


# FORM OF ORDER SHEET

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

**Appeal No.** 1441/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/07/2023	<p>The appeal of Mst. Sonia Nawaz presented today by Mr. Khalid Mahmood Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

Appeal No 1441 /2023

**Mst. Sonia Nawaz**

**Versus**

**Govt of KPK**

**APPLICATION FOR FIXATION AT  
PRINCIPAL SEAT PESHAWAR.**

**RESPECTFULLY SHEWETH,**

1. That the above title case is being filed before this Honorable Court.
2. That the case relates to jurisdiction of camp court D.I.Khan and there is non-availability of bench at D.I.Khan.
3. That it is urgent matter and if not fix then appeal will become infructuous.

It is, therefore, very humbly requested that keeping in view the facts, the same is requested to be fixed for today before the Hon'ble Court.

Dated: 07/07/2023

Appellant

Through 

**Khalid Mehmood**

Advocate High Court D.I.Khan

**Affidavit**

That all the contents of the above application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

  
**Deponent**

12101-8684087-1

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,**  
**PESHAWAR**

Service Appeal No. <sup>1441</sup>/2023

Mst Sonia Nawaz VS. Govt. of KPK Etc.

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Yours Humble Appellant

(Mst Sonia Nawaz)  
Through Counsel

Dated: 5/7/2023

Amjad Ali ASC

Faaid Mahmood

Advocate High Court

Stationed at Dikhan,

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL,**  
**PESHAWAR**

Service Appeal No. <sup>144</sup>/2023

Mst. Sonia Nawaz, Sub Divisional Education Officer (F) Tank, District Tank.

.....**APPELLANT**

**VERSUS**

1. **Government of Khyber Pakhtunkhwa through Secretary, Khyber Pakhtunkhwa, Peshawar.**
2. **Chief Secretary, to Govt. of Khyber Pakhtunkhwa, Peshawar.**
3. **Secretary to Govt. of Khyber Pakhtunkhwa, Elementary & Secondary Education Department, Peshawar Khyber Pakhtunkhwa Peshawar.**
4. **Director, Elementary & Secondary Education Department, Peshawar Khyber Pakhtunkhwa Peshawar.**
5. **District Education Officer (Female), Dera Ismail Khan.**
6. **District Education Officer (Female), Tank.**
7. **District Account Officer, Dera Ismail Khan**
8. **Nighat Shaheen, SDEO (F), Paroa District Dera Ismail Khan.**

.....**Respondents**

**SERVICE APPEAL U/S 4 OF KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL ACT 1974, AGAINST THE**  
**NOTIFICATION BEARING NO. SO(MC)E&SED/4-**  
**16/2022/POSTING/TRANSFER/MC/: DATED 22/03/2023,**  
**ISSUED BY THE RESPONDENT NO.3.**

**PRAYER:**

**ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE OFFICIAL REPENDENTS MAY KINDLY BE DIRECTED TO CANCEL THE IMPUGNED WITHDRAWAL ORDER BEARING NO. SO(MC)E&SED/4-16/2022/POSTING/TRANSFER/MC/ DATED 22/03/2023 BE DECLARED AS VOID AB-INITIO WITHOUT LAWFUL AUTHORITY, AGAINST THE NORMS OF NATURAL JUSTICE AND INEFFECTIVE UPON THE RIGHTS OF APPELLANTS AND THE TRANSFER NOTIFICATION BEARING NO. SO(MC)E&SED/4-16/2022/POSTING/TRANSFER/MC/: DATED 20/03/2023 MAY KINDLY BE RESTORED IN THE BEST INTEREST OF JUSTICE.**

**Note:** The addresses of the parties given above are sufficient for the purpose of services.

Respectfully Sheweth,

Appellant through council humbly submits and request as under.

