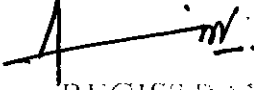


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

1385/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	21/06/2023	The appeal of Miss. Sheema presented today by Mr. Rahim Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 12-07-2023 .
		By the order of Chairman  REGISTRAR

BEFORE THE COURT OF WORTHY CHAIRMAN SERVICES

TRIBUNAL, PESHAWAR

Service Appeal No. 1385/2023

Miss. Sheema

VERSUS

DEO (F) Buner and others

APPLICATION FOR FIXATION OF THE TITLE APPEAL IN THE PRINCIPAL

SEAT AT PESHAWAR

Respectfully Sheweth:

1. That the title appeal is being filling before this honourable tribunal where in no date is fix so far.
2. That the title appeal may be fixed herein before the principal seat for hearing of the title appeal for preliminary arguments.

It is therefore humbly prayed that on acceptance of the instant application the relief sought may granted in favour of the petitioner / appellant.

Petitioner/ Appellant

Through Counsel


Raheem Khan

Advocate High Court Peshawar

Cell No. 0343-9049150

IN THE HON'BLE SERVICE TRIBUNAL KHYBER
PUKHTONKHWA PESHAWAR

Service Appeal No. 1385 /2023.

Miss, Sheema.....APPELLANT

VERSUS

District Education Officer (Female) & others....Respondents

I N D E X

S NO	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Service Appeal	-	1-11
2.	Affidavit	-	12
3.	Application for Suspension	-	13-14
4.	Affidavit		15
5.	Copy of order Endst No 1601 dated 26.12.2022 & Appointment Order	A	16-18
6.	Copy of Relieving Order and arrival Reports	B	19-20
7.	Copy of Salary and duty performance certificate up to 07.03.2023 & Impugned cancellation order 26.12.2022, Departmental Appeal dated 15.03.2023 and Legal notice dated 20.03.2023	C	21-29
8.	Copy of Impugned Relieving Order No 178 dated 15.05.2023	D	30
9.	Copy of Pay stoppage order and duty certificate upto 31.05.2023	E	31
10.	Copy of Transfer Orders of Private respondents dated 26.12.2022	F	32-33
11.	Copy of transfer Order endst No 1216 dated 13.05.2023 of private respondent No 7	G	34
12.	Wakalat Nama		35

Appellant

Through

Dated: 21.06.2023

RAHEEM KHAN

Advocate, High court

At District Courts Dagar Buner

Cell # 0343-9049185

①

IN THE HON'BLE SERVICE TRIBUNAL KHYBER
PUKHTONKHWA PESHAWAR

Service Appeal No. 1385/2023.

Miss, Sheema D/O Bahroz Khan Village Amnawar Tehsil Gagra
District Buner / T.T Govt; Girs Higher Secondary School
Shalbondai Tehsil Gagra District Buner.

"APPELLANT"

VERSUS

1. DISTRICT EDUCATION OFFICER (FEMALE) E & S
DISTRICT BUNER.
2. MST. RUKHSANA RAHIM EX D.E.O FEMALE BUNER
DISTRICT.
3. DIRECTOR EDUCATION E & S EDUCATION K.P
PESHAWAR.
4. SECRETARY EDUCATION E & S DEPARTMENT K.P
PESHAWAR.
5. DISTRICT ACCOUNTS OFFICER BUNER.
6. CHIEF SECRETARY K.P PESHAWAR.
7. MISS, MAJIDA GOVT; GIRLS HIGH SCHOOL TOPAI
TEHSIL CHAGEZAI DISTRICT BUNER.
8. PRINCIPAL GGHS SCHOOL SHALBONDAI TEHSIL GAGRA
DISTRICT BUNER.

"RESPONDENTS"

SERVICE APPEAL UNDER S. 4, OF THE SERVICE
TRIBUNAL ACT 1974, AGAINST THE TRANSFER ORDER
IMPUGNED, END; NO.2065, TACTFULLY SHOWN ON
DATED 26/12/2022, ACTUALLY ISSUED BY THE

(2)

RESPONDENT NO.2 AND RECEIVED, ON
DATED,06/03/2023, AFTER LAPSE OF MORE THAN 02
MONTHS PERIOD , FOR WHICH THE APPELLANT HAS
BEEN PAID SALARY ON THE BASES OF HER CHARGE
RELINQUISH, IN GGMS SHANGRA AND CHARGE
ASSUMPTION/ ARRIVAL REPORT, MADE PROPERLY IN
GGHSS SHALBONDAI , WHEREBY A LEGAL AND
MERITORIOUS TRANSFER ORDER END; 1601 DATED
26/12/2022, PASSED BY THE RESPONDENT NO.2
HERSELF , IN THE INTREST OF PUBLIC SERVICE AND
ALSO AGAINST THE ORDERS IMPUGNED REGARDING
RELEAVING OF THE APPELLANT VIDE ORDER IMPUGNED
END; NO.178 DATED 15/05/2023 AND STOPPAGE OF
SALARY OF THE APPELLANT W.E.FROM 01/06/2023,
IMPUGNED ISSUED BY THE RESPONDENT NO.1 in
violation of her fundamental rights, WAS AGAINST THE
LAW, RULES AND POLICEY AND ALSO AGAINST THE
FACTS AND ON MALA FIDE INTENTION AND ILL WELL,
JUST TO PLACE THE RESPONDENT NO.7, ON THE SAME
STATION , BEING THE EYE BLUE OF THE RESPONDENT
NO.1 , CANCELLED/WITHDRAWN WHICH IS VOID
ACCORDING TO THE LAW AND WAS NOT SUSTAINABLE
IN THE EYES OF LAW BUT IS LAIBLE TO BE
SEASIDE IN FAVOUR OF THE APPELLANT.

