

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**  
**AT CAMP COURT ABBOTTABAD**

Service Appeal No. 9269/2020

BEFORE: **MR. KALIM ARSHAD KHAN** ... **CHAIRMAN**  
**MRS. RASHIDA BANO** ... **MEMBER(J)**

Farhat Jabeen D/O Kala Khan, R/O Jhangi Syedan, Tehsil & District Abbottabad.  
... (Appellant)

VERSUS

**Secretary Elementary & Secondary Education Department, Government of**  
**Khyber Pakhtunkhwa, Peshawar.**

2. **Director Elementary & Secondary Education, Khyber Pakhtunkhwa**  
**Peshawar.**

3. **District Education Officer (Female) District Kohistan.**

... (Respondents)

Mr. Arshad Khan Tanoli  
Advocate

... For Appellant

Mr. Asad Ali Khan  
Assistant Advocate General

... For Respondents

Date of Institution.....16.07.2020  
Date of Hearing.....21.06.2023  
Date of Decision.....21.06.2023

**JUDGMENT**

**RASHIDA BANO, MEMBER (J):** The instant service appeal has been instituted under section 4 of the Khyber Pakhtunkhwa Service Tribunal, Act 1974 with the prayer copied as below:

**“On acceptance of the instant service appeal the impugned removal from service order dated 21.03.2011 may be set aside and respondents No. 3 may be directed to reinstate the appellant in service with all back benefits.”**

2. Brief facts giving rise to the instant appeal are that appellant was appointed as Primary School Teacher (PST) vide order dated 27.09.1996.

That the appellant was performing her duties with dedication and devotion.



In the year 2011, the appellant was transferred to GGPS Kalash. That the appellant visited the area and found that no school was available, therefore, the appellant filed representation and started shuttling in the offices of respondent No.3 for adjustment but of no avail. As a last resort, the appellant filed complaint before the Hon'ble Provincial Ombudsman. During the course of investigation, respondent No.3 issued termination order dated 21.03.2011 of the appellant. On the basis of that termination order, Ombudsman did not entertain the complaint of the appellant. Feeling aggrieved the appellant filed departmental appeal on 10.07.2019, which was not responded to, hence, the present service appeal.

3. Respondents were put on notice, who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned Assistant Advocate General and perused the case file with connected documents in detail.

4. Learned counsel for the appellant argued that the appellant has not been treated in accordance with law and rules hence, liable to be set aside. He contended that no show cause notice, explanation to the appellant prior to the issuance of the impugned removal order was issued to the appellant, he, therefore, requested for the acceptance of the instant service appeal.

5. Conversely, learned Assistant Advocate General argued that the appellant was treated in accordance with law and rules. He argued that she was served with an explanation and statement of allegations, and after fulfillment of all codal formalities the competent authority passed the order of removal from service, he, therefore, requested for dismissal of the instant service appeal.

6. The appellant impugned the order of her removal from service dated 21.03.2011 by contending that she was unaware of the same because when

she visited Kalash for assuming charge of her duties as a consequence of her transfer to the GGPS Kalash, she found that there was no government school. She informed her high ups about this fact through written application with request to post her to some other place but in vain. As per her contention she came to know about her termination order during pendency of petition/complaint filed by her before the Provincial Ombudsman, wherein respondent No. 3 submitted termination order 21.03.2011. Appellant feeling aggrieved from the order of her termination from service filed departmental appeal on 01.07.2019 which was not decided till the institution of appeal in hand.

7. Admittedly the appeal in hand is filed on 16.07.2020 in this Tribunal after considerable delay of one year and fifteen days, while it was to be filed within 120 days from the date of filing of departmental representation in a situation when departmental representation was not decided by the competent authority within statutory period of ninety days. Therefore, appeal of the appellant is barred by one year and sixteen days.

8. Although appellant tried to explained that she has informed her high ups about non-existence of GGPS Kalash but she has not annexed any such application alongwith her appeal however, the respondents in parwise/reply to condonation of delay application annexed her application dated 03.06.2011 wherein she has categorically mentioned that she was informed orally about her termination from service by respondent office which meant that she has the knowledge of her termination from service order dated 21.03.2011 on 03.06.2011 but she kept mum and did not file appeal before this Tribunal after expiry of 90 days of filing of the said application. This also leads to the conclusion that she was well aware of her termination from service order issued in June 2011. Furthermore, as per her



own contention she has received pay till November 2010 and afterwards her pay was stopped but she kept mum till 01.07.2019 and has not approached competent forum for redressal of her grievance. So this deep slumber on her part is also meaningful, which negates her contention about having no knowledge of impugned order of termination from service. Appellant has filed application for condonation of delay but fails to justify and explain plausibly that how she kept mum for a considerable period of one year and fifteen days as alleged by her and a long period of nine years, 3 months and 25 days as is evident from her application dated 03.06.2011. So far as medical prescription attached with the appeal is concerned, nature of the illness was not such due to which she was bed ridden, hence, application for condonation of delay is dismissed.

9. As sequel to above discussion, the appeal in hand is dismissed. Costs shall follow the event. Consign.

10. *Pronounced in open court at Abbottabad and given under our hands and seal of the Tribunal on this 21<sup>st</sup> day of June, 2023.*



(RASHIDA BANO)  
Member (J)  
Camp Court, Abbottabad



(KALIM ARSHAD KHAN)  
Chairman  
Camp Court, Abbottabad

SCANNED  
KPST  
Peshawar

- 26<sup>th</sup> April, 2023
1. Learned counsel for the appellant present. Mr. Asad Ali Khan, Asst: AG for the respondents present.
  2. Learned counsel for the appellant seeks adjournment. Last chance is given to the appellant to argue the case on the next date. Adjourned. To come up for arguments on 21.06.2023 before D.B at camp court Abbottabad. P.P given to the parties.

SCANNED  
KPST  
Peshawar



(Salah Ud Din)  
Member (Judicial)



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

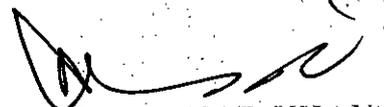
\*Adnan Shah, P.A\*

ORDER

- 21<sup>st</sup> June, 2023
1. Learned counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.
  2. Vide our detailed judgement of today placed on file, the appeal in hand is dismissed. Costs shall follow the event. Consign.
  3. *Pronounced in open court at Abbottabad and given under our hands and seal of the Tribunal on this 21<sup>st</sup> day of June, 2023.*



(RASHIDA BANO)  
Member (J)  
Camp Court, Abbottabad



(KALIM ARSHAD KHAN)  
Chairman  
Camp Court, Abbottabad

\*Kaleemullah\*

13<sup>th</sup> Dec, 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Fakhar Saeed, ADEO for the respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the brief. Adjourned. To come up for arguments on 21.02.2023 before the D.B at Camp Court Abbottabad. .

SCANNED  
KPST  
Peshawar.



(Salah Ud Din)  
Member (Judicial)  
Camp Court Abbottabad



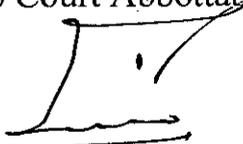
(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

21<sup>st</sup> Feb, 2023

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned counsel for the appellant wants time to prepare the case. Granted. To come up for arguments on 26.04.2023 before the D.B at Camp Court Abbottabad.

SCANNED  
KPST  
Peshawar.



(Salah-ud-Din)  
Member (J)  
Camp Court Abbottabad



(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

19<sup>th</sup> Sept 2022

Learned counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Rahim Dad, ADEO for respondents present.

Written reply/comments submitted on behalf of the respondents which is placed on file. To come up for arguments on 14.11.2022 before D.B at camp court Abbottabad.

*Written reply is ready  
Setting aside order dated 14.11.2022*

*Fareena Paul  
Member*

(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

SCANNED  
KPST  
Peshawar

14<sup>th</sup> Nov, 2022

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant seeks adjournment on the ground that he has not gone through the brief of the instant appeal. To come up for arguments on 13.12.2022 before the D.B at Camp Court Abbottabad.

*(Signature)*

(Salah Ud Din)  
Member (Judicial)  
Camp Court Abbottabad

*(Signature)*

(Kalim Arshad Khan)  
Chairman  
Camp Court Abbottabad

SCANNED  
KPST  
Peshawar

20.12.2021

Clerk of learned counsel for the appellant present. Ms. Zubaida Khattak, District Education Officer (Female) alongwith Mr. Riaz Ahmad Paindakhel, Assistant Advocate General for the respondents present and sought time for submission of reply/comments. Adjourned. To come up for written reply/comments on 14.02.2022 before the S.B at Camp Court Abbottabad.



(Salah-Ud-Din)  
Member (J)

Camp Court Abbottabad

14-2-2022

Due to retirement of the Hon'ble Chairman the case is adjourned. To come up for the same as before on 18/7/22.

For...  
Reader

18<sup>th</sup> July 2022

Learned counsel for the appellant present. Syed Naseer Ud Din Shah, Asst: AG for respondents present.

Written reply/comments not submitted. Notice be issued be issued to the respondents through registered post for submission of written reply/comments. To come up for written reply/comments on 19.09.2022 before S.B at camp court Abbottabad.



(Kalim Arshad Khan)  
Chairman

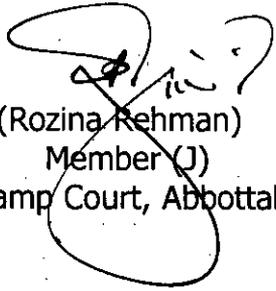
Camp Court Abbottabad

15.02.2020

Learned counsel for the appellant present. Preliminary arguments heard. File perused.

Points raised need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter notices be issued to respondents for written reply/comments. To come up for written reply/comments on 19.05.2021 before S.B at Camp Court, Abbottabad.

Appellant Deposited  
Security & Process Fee  
15/2/20

  
(Rozina Rehman)  
Member (J)  
Camp Court, Abbottabad

19.05.2021

Due to cancellation of tour, Bench is not available. Therefore, case to come up for the same as before on 27.09.2021.

  
Reader

27.09.2021

Counsel for the appellant and Mr. Muhammad Riaz Khan Paindakhel, Asstt AG alongwith Shehzad, ADO and Zahid Khattak, DEO for the respondents present.

Representatives of the respondents seek further time to submit reply/comments. Request is accorded but as last chance. Respondents are directed to furnish written reply/comments <sup>within 10 days</sup> in office, positively. If the respondents have not submitted written reply/comments within the stipulated time, their rights of filing of reply/comments stands struck off and the case will be heard and decided on the basis of available record. Case to come up on 20.12.2021 before the D.B at Camp Court, Abbottabad.