1. That the appellant is permanently residing at District Dera Ismail Khan and is serving in the Education Department in management cadre (BPS-17).
2. That vide Notification NO. SO(S/F)E&SED/4-16/2021/POSTING/TRANSFER/MC: DATED 07/10/2021 ( Annexure-A), the appellant was transferred from (SDEO) Female Paharpur, District Dera Ismail Khan to (SDEO) Female Tank and thereafter vide Notification NO. SO(MC)E&SED/4-16/2022/POSTING/TRANSFER/MC/: DATED 14/03/2023 (Annexure-B) she stood posted as (SDEO) Female, Tehsil Dera Ismail Khan and relieved from the post of (SDEO) Female Tank vide Letter No. 1933-41 Dated 16-03-2023 (Annexure-C) and accordingly appellant assumed the charge of (SDEO) Female Dera Ismail Khan vide Certificate of Transfer of charge dated 16-03-2023 (Annexure-D) and after the passage of 02 days, the above mentioned order was withdrawn/cancelled vide Notification NO. SO(MC)E&SED/4-16/2022/POSTING/TRANSFER/MC/: DATED 17/03/2023 without any cogent reason (Annexure-E)
3. That vide Notification NO. SO(MC)E&SED/4-16/2022/POSTING/TRANSFER/MC/: DATED 20/03/2023 (Annexure-F), the appellant stood again posted as SDEO (Female) Paroa, Dera Ismail Khan
4. That the Respondent No.8 which was previously posted as (SDEO) Female Paroa, Dera Ismail Khan vide Notification dated 12-04-2021 (Annexure-G) upon completion of her normal tenure stood transferred from (SDEO) Female Paroa, Dera Ismail Khan to (SDEO) Female Tank (already Annexed as Annexure-F) and after the passage of 02 days, the above-mentioned Notification dated 20-03-2023 was withdrawn/cancelled vide notification dated 22.03.2023(Annexure-H).

Attorney

In this way, the transfer of appellant was over turned within 02 days of his arrival/charge report, just due to the facts that Respondent No.8 is having blessings of the political figures and she after her transfer out from Dera Ismail Khan on 20-03-2023 come back to Dera Ismail Khan on 22-03-2023 and hence, a great injustice has been done to the appellant.

5. That thereafter, the appellant submitted departmental appeal/representation on 30-03-2023(Annexure-I). The representation filled by the appellant had not been rejected/accepted and remain undecided till filing of service appeal, the appellant approach to this Honorable Tribunal for redressal of her grievances, inter alia, on the following grounds.

**GROUND:**

- i. That the impugned Notification NO. SO(MC)E&SED/4-16/2022/POSTING/TRANSFER/MC/:DATED 22/03/2023 is the outcome of mala-fide, result of political victimization, without jurisdiction, without lawful authority and having no binding effect upon rights of appellant.
- ii. That appellant has been made a rolling stone by official respondent just because of the fact that she is not having any political backing.  
**Firstly** the appellant was posted to SDEO (Female) Dera Ismail Khan vide Notification NO. SO(MC)E&SED/4-16/2022/POSTING/TRANSFER/MC/:DATED 14/03/2023 and after the passage of 02 days, the above order was withdrawn/cancelled vide Notification dated 17-03-2023.  
**Secondly**, the appellant vide notification dated 20-03-2023 posted to SDEO (Female) Paroa, Dera Ismail Khan after 6 days of earlier order.  
**Thirdly**, just within one day of her posting and taking over the charge as SDEO (Female) Paroa D.I.Khan, order again stood cancelled/withdrawn vide impugned notification dated 22.03.2023.  
 As against this, the respondent No 8 was transferred from Paroa D.I.Khan to Tank after completion of her normal tenure, and now she got her posting at Paroa D.I.Khan at the cost of rights of appellant. Hence appellant cannot be made a rolling stone for the benefits of respondent No 8.
- iii. That impugned withdrawal notification is not in the public interest whether in the interest of respondent no 8 only. Hence, a great injustice is being done to the appellant.
- iv. That impugned notification has been issued to oblige the political figure of area and therefore the same is having no legal sanctity and not worth to be maintained.
- v. That public officers and public functionaries are bound to obey the laws, rules, procedures and being a public servant they are required to serve the public and it is not in their duties to bow before the politicians. Impugned notification dated 22.03.2023 is therefore nullity in the eyes of law and rights of appellant are required to be protected from the influence of political figures.
- vi. That it has been held by the superior courts that 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. On this score too, the impugned notification dated 22.03.2023 is liable to be cancelled and notification dated 20.03.2023 maybe restored.

- vii. That impugned notification after 2 days of posting of appellant as SDEO (Female) Paroa is based on malafide and is due to political victimization, based on favoritism and also there are no compelling circumstances for impugned notification of appellant before completion of her ordinary tenure.
- viii. That the counsel for appellant may be allowed to raise additional grounds at the time of arguments.

It is therefore, humbly prayed that the present service appeal may graciously be allowed as prayed for and thereby the impugned notification dated 22.03.2023 may kindly be cancelled and as result thereof the posting of appellant as SDEO (Female) Paroa D.I.Kha vide notification dated 20.03.2023, may kindly be restored.