Respectfully Sheweth;

FACTS

1. That the appellant was appointed as Theology Teacher (TT) in BPS 15, vide order End; No.1965-72 dated 02/08/2021 , in GGMS shangra chagerzai Tehsil Distt;

(3)

Buner and after lapse of about one and half years, she was transferred, on merit in the interest of public service to the Govt; Girls Higher Secondary School shalbandai vide order end; No. 1601 dated, 26/12/2022. **(Copy annexed as "A" for ready reference).**

2. That the Govt; Girls Middle School Shangra Tehsile Chagerzai was in a hilly remote area and according to the policy, K.P Appointment, Promotion and Transfer of Teachers, Lecturers, Instructors and Doctors Regulatory Act 2011 the appellant was deserving and entitled to be transferred to her Union Council against vacant Post of T.T and therefore her transfer was rightly and lawfully made to the GGHS School shalbondai against vacant post of TT vide order end; No.1601 dated 26/12/2022 in the interest of public service which the appellant was timely complied with, by handing and taking over of charge and reliving and submission of arrival report. **Copies of all are annexed as "B" for ready reference.**

3. That after the submission of the arrival report the charge of TT in Govt; Higher Secondary School Shalbondai was assumed and the routine duty was started to perform in the said school and also on the same performance of duty the appellant had been paying her monthly salary. **copy of salary and duty performance certificate up to 07/03/2023 is annexed as "C" for ready reference and perusal.**

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4. That the impugned order, whereby the so called cancellation /withdrawal of the legal transfer order of the appellant was made, was actually noticed on 06/03/2023, which tactfully just to easily adjust, her eye blue in the GGHSS shalbondai , in place of the appellant, without any legal and lawful resistance and the appellant then not to raise the point and question of pre maturity of the order impugned, this fraudulent and false base was planned to be shown as issued on, 26/12/2022, which itself indicates that Dispatch No. allotted to the legal and meritorious transfer order of the appellant was NO.1601 dated 26/12/2022, while the subsequent order impugned was wrongly allotted a so called dispatch No.2065 dated 26/12/2022, was impossible, having fraction and difference of 464 figures , so was wrong and fraudulent and was mala fide but was actually pre mature transfer which was planned as a result of illegal gratification by give and take. Copies of both the orders are annexed just for perusal and to compare with each other and also keeping in view the fact, if the same was actually on the same day and date ie 26/12/2022, why the same was not handed over on the same or alternate day, even why after about 3 months and also why the arrival report was especially considered for changing of BD No. of the appellant and why the monthly salary on regular bases had been paying for 2 months up to 28/2/2023, and why was not objected over. Hence the order impugned dated 26/12/2022 regarding cancellation and withdrawal is illegal and void and invalid and fraudulent while the

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legal and meritorious order dated 26/12/2022 of the appellant Endst No 1601, which was complied with and duly implemented by the authority even respondent No 2, 5 & 8 and the withdrawal and cancellation impugned is not applicable in the same case of the Appellant.

5. That the previous respondent No. 2, being predecessor of the respondent No.1 was then convinced and viewed off the impugned order issued by her allegedly on 26/12/2022, who was notice legally for, on dated 20/03/2023, after the order impugned was noticed by filing of departmental appeal 15/3/2023, so consequently the appellant was impliedly allowed for continuously performing of her duty in GGHS shalbondai and her monthly salary has also been drawing and paying up 31/5/2023. **Copy of reliving letter end; No.178 dated 15/5/2023 passed by the successor of respondent No 2 for ready reference and perusal is annexed as :D".**

6. That on the arrival of the respondent No.1, she just to please un duly the private respondent No.7 has transferred her from GGHS School Topay Tehsil chagerzay to the GGHS School Shalbondai vide order impugned, End; No.1216 -22 Dated 13/5/2023 while the appellant had relieved vide letter impugned No.178 dated 15/5/2023, who being surplus and eye blue was needed to be adjusted at any cost while the appellant for no fault of her or no valid reason was relived in a

6

sequence of the impugned order issued and viewed off by admitting her illegality was recalled for her personal interest and wrong adjustment. **Copies of both the order impugned are annexed as "E" & "F".**

7. The it is also worth mentioning to pinpoint here that appellant is just merely disturbing for compelling like other to pay the respondents No. 1 & 2 because if the point of cancellation of the valid and legal and a mature, order if was in public interest than why two other teachers Miss, Khuzaima CT who even was relived the appellant has been transferred vide order end; No. & date wrongly shown while another teacher Miss, Iqra Ijaz CT has also been transferred vide order end; No.1957 -62 dated 26/12/2022, from the same school shangra whom order are still intact ie not cancelled or withdrawn.
8. That the appellant has already filed departmental appeal on dated 15/3/2023 which after lapse of 90 days being statutory period did not decided or rejected responded so far, hence the appellant having no alternative adequate remedy except to file the instant service appeal on the following grounds amongst other inter alia.

GROUND:-

- A) That the case of the Appellant is one of unique nature wherein extraordinary malafide, fraud, tactfulness for the purpose just to disturb the Appellant

⑦

unwarrantedly by misuse of her / respondent No 2 & 1 discretions just to please unduly and beyond the proper application of law their blue eyed and even the respondent No 1 arrive at a belated stage, just adjusted wrongly private respondent No 7, which is not sustainable in the eyes of law, but the order dated 26.12.2022 conveyed / issued on 06.03.2023 impugned regarding cancellation and withdrawal of a mature and meritorious transfer order Endst No 1601 dated 26.12.2022, is liable to be set aside in favour of the Appellant.

- B) That the valid and meritorious transfer order dated 26.12.2022 of the appellant already complied with and implemented properly has created rights in favour of the appellants while the fraudulent withdrawal and cancellation order endst No 2065 dated 26.12.2022 issued and noticed actually on 06.03.2023 is a premature and against the principal of locus ponetentia, hence is liable to be set aside in favour of the Appellant by releasing of her monthly salary for the period w.e.f 01.06.2023 onward.
- C) That the appellant may not be suffered due to the lapses of the respondents either No 2 or 1 or even or not to suffer due to clear undoubted malafide action discrimination and also undue favour of respondent No 7 or others.

