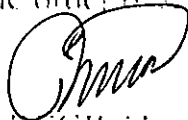


FORM OF ORDER SHEET

Court of _____

Appeal No. 1615/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	07/08/2023	The appeal of Mst. Sumaira was argued by Noor Muhammad Khattak Advocate. The preliminary hearing before Single Bench was held on 9-8-23.
		By the order of _____  REGISTRAR

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

APPEAL No. 1615 /2022

SUMAIRA

VS

EDUCATION DEPTT:

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
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3.	Regularization Order dated 15.01.2010 & Charge Report dated 25.01.2010	B & C	5-6
4.	Letter dated 21.09.2021	D	7
5.	Departmental Appeal and service appeal	E & F	8-11
6.	attendance register and certificate	G & H	12-21
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APPELLANT

THROUGH:


NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

-1-

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

APPEAL NO. 1615 /2023

Miss: Sumaira, SST (General) (BPS-16),
Govt. Girls High School, Thano, Swabi.

..... **APPELLANT**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Secretary (E&SE) Department, Civil Secretariat, Peshawar.
- 2- The Director (E&SE), Khyber Pakhtunkhwa, Govt. Hasnain Shaheed High School, Firdous Peshawar.
- 3- The District Education Officer (Female), District Swabi.

..... **RESPONDENTS**

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION DATED 10.04.2023 WHEREBY THE APPOINTMENT ORDER DATED 25.11.2008 HAS BEEN DISOWNED AND AGAINST THE INACTION OF THE RESPONDENTS BY NOT DECIDING THE DEPARTMENTAL APPEAL WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the impugned notification dated 10.04.2023 may very kindly be set aside and the appellant may please be re-instated in to service with all back benefits. Any other remedy which this August Tribunal deems fit that may also be awarded in favour of the appellant.

R. SHEWETH:

ON FACTS:

- 1- That the appellant is the employee of respondent and was appointed as SST (General) on contract basis after fulfilling all the codal & legal formalities required for the post vide order dated 25-11-2008. Copy of Appointment Order dated 25-11-2008 is attached as Annexure **A.**
- 2- That appellant after taking over the charge of her post the appellant started performing her duty quite efficiently whole heartedly and up to the entire satisfaction of his high ups that in the meanwhile the Khyber Pakhtunkhwa Regularization of Service Act, 2009 was promulgated and

accordingly the service of the appellant was regularized vide order dated 15-01-2010 and took over the charge of her post on 25-01-2010. Copy of Regularization Order dated 15.01.2010 & Charge Report dated 25.01.2010 is attached as annexure **B & C.**

3- That the appellant while performing her duty at her assigned duty station an inquiry was initiated against the appellant (the copy of which has not been provided to the appellant) the copy of which was asked by the Anti Corruption Establishment of District Swabi vide letter dated 21-09-2021. Copy of Letter dated 21.09.2021 is annexed as annexure **D.**

4- That finally in November 2021 the salary of the appellant was stopped without any cogent reason against which the appellant filed Departmental Appeal followed by service appeal No. 314/20 22. Copies of Departmental Appeal and service appeal are attached as annexure **E & F.**

5- That it is pertinent to mention here that the appellant has been performing her duty regularly till date. Copy of the attendance register and certificate are attached as annexure.....**G & H.**

6- That during pendency of the above mentioned appeal the respondents issued the impugned notification dated 10.04.2023 whereby the appointment order dated 25.11.2008 of the appellant was disowned. Copy of the impugned notification is attached as annexure**I.**

7- That feeling aggrieved from the impugned notification, the appellant preferred departmental appeal which has not been responded within the statutory period of ninety days. Copy of the departmental appeal is attached as annexure.....**J.**

GROUND:

A- That the impugned notification of the respondents whereby the appointment order dated 25.11.2008 has been disowned is against the law, facts, norms of natural justice and materials on the record hence not tenable; and liable to be set aside.