  
Chairman  
Camp Court, A/Abad

Form- A

FORM OF ORDER SHEET

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

Case No.- \_\_\_\_\_ 9269 /2020 \_\_\_\_\_

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/08/2020	<p>The appeal of Mst. Farhat Jabeen resubmitted today by post through Muhammad Arshad Khan Tanoli Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-		<p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>16.11.2020</u></p> <p> CHAIRMAN</p>
16.11.2020		<p>Mr. Zahid, clerk to learned counsel for appellant is preset and seeks adjournment on the ground that learned counsel for appellant is not available today. Adjourned to 15.02.2021 on which date file to come up for preliminary hearing before S.B at Camp Court, Abbottabad.</p> <p> (MUHAMMAD JAMAL KHAN) MEMBER CAMP COURT ABBOTTABAD</p>

The appeal of Mst. Farhat Jabeen daughter of Kala Khan Tehsil and District A.Abad received today i.e. on 16.07.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- The law under which appeal is filed is wrong.
- 2- Copy of termination order 21.03.2011 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.
- 3- Annexure-C and page 15 of the appeal are illegible which may be replaced by legible/better one.

No. 1677 /S.T,

Dt. 17-07 /2020.

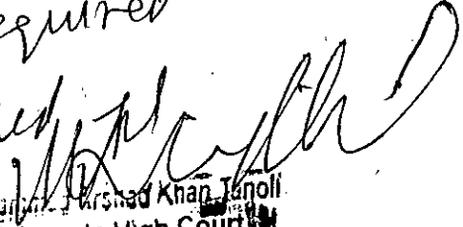
  
REGISTRAR -  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Arshad Khan Tanoli Adv. A.Abad

*Sir objections have duly  
been removed as required.*

*File is re-submitted*

*8/8/20*

  
Muzaffar Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to  
Dist Bar Abbottabad

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 9269 /2020

Farhat Jabeen daughter of Kala Khan, resident of Jhangi Syedan, Tehsil &  
District Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary  
Education, Peshawar & others.

...RESPONDENTS

**SERVICE APPEAL**

**INDEX**

S.No	Description of Document	Annexure	Page #
1.	Service appeal alongwith affidavit		1 to 9
2.	Copy of appointment order of the appellant	"A"	10- 11
3.	Copy of transfer order of appellant	"B"	12
4.	Copies of applications	"C"	13-16
5.	Copy of order of provincial ombudsman dated 07-11-2019	"D"	17-19
6.	Copy of departmental appeal	"E"	20-
7.	Copies of medical documents of the appellant	"F"	21-27
8.	Wakalat Nama		28

*Farhat Jabeen*

...APPELLANT

Dated: 18/7 /2020

Through;

  
(ARSHAD KHAN TANOLI)  
Advocate High Court Abbottabad

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**BEFORE THE CHAIRMAN SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 9269 /2020

Farhat Jabeen daughter of Kala Khan, resident of Jhangi Syedan, Tehsil & District Abbottabad.

**APPELLANT**  
Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 7409

Dated 16/7/2020

**VERSUS**

1. Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Peshawar.
2. Director Elementary & Secondary Education, Peshawar.
3. District Education Officer (Female), Kohistan.

**...RESPONDENTS**

**Filed to-day**

**Registrar**

16/7/20

**Re-submitted to-day  
and filed.**

**Registrar**

11/8/2020

**SERVICE APPEAL UNDER SECTION 4 OF KPK**

**SUPREME COURT OF SERVICE TRIBUNAL ACT,**

1974 FOR DECLARATION TO THE EFFECT THAT

THE APPELLANT WAS APPOINTED AS PST IN

THE RESPONDENTS DEPARTMENT VIDE ORDER

NO.12126/70 DATED 27-09-1996. THE APPELLANT

WAS TRANSFERRED TO GGPS HAIDER KHAIL

THEREAFTER TO GGPS KALASH BUT NO

SCHOOL WAS AVAILABLE IN THIS AREA,

HENCE, THE APPELLANT APPLIED TO THE DEO (FEMALE) KOHISTAN, FOR HIS ADJUSTMENT IN ANY OTHER SCHOOL BUT NO REPLY WAS MADE TO THE APPELLANT AS A LAST RESORT, THE APPELLANT FILED APPLICATION TO PROVINCIAL OMBUDSMAN THROUGH HER REAL SON. DURING THE INVESTIGATION, THE RESPONDENTS' DEPARTMENT PROVIDED TERMINATION ORDER OF APPELLANT DATED 21-03-2011 WHICH WAS NEVER PROVIDED TO THE APPLICANT PRIOR TO THE COMPLAINT BEFORE OMBUDSMAN. THE TERMINATION ORDER DATED 21-03-2011 IS WITHOUT ANY SHOW CAUSE NOTICE, EXPLANATION AND IS A RESULT OF AUDI ALTRUM PARTRUM AND THE SAME IS LIABLE TO BE SET-ASIDE.

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**PRAYER**; ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL OF THE APPELLANT IMPUGNED REMOVAL FROM SERVICE ORDER DATED 21-03-2011 MAY BE SET-ASIDE AND RESPONDENT NO.3 MAY BE DIRECTED TO REINSTATE THE APPELLANT IN SERVICE WITH ALL SERVICE BACK BENEFITS. ANY OTHER

9

RELIEF WHICH THIS HONOURABLE TRIBUNAL  
DEEMED APPROPRIATE IN THE  
CIRCUMSTANCES OF THE CASE MAY ALSO BE  
GRANTED TO THE APPELLANT.

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Respectfully Sheweth;-

1. That the appellant got appointment as PST in the respondents' department on 27-09-1996. Copy of appointment order of the appellant is attached as Annexure "A".
2. That the appellant served the department with complete devotion and dedication. The appellant was transferred to GGPS Kalash on 2011. Copy of transfer order of appellant is attached as Annexure "B".
3. That the appellant visited the area and found that no school was available, therefore, the appellant filed representations and started shuttling in the offices of respondent No.3 for her adjustment but of no avail. Copies of applications are attached as Annexure "C".

4. That as a last resort, the appellant filed complaint before the Honourable provincial ombudsman. During the course of investigation, the respondent No.3 provided termination order dated 21-03-2011 of the appellant. As a result, ombudsman did not entertain the complaint on the basis of jurisdiction vide finding order dated 07-11-2019. Copy of order of provincial ombudsman dated 07-11-2019 is attached as Annexure "D".
5. That the appellant filed departmental appeal against the impugned order on 01-07-2019 but the same was not redressed by the competent authority. Copy of departmental appeal is attached as Annexure "E". Therefore, the instant service appeal is filed inter-alia on the following grounds:-

**GROUND S;-**

- a) That the impugned removal from service order dated 21-03-2011 is malafide, discriminatory, against the law, without following the prescribed code of formalities.

Hence, the impugned order is liable to be set-aside.

- b) That respondent No.3 did not issue show cause notice, explanation to the appellant prior to the issuance of impugned removal from service order.
- c) That when law prescribed something which is to be done in a particular manner that must be done in that manner and not otherwise. The impugned removal from service order is a result of audi altrum partrum.
- d) That the appellant is suffering from knee joint disease and could not approach the Honourable Tribunal due to prolong ailment. Copies of medical documents of the appellant are attached as Annexure "F".
- e) That the matter relates to the terms and conditions of service, therefore, the instant service appeal is entertainable by this Honourable Tribunal.



It is therefore, humbly prayed that an acceptance of the instant service appeal of the appellant, impugned removal from service order dated 21-03-2011 may be set aside and respondent No.3 may be directed to reinstate the appellant in service with all service back benefits. Any other relief which this Honorable Tribunal deem appropriate in the circumstances of the case may also be granted to the appellant.

*[Handwritten signature]*

...APPELLANT

Through;

Date: 12/2 15050

Advocate High Court  
Office No. 23  
Cell Bar Appellate

**VERIFICATION:**

Verified that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Tribunal.

*[Handwritten signature]*

...APPELLANT



**BEFORE THE CHAIRMAN SERVICE TRIBUNAL, KHYBER  
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. \_\_\_\_\_/2020

Farhat Jabeen daughter of Kala Khan, resident of Jhangi Syedan, Tehsil & District Abbottabad.

**...APPELLANT**

**VERSUS**

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary & Secondary Education, Peshawar & others.

**...RESPONDENTS**

**SERVICE APPEAL**

**AFFIDAVIT**

I, Farhat Jabeen daughter of Kala Khan, resident of Jhangi Syedan, Tehsil & District Abbottabad, 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, belief and information, and that nothing has been concealed from this Hon'ble Tribunal.

*Farhat Jabeen*

**...DEPONENT**



9

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL,**  
**KHYBER PAKHTUNKHWA, PESHAWAR**

Farhat Jabeen daughter of Kala Khan, resident of Jhangi Syedan Tehsil and District, Abbottabad

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Secretary Elementary and Secondary Education, Peshawar & others.

...RESPONDENTS

**APPEAL**

**APPLICATION FOR CONDONATION OF  
DELAY W.E.F 01/11/2019 TO 16/07/2020.**

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Respectfully Sheweth; -

1. That the titled appeal is pending adjudication before this Honourable Tribunal and this application is part and parcel of the main service appeal.
  
2. That the appellant was suffering from multifarious knee joint deceases and could not approach this Honourable Tribunal well within the period of limitation. Copies of medical certificates are attached.

9

3. That the circumstances were beyond the control of the appellant as human being. Hence, delay w.e.f 01/11/2019 to 16/07/2020 is to be condoned.
4. That the valuable rights of the appellant are involved.

It is therefore, humbly prayed that on acceptance of instant application delay w.e.f 01/11/2019 to 16/07/2020 may graciously be condoned in the interest of justice.