D) That the legal & valid transfer order endst No 1601 dated 26.12.2022 has been implemented in letter and spirit and the appellant had been paid his salary accordingly w.e.f 26.12.2022 to 31.05.2023 on the newly joined stations GGHSS Shalbandai and have been performing her duties as such against a proper post of TT in the same GGHSS Shalbandai School continuously, while the impugned cancellation / withdrawal Order endst No 2065, conveyed and issued actually on 06.03.223 hitting by the principal of locus ponetentia rightly as not valid which has therefore, viewed off by the respondent No 2, while subsequently the respondent No 1 by passing relieving letter dated 15.05.2023 impugned was just for the undue favour and adjustment of the private respondent No 7, who was transferred by undue favour being blue eyed of respondent No 1 on dated 13.05.2023 without availability or presence of any vacant post of TT, hence is not tenable under the law.

E) That the appellant being female teacher having been transferred vide a valid proper transfer order endst No 1601 dated 26.12.2022 on merit without any undue pressure or favour and inclination is not deserving the any interference even after its due implementation while the transfer was made against a vacant post of TT and the relevant UC of the Appellant which the policy purely favour. Hence the order impugned even endst No 2065 dated 26.12.2022 and relieving order endst No 178 dated 12.05.2023 and

stoppage of pay w.e.f 01.06.2023 all impugned are in violation and utter disregard of law and relevant policy exists, hence are not tenable under the law, but are liable to be set aside in favour of the Appellant.

- F) That the Appellant is peaceful and law abiding citizen of Islamic Republic of Pakistan and is fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- G) That the fundamental right of the Appellant has blatantly violated by the Respondents and the Appellant have been discriminated and has been denied her due rights under the Constitution of Islamic Republic of Pakistan, 1973.
- H) That the acts of the Respondents by not following the same criteria which has been safeguarded by the law and rules and guidelines provided by the apex courts that when the employee serving on respective post the competent authority is not allowed to transfer the employee with malafide intention or for ulterior motives, while in the present case the respondents neither only violated the prescribed rules and regulations but also harassed the Appellant which can easily be gathered from the face of order, which is illegal, unlawful, unnatural, ab-initio, null and void in

the eye of law, hence liable to be declared so and set aside.

- I) That though the transfer order of the employees is the discretion of the respondents but the apex courts has time and again held that the authority should exercise its discretion in judicious manner but in the instant case the authority failed to adhere to the dictum of laid down by the superior courts which is highly deplorable such like order cant not be allowed to remained in the field normally, this does not interfere with the orders passed by the competent authority in exigency of service after due application of mind but if the order seems to be illegal, ab initio, void, the court always intervenes at this stage hence the instant impugned office order to the extent is not only ridicules but also void, illegal and unlawful and liable to be struck down.
- J) That as per the Article 9, 14, 18 of the constitution seeking elaboration of constitutional and legal safeguards relating to the working of civil servants, the point of maintainability is that matter of tenure appointment, posting, transfer and promotion of civil servants could not be dealt with in arbitrary manner, it could only be sustained when it was in accordance with the law, it is settled in the above mentioned judgment that decision which deviated from the accepted or rule based norm without proper

justification could be tested on the touch stone of manifest public interest.

K) That any other ground not raised here specifically may graciously be allowed to be raised at the time of arguments.

It is therefore, most humbly prayed that on acceptance of the instant Service Appeal, all the orders impugned even endst No. 2065 dated 26.12.2022 issued by respondent No 2 and subsequent relieving order No 178 dated 15.05.2023 and stoppage of pay w.e.f 01.06.2023 and all others which ever may be against the Appellant may graciously be set aside in favour of the appellant being totally based on malafide intention, ill will, undue favour of private respondent No 7 & others and just for unwarranted disturbance of the Appellant, while the proper meritorious valid order of the appellant endst No 1601 dated 26.12.2022 may be restored and keep intact being legal, valid and lawful.

Further relief to which the appellant is entitled under the law though not specifically prayed in the instant Service Appeal may graciously be also be granted in favour of the Appellant.

Appellant

Through

Dated: 21.06.2023



RAHEEM KHAN

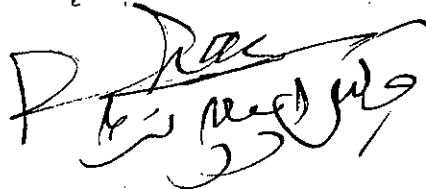
Advocate, High court

At District Courts Dagar Buner

Cell # 0343-9049185

Certificate

It is to certify that no such like appeal has earlier been filed before any court as per instructions of my client/appellant.



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IN THE HON'BLE SERVICE TRIBUNAL KHYBER
PUKHTONKHWA PESHAWAR

Service Appeal No. _____/2023.

Miss, Sheema.....APPELLANT

VERSUS

District Education Officer (Female) & others....Respondents

AFFIDAVIT

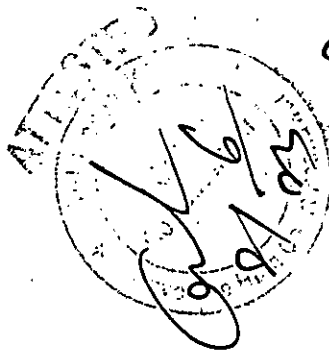
I, Miss, Sheema D/O Bahroz Khan Village Amnawar Tehsil Gagra District Buner / T.T Govt; Girs Higher Secondary School Shalbondai Tehsil Gagrfa District Buner, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

GMC = 15102-0592310-6

DT, 21-6-2023.



IN THE HON'BLE SERVICE TRIBUNAL KHYBER
PUKHTONKHWA PESHAWAR

Service Appeal No. _____/2023.

Miss, Sheema.....APPELLANT

VERSUS

District Education Officer (Female) & others....Respondents

APPLICATION FOR SUSPENSION OF ALL THE
ORDERS IMPUGNED EVEN ENDST NO. 2065
DATED 26.12.2022 ISSUED BY
RESPONDENT NO 2 AND SUBSEQUENT
RELIEVING ORDER NO 178 DATED
15.05.2023 AND STOPPAGE OF PAY W.E.F
01.06.2023, TILL THE FINAL DECISION OF
THE SERVICE APPEAL.