B- That the appellant has not been treated by the concerned authority in accordance with law and rules and as such the authority violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.

- C- That act and action of the respondents by disowning the appointment order vide impugned notification is illegal and unlawful and the same is not sustainable in the eye of law.
- D- That act and action of the respondents by disowning the appointment order vide impugned notification is arbitrary, mala fide; and against the norms of natural justice.
- E- That no show cause notice has been issued to the appellant before the issuance of the impugned notification.
- F- That no regular inquiry has been conducted in to the matter to dig out the real facts.
- G- That no chance of personal hearing and personal defense has been provided to the appellant the issuance of the impugned notification.
- H- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that the appeal of the appellant may kindly be accepted as prayed for.

Dated: 31.07.2023


APPELLANT
SUMAIRA

THROUGH:


NOOR MOHAMMAD KHATTAK


KAMRAN KHAN


MUHAMMAD AYUB


UMAR FAROOQ

ADVOCATES, PESHAWAR

AFFIDAVIT

I Miss: Sumaira, SST (General) (BPS-16), Govt. Girls High School, Thano, Swabi, do hereby solemnly affirm that the contents of this Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.


Deponent

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION NWFP, PESHAWAR

NOTIFICATION

ANNEXURE A

In pursuance of the powers conferred under section 25 of the NWFP Civil Servant Act, 1973 the competent authority is pleased to re-appoint the following Male/Female SST (B-16) on contract basis as a stop-gap arrangements for a period of one year w.e.f. the date of assumption of charge or till the availability of selectees of the NWFP Public Service Commission / Departmental Selection Committee whichever is earlier:-

Sr	Name	Father Name	Subject	Place of Posting
1	Sumaira	Gul Zada	General	GGHS Zaroobal Swabi

Terms and Conditions

1. The appointment of the above candidates will be on contract basis for the period of one year from the date of assumption of charge till the arrival of the selectees of the NWFP Public Service Commission/Departmental Selection Committee, whichever is earlier.
2. They will draw Pay in BPS-16.
3. No TA/DA is allowed.
4. If they want to resign from the service before expiry of the contract, they will have to serve one month notice in advance failing which they will have to deposit prior notice to the appointing authority one month pay in lieu of such notice, in the Government Treasury.
5. Their appointments have been made for specific schools, so shall not make any request for transfer from the School where they are posted. In case in case of such occurrence, their service shall stand terminated.
6. They should join their posts within 15-days of the issue of this notification. The Executive District Officer, Elementary & Secondary Education concerned, should furnish certificate to the effect that the candidates have joined the post or otherwise within 15-days of the issue of this Notification.
7. They shall execute an agreement with the Government before taking over charge, signed by the concerned EDOs Elementary & Secondary Education NWFP, on behalf of the Government/Director (E&SE).
8. They will not be entitled for any pension or gratuity for the service rendered by them on contract basis and shall not claim regularization for their contract service.
9. Charge report in duplicate should be submitted to all concerned.
10. Their service shall be terminated if they violate any provision of the terms and conditions specified in the agreement Bond/Dead.
11. They shall not be entitled to perform any examination duty of the BISEs/University/RDE, NWFP, during the current contract period.

Director
Elementary & Secondary
Education, NWFP, Peshawar

Endst No. 5139-5197 /A-14/SST/M&F/Contract One Year/

Dated: 25 / 11 /2008

Copy of the above is forwarded to..

1. Accountant General, NWFP Peshawar
2. Director of Education, FATA, NWFP Peshawar
3. Distt: Accounts Officers concerned
4. Director Elementary & Secondary Education NWFP, Peshawar
5. Executive District Officers (E&SE) concerned
6. Principals/Head Masters/Head Mistress concerned
7. SST concerned
8. PS to the Minister for Education NWFP
9. PS to Secretary to Govt: of NWFP
10. All Chairman BISE/Registrars of University in NWFP, with the request to comply with the above condition as at S.No
11. PA to Director (E&SE) Local Office
12. Master File

Deputy Director (Estab:)
Elementary & Secondary
Education, NWFP, Peshawar

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDRY EDUCATION NWFP PESHAWARNOTIFICATION

The competent authority has been pleased to regularize the services of the following Adhoc / contract employees against the post of SST (Female) (BPS-16) with effect from 01-01-2009, under the NWFP, Employees (Regularization of Services) Act, 2009 on the terms and conditions give at the end of this Notification.

