those candidates who are B.A with 2nd Division plus usual allowances as admissible under the rules on contract basis for 3 years w e f their taking over charge on 01-09-2003 in the interest of public services in the School noted against their names.

S#	Name with F-Name	School	Remarks
1	Shah Begum D/O Mehboob Ali	GGMS Chapper Mishti	Against Newly Created CT post
2	Fehmida Begum D/O Ghanzafar Ali	GGMS Chapper Mishti	Against Newly Created CT post

Terms and Conditions :-

1. Charge report should be submitted to all concerned (in duplicate).
2. The appointment order are made purely on temporary basis and liable to termination at any time without assigning any reason / notices. If the candidates wants to resign they will have to give one months prior notice or forfeit one month's full pay in lien thereof.
3. They will not be entitled to get pay unless their domicile, N.I.C and their academic /professional qualification verified for which the AAEO(F) Circle will be responsible.
4. The pay scale and services rules should be subject to the revision in accordance with the orders passed by the Govt. of NWFP from time to time .
5. They should not handed over charge of their age exceed 30 years or is less then 18 years except those who have rendered Govt./Afghan Refugees service are entitled for relaxation equal to their services period up to the maximum of 10 years.
6. If they failed to take over charge with in one month their appointment will be automatically cancelled.
7. They should produce their health and age certificate from the Agency Surgeon Orakzai Agency at Hangu.


 29/08/03
 Agency Education Officer,
 Orakzai Agency at Hangu.

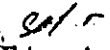
Endst No. 319-25

Dated Hangu:-the 29 /08/2003.

Copy to the :-

1. Director of Education FATA NWFP Peshawar.
2. Political Agent Orakzai Agency at Hangu.
3. Agency Accounts Officer Orakzai Agency at Hangu.
4. AAEO (F) and Pay Clerk of Local Office.
- 5-6. Candidates Concerned.

SOF


 Agency Education Officer,
 Orakzai Agency at Hangu.

OFFICE OF THE AGENCY EDUCATION OFFICER ORAKZAI AGENCY AT HANGU

ADJUSTMENT ORDER.

Consequent upon the recommendation of the departmental promotion Committee in pursuance of the Govt. Khyber Pakhtunkhwa Elementary & Secondary Education Notification No: (B&A)/1-18/E & SE/2012 dated 11/7/2014 and approval by the Director of Education FATA Notification No: 5079-130 Dated Pesh: the 16-04-2014, the following CT are hereby promoted to the post of Senior C.T BPS-16, with effect from 16-4-2014 and adjusted in the following school against their names. (S.CT) BPS-16 Rs: (10000-800-34000) plus usual allowances under the rules on regular basis under the existing policy of FATA on terms and conditions given below.

S.#	Name of teacher	Post	Name of School	Place of Adjustment	Remarks
1	Zakra Bibi	SCT	GGHS And khel	GGHS And khel	Already occupied
2	Neelofar	SCT	GGMS Tagha Sam	GGHS Spin Begi	Against Vacant Post
3	Diltaj	SCT	GGMS Ori Bar	GGHS Gall Ali Khel	Against Vacant Post
4	Qaiser Parveen	SCT	GGHS Kureez	GGHS Kureez	Already occupied
5	Shah Naz Gul	SCT	GGHS Mir Bak	GGHS Mir Bak	Already occupied
6	Farzana	SCT	GGHS Spin Begi	GGHS Spin Begi	Already occupied
7	Noor Sahib Jan	SCT	GGHS Kureez	GGHS Kureez	Already occupied
8	Narges Zeb	SCT	GGMS Tagha Sam	GGHS Spin Begi	Vice S.No:20
9	Sofia Batool	SCT	GGHS Sarobi Garhi	GGHS Sarobi Garhi	Already occupied
10	Shazia Jabeen	SCT	GGHS And Khel	GGHS And Khel	Already occupied
11	Shah Begum	SCT	GGMS Chaper Mishti	GGHS Kureez	Vice S.No:12
12	Fahmida Begum	SCT	GGMS Chaper Mishti	GGHS Bada Khel	Against vacant post
13	Makhmina	SCT	GGMS Khair Ali Kali	GGHS Kureez	Vice S.No: 18
14	Zohra Ali	SCT	GGHS Kureez	GGHS Kureez	Already occupied
15	Rokhsana Yasmin	SCT	GGHS Ghiljo	GGHS Ghiljo	Already occupied
16	Mehrun Nisa	SCT	GGHS Gall Ali Khel	GGHS Gal Ali Khel	Already occupied
17	Sajida	C.T	GGHS Spin Begi	GGMS Mir Mela	Against vacant post
18	Nargis	C.T	GGHS Kureez	GGMS Khair Ali Kali	Vice S.No: 13
19	Muazama	C.T	GGHS Kureez	GGMS Chaper Mishti	Vice S.No: 11
20	Maria	C.T	GGHS Spin Begi	GGMS Tagha Sam	Vice S.No: 8