Dated: 5/7 /2023

Appellant  
Through Counsel

Ahmad Ali Khan ASC  
&  
Khalid Mahmood

Advocate High Court

Stationed at D.I.Khan

**AFFIDAVIT**

I, Sonia Nawaz, SDEO (Female) Tank, appellant do hereby solemnly affirm and declare on oath that all the Para-wise contents of this appeal are true and correct to the best of my knowledge and nothing has been concealed deliberately from this Honorable Court.

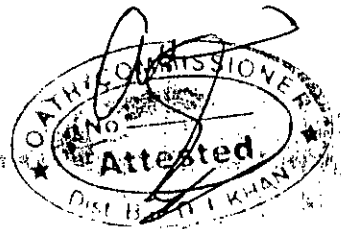
Identified by Counsel

*[Signature]*

Deponent

*[Signature]*

12-101-0904860-8



5

BEFORE THE HONORABLE SERVICE TRIBUNAL,  
KHYBER PAKHTUNKHWA

CM Petition No. \_\_\_\_\_/2023

in

Service Appeal No. \_\_\_\_\_ of 2023

Mst Sonia Nawaz VS. Govt of KPK Etc.

APPLICATION WITH THE REQUEST TO SUSPEND THE OPERATION OF IMPUGNED NOTIFICATION No SO(MC)E&SED/4-16/2022/POSTING/TRANSFER/MC/:DATED 22/03/2023 ISSUED BY RESPONDENT NO 3, TILL FINAL DECISION OF SERVICE APPEAL AND IN THE MEANWHILE RESPONDENT MAY ALSO BE ABSATINED FROM TAKING ANY ACTION DETRIMENTAL TO THE SERVICE CAREER OF THE APPELLANT.

Respectfully Sheweth,

1. That a service appeal is being filed before this Tribunal and the grounds of same may please be considered as an integral part of the subject petition.
2. That the appellant has got a good proma facie case on law as well as on facts and there is every likelihood of the success of the service appeal. Hence balance of convenience tilts in favor of appellant.
3. That the impugned withdrawal order is on the basis of nepotism and favoritism therefore in case of non-suspension of impugned notification, the appellant will suffer an irreparable loss.

It is, therefore, humbly prayed that on acceptance of the present CM petition, the operation of impugned Notification dated 22.03.2023 may please be suspended and respondents may please be desisted from taking any action detrimental to the service career of appellant till decision of service appeal.

Yours Humble Appellant

Mst Sonia Nawaz

Through Counsel

Dated: 5/7/2023

Ahmad Ali Khan ASC

&

Khalid Mahmood,

Advocate High Court

Stationed at Dikhan



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BEFORE THE HONORABLE SERVICE TRIBUNAL,  
KHYBER PAKHTUNKHWA

CM Petition No. \_\_\_\_\_/2023

in

Service Appeal No. \_\_\_\_\_ of 2023

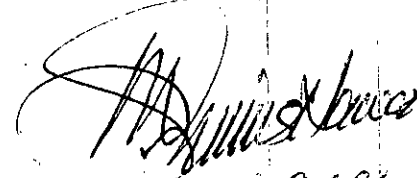
Mst Sonia Nawaz VS. Govt of KPK Etc.

**AFFIDAVIT**

I, Mst Sonia Nawaz, Sub Divisional Education Officer (female), Education Department, Tank, the appellant, do hereby solemnly affirm and declare on oath that all the Para-wise contents of this CM petition are correct and true to the best of my knowledge & belief. I further solemnly affirm and declare that no part of above CM petition is false and nothing material has been deliberately concealed.

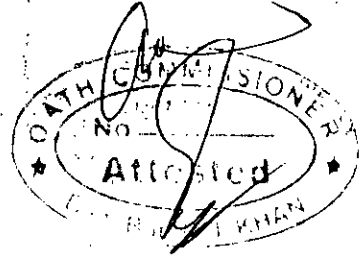


**Identified by Counsel:**  
Khalid Mahmood  
Advocate High Court  
Stationed at D.I.Khan



**Deponent**

12101-0904860





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9221368

28

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

AM...  
AN...  
31  
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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223348