S.No	Name of Candidate	Fathers Name	Present Station	Date of 1 st Appointment Order.
1.	Sumaira	Gul Zada	GHHS Thano Swabi	5139-5197 25-11-2008

TERMS & CONDITIONS OF HER APPOINTMENT

1. Their services will be considered as regular but without pension & granite in terms of section -19 of the NWFP, Civil Servants Act, 1973 as amended vide NWFP, Civil Servants (Amendment) Act, 2005. They will. However be entitled to contributory Provident Fund in such manner and at such rates as prescribed by the Government.
2. Their seniority will be determined according to Section-4 of the NWFP, Employees (Regularization of Services) Act, 2009.
3. They will be required to furnish copies of all there certificates / degrees along with original receipts and Photostat copies thereof, pertaining to the verification fee of the concerned Examining body (board & University) to the EDO (E&SE) concerned.
4. The EDO (E&SE) concerned are directed not to release their pay until the verification their documents.

DIRECTOR

Endor: No 1652-59 / F.No.A-17/SET (F) Contract-Appont:2008Dated Peshawar the 15/10/2010

1. PS Minister for Elementary & Secondary Education NWFP, Peshawar.
2. PS to Secretary to Govt: of NWFP, E&SE, Department Peshawar.
3. Executive District Office Elementary & Secondary Education concerned.
4. District Account Officer concerned.
5. Candidate concerned Mistress concerned.
6. Ps\ to Director of Elementary & Secondary Education NWFP, Local Office.

10
15/11/2010
Deputy Director (Establishment)
Elementary & Secondary Education NWFP, Peshawar

CERTIFICATE OF TRANSFER OF CHARGE

1. Certified that we have on the foregoing of this day respectively made over and
25 07 2010 (F.N)
positive charge of this office of the SST (G) Post Regular User for Contract based

Via ENCL N/D/652-57/F.No. A-11/SET (F) Contract APPROVED
Dated 25/07/2010

2. Particulars of cash and important secret and confidential documents handed over are
noted on the reverse

Signature of relieved
Government servant

Designation

Signature of relieving
Government servant

Designation

Dated 25/07/2010
25/07/2010

Station

6-
A

ANNEX C

11

ANNEXURE D

8

7-

**OFFICE OF THE CIRCLE OFFICER
ANTI CORRUPTION ESTABLISHMENT DISTRICT SWABI**



NO: 547/CO/AGE/SWABI
Dated: 21-09-2021

District Education Officer (F)
District Swabi

Subject:

PROVISION OF RECORD / INFORMATION AN OPEN ENQUIRY
NO. 118/2020 AGAINST MISS SUMERA (personal number 695632)
YSS T GHSS TANO SWABI REGARDING ILLEGAL APPOINTMENT
AND ILLEGAL TRANSFER.

Kindly refer to the subject cited above and to state that in the subject Enquiry under investigate with this establishment inquiry officer along with Audit team will visit your office date 23-09-2021

Therefore you are requested to arrange and provide relevant record on the above mentioned date also you may make sure presence of the relevant staff to provide the attested photo copies of concerned following mentioned record to this office in earliest as soon as possible for finalization of the enquiry.