TERMS & CONDITIONS:

- 1- They will be on probation for period of one year extendable for another one year.
- 2- They will be governed by such rules and regulations as may issue from time to time by the government
- 3- Their services can be terminated at any time. In case his performance is found unsatisfactory during probation period. In case of misconduct he will be preceded under the rules framed time to time.
- 4- Charge report should be submitted to all concerned.
- 5- Their Inter Se-Seniority on lower post will remain intact.
- 6 -No: TA /DA is allowed for joining his duty.
- 7- They will give an undertaking to be recorded in their service Book to effect that if any Over payment has made to them in light of this order will be recovered and if they are wrongly promoted they will be reversed.
- 8- No payment will be made unless all the documents are verified from respective Boards/Universities.

Agency Education Officer
Orakzai Agency at Hangu.

Endst: No 1967-710

Dated Hangu the 5/6

2014.

Copy for information to the:-

- 1- Director of Education FATA Secretariat Peshawar.
- 2-Agency Accounts Officer Orakzai Agency at Hangu.
- 3 AAEO Circle and pay Clerk of the local office.
- 4- Teachers Concerned.

Orakzai Agency at Hangu
Orakzai Agency at Hangu.



District Education Office

No. 920

District Orakzai

Date 14/3/2020

PHONE NO. 0925-690017, Email: deoorakzai@gmail.com

TRANSFER ORDER

The following transferred is hereby made in the interest of public service as well as institutions with immediate effect.

S.No	Name with designated & school	To	Remarks
1	Mst. Shah Begum(SST) GGMS Lal Mela	GGMS landagharay Sepaya	Newly Created Post

Note:

1. Charge report should be submitted to all concerned
2. TA/DA is not allowed.

*District Education Officer,
District Orakzai*

Endst No. 921-22 /

Dated 14/3/2020.

Copy for information to the:

1. Director Ele&Sec. Education Khyber Pakhtunkhwa Peshawar
2. District Account Officer Orakzai
3. ADEO Concerned and pay clerk of the local office
4. District Monitoring Officer Orakzai
5. Heads of GGMS Lal Mela / GGMS landagharay Sepaya .
6. Official Concerned

*District Education Offices,
District Orakzai*

Alimul Uloom

16

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE-ORAKZAI
Opposite to DC Orakzai Head Quarter Baber Mela al Hangu.
Phone # 0925-690017 Fax # 0925-690017
Email: deofemaleorakzai@gmail.com



No 1537-24 Transie:/DEO(F)-Orakzai, Dated:08/12/2022

OFFICE ORDER

The Competent Authority is pleased to transfer the following SST in District Orakzai on their own pay and scale to the school mentioned against their name in the best interest of public Service with immediate effect.

S#	NAME	DESIGNATION	FROM	TO	REMARKS
1	Mst. Salma Begum	SST(G) BPS: 16	GGMS Stara Pakha Lower Orakzai	GGMS Landa Ghar lower Orakzai	Vice S# 2
2	Mst. Shah Begum	SST(G) BPS: 16	GGMS Landa Ghar lower Orakzai	GGMS Stara Pakha Lower Orakzai	Vice S# 1

Note:

1. Charge report should be submitted to all concerned.
2. TA/DA is not allowed

DISTRICT EDUCATION OFFICER (F)
DISTRICT ORAKZAI

Endst No: Even No & Date:

Copy forwarded for information to the:

1. Deputy Commissioner Orakzai
2. District Monitoring Officer Orakzai
3. Deputy DEO District Orakzai
4. Head mistress/Head Teacher concern
5. Teacher concern
6. Office Copy

DISTRICT EDUCATION OFFICER (F)
DISTRICT ORAKZAI

خدمت صحت ڈائری ہینڈ آؤٹ کونسل نسا اور چھوڑ دینے والے

صحت خانی

موجودہ ماہ گورنمنٹ کے ساتھ ساتھ صحت خانی میں کونسل کیلئے
 کونسل کیلئے کام کے متعلق بات چیت ہے اور GMS کی نئی اسکیم
 اور کونسل میں کونسل (G) کی مدد سے ایسی ڈیولپمنٹ اسکیمیں
 جناب والا سائل کے لئے لکھنؤ اور نسا کے علاقوں میں ایسی
 ڈیولپمنٹ اسکیمیں جو کونسل کے تحت آ رہی ہیں۔ اب حال ہی میں
 سائل کی لکھی ہوئی GMS کی نئی اسکیم سے GMS کی اسکیم کے
 کرا دی گئی ہے جو کہ سائل کے لئے لکھنؤ اور نسا کے علاقوں میں
 یہ سائل کے ساتھ ساتھ کونسل کے لئے لکھی ہوئی اسکیموں کے
 سے ہوتی ہے اور کونسل اور نسا کے علاقوں میں سائل کے خلاف
 کوئی اسکیم یا شکایت ہے۔ اس کے لئے ہم نسا اور نسا کے علاقوں میں
 ہے