Respectfully Sheweth:

1. That the above noted Service Appeal is being filed before this hon'ble court, in which no date of hearing has yet been fixed.
2. That the Appellant has got a good prima facie case in their favour, and is sanguine about its success.
3. That the balance of convenience also lies in favour of the Appellant.
4. That if all the orders impugned even endst No. 2065 dated 26.12.2022 issued by respondent No 2 and subsequent relieving order No 178 dated 15.05.2023 and stoppage of pay w.e.f 01.06.2023

are not suspended, the Appellant would suffer extreme irreparable loss.

- 5. That the facts and grounds of the Appeal may kindly be read as an integral part of this application.

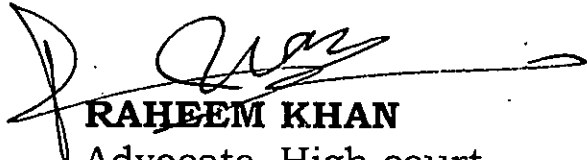
It is, therefore, respectfully prayed that on acceptance of this application, all the orders impugned even endst No. 2065 dated 26.12.2022 issued by respondent No 2 and subsequent relieving order No 178 dated 15.05.2023 and stoppage of pay w.e.f 01.06.2023 may kindly be suspended, till the final decision of the case.



Appellant

Through

Dated: 21.06.2023



RAHEEM KHAN

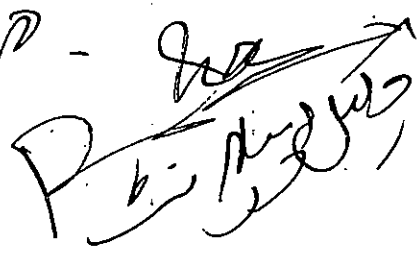
Advocate, High court

At District Courts Dagar Buner

Cell # 0343-9049185

Certificate

It is certified that the instructions of my clients are true + no such parties have been filed against -



(15)

IN THE HON'BLE SERVICE TRIBUNAL KHYBER
PUKHTONKHWA PESHAWAR

Service Appeal No. _____/2023.

Miss, Sheema.....APPELLANT

VERSUS

District Education Officer (Female) & others....Respondents

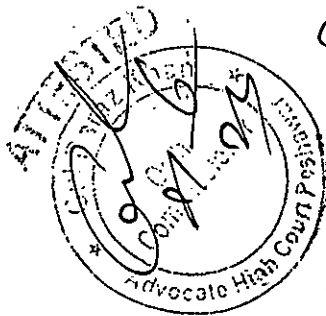
AFFIDAVIT

I, Miss, Sheema D/O Bahroz Khan Village Amnawar Tehsil Gagra District Buner / T.T Govt; Girs Higher Secondary School Shalbondai Tehsil Gagrfa District Buner, 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 Court.



DEPONENT

Case = 15102-0592310-6



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Annex "A"



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT BUNER
PHONE & FAX NO. 0939-510366
EMAIL: deofemalebuner@gmail.com



OFFICE ORDER

The competent authority is pleased to transfer Miss: Sheema TT from GGMS Shangra Buner to GGHSS Shalbandi, Buner on her own pay & scale with immediate effect in the interest of public service.

Notes:-

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned.

(RUKHSANA RAHIM)
DISTRICT EDUCATION OFFICER
(FEMALE) BUNER

Endst: No. 1601 / Dated: 26-12 / 2022

Copy forwarded for information to:-

1. PA to Director E&SE Khyber PakhtunKhwa Peshawar.
2. District Monitoring Officer (EMA) Buner.
3. District Accounts Officer Buner.
4. Principal / Head Mistress Concerned.
5. Teacher Concerned.
6. Master File.


DISTRICT EDUCATION OFFICER
(FEMALE) BUNER


ATTESTED



P-12,
OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT BUNER
PHONE & FAX NO. 0939-510366
EMAIL: deofemalebuner@gmail.com



APPOINTMENT ORDER.

Consequent upon the recommendations of the Departmental Selection Committee issued vide this office Endst: No.1822-25/ Dated 14/07/2021, appointment of the following candidate is hereby ordered as **Theology Teachers (T.T) Female** purely on merit against the vacant posts on "**Adhoc**" and "**School based**" on one year contract in BPS-15 (Rs.16120-1330-56020) @ Rs. 16120/- fixed plus usual allowance as admissible to them under the Rules and existing policy of the Provincial Government in Teaching Cadre on the terms and conditions given below, with effect from the date of taking over charge in the interest of public service.

S. #	Roll No	Name	Father's Name	CNIC No.	D.O.B	Score	School Name	Remarks
1	17600261	SHEEMA BIBI	BEHROZ KHAN	15102-0592310-6	01/03/1997	112.04	GGMS Shangra	A.V.P

Terms & Conditions:

1. No TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary adhoc /contract basis initially for a period of one year with immediate effect.
4. She should not be handed over charge if her age exceeds 35 years or below 19 years.
5. Appointment is subject to the condition that the certificates, Degree /documents must be verified from the concerned Board / Universities / Institutions. If anyone found producing bogus/ forge/fake Certificates / Degrees will be reported to the law enforcing agencies for further action.
6. If any meritorious candidate is deprived of appointment by this order, the appointment order of the lowest candidate in merit shall be withdrawn on acceptance of the appeal and adjustment order will be reviewed accordingly as per merit.
7. Her services are liable to termination on one month's prior notice from either side. In case of resignation without notice her one-month pay/allowances will be forfeited to the Government.
8. Her pay shall not be drawn unless this office issues a certificate to the effect that her documents have been verified.
9. She should join her post within 15 days of the issuance of this notification. Her appointment shall automatically stand expired and no subsequent appeal etc shall be entertained.
10. **District Accounts Officer (DAO) Buner should release her salary on the production of duty certificate duly signed by the Head Mistress /DDO concerned and countersigned by this Office.**
11. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
12. She will be governed by such rules and regulations as may be issued from time to time by the Government.
13. She services will be terminated at any time; in case her performance is found unsatisfactory during her contract period. In case of misconduct, she will be proceeded under the rules framed from time to time.
14. Her appointment is adhoc made on (School based), she will have to serve at the place of posting, and her service is (NON-TRANSFERABLE) to any other station/school.
15. Posting/ adjustment is the discretionary powers of the Appointing Authority and no one has the right to claim for adjustment at any specific school.