*Farhat Jabeen*

...APPELLANT

Through

Dated: 16/7 /2020

*(Signature)*  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad  
Office No 33 Adjacent to  
Distt Bar Abbottabad

**AFFIDAVIT**

I, Farhat Jabeen daughter of Kala Khan, resident of Jhangi Syedan Tehsil and District, Abbottabad, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

*Farhat Jabeen*  
DEPONENT



240  
251

# Annex- A

## OFFICE OF THE DISTRICT EDUCATION OFFICER PRIMARY KOHISTAN.

P-10

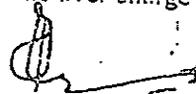
### APPOINTMENTS

Consequent upon the selection by the departmental selection Committee District Education officer (Male & Female) Primary Kohistan has been placed. To appoint the following untrained female out District candidates in BPS-7 (1480-81-2695) Rs. 1480/- per month fixed plus usual allowances his admissible under the rule w.e.f the date of their taking over charge against the vacant PTC posts noted against each name with the following terms and conditions:

S.No	Name & F. Name	School	Remarks
1.	Shazia D/o Munawwar Khan	GGPS Bush	AVP
2.	Rabia D/o Aman Ullah	-do-	AVP
3.	Nadia Hassan D/o Gul Hassan	GGPS Pashol	AVP
4.	Farhat Abeer D/o Kafa Khan	-do-	AVP

### CONDITIONS

1. No L.A/D.A is allowed to anyone.
2. They should not be allowed to take over charge if their age is less than 18 and above 30 years.
3. They should provide age and Health Certificate from the DHO Kohistan.
4. Their original certificates should be checked and verified before handing over of charge by the SDEO(F) Kohistan.
5. Their services are purely temporary and can be terminated with out assign on any reason.
6. Charge reports should be submitted to all concerned.
7. Their order will be cancelled if they failed to take over charge within 10 days.

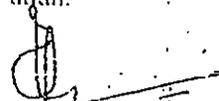


ABDUR RASHID  
DISTRICT EDUCATION OFFICER  
PRIMARY KOHISTAN AT DASSU.

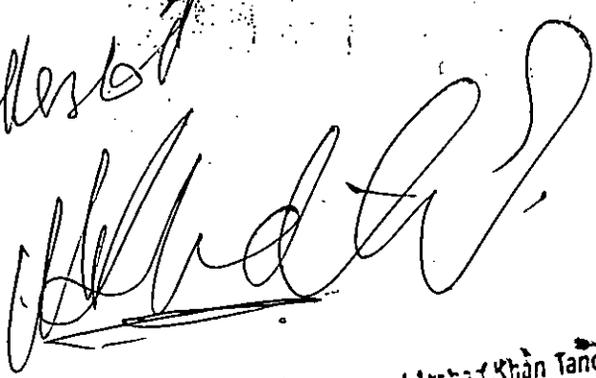
Endst. No. 1264-70 dated Kohistan the 27-09-96.

Copt. to:

1. The Director Primary Education N.W.F.P. shawar.
2. The District Accounts Officer Kohistan.
3. The Sub-Divisional Education Officer (Female) Kohistan at Pattan.
4. Candidate Concerned.



ABDUR RASHID  
DISTRICT EDUCATION OFFICER  
PRIMARY KOHISTAN AT DASSU.

Alleso  


Muhammad Irfan Khan Tanoli  
Advocate High Court  
Office No. 33 Adjacent to  
Distt. 3or Abbottabad

**OFFICE OF THE DISTRICT EDUCATION OFFICER PRIMARY KOHISTAN****APPOINTMENTS.**

Consequent upon the selection by the departmental selection committee district education officer (Male & Female) primary Kohistan has been placed. To appoint the following untrained female out district candidates in BPS-7 (1480-81-2695) Rs.1480/- per month fixed plus usual allowances has admissible under the rule w.e.f the date of their taking over charge against the vacant PTC posts noted against each name with the following terms and conditions;

S.No	Name & F. Name	School	Remarks
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2.	Rabia D/o Aman Ullah	Do	AVP
3.	Nadia Hassan D/o Gul Hassan	GGPS Pashol	AVP
4.	Farhat Jabeen D/o Kala Khan	Do	AVP

**CONDITIONS.**

1. No TA/DA is allowed to anyone.
2. They should not be allowed to take over charge if their age is less than 18 and above 30 years.
3. They should provide age and Health Certificate from the DHO Kohistan.
4. Their original certificates should be checked and verified before handing over of charge by the SDEO(F) Kohistan.
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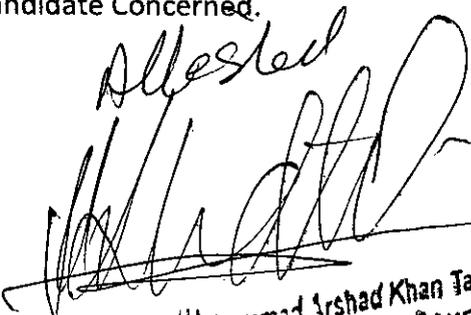
Sd/-

**ABDUR RASHID**  
**DISTRICT EDUCATION OFFICER**  
**PRIMARY KOHISTAN AT DASSU**

Endst: No.1264-70 dated Kohistan the 27-09-96

Copy to;

1. The Director Primary Education N.W.F.P Peshawar.
2. The District Accounts Officer Kohistan.
3. The Sub-Division Education Officer (Female) Kohistan at Pattan.
4. Candidate Concerned.

*Alleged*  


Muhammad Arshad Khan Janoli  
 Advocate High Court  
 Office No 33 Adjacent to  
 Dist Bar Abbottabad

Sd/-

**ABDUR RASHID**  
**DISTRICT EDUCATION OFFICER**  
**PRIMARY KOHISTAN AT DASSU**

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND  
SECONDARY EDUCATION KOHISTAN.

**Annex - B**

**P-12**

NOTIFICATION

Consequent upon enquiry report conducted by the enquiry committee through Deputy District Officer Female E&SE Education, District Kohistan, the service of the following female PST teachers are hereby terminated due to absent from their duties under special power ordinance 2001 on disciplinary ground with effect from 03-2011 in the interest of public service.

No	Name of Teacher		Name of School		Absent Period	Remarks
1	Afshan Hayat ✓	PST	GGPS	Mujawar Abad	From 9/2010	
2	Nuzhat Yasmen	PST	GGPS	Dharo Bela	From 9/2010	
3	Faihat Jabeen	PST	GGPS	Qalash	From 9/2010	

*[Signature]*  
Executive District Officer  
E&SE District Kohistan

Order No. 600-609 / Dated Kohistan the 21/3 /2011

Copy of the above is forwarded to the:-

1. Director E&SE Department KPK Peshawar.
2. District Coordination Officer District Kohistan.
3. District Accounts Officer Kohistan.
4. Deputy District Officer Female Kohistan

*[Signature]*  
Executive District Officer  
E&SE District Kohistan

*Attested*  
*[Signature]*

Advocate High Court  
Office No. 33 Adjacent to  
Distt Bar Abbottabad

# Annex - C

The Director Elements & Secondary  
Education Peshawar

P-13

Subject: Departmental Advice regarding adjustment of the Applicant against the Post PST District Kohistan.

Respected Sir,

That the applicant got appointment as PST at Government Girls Primary School Pashot vide appointment Order No. 12126-70 dated 27-09-1996 copy appointment order of the applicant is attached

The applicant served the department as PST with effect from the date of her appointment i.e 28-09-1996 to Feb, 2011 with complete devotion and dedication to the entire satisfaction of her superiors.

That during this period the applicant was transferred from G.P.S Pashot to Haider Khail in the year 2010, the applicant thereafter was told by some official of the DE-O female Kohistan that she had been transferred at GCPS Qalash.

Therefore, the applicant approached GCPS Kafash and found no Gov. School in Qalash.

Hence, the applicant started shuttling between the offices of Education Department for her adjustment in other schools but of no avail

That the applicant has been made a rolling stone since 2011 to till that. That the applicant has rendered near about 15 years of service till 2011 but the applicant is neither being retired nor adjusted for performing her service.

That the applicant is suffering from financial hardship and hardly copy with unavoidable expenses of her dependent children.

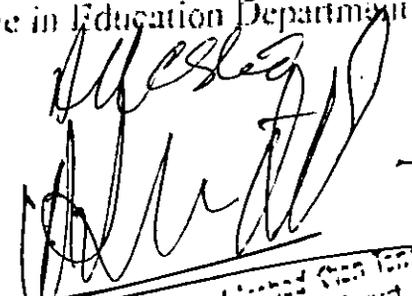
In view of the above it is prayed that the applicant may graciously be ordered to be retired from service compulsory having 15 years service at her credit or she may be adjusted at any Gov School at District Kohistan so, as to enable her to serve in Education Department till her date of superannuation and oblige.

Sincerely Yours.

Fazhat Jabeen

Jhangji Syedan ATO. Manseliba  
Road jubpall

0317-5652235 / 03541999060

  
Muzammil Hussain  
Advocate High Court  
Office: 33 Adabcent  
D.H. Peshawar

10

The Director Elementary & Secondary  
Education Peshawar.

**Subject: Departmental Appeal regarding adjustment of the Applicant against the Post PST  
District Kohitan.**

Respected Sir,

That the applicant got appointment as PST at Government Girls Primary School Pashot vide appointment Order No, 12126-70 dated 27-09-1996 copy appointment order of the applicant is attached.

The applicant served the department as PST with effect from the date of her appointment i.e 28-09-1996 to Feb, 2011 with complete devotion and dedication to the entire satisfaction of her superiors.

That during this period the applicant was transferred from G.P.S Pashot to Haider Khalil in the year 2010, the applicant thereafter was told by some official of DEO female Kohistan that she had been transferred at GGPS Qalash.

Therefore, the applicant approached GGPC Kalash and found no Gov. School in Qalash.

Hence, the applicant started shuffling between the offices of Education Department for the adjustment in other schools but of no avail.

That the applicant has been made a rolling stone since 2011 to till that. That the applicant has rendered near about 15 years of service till 2011 but the applicant is neither being retired nor adjusted for performing her service.

That the applicant is suffering from financial hardship and hardly copy with unavoidable expenses of her dependent children.

In view of the above it is prayed that the applicant may graciously be ordered to be retired from service compulsory having 15 years service at her credit or she may be adjusted at any Gov. School at District Kohistan so, as to enable her to serve in Education Department till her date of superannuation and oblige.

Sincerely Yours,

**Farhat Jabeen**  
Jhangi Syedan Atd. Mansehra  
Road Jabpull  
0317-5652234/03441999020

ASSISTANT DIRECTOR INVESTIGATION PROVISIONAL OMBUDSMAN  
SECRETARIAT KHYBER PAKHTUNKHWAH

Subject: NON-PAYMENT OF SALARIES AND PROVISION SERVICE BOOK

Sir,

1. Reference is made to your letter No. PO/Complaint/ 0362/04/2018.
2. Rejoinder of the reply of District Education Officer Female Kohistan is appended below.
3. Reply of Para No. 1 is correct.
4. Para No. 2 of the reply to the extent of payment of salary is correct and the rest of the para is incorrect.
5. Para No. 3 of the reply is incorrect because the petitioner applied for the provision of service book but in vain.
6. Para No. 4 it is submitted that the applicant petitioner has never been provided copy of removal from service and it is the first time that the applicant came to know through the reply of D.E.O (Female) Kohistan dated 13-06-2019 that the applicant has been removed from service 21-03-2011 therefore, in this regard, departmental appeal to the next higher authority against the impugned removal order dated 21-03-2011 is being filed.