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

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: of Even No & date

Copy forwarded for information to the: -

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

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



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Ans B

10

Dated: 14<sup>th</sup> March, 2023

**NOTIFICATION**

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

Sr. No	Name of officer	FROM	TO	Remarks
1.	Muhammad Tariq (MC) BS-17	SDEO Serai Naurang Lakki Marwat	Deputy DFO (Male) Bannu in OPS	V.S.No 2
2.	Riaz Khan (MC) BS-17	Deputy DEO (Male) Bannu in OPS	SDEO (Male) Bannu	V.S.No 4
3.	Mst. Sonia Nawaz (MC) BS-17	SDEO (Female) Tank	SDEO (Female) D.I.KHAN	V.S.No 14
4.	Muhammad Irshad (MC) BS-17	SDEO (Male) Bannu	SDEO (Male) Bankad Lower Kohistan	AVP
5.	Matiullah Khan (MC) BS-17	SDEO Miranshah District North Waziristan	SDEO (Male) Kakki Bannu	V.S.No 6
6.	Waheed Ullah Shah (MC) BS-17	SDEO (Male) Kakki Bannu	SDEO Serai Naurang Lakki Marwat	V.S.No 15
7.	Bakhtiar Khan (TC) BS-17	Head Master, GHS Bathi Kala Umerzai Bannu	SDEO (Male) Bhattani Lakki Marwat	V.S.No. 10
8.	Mst. Tahirun Nisa BS-17 MC	SDEO (Female) Bannu	Services Placed at the disposal of Directorate	
9.	Mst Zafran Begum BS-16 MC	ADEO (F) Bannu	SEDO (Female) Bannu in OPS	V.S.No 8
10.	Mr. Abdul Hameed SST (Bio/Chem)	Working as SDEO (Male) Bhattani Lakki Marwat in OPS	Services Placed at the disposal of Directorate	
11.	Mst. Basmin Begum MC BS-17	SDEO (Female) Mandani Buner	SDEO (Female) Tangi District Charsadda	AVP
12.	Mr. Tahir Ibrar TC (BS-17)	SS (Economics) GHSS Landiyah Lakki Marwat	SDEO (Male) Sub- Division Wazir Bannu	V.S.No 17
13.	Fatima Ali TC BS-17	SST (G) GHS Malana Upper Kurram	SDEO (Female) Upper Kurram	AVP
14.	Sobia Tabassum MC BS-17	SDEO (Female) DIKHAN	SDEO (Female) Tank	V.S.No.3

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GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

15	Tariq Khan MC BS-17	SDLO (M) Serai Naurang	Services Placed at the disposal of Directorate	
16	FIDA KHAN IC BS-16	SDEO (Male) Razmak in North Waziristan in OPS	Services placed at the disposal of DEO (M) North Waziristan	
17	Ilam Din MC BS-17	SDEO (M) SD Wazir Bannu	SDEO (Male) Razmak	V.S.No. 16
18	Muhammad Hussain MC BS-17	SDEO (M) Kohat Gumbat Circle	SDEO (Male) FR Kohat	AVP
19	Awal Rehman TC BS-17	SST (Bs-17) GCMHS Chokara Karak	SDEO (M) Kohat Gumbat Circle	V.S.No. 18

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: of even No. & date:

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. District Education Officers (Male/Female) Concerned.
5. District Accounts Officers Concerned.
6. Additional Director General (Election-1) Election Commission of Pakistan, Islamabad
7. PS to Advisor to Chief Minister for E&SE Khyber Pakhtunkhwa.
8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
9. Master file.

11/17/2023  
14/3/2023

(IMRAN ZAMAN)  
SECTION OFFICER (Management Cadre)



Telephone & Fax: 0963-510380

Email: [deofTank@gmail.com](mailto:deofTank@gmail.com)

Facebook: deofTank

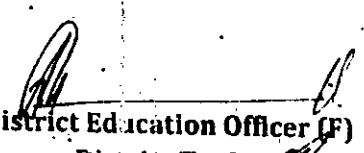
OFFICE OF THE  
DISTRICT EDUCATION OFFICER (F) TANK

**RELIEVING CHIT:**

In pursuance to notification vide worthy Secretary to Govt: of Khyber Pakhtunkhwa E&SED No. SO (MC) E&SED / 4-15/Posting / Transfer / MC dated 14/03/2023, Mrs. Sonia Nawaz SDEO-F Tank (B-17) is hereby relieved from her duties to day on 15/03/2023 (afternoon).

