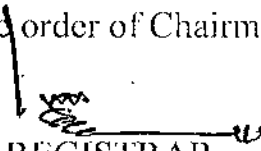


# FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- \_\_\_\_\_ **348/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	20/02/2023	<p>The appeal of Mst. Tabinda resubmitted today by registered post through Mr. Waqar Orakzai Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

The amended appeal of Mst. Tabinda d/o Hakeem Dad r/o Kolai Tehsil Palas District Kohistan received today i.e. on 13.02.2023 is incomplete on the following score which is returned to the counsel for the appellants for completion and resubmission within 15 days.

- 1- ✓ Check list is not attached with the appeal.
- 2- ✓ Appeal has not been flagged/marked with annexures marks.
- 3- Copy of departmental appeal is not attached with the appeal which may be placed on it.
- 4- Certificate be given to the effect that no appeal has been filed on the subject matter earlier in this Tribunal.
- 5- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 579 /S.T.

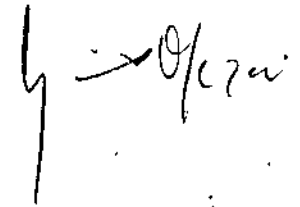
Dt. 15/2 /2023

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Waqar Orakzai Adv.  
High Court A.Abad.

- All objections raised above have been removed.
- Check list Attached.
  - Appeal / Departmental Representation has been attached as Annexure F
  - Certificate has been Attached.

17-2-2023



Waqar Orakzai  
Advocate High Court

**IN THE SERVICE TRIBUNAL, KHYBER  
PAKHUTUNKHUWA**

*In re*

Service Appeal No. 348 /2023

Tabinda D/o Hakeem Dad , R/o Kolai Tehsil Palas District KP Kohistan.

Appellant

Versus

Government of KPK through its Secretary Elementary and Secondary Education  
Department, Secretariat Peshawar & others.

Respondents

**INDEX**

S.#	Description	Page No.	Annexure
1.	Service Appeal Along With Affidavit / <i>CERTIFICATE</i>	1 to 9A	
2.	Application For Condonation Of Delay	10 <del>11</del>	
3.	Copy Of Appointment Letter <i>with Medical Cert</i>	11 — 12	"A"
4.	Copy Of Charge Sheet	13 — 18	"B"
5.	Copy Of Personal Hearing Notice	19	"C"
6.	Copy Of Publication Of Show Cause Notice	20-22	"D"
7.	Copy Of Impugned Termination Order	23	"E"
8.	Copy Of Departmental Representation	24-24A	"F"
9.	Vakalatnama	25	

Through Counsel

*Waqar Orakzai & M. Shahzad*

*Advocates High Court*

*Waqar Orakzai  
Advocate High Court  
A. Abad*

Appellant *File*

IN THE SERVICE TRIBUNAL, KHYBER PAKHUTUNKHUWA

In re

3537

Dated 13-2-2023

Service Appeal No. 348 /2023

Tabinda d/o Hakeem Dad , R/o Kolai Tehsil Palas District KP Kohistan.

Appellant

Versus

1. Government of KPK through its Secretary Elementary and Secondary Education Department, Secretariat Peshawar.
2. Director General, Elementary & Secondary Education Department Peshawar.
3. Director, Elementary & Secondary Education Department Peshawar.
4. District Education Officer (Female) District Kolai Palas Kohistan.

Respondents

Filed to-day  
Registrar  
13/2/2023.

SERVICE APPEAL UNDER SECTION 4 OF KPK SERVICE TRIBUNAL ACT, 1974

It is most respectfully submitted:

FACTS

1. That the addresses of the parties, as provided in the heading of the instant service appeal, are sufficient for any communication to be done by the honorable tribunal.
2. That the appellant was appointed as Arabic Teacher in Secondary and Education Department KPK on 20.5.2014 vide appointment letter 777-90. Copy of appointment letter is attached. (Annexure A)

3. That the appellant assumed the charge as AT at Government Middle School Madaan Kolai, Distt KP Kohistan on 24-05-2014. **Copy of Charge Sheet is attached. (Annexure B)**
4. That, the appellant was performing her duties with due diligence to the entire satisfaction of students as well as the administration of the respondent's department since her appointment.
5. That the area in which the appellant was appointed is an under developed and far-flung area. Due to its remote geographical location and backwardness along with the tribal customs rarely, females are allowed to join any profession.
6. That according to respondent No. 4 appellant was found to be willfully absent from her duty. In this regard, according to respondent No.4 issued show cause notice to on 26-09-2020. The appellant never received the mentioned notices. That subsequently, according to respondent No.4 notice for personal hearing was issued to the appellant vide letter no. 2065-69 dated 01-10-2020. **Copy of personal hearing notice is attached as Annexure C.** However, the appellant never received any such notice and the matter was proceeded ex-parte by issuing a final notice through publication in daily Newspapers i.e Mashriq Aaj and Shamal vide letter no 2973 DEO F KP KH Dated 17-12-2020. **Copy of publication of Final Show Cause Notice is attached as Annexure D.**
7. That respondent No.4 vide impugned letter No. 4010-18 DEO (F) KP, KH Dated Paalas 03-06-2021 imposed major penalty of removal from service under E & D rules 2011 upon the appellant . **Copy of Impugned termination order is attached as Annexure E.**

8. That feeling aggrieved, the appellant filed departmental appeal to respondent No. 3 on 09-08-2021, which is yet to be replied by respondent No.1. Copy of Departmental Representation is attached as Annexure F Therefore, the instant Writ Petition is filed inter alia on the following grounds:

GROUNDS

- A. That the impugned notification is illegal, unlawful, unwarranted and against the concept of natural justice. That the impugned notification is based on malafide and biased on behalf of respondent No. 4.
- B. That impugned order is arbitrary and without following the codal formalities. That the appellant was not accorded an opportunity of hearing.
- C. That in service matters extreme penalty for minor acts depriving a person a person from right of haring would defeat the reformatory concept of punishment in administration justice. Hence, impugned notification is liable to be set aside.
- D. That it was incumbent upon the authorities that before passing the termination order the appellant should have been provided an opportunity of hearing and thereafter well considered order should have been passed. That in the instant case the appellant was condemned unheard hence the impugned order is liable to be set aside.