ATTESTED:

P-18.

16. Before taking over charge, they will sign an agreement /affidavit with the Department. otherwise this order will be not effective.
17. Before handing over charge Head Mistresses/Principals concerned will check her documents, if she has not acquired the required qualifications, they may not be handed over charge.
18. The appointee shall take nine (09) months mandatory training at RPDC (Old RITE) or DPD (Old PITE).
19. In case of regularization their inter-se-seniority shall be determined on the basis of her merit position and the date of taking over charge shall not effect her inter-se-seniority.
20. Errors and omissions will be accepted for further rectification within the specified period.

(SHAZLA NAWAZ)

DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER.

Endst: No. 1965-72 / Dated 02/08/2021.

Copy forwarded for information and necessary action to the: -

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Buner at Daggar.
3. District Monitoring Officer Buner.
4. District Accounts Officer Buner.
5. Medical Superintendent DHQ Hospital Buner.
6. Budget & Accounts Officer Local Office.
7. Head Mistress Concerned.
8. Teacher Concerned.


DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER

ATTESTED



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Annex "B"
Relieving Certificate

Miss: Sheema TT has been transfer from GGMS Shangra Buner to
GGHSS Shalbandi Buner Vide End; No. 1601 Dated: 26/12/2022 DEO(F) Buner.

She is relieved off from all kind of her duties on 26/12/2022 Afternoon.

Copy of the order is attached.

Kha
Head Mistress GGMS
Shangra Buner

ATTESTED

P. A. R.
M. A. R.

P. 20
P.

CHARGE REPORT

Certified that Miss. Sheema D/O Baroz Khan BPS -15 on this day 26-
12-2022 took over charge of T.T. BPS -15 at GGHSS Shalbandi District 27
Buner Vide District Education Officer (Female) End: No 1601 dated 31-12-
2022

Station GGHSS SHALBANDI District Buner.

Signature of
Miss: Sheema
T.T. GGHSS Shalbandi, Buner.

M. S.
PRINCIPAL
GGHSS SHALBANDI

Endst No 173 Dated 31.12.2022.

Copy to:- 27

- (1) The District Education Officer (F) Buner
- (2) The District Accounts Officer District Buner at Daggar.
- (3) Master File.
- (4) Official Concerned.

Signature of
Miss: Sheema
T.T. GGHSS Shalbandi, Buner.

M. S.
PRINCIPAL
GGHSS SHALBANDI

ATTESTED

P. 20
P.

10:27 AM

P- 21

29



Amman "C"



CHANGE ALERT - 17.02.2023

(00986504 - SHEEMA BIBI)



Inbox



Employee Services 17 Feb

to me



00986504

SHEEMA BIBI

BD6007

Office
Details

DDO CODE CHANGED to BD6064 - HEAD
MISTRESS GGHSS SHAL BANDI BUNER
DESIGNATION CHANGED to 80030932 -
THEOLOGY TEACHER
DISTRICT GOVERNMENT KHYBER
PAKHTUNKHWA

Pay
Details

Pay against wage type 0001 (Basic Pay)
is Rs. 25900

یہ ای میل خودکار نظام کے تحت بھیجی جا رہی ہے جس کا مقصد
ذی ذی او کو ملازمین کی چینجز سے متعلق ہر وقت مطلع کرنا ہے۔
اگر اس ای-میل میں شامل ملازمین کی چینجز میں کوئی غلطی



ATTES RE-

Handwritten signature and date 17/2/23

P-122 22,
 22

Government Collection

Controller General of Accounts, Pakistan
 Islamabad
DDD: OPEN & FILLED POSTS

Only for KP Government
 DDD CODE: 306864

Details

View: Print Version Export

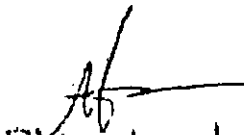
Employee Name	POSITION	DESCRIPTION	ID of related object	EPS	OPEN/FILLED	Employee Group	Job Description
SHEENA BGI	80030932	THEOLOGY TEACHER	00102467	15	FILLED	7	THEOLOGY TEACHER
IBRAHIM	80030934	SLEEPER	00102479	03			SLEEPER
FUZZA HAMEED	800316481	SUBJECT SPECIALIST LT	00102224	17	OPEN		SUBJECT SPECIALIST LT
KALSOOM BGI	80403038	SENIOR PHYSICAL EDUCATION TEACHER	00102269	10	FILLED		SUBJECT SPECIALIST
ASMA	80030936	SENIOR DRAWING MASTER	00102732			4	SENIOR PHYSICAL EDUCATION TEAC
ADAR SADEEN KHAN	80001928	SENIOR CLERK	00102710	18		1	SENIOR DRAWING MASTER
	80002008	SENIOR CERTIFIED TEACHER	00102728	16	OPEN	7	SENIOR CLERK
	80002030					4	SENIOR CERTIFIED TEACHER
FARWA BEGUM	80000729				FILLED	1	
	80698241	SECONDARY SCHOOL TEACHER	00102717		OPEN	7	SECONDARY SCHOOL TEACHER
MISS TOHREED	80698240				FILLED		
HUSNAT BEGUM	80698309						
MERAJ ZAH	80533619						
ASMA BGI	80403053						
	80403057						
ARIDA BEGUM	80002940				OPEN		
MUMLIKAT BEGUM	80003031				FILLED		
LIZNA	80403052	CAFÉ	00101922	12			CAFÉ
	80403054	PRINCIPAL	00101926	18	OPEN		PRINCIPAL
AJAJ MULLAH KHAN	80403059	MASJID QASID	00101629	03	FILLED		MASJID QASID
GONAR ALI	80002933						
SHANSA	80403063	LABORATORY ATTENDANT	00101495				LABORATORY ATTENDANT
ROBERTA	80002925						
	80403065	LABORATORY ASSISTANT	00101494	07	OPEN		LABORATORY ASSISTANT
FAYAD ALI	80002927	JUNIOR CLERK	00101481	19	FILLED		JUNIOR CLERK
HUSSAN ABRA	80403066	DIRECTOR OF PHYSICAL EDUCATION	00102997	17			DIRECTOR OF PHYSICAL EDUCATION
AKUB	80403031	CHOWKIDAR	00100543	03			CHOWKIDAR
ESPAR KHAN	80002927						
ASMAJ BGI	80215400	CERTIFIED TEACHER II	00103004	12			CERTIFIED TEACHER II
	80698307	CERTIFICATED TEACHER	00103008	15	OPEN		CERTIFICATED TEACHER
ISHRAF BEGUM	80698305				FILLED		
MISS SHAESTA	80698335						
SABBA KALESH	80698334						
	80698318						
MARZEM MUHAMMAD	80485560	Certificated Teacher			OPEN	1	
					FILLED		
SPIRASHA BGI	80485568						
MADIA	80003039	ARABIC TEACHER	00103119			4	ARABIC TEACHER