She is directed to report to the District Education Officer (Female)

D. I. Khan for further duties.

  
District Education Officer (F)  
District Tank

Tank the 16/03/2023

Indst: No. 1933-41 /

Date:

Copy to the:

- 1- PS to Secretary Govt: of Khyber Pakhtunkhwa E&SED Peshawar.
- 2- PA to Director, Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 3- Section Officer (MC) Govt: of Khyber Pakhtunkhwa E&SED Peshawar.
- 4- Deputy Commissioner Tank.
- 5- DMO EMA Tank.
- 6- District Accounts Officer Tank / DI Khan.
- 7- District Education Officer-F D.I. Khan.
- 8- Manager Bank concerned.
- 9- Office File.

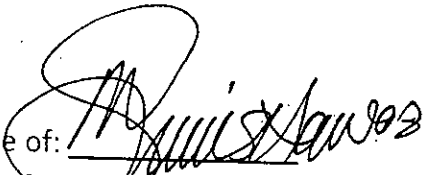
District Education Officer (F)  
District Tank

Anex (D) 13

**CERTIFICATE OF TRANSFER OF CHARGE**

01)-Certified that we have on the 16/03/2023 Afternoon/Forenoon of this day respectively made over and received Charge of the Post of SDEO(F)DIKhan O/O Sub: Divl: Education Officer (Female) DIKhan, Notification Issued by the Secretary Elementary & Secondary Education Department KP Peshawar. Vide bearing, NO.SO(MC)E&SED/4-16/2022/posting/Transfer dated 14/03/2023.

02)- Particular Cash and important Secret and confidential documents handed over and noted on the reverse.

Signature of:   
Relieving Govt: Servant.  
Designation: SDEO(F) Tomk.

Station: SDEO(F) DIKhan

Signature of: \_\_\_\_\_  
Relieved Govt: Servant.  
Name: Mst Sonia Nawaz  
Designation. SDEO(F)DIKhan

Dated: 16/03/2023.

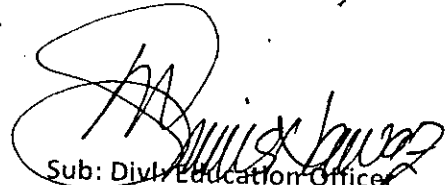
**OFFICE OF THE SUB DIVL: EDUCATION OFFICER (FEMALE) DERA ISMAIL KHAN.**

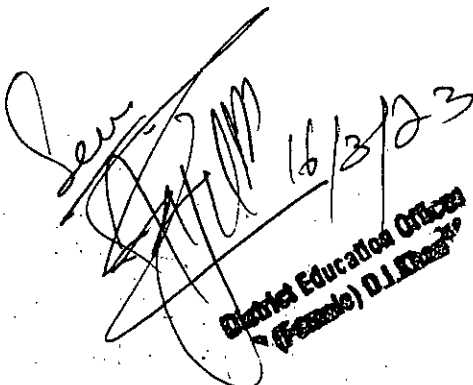
Endst: No. \_\_\_\_\_/F-SDEO

Dated DIKhan the: 16-03/2023

Copy of the above is forwarded to the:-

1. Secretary Elementary & Secondary Education Department KPK Peshawar.
2. Director Elementary & Secondary Education Department KPK Peshawar.
3. District District Education Officer (Female) DIKhan.
4. District Accounts Officer Dera Ismail Khan.
5. Officer Concerned.
6. Office Record.

  
Sub: Divl: Education Officer  
(Female) DIKhan.

  
District Education Officer  
(Female) D.I. Khan  
16/3/23

Anaf

(E)

(14)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated Peshawar 17<sup>th</sup> March, 2023

**NOTIFICATION**

NO. SC(MC)E&SED/4-16/2022/Posting/Transfer/MC: This Department's Notification of even number dated 14-03-2023 to the extent of Sr. No-3 and Sr.No14 regarding posting / transfer in respect of **Mst. Sonia Nawaz** and **Mst. Sobia Tabassum** is hereby withdrawn/cancel ab-initio. Rest of the order shall remain intact.

**SECRETARY TO THE GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT**

Endst: of even No. & date:

Copy forwarded for information to the: -

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

*(Handwritten signature)*

1111 / 17/3/2023

**(IMRAN ZAMAN)**  
SECTION OFFICER (Management Cadre)



Handwritten marks: "F" in a circle and "15" in a circle.



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Date: 20<sup>th</sup> March, 2022

**NOTIFICATION**

NO. SO/INC/EB&SED/4-16/2022/Posting/Transfer/MC/ The following posting/transfer are hereby ordered with immediate effect, in the best public interest.