E. That the august Supreme Court in the case of "Mahmood Akhtar Naqvi v. Federation of Pakistan" (PLD 2013 SC 195), commonly known as Ms. Anita Turab's case, held as under:

"(i) Appointments, Removals and Promotions: Appointments, removals and promotions must be competent made in accordance with the law and the rules made thereunder; where no such law or rule exists and the matter has been left to discretion, such discretion must be exercised in a structured, transparent and reasonable manner and in the public interest.

(ii) Tenure, posting and transfer: When the ordinary tenure for a posting has been specified in the law or rules made thereunder, such tenure must be respected and cannot be varied, except for compelling reasons, which should be recorded in writing and are judicially reviewable"

**The impugned notification is a patent derogation from the principles enunciated in the Anita Turab Case**

F. That the superior Courts have held that notification of termination without due process of deliberations is the root cause of poor governance and the instant notification amplifies poor governance and whimsical display of discretion. Reliance is placed on **Munir Ahmed Khan**

**Kakkar v Province of Baluchistan reported PLD 2020**  
**Baluchistan 58.**

- G.** That the appellant belong to an under developed and hard area. That literacy rate in the area is very low especially in terms of females. That imposing major penalty of termination would amount to discouraging the female education in the area.
- H.** That the impugned order passed by the authorized officer lacks application of mind and derogates from the settled principled developed by the superior Courts under section 24A of the General Clauses Act, 1897.
- I.** That the impugned notifications passed by respondent no. 4 are based on malafide hence are liable to be set aside.
- J.** That it is an inalienable right of the appellant to enjoy equal protection of law and to be treated in accordance with law per the mandate of Article 4 of the Constitution. The expression "law" has been liberally interpreted by the superior Courts and includes that Government Departments to comply with the requirements of law while making transfer/posting orders.
- K.** That the superior Courts have consistently held that Article 9 of the Constitution has a wide import. It simply does not



cater to the life on vegetative stage, but in fact, it includes, all the amenities, essentials, things and means necessary to live a fuller and a healthy life. A gainful employment as well as posting on the tenured post is legitimately attracted within the purview of Article 9 of the Constitution.

L. That it is the fundamental right of the appellant to enter upon any lawful profession or occupation and have a secured source of livelihood in accordance with the mandate of Article 18 of the Constitution. The said right can only be regulated by imposing reasonable restrictions as envisaged in the proviso provided under Article 18 of the Constitution. In the instant matter, the appellant right under Article 18 to have a secured source of livelihood has been completely usurped and no reasonable explanation has been rendered by the Authority to the appellants for ignoring their legitimate claims.

M. That the impugned action of the Authority is violative of Article 10 of the Constitution as due process of law was not followed before imposing major penalty upon the appellant. That the same law guarantees fair trial which in the present situation has been violated.

N. That the superior Courts have consistently held that the seven instruments that are most useful in structuring of discretionary power are: open plans, open policy statements, open rules, open findings, open reasons, open precedents and fair and informal procedures. In the instant matter, the

impugned notification violates the principles developed by the superior Courts on the exercise of discretion.

O. That it is settled law that no superstructure can be raised on an illegal order and no valuable rights accrue therefrom.

P. That the appellant, seeks leave, to raise further grounds at the time of submissions before this honorable Court.

Q. That this Honourable tribunal has jurisdiction to adjudicate upon the matter.

R. That the Appellant reserves the right to submit further grounds at the bar, at any subsequent stage in the proceedings.

### **PRAYER**

That in the light of the foregoing, it is most respectfully prayed that the instant petition may be allowed, granting the following relief sought against respondent:

- A. **Declare** that the impugned notification No 4010-18 DEO (F) KP KH Dated Paalas 03-06-2021 is illegal, ultra vires and of no legal effect;
- B. **Direct** the respondent no. 4 to reinstate the appellant as AT at Girls Middle School Maidaan Kolai.

Suspend the operation of the impugned notifications letter No.  
4010-18 DEO (F) KP, KH Dated Paalas 03-06-2021

**C. Award costs of the petition.**

Any other and better relief that this honorable Court deems just and appropriate in the circumstances may also be granted.

Through Counsel

Waqar Orakzai & M. Shabzad

Advocates High Court

Appellant

Waqar Orakzai  
Advocate High Court

**First Certificate:** It is certified as per instructions that this is the first writ petition against the impugned notification and no other petition, ICA, CPLA or review petition is pending before any forum filed by the appellant.

**Second Certificate:** It is certified that this petition has arisen from violation and non-fulfillment of obligations under the Constitution of Islamic Republic of Pakistan, 1973 and that no other adequate remedy is available to the Appellant.

Counsel

Waqar Orakzai  
Advocate High Court

**IN THE SERVICE TRIBUNAL, KHYBER  
PAKHUTUNKHUWA**

*In re*

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

Tabinda d/o Hakeem Dad , R/o Kolai Tehsil Palas District KP Kohistan.