ATTESTED
 [Signature]

~~P-23~~
Duty Certificate P-23

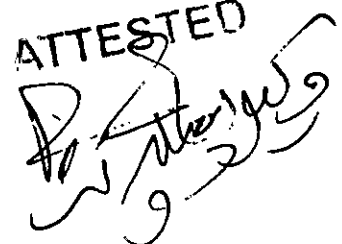
Certified that Miss Sheema Bibi D/o
Behaz Khan (T.T) has been performed
her duty at GCHSS Shalbandi Buner
w.e.f 26-12-2022 to 07-03-2023.

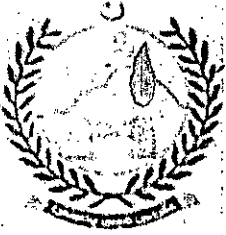
Principal
GCHSS Shalbandi


Principal
GCHSS Shalbandi

15-03-2023

ATTESTED





P- 24
22

OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT BUNER
PHONE & FAX NO. 0939-510366
EMAIL: deofemalebuner@gmail.com



CANCELLATION ORDER

The competent authority is pleased to cancelled/withdrawn the Office Orders issued regarding transfers of teachers vide this Office Endst: No. 1600, 1601, 1923-29, 1936-44, 1976-82, 2018-24, 2025-31 and 2032-35 dated 26-12-2022 with immediate effect in the best interest of public service.

NOTE:

1. No TA/DA is allowed.

(RUKHSANA RAIHM)
DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER

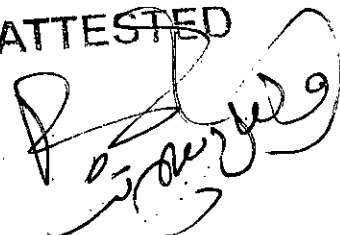
Endst: No. 2065 / Dated 26/12/2022.

Copy forwarded for information and necessary action to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer (DMA) Buner.
3. District Accounts Officer Buner.
4. Principals /Head Mistresses concerned to inform teachers concerned to report to their original station.
5. All SDEOs Female to inform teachers concerned to report to their original station.
6. Teachers Concerned for strict compliance otherwise disciplinary action will initiated against them under E & D Rules 2011.


DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER

ATTESTED



خدمتِ جناب ڈاکٹر صاحبان علیہ السلام (پاکستانی ایجوکیشنل سوسائٹی) کی طرف سے
ایجوکیشنل سوسائٹی کے سربراہان اور دیگر اہل علم و کرامت کے ذریعے
میں شیما دخترا لبر و زخان 2065 کو جنٹل گریڈنگ کے لیے پرائیمری
اسکول کے لیے داخلہ کی تفصیل کا گراہ ضمیمہ دیا گیا۔
ایس ایم: 2065 زمانہ پورے دی جا رہی ہے۔ "ایس ایم"

اسلٹ کیلئے برخلاف حکم تیار (Impugned)

2065 26 جولائی 2022
2063 26 جولائی 2022
2061 26 جولائی 2022
2062 26 جولائی 2022
2061 26 جولائی 2022
2062 26 جولائی 2022

ایس ایم کے اسلٹ کے جو کہ جنٹل گریڈنگ کے لیے تیار کیے گئے ہیں ان کے بارے میں
ایس ایم کے سربراہان اور دیگر اہل علم و کرامت کے ذریعے
میں شیما دخترا لبر و زخان 2065 کو جنٹل گریڈنگ کے لیے پرائیمری
اسکول کے لیے داخلہ کی تفصیل کا گراہ ضمیمہ دیا گیا۔
ایس ایم: 2065 زمانہ پورے دی جا رہی ہے۔ "ایس ایم"

ATTESTED
[Signature]

03/02/2006 قریباً ساڑھے دو گنا بعد لانے ایسا نہ کی گئی

B.D. مندرجہ کوکھو Change کر کے وہ نئی سٹیٹ
پر ترقی دلائی گئی ہے اس پر وہ نئی سٹیٹ پر بھی کر کے
سے سٹیشن مندرجہ کے تمام جانسی دھوکہ دہی سے پار کر کے

Signature بنادہ کی بجائے قریباً چار گنا بعد

جو کہ ان کے قانون کا Cancellation کا ذکر ہے

نیز مندرجہ حکمتاء Impugned اور قابل عمل ہے

ان کے قانون اثرانہ تحصیل سے لا رہے، اس پر ان کے قانون

کی اصلاح کی جائے گی، اس پر ان کے قانون کی اصلاح

کے لیے ایک رٹ کی درخواست ہے، اس پر ان کے قانون

رکھی ہے۔ اس پر ان کے قانون کی اصلاح

3. کہ مندرجہ حکمتاء Impugned

پر 12/26 کے برخلاف ایک درخواست ہے

DEO کے نام پر لوندز کے لیے ایک درخواست ہے

لے کر ترقی دلائی گئی ہے، اس پر ان کے قانون

ATTESTED

Impugned حکمتاء کے مطابق اس پر ان کے قانون

صاف طور پر لوندز کے لیے ایک درخواست ہے

کی اصلاح کی جائے گی، اس پر ان کے قانون

لے کر ترقی دلائی گئی ہے، اس پر ان کے قانون

15/02/06

P-27

1409

For insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

Rs. 's.