Sr. No	Name of officer	Present Station	Proposed Station	Remarks
1.	Ms. Sonia Nawaz MC BS-17	SDEO (Female) Tank	SDEO (Female) Parova D.I.Khan	V.S No 2
2.	Nighat Shaheen MC BS-17	SDEO (Female) Parova D.I.Khan	SDEO (Female) Tank	V.S No 1

Handwritten signature/initials on the left margin.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Date: of order No. & date:

Copy forwarded for information to the:-

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
4. District Education Officers (Female) Tank/D.I.Khan
5. District Accounts Officers Tank/D.I.Khan.
6. Additional Director General (Election-1), Election Commission of Pakistan, Islamabad.
7. PS to Advisor to Chief Minister for E&SE Khyber Pakhtunkhwa.
8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
9. Master file.

Handwritten signature: IMRAN ZAMAN  
SECTION OFFICER (Management Group)  
Date: 20/3/2022



**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT**  
 Opposite MPA's Hostel, Civil Secretariat, Peshawar  
 Fax # (091-723) 437  
 Dated Peshawar (the April) 12<sup>th</sup>, 2021

Annex **(9)**  
**(16)**

**NOTIFICATION**

**No. SO/DE/ASED/1102/11/POSTING/TRANSFERS/MC** (Consequent upon the approval of the Competent Authority, following posting/transfers are hereby ordered in the public interest, with immediate effect.

SR.#	NAME	FROM	TO
1	Mrs Nighat Shabeen, MC (BS-17)	SDECO(F), Ward 1/4r Upper	SDECO(F), Prova, DI Khan Vice B NO 2
	Mst. Sabra Ambreen, (MC BS-17)	SDECO(F), Prova DI Khan	SDECO(F), Burka Daud Shah, Karak (against vacant pool)

No TA/DA will be allowed for joining their duties.

**SPECIAL SECRETARY  
 ELEMENTARY & SECONDARY  
 EDUCATION DEPARTMENT**

Encl: of even No. & date:

- Copy forwarded to the:
- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- Director E&SE, Khyber Pakhtunkhwa, Peshawar.
- District Education Officer (F) Concerned.
- District Education Officer (F) Concerned.
- District Accounts Officer, Concerned.
- Director EMIS, E&SE Department.
- Officers concerned.
- Office order file.

**(FAWAD KHATTAK)** 12/11/2021  
**SECTION OFFICER (S/F)**

Amef (H) (17)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

Dated: 22<sup>nd</sup> March 2023

**NOTIFICATION**

GO.SO(MC)E&SE/14-16/2022/Posting/Transfer/MCI: This Department's Notification of even number dated 20-03-2023 regarding posting/ transfer of SDEOs (Female) Parova D.I.Khan and Tank is hereby withdrawn/cancel

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Text of even No. & date:

Copy forwarded for information to the:

- 1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
- 2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
- 3. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
- 4. District Education Officers (Female) Tank/D.I.Khan
- 5. District Accounts Officers Tank/D.I.Khan.
- 6. Additional Director General (Election-1) Election Commission of Pakistan, Islamabad
- 7. PS to Advisor to Chief Minister for E&SE Khyber Pakhtunkhwa.
- 8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
- 9. Master file.

*Amef*

20/3/2023

(IMRAN ZAMAN)  
SECTION OFFICER (Management Cadre)

Annex I 18

To  
The Chief Secretary  
Government of Khyber Pakhtunkhwa, Peshawar

Through Secretary (Elementary and Secondary Education) Peshawar

Subject: Appeal against notification dated 22.03.2023 in which the posting order of appellant dated 20.03.2023 was withdrawn.

Respected Sir,

I Sonia Nawaz SDEO (Female) have been transferred to D.I.Khan vide secretary order no SO(MC)E&SED/4-15/2022/posting/transfer/MC dated 14<sup>th</sup> march 2023 and later on to Paroa vide order no SO(MC)E&SED/4-16/2022/posting/transfer/MC dated 20.03.2023 (copies attached).

I reported my arrival in D.I.Khan and then Paroa on the next day of orders and subsequently the same orders were cancelled/withdrawn within next day time.

Although their tenure is completed yet their transfer order is withdrawn which is beyond my understanding. It is requested to kindly my order to Paroa D.I.Khan maybe reissued, as I have spent more than a year and a half in the unattractive station Tank and it is highly difficult to carry on my duty there. It is requested to issue the order of my posting to Paroa D.I.khan. It is worth mentioning that I do not have any political approach or any influence to get my orders restored. Except through departmental appeal.