**Appellant**

**Versus**

Government of **KPK** through its Secretary Elementary and Secondary Education  
Department, Secretariat Peshawar & others.

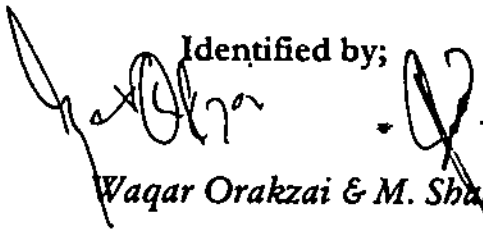
**Respondents**

**AFFIDAVIT**

I, Tabinda d/o Hakeem Dad , R/o Kolai Tehsil Palas District KP Kohistan., do hereby solemnly affirm and declare that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

تابیندا

**DEPONENT**

Identified by;  
  
**Waqar Orakzai & M. Shahzad**  
*Advocates High Court*

**Waqar Orakzai**  
*Advocate High Court*

**IN THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**

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

Tabinda daughter of Hakeem Dad, resident of Tehsil Palas, District KP Kohistan.

...APPELLANT

VERSUS

Government of Khyber Pakhtunkhwa through its Secretary Elementary and Secondary Education Department, Secretariat Peshawar &amp; others.

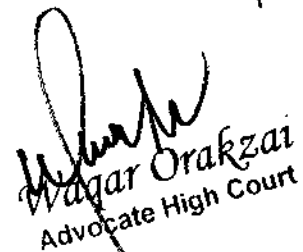
...RESPONDENTS

**SERVICE APPEAL****CERTIFICATE***It is certified that no such like appeal has earlier been filed before this Honourable Tribunal or any other Court of Law.*

...APPELLANT

Dated: 12/12/2023

Through

Waqar Orakzai & M. Shahzad  
Advocates High Court  
Waqar Orakzai  
Advocate High Court

(10)  
**IN THE SERVICE TRIBUNAL, KHYBER  
PAKHUTUNKHUWA**

*In re*

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

Tabinda D/o Hakeem Dad , R/o Kolai Tehsil Palas District KP Kohistan.

**Appellant**

**Versus**

Government of **KPK** through its Secretary Elementary and Secondary Education Department, Secretariat Peshawar & others.

**Respondents**

**Application For Condonation of Delay on Behalf of the Appellant**

*Respectfully Sheweth:*

1. That the applicant has filed service appeal before this Hon'ble Court.
2. That there is a delay of 01 year and 15 days in filing the service appeal.
3. That appellant submitted her departmental representation before respondent no 03 on 09-08-2021. That the decision was taken on 24-01-2022 by respondent no 04 (*copy of order is attached as annexure F in the appeal*)
4. That the appellant belong to an underdevelopment and backward area. That the cultured norms in the area makes it very difficult for the friends to approach relevant forum for redressed of their grievances.
5. That due to the same reason she was unable to receive the notice of hearing and order against her department representation
6. That the delay in filing the instant appeal is neither intentional nor willful but due to good and sufficient reasons shown herein above.
7. That the justice demand that the case be heard on merits technicalities should be avoided be dispensation of justice.

*In view of the above it is most graciously submitted that the time lapse in filing the instant application the condoned. Any other relief which this honourable court may deem appropriate may also be given.*

Through Counsel

*Waqar Orakzai & M. Shahzad*

*Advocates High Court*

**Waqar Orakzai**  
Advocate High Court

*only*  
**Appellant**

IN THE SERVICE TRIBUNAL, KHYBER  
PAKHUTUNKHUWA

In re

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

Tabinda D/o Hakeem Dad , R/o Kolai Tehsil Palas District KP Kohistan.

Appellant

Versus

Government of KPK through its Secretary Elementary and Secondary Education  
Department, Secretariat Peshawar & others.

Respondents

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Through Counsel

Waqar Orakzai & M. Shabzad

Advocates High Court

Appellant



(11) *Anne* (A)

**BETTER COPY**  
**OFFICE OF THE DISTRICT EDUCATION OFFICER**  
**(FEMALE) KOHISTAN.**

**APPOINTMENT**

Consequent upon recommendation of the District Education Committee, appointment of the following ordered against the post of AT, School based in BPS-15 (Rs.8500-700-29500) @ Rs. 8500/- fixed plus as not allowances as admissible under the rules an adhoc basis on contract under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge. *AT*

S#	St	Roll No	Name of Teacher	Father Name	Domicile	Home Address	Place of posting	Score
1	1	2240146	Munira Begum	Nizam ud Din	Kohistan	Toheed Abad Kuz Sheryal Tehsil Pallas District Kohistan	GGMS Shulgara	88.2
2	3	2240142	Tahira	Hikmat	Kohistan	Ghazi Abad Tehsil Pallas District Kohistan	GGMS Shil Khan Abad	86.15
3	3	2240148	Attiya Ellahi	Shad Muhammad Khan	Kohistan	Bar Paro Tehsil Pallas District Kohistan	GGMS Pattan	79.54
4	2	1140367	Abida Bibi	Sher Wali Khan	Kohistan	Baryar Tehsil Dassu District Kohistan	GGMS Jahamra	76.98
5	4	2240147	Maria Zafar	Qazi Muhammad Ahsan Zafar	Kohistan	Garang Hwari Madakhail Tehsil Pallas District Kohistan	GGMS Bela Dubair	69.29
6	9	2240141	Tabinda	Hakim Dad	Kohistan	Koseen Kolai Tehsil Pallas District Kohistan	GGMS Miadan Kolai	66.7
7	12	2240154	Rozina Mir	Mir Afzal	Kohistan	Kundal Tehsil Pallas District Kohistan	GGMS Rustan Khail	58.21
8	8	2240151	Nagina Bibi	Muhammad Haroon	Kohistan	Gaidar Tehsil Pallas District Kohistan	GGMS Guli Bagh	52.05