لہذا سائل آپ کے خدمت میں میں غائب ہونے سے
 کہ اس لکھی ہوئی اسکیم کو کرا دیا جائے اور سائل کو کونسل
 اسکیموں کیلئے GMS کی نئی اسکیم اور کونسل میں حال کرا
 کلیم ہمارے سرکاری

عین نواز شیلوگی
 صحت آزاد
 لاہور 20120529

التمار
 آئی ڈی ایف ایف
 سہیل سلیم (G) SST
 GMS سکول نسا
 نسا کے علاقوں میں

مختصر جناب ایڈیشنل ڈسٹرکٹ ایجوکیشن پشاور NMD خیبر پختون خواہ

جناب عالی!

فوریانہ گزارش ہے کہ سائلہ قوم سیانے تپہ میٹھا خان خیل یونین کونسل پلوسی کا مستقل باشندہ ہے اور GGMS لنڈا غر ضلع اور کزنٹی میں بحیثیت (G) SST معلمہ اپنی ڈیوٹی انجام دے رہی ہے۔

جناب والا۔ سائلہ نے تقریباً 22 سال دور دراز کے علاقوں میں اپنی ڈیوٹی نہایت خوش اسلوبی سے انجام دی ہے۔ اب حال ہی میں تقریباً 2 سال ہو گئے ہیں کہ سائلہ اپنے مستقل علاقے یعنی قوم سیانے کو GGMS لنڈا غر کو ٹرانسفر ہو چکی ہے۔ لیکن اب پھر سے سائلہ کو دور دراز کے علاقے یعنی GGMS سترہ پختہ کو ٹرانسفر کیا گیا ہے جو کہ سائلہ کے گھر سے تقریباً 80 کلومیٹر دور ہے۔

جناب والا۔ سائلہ پر نہ بچیوں اور نہ انکی والدین کی طرف سے کوئی شکایت ہے اور نہ اس ٹرانسفر میں سائلہ کی فرہمی شامل ہے اس لئے ان کے ساتھ سراسر زیادتی اور بے انصافی ہے۔ سائلہ نے DEO ضلع اور کزنٹی کو بھی تیار نہ منسوخ کرنے کیلئے درخواست جمع کیا تھا۔ مگر انھوں نے کوئی عمل درآمد نہیں کی۔ اس لئے ہم مجبور ہو کر آپ صا حبان کے پاس آئے ہیں۔

لہذا سائلہ کی آپ کی خدمت میں عاجزانہ عرض ہے کہ سائلہ کی ٹرانسفر کو منسوخ کیا جائے اور اپنی ہی سکول یعنی GGMS لنڈا غر ضلع اور کزنٹی میں بحال کرنے کی احکامات صادر فرمائیں۔

عین نوازش ہوگی

مورخہ 14/12/2022

العارفہ

آپ کا فرمائندہ دار
شاہ بیگم (G) SST
سکول GGMS لنڈا غر
قوم سیانے ضلع اور کزنٹی

قرارداد

آج مورخہ 17/12/2022 کو قوم سبائے ضلع اور کزنٹی کے مشیران نے متفقہ قرارداد منظور کیا اور سب اس بات پر متفق ہوئے کہ GGMS گنڈا غر قوم سبائے ضلع اور کزنٹی میں مسماۃ شاہ بیگم (9) SST جو ہیڈ مسٹرس استانی ہے نہایت اچانکاری دہانت داری اور محنت و لگن سے ہمارے قوم کے بچیوں کو تعلیم کی روشنی سے فہر کر رہے ہیں۔ ہم سب ان کی کارکردگی سے مطمئن ہیں۔

ان کی حالیہ تبار کے پیر ہم سب ناراض اور ناخوش ہیں اور ہم سب میں سے چینی کی سپرد و درگوشی ہے۔ لہذا ہم سب قوم کے مشران آفسراں بالا سے درخواست کرتے ہیں کہ اس تبار کو منسوخ کیا جائے۔

تاکہ ہمارے قوم کے بچیوں کے تعلیم حاصل کرنے

میں کوئی خلل نہ ہو۔




صفحے دوسرے جانب قوم سبائے ضلع اور کزنٹی


کے مشران کے دستخط مرقوم ہیں۔

دستیخط مشتریان قوم سپاٹے

- 21603-1201174-3 - 3 حسین گل حسین
- 21603-8872254-9 - 9 یقوت علی
- 21603-6387319-1 - 1 حسین علی
- 21603-6647884-1 - 1 عہوان علی
- 21603-7299458-3 - 3 قاسم علی
- 21603-6811689-1 - 1 حاجی یوسف حسین
- 21603-0884955-7 - 7 سیف علی
- 14301-1333555-7 - 7 غلام حسن
- 21603-7299458-3 - 3 زاہد حسین
- 14301-2036552-7 - 7 شہزاد حسین
- 14301-7866409-3 - 3 زینان حیدر