Prayer:

*In view of above it is prayed that complaint of the applicant may be accepted as prayed for.*

Thanks

*Farhat Jabeen*

Your Obediently

**Farhat Jabeen D/o Kala Khan**

Address: Jhangi Syedan

Abbottabad Mansehra Road

Jubpull

Date: 01-07-2019

**Muhammad Arshad Khan Tanoli**  
Advocate High Court  
Office No 33 Adjacent to  
Distt Bar Abbottabad

Date: 01-03-2019

Mohammad Ali Jinnah University  
Director's Office  
Office No. 23 Adjacent to  
7-51 1st Abbolabad

Farhat Ishaq  
Changer Syedan, Mamchia Road  
Jubbah, Abbotabad  
Mobile: 0117-509234  
Mobile # 0344-1999020

Thanks

It is prayed that the DHO (Female) Kohistan may be directed to provide/provide Service Book and other Service Record and the said authority may also be directed to either retire the applicant or adjust in any school of Kohistan.

4. That the act of DHO (Female) Kohistan is without lawful justification and contrary to law.

3. That besides, the petitioner is not being provided her service book etc. The department has also not provided any justification of stoppage of salary for the period of the applicant's school in March 2011 onward.

2. That the applicant acts in the Department with devotion and received salary till February, 2011. Thereafter, the applicant is neither being appointed nor being retired from service by the DHO (Female) Kohistan since March, 2011.

P-15

OFFICE OF THE DIRECTOR, PUNJAB AND PESHAWAR DIVISION OF SERVICE  
GOVT. PUNJAB

The undersigned is authorized to sign on behalf of the Director, Punjab and Peshawar Division of Service, Government of Punjab.

The Ombudsman Provincial Hayatabad, KPK Peshawar.

Subject: GRANT OF PENSION AND PROVISION OF SERVICE DOCUMENTS.

Respected Sir,

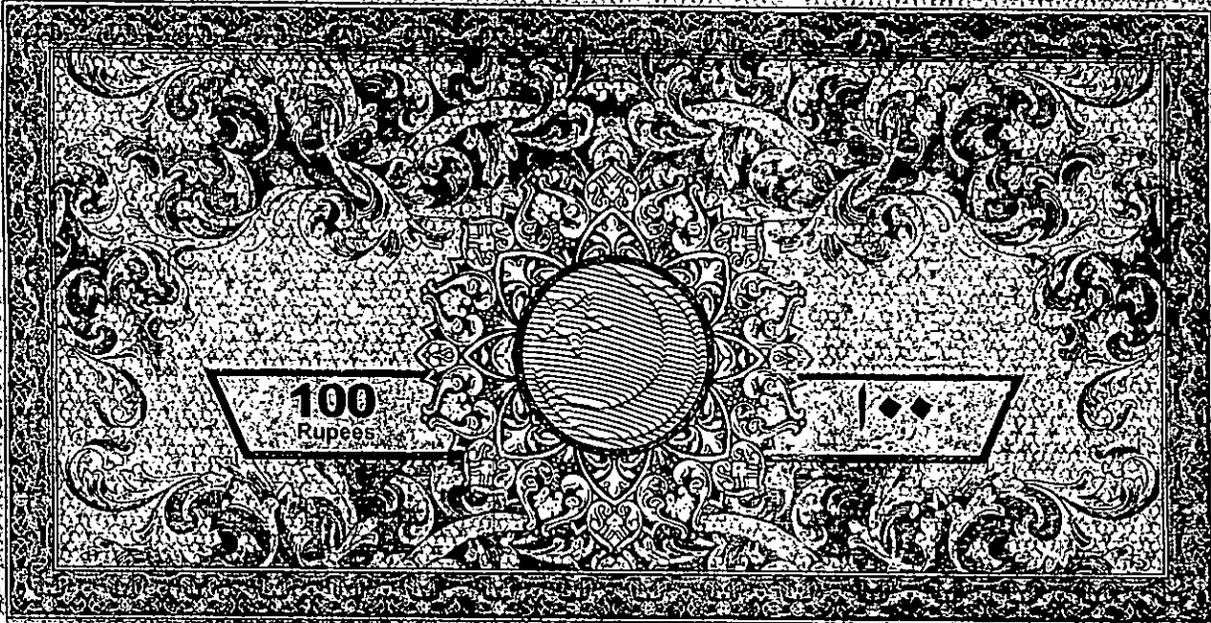
1. It is respectfully submitted that the applicant joined service as PST on 28-09-1996 in District Kohistan under the control of Distt Education Officer Elementary & Secondary Education District Kohistan.
2. That the applicant served the Department with devotion and received salary till February, 2011. Thereafter, the applicant is neither being appointed nor being retired from service by the DEO (Female) Kohistan since March, 2011.
3. That besides, the petitioner is not being provided her service book etc. The department has also not provided any Justification of stoppage of salary/ non-adjustment of the applicant in any school since March, 2011 onward.
4. That the act of DEO (Female) Kohistan is without lawful justification and contrary to law.

It is prayed that the DEO (Female) Kohistan may be directed to provide/ produce Service Book and other Service Record and the said authority may also be directed to either retire the applicant or adjust in any school of Kohistan.

Thanks

Dated: 01-03-2019

**Farhat Jabeen**  
Jhangi Syedan, Mansehra  
Road Jubpull, Abbottabad  
Mobile # 0317-5652234  
Mobile # 0344-1999020



**AFFIDAVIT**

- a) The allegations contained in the complaint are true to the best of my knowledge and belief.
- b) Previously no complaint on the subject was filed at the Head Office or any Regional Office.
- c) No suit, Appeal, Petition or any other judicial proceedings in connection with the subject matter of the complaint is pending before any Court.

You are also advised to provide relevant documents if any, to proceed further in the matter.

**THIS ISSUE WITH THE APPROVAL OF THE PROVINCIAL OMBUDSMAN**

**DEPONENT**

*Farhat Jabeen*



**FARHAT JABEEN**

(Complainant)

CNIC No: 13101-1350343-0

*Muhammad Arshad Kadir Talib*  
 Advocate High Court  
 Office No 33 Adjacent to  
 Distt Bar Abbottabad



**Annex - D**

**PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,  
KHYBER PAKHTUNKHWA**

**P-17**

PO/Complaint No.0362/04/2019

Dated 07/11/2019

1. Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar.
2. Director, Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa.
3. District Education Officer (Female), Kohistan.
4. Mst. Farhat Jabeen w/o Muhammad Shafeeq r/o Jhangi Syedan Mansehra Road Jubpull, Abbottabad (Contact # 0317-5652234, 0344-1999020).

Subject: **NON-PAYMENT OF SALARIES AND PROVISION OF SERVICE BOOK.**

Memo:

Copy of the Findings dated 07/11/2019 issued by the Hon'able Provincial Ombudsman Khyber Pakhtunkhwa in Complaint No: 0362/04/2019 filed by Mst. Farhat Jabeen r/o Abbottabad regarding the subject is enclosed herewith for information and necessary action.

*[Signature]*  
Assistant Director (Investigation)  
Provincial Ombudsman Secretariat,  
Khyber Pakhtunkhwa.

**ENDST: EVEN NO & DATE:**

Copy forwarded to the i/c Computer Section, Provincial Ombudsman Secretariat Khyber Pakhtunkhwa alongwith findings in duplicate for updating record under Regulation 19 of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation and Disposal of Complaints) Regulations, 2011.

*[Signature]*  
Assistant Director (Investigation)  
Provincial Ombudsman Secretariat,  
Khyber Pakhtunkhwa.

*[Signature]*  
**Muhammad Arshad Khan Bano**  
Advocate High Court  
Office No 33 Adjacent to  
Distt Bar Abbottabad



**PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,  
KHYBER PAKHTUNKHWA**

CLOSURE FINDINGS		
1	COMPLAINT NO.	PO/Complaint No.0362/04/2019.
2	NAME & ADDRESS OF THE COMPLAINANT	Mst. Farhat Jabeen w/o Muhammad Shafeeq r/o Jhangi Syedan Mansehra Road Jubpull, Abbottabad (Contact # 0317-5652234, 0344-1999020).
3	NAME OF THE AGENCY COMPLAINED AGAINST	1. Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa Peshawar. 2. Director, Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa. 3. District Education Officer (Female), Kohistan.
4	NAME OF THE INVESTIGATION OFFICER	Hanif Khan, Assistant Director.
5	SUBJECT OF COMPLAINT	Non-payment of salaries and provision of service book.
6	DATE OF REGISTRATION	29/04/2019.
7	DATE OF FINDINGS	07/11/2019.

**THE COMPLAINT**

Ms. Farhat Jabeen, instituted complaint stating that she was appointed as PST in E&SE Department, in Kohistan, vide Order No. 12126-70, dated: 27/09/1996. She was transferred to GGPS Haider Khail thereafter to GGPS Qalash. The complainant visited the said area but could not find any Government School. She further added that the complainant requested DEO (F) Kohistan for adjustment in any other school but she was terminated. The complainant has requested this Forum to probe the matter.

**REPORT OF THE AGENCY**

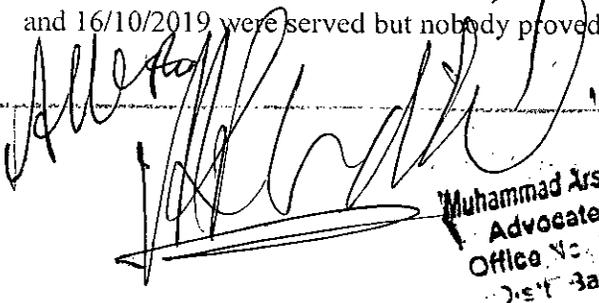
The matter was taken up with Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Directorate of Elementary & Secondary Education Khyber Pakhtunkhwa, and District Education Officer (Female) Kohistan to meet the allegations and submit reply including rebuttal, if any. In response, DEO (Male) Kohistan submitted that the complainant was not regular in her service. The DEO (F) Kohistan acted as per rules and the complainant was served with Show Cause Notice but she failed to submit any cogent reply. She neither attended the school nor visited the DEO office. The removal order was issued by the competent authority vide order No. 600-604, dated: 21/03/2011. His request was now hopelessly time barred.