**TERMS & CONDITIONS:-**

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year with effect from the date of issue.
4. They should not be handed over charge if they exceed 33 years or below 20 years of age. Age relaxation case should be submitted to the competent authority.
5. Appointment in subject to the condition that the certificates, documents must be verified from the concerned authorities by the DEO, anyone found producing bogus certificate will be reported to the law enforcing agencies for further actions.
6. Her services are liable to termination on one month's notice from either side. In case of resignation without notice her one month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate to the effect by DEO is issued that her certificates are verified.
8. She should join her post within 10 days of the issuance of this notification, in case of failure to join their post within 10 days of the issuance of this notification her appointment will expire automatically and no subsequent appeal etc. shall be entertained.
9. Health and age certificate should be provided from the Medical Superintendent Kohistan before taking over charge.
10. She will be governed by such rules and regulation as may be issued from time to time by the Govt.
11. Her services shall be terminated at any time, in case her performance is found unsatisfactory during her contract period. In case of misconduct, she shall be preceded under the rules framed from time to time.
12. Her appointment is made on School based, she will have to serve at the place of posting, and her service is not transferable to any other station.
13. Before handing over charge, once again their document may be checked if they have not the required qualifications, they may not be handed over charge.
14. Before handed over charge she will sign an agreement with the department, otherwise this order will not be valid.

**DISTRICT EDUCATION OFFICER,**  
**(FEMALE) KOHISTAN.**

Endst: No. 777-90/AT adhoc/appointment/Kohistan the 20 May 2014

**Copy forwarded to the:**

1. The Director, Elementary & Secondary Education Peshawar.
2. District Accounts Officer Kohistan.
3. PS to secretary Khyber Pakhtunkhwa E&SE Department Peshawar.
4. Official concerned.
5. Office file.

**DISTRICT EDUCATION OFFICER,**  
**(FEMALE) KOHISTAN.**



No. 1180

MEDICAL CERTIFICATE

Name of Official TABINDA  
 Caste or race BIGOM KHIC  
 Father's name HAKIM DAD  
 Residence KOLAI KAHISTAN  
 Date of birth 25-10-1989  
 Exact height by measurement 5-5  
 Personal mark of identification side  
 Signature of the Official [Signature]  
 Signature of head of office [Signature]

Head of Office [Signature]  
 District Education Officer  
 Peshawar

I do hereby certify that I have examined Mrs. Tabinda a candidate for employment in the Office of the Education Department Kohistan and can not discover that he had any disease communicable or other constitutional affection or bodily infirmity except Nil

I do not consider this as disqualification for employment in the office of the Education Department Kohistan His age according to his own statement 25 year and by appearance about 25 year (Twenty-five years)

- C.M.C. 71501-4877646-2
- Mark of identification :- Black mole on elbow
- Vision :- L/E both sides

Waqar Orakzai  
 Advocate High Court  
 Medical Superintendent,  
 Civil Hospital District Health Officer  
 Kohistan  
2/6/2014

LEFT HAND THUMB AND FINGER DEPRESSIONS



# چارج رپورٹ

ڈسٹرکٹ ایجوکیشن آفیسر ایف ڈی اے کورسٹان داسو

حسب الحکم آرڈر نمبر ۹۰-۷۷۷ مورخہ ۲۵/۵/۲۰۱۹ کی تکمیل میں

آج مورخہ ۲۶/۵/۲۰۱۹ کو قبل از دوپہر گورنمنٹ اسکول میرالہوائی

میں اپنی منصب نشست (AD) کا چارج سنبھال کر ڈیوٹی کا باقائده

آغاز کر دیا ہے۔

*(Signature)*  
Waqar Drazai  
Advocate High Court

لہذا چارج رپورٹ حاضر خدمت ہے۔

چارج گہندہ

تاریخ

چارج دہندہ

تاریخ

*(Signature)*  
Seserep

MS Madam

*(Signature)*  
Teacher

24/5/2019

(For use in Police Department only).

leirs,

(1) Passed SSC Examination from (KIU) Gilgit under the Roll No. 105405 Session 2006 Annual obtained marks 593/1050

(2) Passed Shahadatul Aalamia from Waqaf Madaris Multan under Roll No. 4694 Session 2011 obtained marks 46/500 dated received back

Deputy Commissioner Kohistan  
Deputy Commissioner Kohistan

Left Thumb Impression

Qualification	Date	Qualification	Date
English		First Arts	
Maths		B.L. Or B.A	
Law		Pleadership examination	
Non-drawing		Training School Final examination	
Computer Print		Other qualifications	
Asst Instructing			
Asst Duties			
Senior Duties			

Waqar Orakzai  
Advocate High Court

Note: The entries on this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

1. Name: Takhinda

2. Race: Sheen Begum Khair

3. Residence: Kalai Tehsil Pallas Distt: Kohistan


4. Father's name and residence: Hakimdad


5. Date of birth by Christian era as nearly as can be ascertained: 25-10-1989


6. Exact height by measurement: 5-5


7. Personal marks for identification: Black mole on chin

8. Left hand thumb and Finger impression of (Non-Gazetted) officer:

Little Finger: 

Ring Finger: 