S. M. I.
Circle Officer

Anti-Corruption Establishment
Swabi

Provide the following records

S.NO	Required Record
1.	Appointment order
2.	Charge report
3.	Pay slip issue by account office
4.	Pay release / documents verification
5.	Transfer order (all) & change assumption reports
6.	Last pay certificate

TESTED

BETTER COPY

OFFICE OF THE CIRCLE OFFICER
ANTI CORRUPTION ESTABLISHMENT DISTRICT SWABI

No-54/CO, ACE Swabi

Dated 21.09.2021

District Education Officer (F)
District Swabi.

SUBJECT: PROVISION OF RECORD / INFORMATION AN OPEN ENQUIRY NO.118/2020 AGAINST MISS SUMERA (PERSONAL NUMBER 695632) SST GHSS TANO SWABI REGARDING ILLEGAL APPOINTMENT AND ILLEGAL TRANSFER.

Kindly refer to the subject cited above and to state that in the subject enquiry under investigate with this establishment inquiry officer along with Audit team will visit your office date 23.09.2021.

Therefore you are requested to arrange and provide relevant record on the above mentioned date also you may make sure presence of the relevant staff to provide the attested photo copies of concerned following mentioned record to this office in earliest as soon as possible for finalization of the enquiry.

Circle Officer
Anti Corruption Establishment
Swabi.

Provide the following records

S.No.	Required Record
1.	Appointment Order/
2.	Charge Report.
3.	Pay Slip issue by account office
4.	Pay release/ documents verification
5.	Transfer Order (all) & charge assumption reports
6.	Last Pay certificate.

~~ATTESTED~~

حضور ضار سکریٹری ایلیمینٹری اور پرائمری سکولوں کی کونسل صہبہ آئی ڈی

دفعہ وقت پرک ریٹرنز کی تصدیق

Govt. of Khyber Pakhtunkhwa
Elementary & Secondary
Education Department
S.E Dairy No. 3516
Date 08/12/2021

صہبہ آئی ڈی

موربانہ گورنمنٹ پری۔ کے ساتھ ساتھ صہبہ آئی ڈی کے

یونٹ ڈائریکٹ گورنمنٹ سکول تحفظ و حمایت میں سرحد دار سے ڈیڑھ

کمرہ میں ہے۔ اور یہ قاعدہ ریگولر طور پر اپنی ڈیڑھ سرحد دار کی

ہے۔ سیکرٹری کی 2021 صہبہ آئی ڈی کے مطابق لکھ

کی گورنمنٹ پری۔ کے ساتھ ساتھ صہبہ آئی ڈی کے ساتھ ساتھ

صہبہ آئی ڈی کے ساتھ ساتھ صہبہ آئی ڈی کے ساتھ ساتھ

سکول میں صہبہ آئی ڈی کے ساتھ ساتھ صہبہ آئی ڈی کے ساتھ ساتھ

اور سکول میں اور سکول میں اور سکول میں

لکھ آئی ڈی کے ساتھ ساتھ صہبہ آئی ڈی کے ساتھ ساتھ

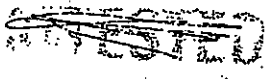
ریٹرنز کی تصدیق کے ساتھ ساتھ صہبہ آئی ڈی کے ساتھ ساتھ

صہبہ آئی ڈی کے ساتھ ساتھ صہبہ آئی ڈی کے ساتھ ساتھ

12
2021

الحق علی

صہبہ آئی ڈی کے ساتھ ساتھ صہبہ آئی ڈی کے ساتھ ساتھ



'F' 9-

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

APPEAL NO. 314 /2022

Miss: Sumaira, SST(General) (BPS-16),
Govt. Girls High School, Thanoo, Swabi.

..... **APPELLANT**

VERSUS

- 1- The Government of Khyber Pakhtunkhwa Secretary (E&SE) Department, Civil Secretariat, Peshawar.
- 2- The Director (E&SE), Khyber Pakhtunkhwa, Govt. Hasnain Shaheed High School, Firdous Peshawar.
- 3- The District Education Officer (Female), District Swabi.