AD 50

Registered*

to _____

Date Stamp

Receiving Officer _____
"Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.

Insured for Rs. (in figures) _____

(in words) _____

Insurance fee Rs. _____

Ps. _____

Weight

(in words) _____

Kilo
Grams

Name and
address
of sender _____

121323

P. S. [Signature]

ATTESTED

P-28

LEGAL NOTICE Regd; AD

RAHIM KHAN
Advocate HIGH COURT
Office; at Distt; Courts Daggar Buner
Cell = 0343 -9049185

DATED; 20/03 /2023.

Mst, Sheema TT GGHS School Shalbandai, Distt; Buner (through Rahim Khan Adv;)

"Notice presenter"

MST RUKHSANA RAHIM D.E.O FEMALE E & S Education Deptt; Buner.

"Notice receive"

As per instruction, of my client/ Mst Sheema D/O Bahroz Khan TT Govt ; Girls Higher Secondary School Shalbandai, Distt; Buner/ subsequently to be termed as Notice presenter; that she had already been transferred vide a competent order End; No.1601 dated, 26/12/2022, issued by you Notice receiver, from Govt; Girls Middle School Shangra Chagerzai to GGHS School Shalbandai /present School , purely on merit and in the best interest of public .

That the Notice presenter has complied with the said order on the same day (26/12/2022) after noon and submitted her arrival report to the principal of the said School and since the Notice presenter has been performing her duty up to entire satisfaction of her bosses without any complaint to any one of them up till now and monthly salaries has therefore been paying her with due change of BD etc in the present School Shalbandai.

That astonishing to say that on 06/03/2023 an order allegedly to on dated 26/12/2022 bearing End; No.2065 has been also issued wrongly on Mala fide Intention and ill well; under undue influence and perhaps by illegal give and take, whereby the previous legal and competent order No.1601 of the Notice presenter has been cancelled without any lawful authority or legal valid cause which has seriously disturbed and agcnized the Notice presenter .

That the above order has no legal base or footing and also has not been actually issued on the same day but in order to avoid valid reason of calling the said to be premature and in violation of the posting and transfer policy exist , for mere so called justification, the same undue and unlawful action has been taken which is not sustainable and is not binding on the Notice presenter .

Though a departmental appeal against the same order has already been filed with an earlier objection petition, however , the Notice presenter has the right to serve up on you this legal Notice, before sending it to the Govt; Of KP for Proper initiating of legal proceeding , just to give you a chance of mutual peach off, by asking you/ Notice receiver, to un conditionally withdraw the same illegal order issued late bearing End; No 2065; under correspondence with due apology within 15 days, positively. Otherwise the Notice presenter will reserve, right to approach the Govt; through Hon; Secretary Education E & S KP and also the anticorruption authorities for proper enquiry etc, before filing suit in a competent forum of law for declaring the same as illegal and invalid basing on mala fide and ill well. Damages of which and also damages for mental agony, etc will be claimed from the pay and pension of you/notice receiver.

*Noted: One copy of this
CNRC has been
retained for legal
proceeding.*

[Signature]
RAHIM KHAN
Advocate HIGH COURT
Peshawar at Distt Courts Daggar

ATTESTED
[Signature]

Handwritten initials or mark at the top of the page.

No. 1431

For Insurance Notices see reverse. Stamps affixed except in case of uninsured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due.

Received a registered* addressed to

DEO (F)

Date Stamp

Initials of Receiving Officer

*Write here "letter", "postcard", "packet", or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures)

Rs. 3 (in words)

Insured.

Insurance fee Rs.

Ps. (in words)

Weight

Kilo Grams

Name and address of sender

21/3/23

ATTESTED

Handwritten signature or stamp below the ATTESTED stamp.

P-30

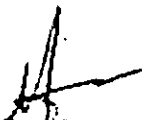
RELIEVING SLIP

Annex "D"

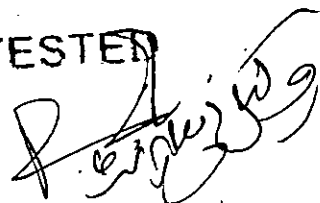
It is certified that SHEEMA TI transferred to GGMS SHANGRA office Endst; No. 1601 Dated 26/12/2022. She is relieved from her duty as T from GGISS Shalbandi Buner on 15/05/2023 (A.N)

Endst No. 178

Dated: 15/05/2023


PRINCIPAL
GGHS SHALBANDI
DISTRICT BUNER

ATTESTED



P-31
CHANGE ALERT - 06.06.2023
(00986504 - SHEEMA BIBI)

Amir E

Inbox



Employee Servic... Yesterday
to me ▾



00986504

SHEEMA BIBI

BD6064

	LEAVING ACTION PERFORMED (SALARY STOPPED) with effect from 01.06.2023
	DDO CODE CHANGED to BD6064 - HEAD MISTRESS GGHSS SHAL BANDI BUNER
	DESIGNATION CHANGED to 80030932 - THEOLOGY TEACHER
ATTESTED	DESIGNATION CHANGED to 99999999 - WARD ORDERLY
	DISTRICT GOVERNMENT KHYBER PAKHTUNKHWA

P- 2039

Annex F



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT BUNER
PHONE & FAX NO. 0939-510366
EMAIL: deofemalebuner@gmail.com



CORRIGENDUM

In continuation to this Office Appointment Orders issued vide
Endrs: No. & dated noted below against each; may be read as follows in the best
interest of public service.