**REJOINDER**

Reply of the Agency was shared with the complainant for feedback/rejoinder, who expressed discontent over reply of the Agency.

**HEARING**

Due to divergent pleadings, the complaint was fixed for hearing on 25/07/2019, which was adjourned on the request of the Agency to bring the record. Hearing notice for 05/09/2019 and 16/10/2019 were served but nobody proved the point.

  
**Muhammad Arshad Khan Tano**  
 Advocate High Court  
 Office No. 33 Adjacent  
 3rd Bar Abbottabad

P-19



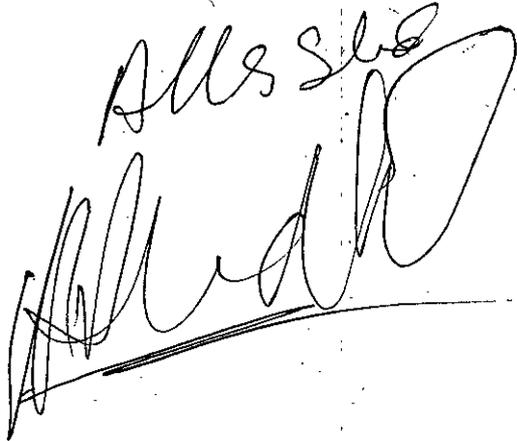
PROVINCIAL OMBUDSMAN (صوبائی محتسب) SECRETARIAT,  
KHYBER PAKHTUNKHWA

FINDINGS

Reinstatement in service is purely service matter. This forum lacks jurisdiction to adjudicate <sup>upon</sup> the matter. Accordingly, investigation in the complaint is closed under Regulation 17(a)(k) of the Khyber Pakhtunkhwa Provincial Ombudsman Office (Registration, Investigation, and Disposal of Complaints) Regulations, 2011.

  
AQAL BADSHAH  
PROVINCIAL OMBUDSMAN

07/11  
19



Muhammad Arshad Khan Tanoli  
Advocate High Court  
Office No 33 Adjacent to  
District Bar Abbottabad

Annex - E

TO THE DIRECTOR ELEMENTARY AND SECONDARY EDUCATION  
KPK PESHAWER.

P-20

Subject : DEPARTMENTAL APPEAL AGAINST IMPUGNED REMOVAL  
FROM SERVICE ORDER DATED 21-03-2011.

Sir,

1. It is submitted that the applicant filed complaint before the provincial ombudsman KPK, regarding release of her salary with effect from 2011 onwards and provision of service documents now, the applicant has been informed by the ombudsman for the submission of rejoinder in complain wherein, termination order was found attached with documents received from ombudsman.
2. That the officer of DEO (Female) Kohistan kept the removal from service order date 21-03-2011 vide letter dated 18-06-2019 of the applicant as secret therefore, the applicant got the impugned order through letter of ombudsman dated 18-06-2019. (Copy of the letter ombudsman dated 18-06-2019 in comments of DEO Female Kohistan dated 13-06-2019 is attached).
3. That the impugned termination order dated 21-03-2011 has been issued without show cause notice, charge sheet and without following the codle formalities under the rules therefore, order dated 21-03-2011 is liable to be set aside.

Prayer:

*In view of the above, it is prayed that impugned remove from service order at 21-03-2011 may be set aside and the applicant may be re-instated in service with all back benefits.*

Thanks

Farhat Jabeen

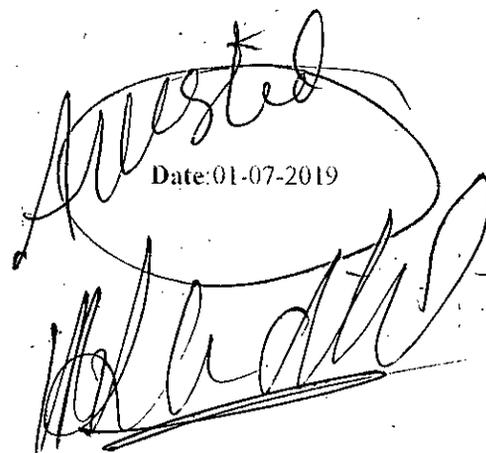
Your Obediently

Farhat Jabeen, D/o Kala Khan

Address: Jhangi Syedan

Abbottabad Manshra Road

Jubpull

  
Date: 01-07-2019

Muhammad Arshad Khan Tan  
Advocate High Court  
Office No 33 Adjacent  
Distt Bar Abbottabad

OPD Prescription form

SN : MRS SHAFFIQ  
Age :  
Sex : M SHAFFIQ  
DOB : 40 Year(s) 00 Month(s) 0 Day(s)  
Type : REGULAR  
Admission :

Annex - F

P. 21

RO O.A

clg

- O.A.U (RO) knee - byr
- pain at knee joint during upstair & down stair
- follow up can from byr

Attested

*[Signature]*

① Pat. Egg Sachet

Pambled

3/2 No. of 5 1/2 1/2 1/2

Kept to Office No. 23 Adjacent to  
Muzaffar Abbudabad

②

Sachet Pat. NEMS

physiotherapy

1/1

③

Pat. Dalsan-D

*[Signature]*

*[Handwritten notes]*



Token No : 44 /  
Room No :  
Department : ORTHOPEDIC-B  
Date : 27-FEB-20 11:37:39  
Dept Fee : 30  
User : FIZZA ZAHEER  
MRNO : K0400002239695  
Invoice No : K04200452785  
Sex : Female

OPD Prescription form

Name : FARHAT BIBI  
Father Name :  
Husband Name : M SHAFFIQ  
Age : 38 Year(s) 00 Month(s) 0 Day(s)  
Patient Type : REGULAR

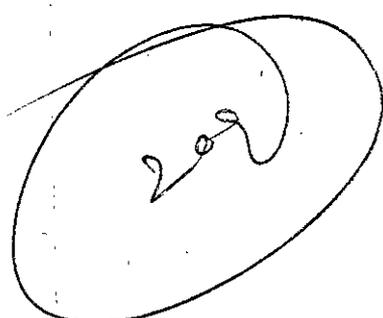
Investigation

✓ Rt knee joint pain - 3-4 months  
✓ Pain while climbing up/down stairs

✓ Anterior drawer @  
✓ Xray Rt knee joint AP/lateral view Digital

Delo  
MRI

Rt knee joint



P-22

Rx

⑥ Tab nri 1000

③ ④ 1-1

③ Tab Nuberol Forte

③ ④ 1-1-1

③ Cap Rocid-2 caps

③ ④ nri 6

*[Handwritten signature]*

Muhammad Arshad Khan I.  
Advocate High Court  
Office No 33 Adjacent  
Distt 3rd Floor Abbottabad

⑥ Tab ostepro-1k  
cc ① nri 6

*[Handwritten signature]*  
27/2/2020



OPD Prescription form

Token No : 775  
Room No :  
Department : EAR CLINIC  
Date : 23-OCT-19 18:39:19  
Dept Fee : 10  
User : SHERAZ KHAN  
MRNO : K04ACE19490670  
Invoice No : K04192015902  
Sex : Female

Name : MRS SHAFIQUE  
Father Name :  
Husband Name : SHAFQUE  
Age : 41 Year(s) 00 Month(s) 0 Day(s)  
Patient Type : ACUTE EMERGENCY

Investigation

Qc  
Lungs

(99)

Adv  
Z. value  
1mm

P-23

AS  
Lungs  
RT knee  
joint

All S. S. S. S.

*[Signature]*  
Muhammad Arshad Khan Tanoli  
Advocate High C  
Office No 33 Ac

Las. Montail 20  
Las. Myonol 1-1  
Las. Musidun 2-8  
Targeste 1-1  
CP 10/11/11

Neuro Surgeon

Brain for Brains

**Dr. Abdul Aziz Khan**

Associate Professor

M.B.B.S (Gold Medalist) RMP MCPS

FCPS (Neuro Surg)

AMC Complex Abbot Abad



ایسوسی ایٹ پروفیسر نیوروسرجن  
ڈاکٹر عبدالعزیز خان  
ایم۔ بی۔ بی۔ ایس گولڈ میڈلسٹ

آر۔ ایم۔ پی۔ ایم۔ سی۔ پی۔ ایس۔ ایف۔ سی۔ پی۔ ایس۔ (نیوروسرجی)

ماہر امراض: فالج، حرام مغز، مرگی، ٹھہ، جوڑ، دماغ، کمر درد، عرق النساء  
ایوب میڈیکل کیمپلکس ایبٹ آباد

Name Farooq Age 45 Sex F Date 28/11/2020

P-24

*Handwritten notes on the left side of the diagram, including a circled 'D' and 'P-24'.*



*Handwritten notes on the right side of the diagram, including 'Cp Gabylo', '1-1', 'Tos Bextos', '1-1 20', 'Cp B-paul', 'Zurich', and '1-1'.*

*Handwritten signature and notes at the bottom right, including 'Cp Dites - G', '1-1', and a signature.*

Not Valid for Court



# AYUB TEACHING HOSPITAL ABBOTTABAD



## FILTER OUT PATIENT DEPARTMENT

P-25

A9268

B.Code No: \_\_\_\_\_

Book No: \_\_\_\_\_

Appointment Time: 11:30

Patient Name:

FARID BIBI

M.R No:

Patient Sex:

Female

Patient Yearly No:

K0400001915748

Patient Age:

40 Year(s)

Date & Time:

22-06-2019 11:29:15

Address:

Amount:

30.00

O.P.D:

Computer Operator:

ORTHOPEDIC-B - OPD

pain in neck region - 15 days.  
pain in (R) Shoulder  
Joint - 15 days.  
Movements are restricted  
at (R) Shoulder joint - 15 days.