Middle Finger: 

Fore Finger: 

Thumb: 

*Waqar Orakzai*  
Advocate High Court

9. Signature of Government Servant: *Takhinda*

10. Signature and designation of the Head of the officer, or other Attesting Officer: 

Deputy DEO (F)  
Kohistan

1	2	3	4	5	6	7	8
Name of Post	Substantive Whether Substantive or officiating and whether permanent or temporary.	If officiating, state (i) substantive appointment, or (ii) Whether service counts for pension under Art. 374 C.S.R.	Pay in substantive Post	Additional pay for officiating	Other emolument falling under the term "pay"	Date of Appointment	Signature of Government servant
(A.T)		BPS-15(8500-700-29500)					
G.G.M.S (AT) Midan Kolai			Rs. 8500/-			24/5/2014	
-do-			Rs. 8500/-			01/12/2014	
BP S/Ran.		BPS-15(10985-905-38135)					
			Rs. 10985/-			1/7/2015	
			Rs. 10985/-			1/12/2015	
S/R (B.P.S. NO 15) @		13510-1120-47110					
			Rs. 13510/-			01/07/2016	
			Rs. 13510/-			01/12/2016	
S/R (B. NO 15) @		16120-1330-56020					
			Rs. 16120/-			01/07/2017	
			Rs. 16120/-			01/12/2017	

Wagar Oraksan  
 Andhra High Court

9	10	11	12	13		14	15
Signature and Designation of the head of the office or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or award or praise of the Government Service
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
					Period		
Deputy BEO (F) Kohistan	30/11/2014 S/R	Fixed	[Signature]		Appointment is AT Post at G.G.Ms Midan Kolai under the rules of Govt. Vide Endast D NO 777-90 dated 20-05-2014	[Signature]	
Deputy District Education Officer (F) Kohistan	30/11/2015	Fixed	[Signature]		S-2013	Deputy BEO (F) Kohistan	
Deputy District Education Officer (F) Kohistan	30/11/2015	Fixed	[Signature]		S-2013	Deputy District Education Officer (F) Kohistan	
Deputy District Education Officer (F) Kohistan	30/11/2015	Fixed	[Signature]		pay active up to 1/1/2015	[Signature]	
Deputy District Education Officer (F) Kohistan	30/11/2015	Fixed	[Signature]		S-II	District Accounts Officer Kohistan	
Deputy District Education Officer (F) Kohistan	30/11/2015	Fixed	[Signature]		31/11/17/2-156143	[Signature]	
Deputy District Education Officer (F) Kohistan	30/11/2015	Fixed	[Signature]		verified up to 31/11/2014	[Signature]	
Deputy District Education Officer (F) Kohistan	30/11/2015	Fixed	[Signature]		DA-2102	District Accounts Officer Kohistan	
Deputy District Education Officer (F) Kohistan	30/11/2015	Fixed	[Signature]		verified up to 24-05-2014	[Signature]	Wajid Orakza Advocate High Court
Deputy District Education Officer (F) Kohistan	30/11/2015	Fixed	[Signature]		to 25-05-2015 from Reg. Roll	[Signature]	
Deputy District Education Officer (F) Kohistan	30/11/2015	Fixed	[Signature]		of other record of this office	[Signature]	

9	10	11	12	13		14	15
Signature and Designation of the head of the officer or other attesting officer in attestation of columns 1 to 8	Date of termination or appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting officer	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
				Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit- to another Government		
					Period		
<p>Deputy District Education Officer (F) Kolai Pallas Kohistan</p> <p>30-11-2017</p>			<p>Deputy District Education Officer (F) Kolai Pallas Kohistan</p>		<p>Service verified w.e.f 26-05-2005 to 27-05-2016 from ACB, Roll &amp; other record of this office.</p>		<p>Deputy District Education Officer (F) Kolai Pallas Kohistan</p>
<p>Deputy District Education Officer (F) Kolai Pallas Kohistan</p> <p>3</p>					<p>Service verified w.e.f 28-05-2016 to 29-05-2017 from ACB, Roll &amp; other record of this office.</p>		<p>Deputy District Education Officer (F) Kolai Pallas Kohistan</p>
<p>Deputy District Education Officer (F) Kolai Pallas Kohistan</p> <p>3</p>					<p>Service verified w.e.f 30-05-2017 to 01-06-2018 from ACB, Roll &amp; other record of this office.</p>		<p>Deputy District Education Officer (F) Kolai Pallas Kohistan</p>
<p>Deputy District Education Officer (F) Kolai Pallas Kohistan</p> <p>3</p>					<p>Service verified w.e.f 01-06-2018 to 30-05-19 from ACB, Roll &amp; other record of this office.</p>		<p>Deputy District Education Officer (F) Kolai Pallas Kohistan</p>

Annexure  
(C)

19

**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) DISTRICT KOLAI PALLAS KOHISTAN**

Email: DeofemaleKohistan@gmail.com ; face book: District Education Office Female KP Kohistan

No 2065 DEO F KP KH

Dated 01/10/2020

To,

1. Tabinda TT GGMS Maidan Kolai

Subject: PERSONAL HEARING

Memo,

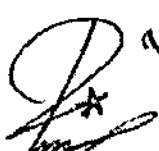
You are hereby directed to appear for personal hearing before District Education Officer (Female) Kolai Pallas Kohistan along with all Original Certificates/Service documents and CNIC on, 09/10/2020, 10:00 AM at DEO Female office Kolai Pallas Kohistan falling which ex-parte action should be taken against you.