I earnestly request you to kindly issue my order a' initio as per issue transfer order SO(MC)E&SED/4-16/2022/posting/transfer/MC dated 20.03.2023.

I shall be very grateful and remember you in my prayers as I have spent more than 18 months in the unattractive district and station due to non-political approach or any political influence by which I could get my transfer orders restored.

I however once again argue you to kindly cancel the withdrawal order on merit and strictly on humanitarian grounds. Thankyou in anticipation and hope you would consider my appeal on merit and justice will prevail.

Your respectfully,  
An aggrieved appellant  
Mrs Sonia Nawaz  
Sub Divisional Educational Officer

*[Handwritten Signature]*  
30-03-2023

Dated: 30.03.2023

*[Handwritten Signature]*

D. 1502

For Insur RGL105400796

Rs. Ps.

Stamps affixed  
uninsured letters of not more than  
the initial weight prescribed in the  
Post Office Guide or on which no  
acknowledgement is due.

Delivered a registered\*  
addressed to

Date-Stamp

\*Write here "letter", "postcard", "basket" or "parcel"  
Name of Receiving Officer with the word "insured" before it when necessary.

Insured for Rs. (in figures) (in words)

Insurance fee Rs. (in words) Weight Kilo Grams

Name and  
address  
of sender

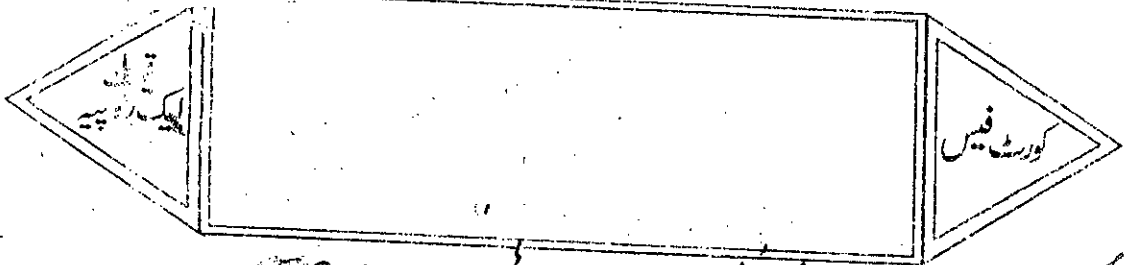
203

KHALID MEHMOOD

Advocate  
bc-15-5415  
Date of issue: November 2022  
Valid upto: November 2025

Secretary  
KP Bar Council

# وکالت نامہ



بعد ازاں جناب **خیر حسین شوگواہ** روٹ برمنگھم اسکوار

جناب **ایم ایف ایف**  
بنام **سونیا نواز**  
**سونیا نواز**  
روٹ برمنگھم اسکوار

ڈیڑی یا جرم

تفصیل وغوی یا جرم

## باعث تحریر آنگہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے پیروی و جوابدہی برائے پیشی یا تصفیہ مقدمہ بمقام **حکومت پاکستان** کیلئے

**خالد محمود ایچ بی اے**

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے، کہ پیشی پر خود ہر ذریعہ اختیار خاص رو برو عدالت حاضر ہوتا ہوں گا۔ اور ہر وقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہوں۔ اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے برخلاف ہو گیا۔ تو صاحب موصوف اسکے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر نظام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر نظام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ ہوں گے۔ اور مقدمہ صدر کچہری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا نفاذ واپس کرنے کے بھی موصوف ذمہ دار نہ ہوں گے۔ نہ کوکل ساختہ پر داخل صاحب موصوف مل کر وہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرض وکالی، باعجاب، رضائی یا درخواست اجراء نے وکالی نظر ثانی اپیل گرانٹی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا وکالی کرانے اور ہر قسم کاروبار قبول کرنے اور بیرونہ اور داخل کرنے اور ہر قسم کے جان و سب سے اور اس پر حاشی یا راضی نامہ و فیصلہ بر حلف کرنے، اقبال وکالی کا بھی اختیار ہوگا۔ اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مذکورہ ہیرا، از کچہری صدر پیشی مقدمہ مذکورہ نظر ثانی اپیل و گرانٹی و ہر قسم کی مقدمہ یا منسوقی وکالی یا طرف یا درخواست حکم امتیازی یا ترقی یا وکالی یا قرضی یا اجراء کے وکالی بھی صاحب موصوف کو بشرط ادا سنگی ٹیکہ عین پیروی کا اختیار ہوگا اور تمام ساختہ پر داخل صاحب موصوف مل کر وہ ذات خود منظور قبول ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ وہ مقدمہ یا اسکے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی اپیل یا گرانٹی یا دیگر معاوضہ مذکورہ کسی اور سے وکیل یا ہیرا شوگر کو اپنے یا اپنے عہد متروک کریں۔ اور ایسے مشیر قانون کو بھی ہر امر میں وہی اور ایسے اختیارات حاصل ہوں گے، جیسے صاحب موصوف کو حاصل ہیں۔ اور دوران مقدمہ میں جو کچھ ہر جات التواء ہوگا، وہ صاحب موصوف کا حق ہوگا۔ مگر صاحب موصوف کو پوری پیشی سے پہلے ادا نہ کرنا۔ تو صاحب موصوف کو اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور اسکی صورت میں میرا کوئی معاوضہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