**Token# 198**

Adv;

X-ray cervical spine AP  
left

*[Handwritten signature]*

*[Handwritten signature]*  
Muhammad Arshad Khan Tan  
Advocate High Court  
Office No 33 Adjacent to  
Distt Bar Abbottabad



# MEDICAL TEACHING INSTITUTION ABBOTTABAD

Avub Teaching Hospital. Phone: 0992-9311162. Fax: 0992-380328  
Email: info@ath.gov.pk. Website: www.ath.gov.pk

## OPD Prescription form

Token No : 001  
Room No :  
Department : **CARDIOLOGY**  
Date : 18-JUN-20 08:50:22  
Dept Fee : 30  
User : FAIZAN ALI  
MRNO : K0400002293191  
Invoice No : K04200861252  
Sex : Female

Name : MRS SHAFIQUE  
Father Name :  
Husband Name : M SHAFIQUE  
Age : 40 Year(s) 00 Month(s) 0 Day(s)  
Patient Type : REGULAR

Investigation

*Chest pain  
radiating to back  
SOB = -ve  
vomiting = -ve*

*\* on Pain Meds  
for 1 week*  
**P-26**

Ado  
CBC  
\* ECG  
\* ALT  
\* S-Amylase  
\* RFTs

*Allesha*

**Muhammad Arshad Khan Tanoli**  
Advocate High Court  
Office No: 33 Adjacent to  
Distt. Bar Abbottabad

# RAUF

## MEDICAL LABORATORY FULLY COMPUTERIZED

P. 27



Committed to Excel in Quality

**24 Hours**  
Service

### FINAL LABORATORY REPORT

MR No: 4634

DATE: /01/2020

NAME: FARIHA F

AGE/SEX: \*\* YRS/FEMALE

REF BY: RMC

SPECIMEN: BLOOD

BIOCHEMISTAY

TEST	UNIT	RESULT	NORMAL RANGE
Uric Acid	mg/d	5.0	(M) 3.5..... 7.0 (F) 3.0..... 6.0
Calcium	mg/dl	9.8	8.6----10.3
Rheumatoid Factor:		NEGATIVE	NEGATIVE

*(Signature)*  
Muhammad Arshad Khan Taz  
Advocate High Court  
Office No 33 Adjacent  
Distt - Sar Abbottabad

*(Signature)*  
Lab Technologist

Incorrect results?

Contact: 0345-9588690

For a Single repeat  
test within 24 hours.

Following tests are available now:

1. EILISA for BBsAg, HBeAg, and HCV (reports delivered with in 2 hours)
2. T3, T4, TSH, FSH, Prolactin, Testosterone (reports delivered within 24 hours)
3. TORCH Screening, CMV 1gm (cytomegalovirus), EBV VCA IgM (Epstein-Barr virus) and HSV 1 & 2 IgM (Herps simplex virus).... (reports Deliver With In 24 Hours)

Address: INOR Gate, Ayub Medical Complex, Mansehra Road, Abbottabad

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND  
SECONDARY EDUCATION KOHISTAN.

P. 29

NOTIFICATION

Consequent upon enquiry report conducted by the enquiry committee through Deputy District Officer Female E&SE Education District Kohistan, the service of the following female PST teachers are here by terminated due to absent from their duties under special power ordinance 2001 on disciplinary ground with effect from 03/03/2011 in the interest of public service.

No	Name of Teacher		Name of School		Absent Period	Remarks
1	Afshan Hayat ✓	PST	GGPS	Mujawar Abad	From 9/2010	
	Nuzhat Yasmen	PST	GGPS	Dharo Bela	From 9/2010	
	Farhat Jabeen	PST	GGPS	Qalash	From 9/2010	

*[Signature]*  
Executive District Officer  
E&SE District Kohistan

Order No. 600-604 Dated Kohistan the 21/3 /2011

Copy of the above is forwarded to the:-

1. Director E&SE Department KPK Peshawar.
2. District Coordination Officer District Kohistan.
3. District Accounts Officer Kohistan.
4. Deputy District Officer Female Kohistan

*[Signature]*  
Executive District Officer  
E&SE District Kohistan

کورٹ فیس

# وکالت نامہ

Service Tribunal ICRP Peshawar

Farhat Jabeen vs Govt of ICRP

Petitioner/ Appellant

لوعیت مقدمہ:

## باعث تحریر آنکے

مقدمہ مندرجہ میں اپنی طرف سے واسطے عیرونی و بموجب دعویٰ کل کارروائی متعلقہ آن مقام

Adv. Atal Muhammad Arshad Khan Talwal

کو وکیل مقرر کر کے تقرر کرتا ہوں کہ صاحب موصوف کو مقدمہ میں کل کارروائی کا کمال اختیار ہوگا نیز وکیل صاحب

موصوف کو کرنے راضی نامہ و تقریر نمٹ و فیصلہ بر طرف دوسرے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اور

وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دخل کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور

کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا نگار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار

بھی ہوگا اور صاحب مقرر شدہ کو بھی دعویٰ اور ویسے ہی اختیارات ہوں گے اور اس کا ساتھ پر داخلہ جج کو منظور

قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ الخوائے مقدمہ کے سبب ہوگا اس کے استحقاق وکیل صاحب ہوں گے

نیز ہر پارٹم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا عد سے باہر ہو تو وکیل صاحب موصوف

پابند ہوں گے کہ عیرونی مقدمہ مذکورہ کریں اور اگر نگار مقرر کردہ میں کوئی جزو چھایا ہو تو وکیل صاحب موصوف

مقدمہ کی عیرونی کے پابند ہوں گے۔ نیز درخواست بر اول تجارت ہائش بعینہ مطلبی کے دائرہ کرنے اور اس کی

عیرونی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند ہے۔

المرقوم (15 جنوری 2020)

مقام: [Signature]

السید

Farhat Jabeen

السید

Advocate High Court  
Office No. 33 Adjacent to  
Distt Bar Abbottabad

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR**

**Service Appeal No.9269/2020**

Farhat Jabeen daughter of Kala, Khan, resident of Jhangi Syedan, Tehsil  
and District Abbottabad.

...APPELLANT

**V E R S U S**

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary and  
Secondary Education, Peshawar.
2. Director Elementary & Secretary Education, Peshawar.
3. District Education Officer (Female), Kohistan Lower.

**SCANNED  
Peshawar  
Peshawar**

...RESPONDENTS

**SERVICE APPEAL**

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**Dated: /2022**

**DISTRICT EDUCATION OFFICER FEMALE  
KOHISTAN LOWER.**

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR**

**Service Appeal No.9269/2020**

Farhat Jabeen daughter of Kala, Khan, resident of Jhangi Syedan, Tehsil  
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**V E R S U S**

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary and  
Secondary Education, Peshawar.
2. Director Elementary & Secretary Education, Peshawar.
3. District Education Officer (Female), Kohistan Lower.

**...RESPONDENTS**

**SERVICE APPEAL**

**PARA WISE COMMENTS ON BEHALF OF RESPONDENT NO. 1 TO 3**

***Respectfully Sheweth;***

**PRELIMINARY OBJECTIONS:-**

1. That the appellant has got no cause of action to file the  
titled appeal.
2. That the appellant is estopped to file the titled appeal by  
her own conduct.
3. That the appeal of the appellant is bad in its present form.
4. That the titled appeal is not maintainable in its present  
form.

5. That the appellant has not come to this Honourable Court with clean hands and concealed the facts from this Honourable Court.
6. That appeal of the appellant is liable to be dismissed due to miss-joinder and non-joinder of the necessary and proper parties.
7. That the respondents acted in accordance with law, rules and regulations.
8. That the appellant has got no locus standi to file the present appeal.
9. That the appeal is hit by the principle of latches.
10. That the present appeal is time barred, hence, liable to be dismissed with cost.

**OBJECTION ON FACTS:-**

1. That para No.1 of the appeal pertains to record, hence, need no comments.
2. That Para No.2 of the appeal is correct to the extent that she received her salary till 30.10.2010, but she was not regular in her services and remained absent from her duty and she is terminated due to

her willful long absence from school duties on 21.03.2011.

3. That para No.3 of the appeal is incorrect.
4. That para No.4 of the appeal needs cogent proof.
5. That para No.5 of the appeal pertains to record, hence, need no comments.

**OBJECTION ON GROUNDS:-**

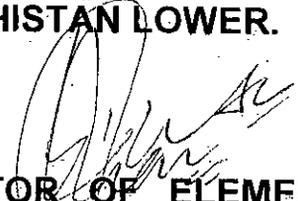
- a. That para "a" of the ground of the appeal is incorrect the removal order was issued by the competent authority after fulfilling of codal formalities.
- b. That para "b" of the ground of the appeal is incorrect as explanation notice and statement of allegation to the appellant has been issued prior to the issuance of impugned removal from service order with this regards two letters about provision of records have been issued to the DEO Female Kohistan Upper but reply is till awaited. **(Explanation notice, statement of allegation and two letters are annexed as Annexures "A", "B", "C" & "D" respectively)**

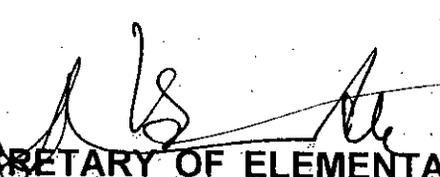
- c. That para "c" of the ground of the appeal is incorrect, as explanation notice has issued vide endst No. 92 dated 08.11.2010.
- d. That Para "d" of the Ground needs cogent proof and the appellant couldn't approach this Honorable Tribunal with-in the time so the case is time barred hence liable to be dismissed.
- e. That para "e" of the ground is incorrect and the instant service appeal is time barred hence not entertain-able by this Honorable Tribunal.

It is therefore humbly prayed that the service appeal of the appellant may graciously be dismissed with cost.

Dated: \_\_\_\_\_/2022

  
DISTRICT EDUCATION OFFICER FEMALE  
P-KOHISTAN LOWER.

  
DIRECTOR OF ELEMENTARY AND  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR.

  
SECRETARY OF ELEMENTARY AND  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA, PESHAWAR.

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR**

**Service Appeal No.9269/2020**

Farhat Jabeen

...APPELLANT

**V E R S U S**

Govt. of Khyber Pakhtunkhwa through Secretary Elementary and  
Secondary Education, Peshawar and others.

...RESPONDENTS

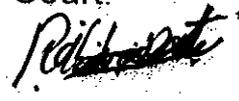
**SERVICE APPEAL**

**PARA WISE COMMENTS ON BEHALF OF RESPONDENT NO. 1 TO 3**

**AFFIDAVIT**

I, Mr. Rahim Dad Rahimi, ADEO Litigation, Kohistan, Lower Female, do  
hearby solemnly affirm and declare on oath that the contain of the  
foregoing comments are true and correct to the best of my knowledge and  
belief and nothing has been concealed from this Honorable Court.