..... **RESPONDENTS**

SERVICE APPEAL UNDER SECTION-4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED INACTION OF THE RESPONDENTS BY NOT RELEASING THE MONTHLY SALARIES OF THE APPELLANT W.E.F. 1.11.2021 TILL DATE AND AGAINST NOT DECIDING THE DEPARTMENTAL APPEAL DATED 01-12-2021 OF THE APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS.

PRAYER:

That on acceptance of this appeal the respondents may kindly be directed to release the monthly salaries of the appellant w.e.f. November 2021 till date. Any other remedy which this August Tribunal deems fit that may also be awarded in favour of the appellant.

R. SHEWETH:

ON FACTS:

- 1- That the appellant is the employee of respondent and was appointed as SST (General) on contract basis after fulfilling all the codal & legal formalities required for the post vide order dated 25-11-2008. Copy of Appointment Order dated 25-11-2008 is attached as **Annexure** **A.**
- 2- That appellant after taking over the charge of her post the appellant started performing her duty quite efficiently whole heartedly and upto the entire satisfaction of his high ups that in the meanwhile the Khyber Pakhtunkhwa Regularization of Service Act, 2009 was promulgated and accordingly the service of the appellant was regularized vide order dated 15-01-2010 and took over the charge of her post on 25-01-2010. Copy of Regularization Order dated

15.01.2010 & Charge Report dated 25.01.2010 is attached as annexure **B & C.**

- 3- That the appellant while performing her duty at her assigned duty station an inquiry was initiated against the appellant (the copy of which has not been provided to the appellant) the copy of which was asked by the Anti Corruption Establishment of District Swabi vide letter dated 21-09-2021. Copy of Letter dated 21.09.2021 is annexed as annexure **D.**
- 4- That finally in November 2021 the salary of the appellant was stopped without any cogent reason against which the appellant filed Departmental Appeal dated 01-12-2021 which is not responded till date. Copy of Departmental Appeal dated 01.12.2021 is attached as annexure **E.**
- 5- That feeling aggrieved from the inaction of the respondents by not releasing the salaries the appellant preferred the instant service appeal on the following grounds amongst the others.

GROUND:

- A- That the impugned inaction of the respondents by not releasing the salaries of the appellant since regularization is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the concerned authority in accordance with law and rules and as such the authority violated Article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the appellant is still performing her duties and the inaction of the respondents by not releasing her salaries is amounting to forced labour which is the blatant violation of the Article 11 of the Constitution of Pakistan, 1973.
- D- That the respondents discriminated the appellant by not releasing the monthly salaries of the appellant.
- E- That the inaction of the respondents by not releasing the monthly salaries of the appellant is against the norms of natural justice.
- F- That the inaction of the respondents by not releasing the monthly salaries of the appellant is arbitrary and malafide.
- G- That appellant seeks permission and advance other grounds and proofs at the time of hearing.

It is therefore most humbly prayed that the appeal of the appellant may kindly be accepted as prayed for.

Dated: 1.3.2022

APPELLANT

SUMERA

THROUGH:

NOOR MOHAMMAD KHATTAK

HAIDER ALI
ADVOCATES, PESHAWAR

TEACHER'S ATTENDANCE REGISTER

For the month of Aug 20 22

No. 1 No. 2 No. 3

Name: <u>Majida Gul</u>	Name: <u>Sumaira</u>	Name: <u>Nagina</u>
Designation: <u>(SST/G)</u>	Designation: <u>(SST/R)</u>	Designation: <u>S. PET</u>
Phone #		
N.I.C #		<u>0311925=174</u> <u>16201-0663760-2</u>