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ایڈوکیٹ: <u>صدر ایڈوکیٹ</u>		
بار کونسل ایسوسی ایشن نمبر: <u>be-10-2969</u>		پشاور بار ایسوسی ایشن، خیبر پختونخواہ سر ویس ٹریبونل صدر پختونخواہ ایسوسی ایشن
رابطہ نمبر: <u>0800-8980846</u>		
بعدالت جناب:		

منجانب: <u>Appellant</u> <u>مقدمہ کنندہ</u> 	دعویٰ: علت نمبر: مورخہ: جرم: تھانہ:
سامت تحریر آگے	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی کی وجواب دہی کاروائی متعلقہ

آن مقام صدر ایڈوکیٹ کو وکیل 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 اور تقریر ثالث و فیصلہ بر حلف دینے (جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق و زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل بگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ لے سکتے ہیں بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور و قبول ہوگا دوران مقدمہ میں جو چیزیں ہر جانب التوائے مقدمہ کے سبب سے ہوگی کوئی تاریخ پیش مقام دورہ یا حد سے باہر ہو تو وکیل صاحب اپنا بندہ ہوں گے کہ پیروی مذکورہ کریں اور اس کے ساتھ ساتھ لکھ دیا تاکہ سند رہے

المقوم: صدر ایڈوکیٹ

مقام صدر ایڈوکیٹ

نوٹ: اس نکات نامہ کی نوکالی ناقابل قبول ہوگی۔

BEFORE THE HON'BLE PESHAWAR HIGH
COURT PESHAWAR



WP No. _____/2022

Mst Shah Begum W/o Qudrat Ali R/o Section Spoi,
Metta Khan Khel, Palosai, District Orakzai, presently
Service as SST (G) GGMS Landa Ghar Tehsil Lower
District Orakzai.

..... **Petitioner**

V E R S U S

1. Government of Khyber Pakhtunkhwa through
Secretary Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (F) District Orakzai.
4. Salma Begum GGMS Stara Pakha District Orakzai.

..... **Respondents**

WRIT PETITION UNDER
ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC
REPUBLIC OF PAKISTAN 1973,
AGAINST THE TRANSFER
ORDER NO. 1587-

FILED TODAY

Deputy Registrar

WP08-2023 MST. SHAH BEGUM VS GOVT OF PGS37 USB.pdf

3.1 DEC 2022

ATTESTED
EXAMINER
Peshawar High Court

PESHAWAR HIGH COURT PESHAWAR
FORM "A"
FORM OF ORDER SHEET



Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or that of parties or counsel where necessary
2	3
12.1.2023	<p><u>WP No. 08-P/2023.</u></p> <p>Present:</p> <p style="text-align: center;">Mr. Safdar Iqbal Khattak, Advocate for petitioner.</p> <p style="text-align: center;">*****</p> <p><u>ROOH-UL-AMIN KHAN, J.-</u> Through the instant writ petition, the petitioner has asked for issuance of an appropriate writ directing the respondents to cancel her transfer order dated 8.12.2022, impugned herein, whereby she has been transferred as SST from GGMS Landa Ghar to GGMS Stara Pkha District Orakzai.</p> <p>2. The petitioner being employee of respondents' department working as S.S.T seeks cancellation of her transfer order dated 8.12.2022. Admittedly she is civil servant, and her grievance is not only an incident of service, but also falls in terms and condition enumerated in Chapter-II of the Civil Servants Act, 1973, wherein jurisdiction of this Court is expressly barred under Article 212(2) of the Constitution of</p>

Rooh ul Amin

ATTESTED
EXAMINER
Peshawar High Court

ATTESTED
EXAMINER
Peshawar High Court

Islamic Republic of Pakistan, 1973 and the Service Tribunal is competent to adjudicate upon such like matters.

3. Resultantly, the instant petition being not maintainable stands dismissed in limine. However, the petitioner would be at liberty to approach the appropriate forum, if so desire.

Announced on;
12th of January, 2023

[Signature]
SENIOR PUSINE JUDGE

[Signature]
JUDGE

MAKED TO BE TRUE CO
CLERK
High Court, Faisalabad
Authorized Under Article 53 of
the Constitution of Pakistan Order 1973

14 JAN 2023

[Stamp] (DB) Hon'ble Mr. Justice Rooh Ul Amin Khan & Hon'ble Mr. Justice Shakeel Ahmad

66029

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