Dated: \_\_\_\_\_/2022

  
...DEPONENT

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR**

**Service Appeal No.9269/2020**

Farhat Jabeen daughter of Kala, Khan, resident of Jhangi Syedan, Tehsil  
and District Abbottabad.

**...APPELLANT**

**V E R S U S**

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary and  
Secondary Education, Peshawar.
2. Director Elementary & Secretary Education, Peshawar.
3. District Education Officer (Female), Kohistan Lower.

**...RESPONDENTS**

**SERVICE APPEAL**

**REPLY OF APPLICATION FOR CONDONATION  
OF DELAY W.E.F 01.11.2019 TO 16.07.2020.**

***Respectfully Sheweth,***

**PRELIMINARY OBJECTIONS:-**

1. That the applicant has got no cause of action to file the  
titled application.
2. That the applicant is estopped to file the titled application  
by her own conduct.
3. That the application is hit by the principle of latches.

4. That the present application is time barred, hence, liable to be dismissed with cost.

**OBJECTION ON FACTS:-**

1. That para No.1 of the application is correct.
2. That Para No.2 of the application is incorrect needs cogent proof and the applicant has written his application to DEO female Kohsitan Lower on 03.06.2011 in which she herself has admitted that she was terminated from service but remained silent for a longtime. **(Application is annexed as Annexure "E")**
3. That para No.3 of the application is incorrect needs cogent proof and the appellant could not approach this Honourable Tribunal well within the period of limitation and he has to explain everyday for condonation of delay.
4. That para No.4 of the application is incorrect as replied above.

It is therefore humbly prayed that the application of the applicant for condonation of delay may graciously be dismissed with cost.

Dated: \_\_\_\_\_/2022

DISTRICT EDUCATION OFFICER FEMALE  
KOHISTAN LOWER.

DIRECTOR OF ELEMENTARY AND  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR.

SECRETARY OF ELEMENTARY AND  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA, PESHAWAR.

AFFIDAVIT

I, Mr. Rahim Dad Rahimi, ADEO Litigation, Kohistan, Lower Female, do hereby solemnly affirm and declare on oath that the contain of the foregoing replication are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Dated: \_\_\_\_\_/2022

...DEPONENT

Annexure 'A'

10

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND  
SECONDARY EDUCATION KOHISTAN

98

To

MIS Farhat Jabeen

GGPS Qalash

Subject:  
Memo

EXPLANATION.

You are hereby called to explain your position that according to the inspection report of Assistant District Officers Elementary and Secondary Education District Kohistan, you were found absent from your duty wef 1-10-2010 to 15-10-2010.

You are hereby directed to submit your written reply within three days to this Office after issuing of this letter; other wise Disciplinary action shall be taken against you.

Executive District Officer  
E&SE District Kohistan

Endst: No. 92 / Dated Kohistan the 8/11/2010

Copy of the above is forwarded to the:-

3. I/C DY: District Officer Female E&SE Kohistan
4. A D.O Circle Concerned.

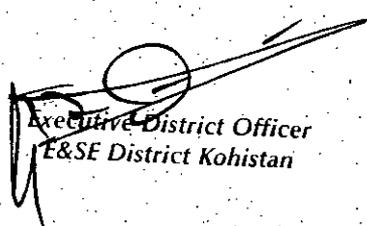
Executive District Officer  
E&SE District Kohistan

OFFICE OF THE EXECUTIVE DISTRICT OFFICER  
ELEMENTARY AND SECONDARY EDUCATION  
KOHISTAN.

STATEMENT OF ALLEGATION.

You Mst: Fazhat Jabeen PTC teacher while posted at GGPS Devesh  
in the capacity of PTC teacher has been found willfully absent from duty with effect from 1-15-2010 to 15-10-2010  
without any information or prior approval of the competent authority in utter disregard and repugnant to the  
relevant rules.

You did not responded the explanation called for vide this office Memo No. 92  
dated 8/11/2010 /20 , obviously it mean that you have nothing in defense to absolve you of the charges  
levelled.

  
Executive District Officer  
E&SE District Kohistan

OFFICE OF THE DISTRICT EDUCATION OFFICER(FEMALE)  
KOHISTAN LOWER

No: 8015 /Dated: 17 /12/2021

To

The Education Officer Female  
Kohistan Upper

Subject: **PROVISION DOCUMENTS OF FARHAT JABEEN EX:PST GGPS QALASH**

Memo:

Reference Khyber Pakhtunkhwa Service Tribunal Peshawar Judicial Complex (Old) Khyber road Peshawar appeal No. 9269 of 2020 on the subject noted above, it is bring into your kind notice that Mst; Farhat Jabeen Ex: PST GGPS Qalash has been terminated on 21-03-2011 from Kohistan Upper.

It is further bring into your kind notice that kindly take it serious because its court matter and send comprehensive data of the above said official to the office of DEO (F) Kohistan Lower within 4 days for onward submission to quarter concerned please.

  
District Education Officer  
(F) Kohistan Lower

Endstt:No 8016-19 /Dated: 17 /12/2021

Copy of the above is forwarded for information to the:-

1. Director of E&SE Khyber Pakhtunkhwa Peshawar.
2. Registrar Khyber Pakhtunkhwa service Tribunal Peshawar
3. Mst; Farhat Jabeen D/O of Kala Khan Jhangi Syedan Abbottabad Mansehra road Jubpull
4. Office Copy.

District Education Officer  
(F) Kohistan Lower



Annexure "D"

13

Remindar-I

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)  
KOHISTAN Lower**

No. 1219 /

Dated: 29 / 07 / 2022

To

The District Education Officer  
Female Kohistan Upper

Subject: **PROVISION DOCUMENTS OF FARHAT JABEEN EX-PST QALASH**  
Memo:

Reference this office issued letter No.8015 dated 17-12-2021 on the subject cited above,

In this regard you are once again requested to provide requisite information for onward submission to quarter concerned please. (copy attached)

District Education Officer (F)  
Kohistan Lower

Endst: No. 1220-24 /

Dated 29 / 07 / 2022

Copy for information & necessary action to:

1. Additional Registrar Peshawar High Court Abbottabad Bench.
2. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner Kohistan Lower.
4. SDEO (F) Pattan
5. Master file.

District Education Officer (F)  
Kohistan Lower

(14) حضرت جناب ن.ع.و صاحب female کوستان

جناب عالی

Annezure "E"

مؤدبانہ گزارش ہے کہ منجملہ فرحت جبین کا آرڈر 27<sup>09</sup> کو P.S.T پوسٹ 1996

"G.G.P.S Pashot" میں ہوا تھا اسکے بعد سائلہ کو حیدر خیل سکول میں ٹرانسفر کیا گیا

"G.G.P.S. Haide. K. el" میں سائلہ اپنے ڈیوٹی باقاعدگی سے سرانجام دیتی رہیں۔

یہ کہ سن 2015 میں سائلہ کو ایجوکیشن آفس سے اطلاع ملی کہ آپکو G.G.P.S Balash

ٹرانسفر کیا گیا ہے۔ جب سائلہ G.G.P.S Balash میں چارج لی گئی تو وہاں پر کوئی

سرکارانہ عہدہ نہیں پائی صحافی لوگوں نے بتایا کہ یہاں کوئی سکول نہیں ہے۔ جب سائلہ

نے اپنے متعلقہ آفس سے رابطہ کیا تو سائلہ کو ذہانی طور پر بتایا گیا کہ آپ کو ٹرانسفر کیا گیا

ہے سائلہ کو ڈیپارٹمنٹ کی طرف سے کوئی تحریری ثبوت نہیں دیا گیا۔ عرض یہ ہے کہ سائلہ نے

16 سال تک باقاعدگی سے اپنی سرورس کی اور نومبر 2015 تک باقاعدہ سائلہ کو تنخواہ ملتی

رہی ہے سائلہ کو ٹرانسفر کی وجہ اور ثبوت دیا جائے۔ تاہم سائلہ کو اپنے مسئلے کا حل نکالیں سکے۔

یہ سائلہ کے سابق سینئر ٹری زیادتی ہے 19 سال کے بعد یوں کہہ دینا کہ آپ ٹرانسفر ہو گئے

ہے۔ آپ سے گزارش ہے کہ جیسے جیسے سائلہ کے سائلے کو کوئی ثبوت نہیں دیا گیا ہے۔

العارضہ فرحت جبین

2011-6

Uhangji Syedan ATO: manshera  
Road jubpall  
03175652239/03441999026

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR**

**Service Appeal No.9269/2020**

Farhat Jabeen daughter of Kala, Khan, resident of Jhangi Syedan, Tehsil and District Abbottabad.

**...APPELLANT**

**V E R S U S**

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**...RESPONDENTS**

**SERVICE APPEAL**

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**Dated: /2022**

**DISTRICT EDUCATION OFFICER FEMALE  
KOHISTAN LOWER.**

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER  
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3. District Education Officer (Female), Kohistan Lower.

**...RESPONDENTS**

**SERVICE APPEAL**

**PARA WISE COMMENTS ON BEHALF OF RESPONDENT NO. 1 TO 3**

***Respectfully Sheweth;***

**PRELIMINARY OBJECTIONS:-**

1. That the appellant has got no cause of action to file the  
titled appeal.
2. That the appellant is estopped to file the titled appeal by  
her own conduct.
3. That the appeal of the appellant is bad in its present form.
4. That the titled appeal is not maintainable in its present  
form.

5. That the appellant has not come to this Honourable Court with clean hands and concealed the facts from this Honourable Court.
6. That appeal of the appellant is liable to be dismissed due to miss-joinder and non-joinder of the necessary and proper parties.
7. That the respondents acted in accordance with law, rules and regulations.
8. That the appellant has got no locus standi to file the present appeal.
9. That the appeal is hit by the principle of latches.
10. That the present appeal is time barred, hence, liable to be dismissed with cost.

**OBJECTION ON FACTS:-**

1. That para No.1 of the appeal pertains to record, hence, need no comments.
2. That Para No.2 of the appeal is correct to the extent that she received her salary till 30.10.2010, but she was not regular in her services and remained absent from her duty and she is terminated due to

her willful long absence from school duties on 21.03.2011.

3. That para No.3 of the appeal is incorrect.
4. That para No 4 of the appeal needs cogent proof.
5. That para No.5 of the appeal pertains to record, hence, need no comments.