  
District Education Officer  
(Female) Kolai Pallas Kohistan

Encls: No 2065-10 Personal File Para No 03 DEO (F) KP KH Dated Pallas the 01/10/2020


Copy of the above is forwarded to the:-

1. Director E&SE Khyber PakhtunKwha Peshawar.
2. Deputy Commissioner Kolai Pallas Kohistan.
3. District Monitoring Officer (EMA) Kolai Pallas Kohistan.
4. Deputy District Education Officer (Female) KP Kohistan.
5. All Committee members.

  
District Education Officer  
(Female) Kolai Pallas Kohistan

  
Waqar Orakzai  
Advocate High Court

Issue Final  
Show cause to  
Tabinda T.T.  
GGMS Maidan Kolai

  
16/12/2020



Annexure

20

①

V-1

**OFFICE OF THE DISTRICT EDUCATION OFFICER  
(FEMALE) DISTRICT KOLAI PALLAS KOHISTAN**

Email: [DeofemaleKokohistan@gmail.com](mailto:DeofemaleKokohistan@gmail.com) face book: District Education Office Female KP Kohistan

No 2973 DEO F KP KH

Dated 17 / 12 2020

To.


The Director Information E&SE  
Department Khyber Pakhtunkhwa

**Subject: Publication of Final Show Cause Notices**

Memo.

Please find enclosed herewith final show cause notices of absent officials serving in Education Department District Kolai Pallas Kohistan for publication in dally News Papers, Mashriq, Aaj and Shamal.

It is further requested to kindly submit your bill for payment please


  
District Education Officer  
(Female) Kolai Pallas Kohistan

Encls: No. 2969-72 F.No 10-DEO (F) KP KH Dated Pallas the 17 / 12 2020

Copy of the above is forwarded to the:-

1. PS to Secretary E&SE Khyber Pakhtunkhwa Peshawar.
2. Director E&SE Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner Kolai Pallas Kohistan.
4. Office Copy.

  
Waqar Orakzai  
Advocate High Court

  
District Education Officer  
(Female) Kolai Pallas Kohistan  
17/12/2020

# مشرق

DAILY MASHRIQ PESHAWAR

## قانونی خبریں

### ایف بی آئی کے افسران کو پولیس کو ہراساں کرنے پر

ایف بی آئی کے افسران کو پولیس کو ہراساں کرنے پر ایک فرانزکاتک وارنٹ جاری کیا گیا ہے۔ ایف بی آئی کے افسران نے ایف بی آئی کے افسران کو ہراساں کرنے کی کوشش کی۔ ایف بی آئی کے افسران نے ایف بی آئی کے افسران کو ہراساں کرنے کی کوشش کی۔ ایف بی آئی کے افسران نے ایف بی آئی کے افسران کو ہراساں کرنے کی کوشش کی۔

ایف بی آئی کے افسران کو پولیس کو ہراساں کرنے پر ایک فرانزکاتک وارنٹ جاری کیا گیا ہے۔ ایف بی آئی کے افسران نے ایف بی آئی کے افسران کو ہراساں کرنے کی کوشش کی۔ ایف بی آئی کے افسران نے ایف بی آئی کے افسران کو ہراساں کرنے کی کوشش کی۔

نمبر	نام غیر حاضر ملازمین	پتہ	تعمیراتی
01	سلیم		GOPS - کلاکت
02	بھائی		GOPS - کلاکت
03	بھائی		GOPS - کلاکت
04	بھائی		GOPS - کلاکت
05	بھائی		GOPS - کلاکت
06	بھائی		GOPS - کلاکت
07	بھائی		GOPS - کلاکت
08	بھائی		GOPS - کلاکت
09	بھائی		GOPS - کلاکت
10	بھائی		GOPS - کلاکت
11	بھائی		GOPS - کلاکت

Handwritten notes and signatures in the bottom right corner of the table, including names like "Dinku" and "Mansoor".

Advertisement for a business or service, including contact information and company name "PESHAWAR".

Case of ADAM HAS

PESHAWAR

ADAM HAS


# دفتر ڈسٹرکٹ ایجوکیشن آفیسر {زنانہ} ضلع کولئی پالس کوہستان

## نوٹس غیر حاضری

آپ مندرجہ ذیل معاملات آئی۔ ایم۔ یو/ایس۔ ڈی۔ ای۔ ادا لے۔ ایس۔ ڈی۔ ای۔ ای۔ کی رپورٹ کے مطابق بغیر کوئی وجہ ڈیوٹی سے غیر حاضر ہیں آپ کو آپ کی غیر حاضری سے بدست میں زیر دستخطی کے دفتر سے شوکار نوٹس بھی جاری کیا جا چکا ہے۔ مگر آپ کی طرف سے تاحال کوئی جواب نہیں ملا اور نہ ہی آپ اپنی ڈیوٹی پر حاضر ہوئے۔ نیز آپ کو بذریعہ اخبار آخری نوٹس دیا جاتا ہے کہ نوٹس ہذا کے جاری ہونے کے ساتھ دن کے اندر اندر اپنی ڈیوٹی پر حاضر ہو کر اپنی غیر حاضری کی وجہ بتلائیں۔ سو دیگر مقررہ عرصہ گزر جانے کے بعد آپ کے خلاف ای۔ ایٹف۔ ڈی۔ رولز 2011 کے تحت ایکٹرز قانونی کارروائی عمل میں لای جائیگی جس میں آپ کو ملازمت سے برخاست کر دیا جائے گا۔