S.No	Name	Cadre	Appointment Order Ends: No. & Date	Read as	Instead of	Remarks
1	Bushra Bibi	AT	1190-97 dated 11-10-2022	GGMS Shalbandai	GGMS Baikhanay	
2	Iqra Ijaz	CT	1166-73 dated 11-10-2022	GGMS Buzai	GGMS Shargra	
3	Munpal	DM	1182-89 dated 11-10-2022	GGMS Panjial	GGMS Munpal Thana	Minority Security Issue
4	Laziza Shah	PET	1174-81 dated 11-10-2022	GGMS Torwarak	GGMS Maradu	

NOTE:

1. No TADA is allowed.
2. Charge report should be submitted to all concerned.

(RUKHSANA RAHM)
DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER

Endrs: No. 1957-62 Dated 26-12-2022

Copy forwarded for information and necessary action to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer (EMA) Buner.
3. District Accounts Officer Buner.
4. Principal/Head Mistresses Concerned.
5. Teachers Concerned.
6. Master File.

R. D. I. L...
DISTRICT EDUCATION OFFICER (F)
DISTRICT BUNER

ATTESTED
[Signature]

P-33



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT BUNER
PHONE & FAX NO. 0939-510366
EMAIL: deofemalebuner@gmail.com



OFFICE ORDER

The competent authority is pleased to transfer Miss: Khuzaima CT from GGMS Shangra to GGMS Kuz Gokand on her own pay & scale with immediate effect in the interest of public service.

Notes:-

1. No TADA is allowed.
2. Charge report should be submitted to all concerned.

(RUKHSANA RAHIM)
DISTRICT EDUCATION OFFICER
(FEMALE) BUNER

Encl: No. _____ / Dated: 20/10/2022.

Copy forwarded for information to:-

1. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer (EMA) Buner.
3. District Accounts Officer Buner.
4. B&AO Local Office.
5. Head Mistresses Concerned.
6. Teacher Concerned.
7. Master File.

R.R. 8
DISTRICT EDUCATION OFFICER
(FEMALE) BUNER

ATTESTED

[Handwritten signature]

P-24. Impugned order of Resp. No. 7

Name

From

Annex C1



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT BUNER
PHONE & FAX NO. 0939-510366
EMAIL: deofemalebuner@gmail.com



NOTIFICATION:

Consequent upon the recommendation of the transfer committee issued vide this office Endstt: No. 1212 dated: 13/05/2023, the competent authority is pleased to Transfer the following Theology Teacher (TT BPS-15) to the school noted against her name on her own pay & scale with immediate effect in the interest of public service.

S.#	Name	From	To	Remarks
1	Miss: Majida	GGHS Topai	GGHSS Shalbandi	A.V.P

Notes:-

1. No TA/DA is allowed.
2. Charge report should be submitted to all concerned.

(DR. SHAMIM AKHTAR)
DISTRICT EDUCATION OFFICER
(FEMALE) BUNER

Endst: No. 1216-22 / Dated: 13-05-2023.

Copy forwarded for information to:-

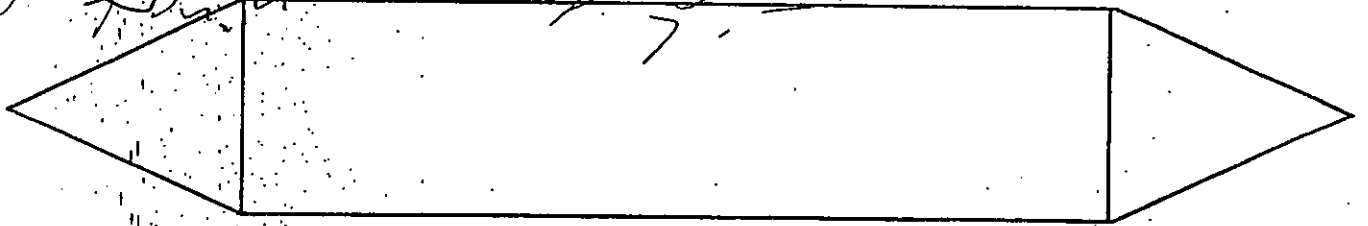
1. Director E&SE Khyber PakhtunKhwā Peshawar.
2. District Monitoring Officer (EMA) Buner.
3. District Accounts Officer Buner.
4. B&AO Local Office.
5. Principal / Head Mistress Concerned.
6. Teacher Concerned.
7. Master File.

DISTRICT EDUCATION OFFICER
(FEMALE) BUNER

ATTESTED

[Handwritten signature]

(35) بعد التجدد خبر کی توجیہ اور کون سے مسائل



مورخہ 15 مارچ 2023ء منجانب من شہادہ
مقدمہ من شہادہ بنام حسی ای۔ اور باتہ لیسٹریٹ
دعویٰ من شہادہ
جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی دیکھ
کارروائی متعلقہ آن مقام لیسٹریٹ کے لئے رحیم خان (بند کیس) کا
مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز
وکیل صاحب کو کرنے راضی نامہ و تقرر ثالث و فیصلہ بر حلف دیے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور وصولی چیک نہ روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمد اور
منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت
مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے
تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور
اس کا ساختہ پداختہ منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے
سبب سے ہوگا۔ اس کے مستحق وکیل صاحب موصوف ہوں گے۔ نیز بقایا و خرچہ کی وصولی کرنے کا
بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہے تو وکیل صاحب پابند نہ ہوں
گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

الرقوم 15 مارچ 2023ء

العبد گواہ شہادہ العبد
Hanifur Ahman

مقام لیسٹریٹ کے لئے منظور ہے۔

Attested & Accepted

رحیم خان (بند کیس) کا