**OBJECTION ON GROUNDS:-**

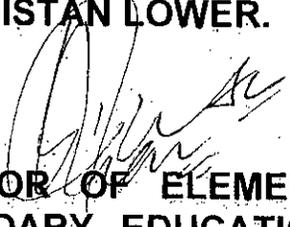
- a. That para "a" of the ground of the appeal is incorrect the removal order was issued by the competent authority after fulfilling of codal formalities.
- b. That para "b" of the ground of the appeal is incorrect as explanation notice and statement of allegation to the appellant has been issued prior to the issuance of impugned removal from service order with this regards two letters about provision of records have been issued to the DEO Female Kohistan Upper but reply is till awaited. **(Explanation notice, statement of allegation and two letters are annexed as Annexures "A", "B", "C" & "D" respectively)**

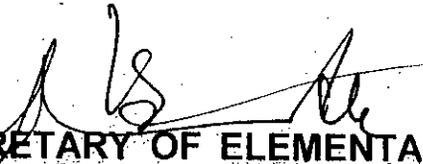
- c. That para "c" of the ground of the appeal is incorrect, as explanation notice has issued vide endst No. 92 dated 08.11.2010.
- d. That Para "d" of the Ground needs cogent proof and the appellant couldn't approach this Honorable Tribunal with-in the time so the case is time barred hence liable to be dismissed.
- e. That para "e" of the ground is incorrect and the instant service appeal is time barred hence not entertain-able by this Honorable Tribunal.

It is therefore humbly prayed that the service appeal of the appellant may graciously be dismissed with cost.

Dated: \_\_\_\_\_/2022

  
DISTRICT EDUCATION OFFICER FEMALE  
P-KOHISTAN LOWER.

  
DIRECTOR OF ELEMENTARY AND  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR.

  
SECRETARY OF ELEMENTARY AND  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA, PESHAWAR.

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR**

**Service Appeal No.9269/2020**

Farhat Jabeen

...APPELLANT

**V E R S U S**

Govt. of Khyber Pakhtunkhwa through Secretary Elementary and  
Secondary Education, Peshawar and others.

...RESPONDENTS

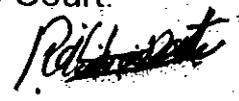
**SERVICE APPEAL**

**PARA WISE COMMENTS ON BEHALF OF RESPONDENT NO. 1 TO 3**

**AFFIDAVIT**

I, Mr. Rahim Dad Rahimi, ADEO Litigation, Kohistan, Lower Female, do  
hearby solemnly affirm and declare on oath that the contain of the  
foregoing comments are true and correct to the best of my knowledge and  
belief and nothing has been concealed from this Honorable Court.

Dated: \_\_\_\_\_/2022

  
...DEPONENT

**BEFORE THE CHAIRMAN SERVICE TRIBUNAL KHYBER  
PAKHTUNKHWA, PESHAWAR**

**Service Appeal No.9269/2020**

Farhat Jabeen daughter of Kala, Khan, resident of Jhangi Syedan, Tehsil and District Abbottabad.

**...APPELLANT**

**V E R S U S**

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education, Peshawar.
2. Director Elementary & Secretary Education, Peshawar.
3. District Education Officer (Female), Kohistan Lower.

**...RESPONDENTS**

**SERVICE APPEAL**

**REPLY OF APPLICATION FOR CONDONATION  
OF DELAY W.E.F 01.11.2019 TO 16.07.2020.**

***Respectfully Sheweth,***

**PRELIMINARY OBJECTIONS:-**

1. That the applicant has got no cause of action to file the titled application.
2. That the applicant is estopped to file the titled application by her own conduct.
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4. That the present application is time barred, hence, liable to be dismissed with cost.

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1. That para No.1 of the application is correct.
2. That Para No.2 of the application is incorrect needs cogent proof and the applicant has written his application to DEO female Kohsitan Lower on 03.06.2011 in which she herself has admitted that she was terminated from service but remained silent for a longtime. **(Application is annexed as Annexure "E")**
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4. That para No.4 of the application is incorrect as replied above.

It is therefore humbly prayed that the application of the applicant for condonation of delay may graciously be dismissed with cost.

Dated: \_\_\_\_\_/2022

DISTRICT EDUCATION OFFICER FEMALE  
KOHISTAN LOWER.

DIRECTOR OF ELEMENTARY AND  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA PESHAWAR.

SECRETARY OF ELEMENTARY AND  
SECONDARY EDUCATION KHYBER  
PAKHTUNKHWA, PESHAWAR.

AFFIDAVIT

I, Mr. Rahim Dad Rahimi, ADEO Litigation, Kohistan, Lower Female, do hereby solemnly affirm and declare on oath that the contain of the foregoing replication are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Dated: \_\_\_\_\_/2022

...DEPONENT

Annexure "A"

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OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY AND  
SECONDARY EDUCATION, KOHISTAN

To

Mrs Forhat Jabeen

GGPS Qalash

Subject:-  
Memo

EXPLANATION.

You are hereby called to explain your position that according to the inspection report of Assistant District Officers Elementary and Secondary Education District Kohistan, you were found absent from your duty wef 1-10-2010 to 15-10-2010.

You are hereby directed to submit your written reply within three days to this Office after issuing of this letter, other wise Disciplinary action shall be taken against you.

Executive District Officer  
E&SE District Kohistan

Endst No. 92 / Dated Kohistan the 8/11/2010

Copy of the above is forwarded to the:-

3. I/C DY: District Officer Female E&SE Kohistan
4. A.D.O Circle Concerned.

Executive District Officer  
E&SE District Kohistan

OFFICE OF THE EXECUTIVE DISTRICT OFFICER  
ELEMENTARY AND SECONDARY EDUCATION  
KOHISTAN.

STATEMENT OF ALLEGATION.

You Mst. Fahim Jabeen PTC teacher while posted at GGPS Deesh in the capacity of PTC teacher has been found willfully absent from duty with effect from 1-10-2020 to 15-10-2020 without any information or prior approval of the competent authority in utter disregard and repugnant to the relevant rules.

You did not responded the explanation called for vide this office Memo No. 92 dated 11/10/20, obviously it mean that you have nothing in defense to absolve you of the charges.

  
Executive District Officer  
E&SE District Kohistan

OFFICE OF THE DISTRICT EDUCATION OFFICER(FEMALE)  
KOHISTAN LOWER

No: 8015Dated: 17 /12/2021

To:

The Education Officer Female  
Kohistan Upper

Subject:

**PROVISION DOCUMENTS OF FARHAT JABEEN EX: PST GGPS QALASH**

Memo:

Reference Khyber Pakhtunkhwa Service Tribunal Peshawar Judicial Complex (Old) Khyber road Peshawar appeal No. 9269 of 2020 on the subject noted above, it is bring into your kind notice that Mst; Farhat Jabeen Ex: PST GGPS Qalash has been terminated on 21-03-2011 from Kohistan Upper.

It is further bring into your kind notice that kindly take it serious because its court matter and send comprehensive data of the above said official to the office of DEO (F) Kohistan Lower within 4 days for onward submission to quarter concerned please.

  
District Education Officer  
(F) Kohistan Lower

Endstt: No 8016-19Dated: 17 / 12 /2021

Copy of the above is forwarded for information to the:-

1. Director of E&SE Khyber Pakhtunkhwa Peshawar.
2. Registrar Khyber Pakhtunkhwa service Tribunal Peshawar
3. Mst; Farhat Jabeen D/O of Kala Khan Jhangi Syedan Abbottabad Mansehra road Jubpull
4. Office Copy.

District Education Officer  
(F) Kohistan Lower

Annexure "D"

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Remindar-I

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)  
KOHISTAN Lower**

No. 1219 /

Dated: 29 / 07 / 2022

To

The District Education Officer  
Female Kohistan Upper

Subject: **PROVISION DOCUMENTS OF FARHAT JABEEN EX-PST QALASH**  
Memo:

Reference this office issued letter No.8015 dated 17-12-2021 on the subject cited above,

In this regard you are once again requested to provide requisite information for onward submission to quarter concerned please. (copy attached)

  
District Education Officer (F)  
Kohistan Lower

Endst: No 1220-24

Dated 29 / 07 / 2022

Copy for information & necessary action to:

1. Additional Registrar Peshawar High Court Abbottabad Bench.
2. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.
3. Deputy Commissioner Kohistan Lower.
4. SDEO (F) Pattan
5. Master file.

  
District Education Officer (F)  
Kohistan Lower

(14) حضرت جناب D.E.U صاحب female کوستان

جناب عالی "E" Annexure

مؤدبانہ گزارش ہے کہ منیما فرحت جبین کا آرڈر 27/09/1996 کو P.S.A پوسٹ

"G.P.S Pashot" میں ہوا تھا اسکے بعد سائلہ کو عیدرخیل سکول میں ٹرانسفر کیا گیا

"G.P.S. Haide Ki et" میں سائلہ اپنی ڈیوٹی باقاعدگی سے سرانجام دیتی رہیں۔

یہ کہ سن 2015 میں سائلہ کو ایجوکیشن آفس سے اطلاع ملی کہ آپ کو "G.P.S Balash"

ٹرانسفر کیا گیا ہے۔ جب سائلہ "G.P.S Balash" میں چارج لیں گئی تو وہاں پر کوئی

سٹرکچرل عمارت نہیں پائی صفائی لوگوں نے بتایا کہ یہاں کوئی سکول نہیں ہے۔ جب سائلہ

نے اپنے متعلقہ آفس سے رابطہ کیا تو سائلہ کو ذہنی طور پر بتایا گیا کہ آپ کو ٹرانسفر کیا گیا

ہے سائلہ کو ڈیپارٹمنٹ کی طرف سے کوئی انٹیریو شیٹ نہیں دیا گیا۔ عرض یہ ہے کہ سائلہ نے

14 سال تک باقاعدگی سے اپنی سرورس کی ہیں اور نومبر 2010 تک باقاعدہ سائلہ کو تنخواہ ملتی

رہی ہے سائلہ کو ٹرانسفر کی وجہ اور توجہ دیا جائے۔ تاہم سائلہ کو کچھ مسئلے کا حل نکالنا پڑے۔

یہ سائلہ کے سابقہ سینئر بڑی زیادتی ہے 14 سال کے بعد یوں کہہ دینا کہ آپ ٹرانسفر ہوئی

ہے۔ آپ سے گزارش ہے کہ سائلہ کے سارے ڈاکومنٹس دیے جائیں اور سائلہ کے مسئلے پر غور کیا جائے

العارضہ فرحت جبین

2011-6-3

Unaji Syedan ATO. manshera  
Road jubpall  
03175652239/03441999026