نمبر شمار	نام غیر حاضری ملازمین	پوسٹ	مقام ڈیوٹی
01	سلہ سلیم	پی۔ ایس۔ ٹی	GGPS - شانان کورٹ
02	کنیز بی بی	پی۔ ایس۔ ٹی	GGPS - گلاب آباد نمبر 2
03	شمینہ بی بی	ڈی۔ ایم	GGHS - بیٹھہ
04	محمد شوکت	ٹاکہ وہب	GGMS - سیر فازی آباد
05	محمد زاہد	ٹاکہ کامد	GGMS - سیر فازی آباد
06	محمد اجمل	چوکیدار	GGPS - سیر فازی آباد
07	طیبہ ڈاکٹر	پی۔ ایس۔ ٹی	GGPS - شانان کورٹ
08	میڈیا خان	چوکیدار	GGPS - کوز سیری کوئی
09	تاجینہ بی بی	ٹی۔ ٹی	GGMS - میدان کوئی
10	خوریہ بی بی	پی۔ ایس۔ ٹی	GGPS - کلاویر
11	عطیہ بی بی	پی۔ ایس۔ ٹی	GGPS - میدان برہادو

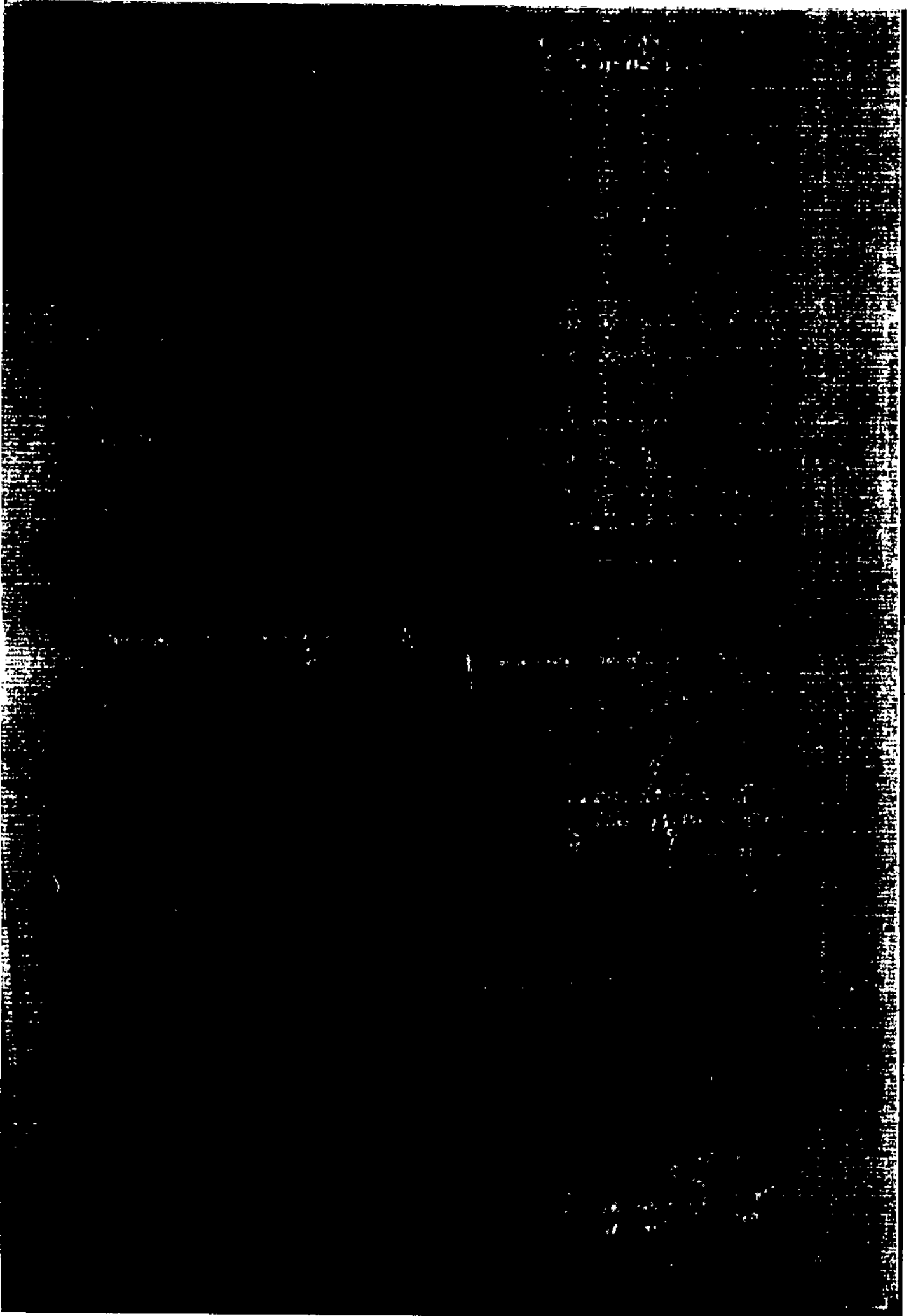
زبیدہ خٹک  
ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ)  
ضلع کولئی پالس کوہستان

  
District Education Officer  
(Female)  
Kotli Pallas Kohistan

  
Wahid Orakzai  
Advocate High Court

Amexure

(A)  
E . . (23)



(24)

(F)

**OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE DISTRICT  
KOLAI PALLAS KOHISTAN**

No. 7141 / dated 24/01/2022

To,

The Director,  
Elementary and Secondary Education  
Khyber Pakhtunkhwa Peshawar

Subject: **APPEAL**

Memo: kindly refer to your letter No. 3256/FNo322/F/Appeal/Kohistan Kolai Pallas  
Dated 28/10/2021 on the subject cited above.