موجودہ 5 جولائی 2023

مضمون وکالت نامہ میں ایسا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

العبد العبد العبد

Accepted

**سونیا نواز ایچ بی اے**  
1261-0904860-8

0336-4330001

وکالت

SEMPER PARITUR  
 SEM ASSOCIATI  
 PARITUR

Ahmad Ali  
 Advocate

President  
 Secretary

کورٹ  
فیس

خبر فتنہ اور سرکس سرپول اسلام آباد

سویٹا وار

سرپول اسلام آباد

پابند تحریر پرائیوٹ

اعلیٰ ایجوکیشنل سوسائٹی کورٹ

مقدمہ مندرجہ بالا میں ایک ایسی صورت پیش آئی ہے جس کی بنا پر اس مقدمے کی سماعت کے لیے ایک ایسی کمیٹی تشکیل دی جائے گی جو اس مقدمے کی سماعت کے لیے ایک ایسی کمیٹی تشکیل دے گی جو اس مقدمے کی سماعت کے لیے ایک ایسی کمیٹی تشکیل دے گی...

کو حسب ذیل شرائط پر دیکل مقرر کیا ہے کہ میں پیشی پر خود یا ہذا بذریعہ رو برو عدالت حاضر ہونا ضروری ہے اور ہر وقت پکارے جانے مقدمہ دیکل صاحب موصوف کو اطلاع دے کر حاضر عدالت کرے گا اگر پیشی پر مقرر حاضر نہ ہو اور مقدمہ میری غیر باخبری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز دیکل صاحب موصوف صدر تمام پکچری کے علاوہ یا پکچری کے اوقات سے پہلے یا بیچے یا بروز تعطیل پکچری کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر پکچری کے علاوہ اور جگہ سماعت ہونے یا بروز تعطیل یا پکچری کے اوقات کے آگے یا بیچے پیش ہونے پر مقرر کوئی قصداً پیچھے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا سخت نہ دیکل کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے اور کوئی ساختہ پر داخدا صاحب موصوف عمل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دہی یا جواب دہی یا درخواست ابراء اسلئے ڈگری نظر دہی اکیل گمانی ہر قسم درخواست ہر قسم کے بیان ہے اور پر پائی یا راشی نامہ و فیصلہ برطانیہ کرنے اقبال دہی کا بھی اختیار ہو گا اور بصورت مقرر ہونے تاریخ پیشی مقدمہ مرکز بیرون از پکچری صدر بیرونی مقدمہ مرکز نظر قابل اعلیٰ و گمانی و برآمدگی مقدمہ یا مشورشی ڈگری ایک طرف یا درخواست حکم اتالی یا اتالی یا گرفتاری اکل از فیصلہ اذوائے ڈگری بھی صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مزاد یا اس کے کسی جزوی کاروائی یا بصورت درخواست اکل از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو گا کہ مقدمہ مزاد یا اس کے کسی جزوی کاروائی یا بصورت درخواست اکل از اتالی گمانی یا دیگر معاملہ و مقدمہ مذکورہ کسی دوسرے دیکل یا ہر طرح کو اپنے ہوائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں دہی اور دیکل اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو جگہ ہر جانب ابراء پاسے گا وہ صاحب موصوف کا حق ہو گا اور صاحب موصوف کو پوری نہیں لین تاریخ پیشی سے پہلے ادا نہ کرے گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پوری نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

5 مورخہ جولائی 2023

منہ مولا وکالت نامہ لکھ دیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Attested  
Amit

سویٹا وار ایڈوائس

[Signature]

12-101-0904860-8

03053240000