It is submitted for your kind information that the Ex AT Teacher Mst  
Tabinada GGMS Midan Kolai was absent from school duty since long, due long absentee she  
was terminated from Government service after completion of all caudal formulates.

Report submitted along with the Photo copies of Show cause Notice, Personal  
hearing, Final Show case (In daily News Paper) ETC to your kind information please.

Endstr: No. \_\_\_\_\_ Date \_\_\_\_\_ / \_\_\_\_\_ /2022

Copy of the above is forwarded to the.

- 1- Deputy Commissioner Kolay Pallas Kohistan.
- 2- Deputy District Education Officer Female Pallas

*[Signature]* 24/1/22  
District Education Officer Female  
District Kolai Pallas Kohistan

*[Signature]*  
District Education Officer Female  
District Kolai Pallas Kohistan

*[Signature]*  
Waqar Orakzai  
Advocate High Court

محرم الحرام ۱۴۴۳ھ  
محرم الحرام ۱۴۴۳ھ

بیماری سے مبتلا ہے جو کہ بیماری کی وجہ سے سکول میں جا سکتا ہے  
تو کسی ملے اور نہ ہی کسی قسم کے بناوچ اطلاع  
میں ہے اور سائنس / نوریات کو ذہن سے لیا گیا ہے

مشیر اسٹریٹیجی کے نام نوریات کو بوم  
بیماری دوبارہ اپنی ڈاکٹر سے علاج دینے کی اجازت  
دی جائے نوریات آپ کے پی دی گری کی

Waqar Orakzai  
Advocate High Court

۰۳-۰۸-۲۰۲۱

۱۴۴۳ھ  
۱۴۴۳ھ

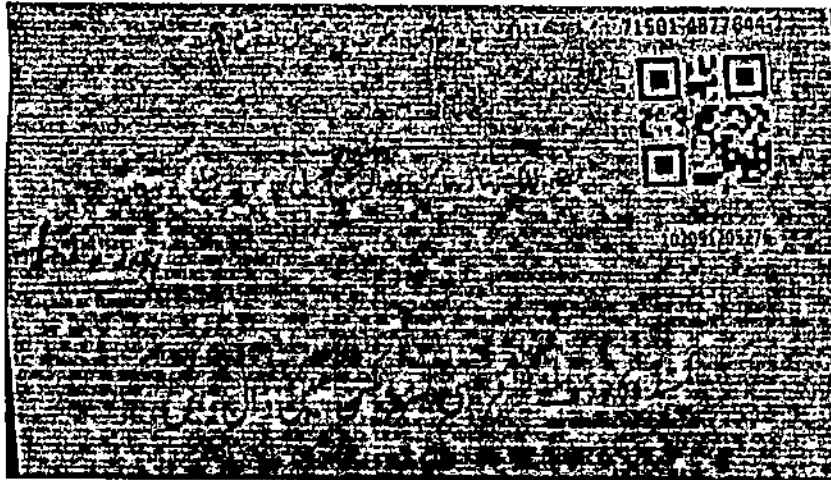
بیماری سے مبتلا ہے

السلامی

نوریات سے GAMS میں ملنے کو ضمانت

Tr

(248 B)



*Waqar Orakzai*  
Advocate High Court

S.No. 188361

Name of Advocate **WABAR ORAKZAI**

DBA NO. **827-A**

TBA NO. \_\_\_\_\_

BC No. **2 2 - 5 8 1**



R.s.200/-

وکالت نامہ

**BIBI SALMA**  
Finance Secretary  
District Bar Association  
Abbottabad

بعدالت جناب سروس نرہیزل فورٹ

عنوان: **ٹا بنڈہ** بنام **ٹورگنٹ آن کے بی کے**

منجانب: **اسپلائٹ** نوعیت مقدمہ **سروس اسٹول**

باعث تحریر آنکہ **میں نے**

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے چرہی اور جوابدہی رائے پیشی یا تفسیر مقدمہ بمقام **اسپلائٹ** کے لیے **وفار اور محترم ایڈووکیٹ لورڈ محمد شہزاد اسیر و عدالت**

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا ہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی پورہ ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پچھے یا بروقت تھیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پکھری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروقت تھیل یا پکھری کے اوقات سے پہلے یا پچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عاقبت کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہونگے۔ کچھ کوئل سماعت پر ادخاست صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل مگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کو ادا کرنے اور ہر قسم کا روپیہ وصول کرنے اور سید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر نائشی اور کسی نام سے وکیل بر حلافہ کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے میر و نجات از پکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا بطور درخواست سے استثنائی یا قریبی یا گرفتاری قبل از گرفتاری اجراءے ڈگری بھی صاحب موصوف کو بشرط ادا سنگی علیحدہ وقتانہ پورہ حق کا اختیار ہوگا اور میری صورت میں صاحب موصوف کو کوئی اختیار ہوگا کہ مقدمہ مذکور یا اس کے کسی جزوی کاروائی کے یا بصورت اپیل کسی دور سے وکیل کو اپنے نام سے یا کسی نام سے ہر قسم کے فریاد کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہونگے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پورے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

ٹا بنڈہ ولد صاحب داد  
ٹا بنڈہ

لہذا وکالت نامہ لکھ دیا ہے کہ سند ہے۔ مورخہ: **2023/02/10**

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ دن ماہ سال

نوٹ: وکالت نامہ کی فوٹو کاپی قابل قبول نہ ہوگی

Handwritten signatures and stamps at the bottom of the document.