Dates	Teacher 1				Teacher 2				Teacher 3			
	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
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15	- C/Leave -				- C/Leave -							
16	7:30	Majida	1:35	Majida	7:30	Sumaira	1:35	Sumaira	7:30	N/A	11:30	N/A
17	7:30	Majida	1:35	Majida	7:30	Sumaira	1:35	Sumaira	7:30	N/A	11:35	N/A
18	7:30	Majida	1:35	Majida	7:30	Sumaira	1:35	Sumaira	7:30	N/A	11:35	N/A
19	7:30	Majida	1:35	Majida	7:30	Sumaira	1:35	Sumaira	7:30	N/A	11:35	N/A
20	7:30	Majida	1:35	Majida	7:30	Sumaira	1:35	Sumaira	7:30	N/A	11:35	N/A
21					7:30	Sumaira	1:35	Sumaira	7:30	N/A	11:35	N/A
22	Sunday				Sunday				7:30	N/A	11:35	N/A
23	7:30	Majida	1:35	Majida	C/leave				Sunday			
24	7:30	Majida	1:35	Majida	7:30	Sumaira	1:35	Sumaira	7:30	N/A	11:35	N/A
25	7:30	Majida	1:35	Majida	7:30	Sumaira	1:35	Sumaira	7:30	N/A	11:35	N/A
26	7:30	Majida	1:35	Majida	7:30	Sumaira	1:35	Sumaira	7:30	N/A	11:35	N/A
27	7:30	Majida		Majida	7:30	Sumaira		Sumaira	7:30	N/A	11:35	N/A
28	- C/leave -				- C/leave -				7:30	N/A	11:35	N/A
29	7:30	Majida		Majida	Sun - day				7:30	N/A	11:35	N/A
30	C - Leave				7:30	Sumaira	1:35	Sumaira	7:30	N/A	11:35	N/A
31	7:30	Majida		Majida	C - Leave				7:30	N/A	11:35	N/A

STATEMENT OF LEAVES TAKEN.

	Sick		Casual		Pri.		Total		Sick		Casual		Pri.		Total	
This month																
Previous																
Total																

HEAD MISTRESS
 Govt. Girls
 Tano (Swabi)

TEACHER'S ATTENDANCE REGISTER

- 13 -

For the month of May 2022

No. 01 No. 02 No. 02

Name: <u>Majida Gul</u>	Name: <u>Sumaira</u>	Name: <u>Nagina</u>
Designation: <u>(SST/G)</u>	Designation: <u>(SST/G)</u>	Designation: <u>(SDET)</u>
Phone # <u>0313-9767627</u>	Phone # <u>0311-9210834</u>	Phone # <u>0311-9250174</u>
N.I.C # <u>17201-6645301-6</u>	N.I.C # <u>17201-2071079-2</u>	N.I.C # <u>16201-0663760-2</u>

Dates	No. 01				No. 02				No. 02			
	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
1												
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STATEMENT OF LEAVES TAKEN.

	No. 01				No. 02				No. 02			
	Sick.	Casual.	Pri.	Total	Sick.	Casual.	Pri.	Total	Sick.	Casual.	Pri.	Total
This month.												
Previous												
Total												

Dated: _____

Master Block Center, 15-Under Bazar Lahore.
Tel: 3732211, 3732111 Fax: 3732222, 3732111

HEAD MISTRESS
Govt. Girls High School
Headmistress (S/6)

TEACHER'S ATTENDANCE REGISTER

For the month of APRIL 2022

-14-

No. 01

No. 02

No. 03

Name: <u>MAJIDA Gul</u>	Name: <u>SUMAIRA</u>	Name: <u>MAGINA</u>
Designation: <u>SST (G)</u>	Designation: <u>SST (G)</u>	Designation: <u>S. PET</u>
Phone # <u>0313-9767627</u>	Phone # <u>0311-9210834</u>	Phone # <u>0311-9250174</u>
N.I.C # <u>17201-6645301-6</u>	N.I.C # <u>17201-2071079-2</u>	N.I.C # <u>16201-0663760-2</u>

Dates	No. 01				No. 02				No. 03			
	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
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4												
5												
6												
7												
8	7:30	mejida	10:00	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	10:25	NA
9	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
10	SUNDAY				SUNDAY				SUNDAY			
11	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
12	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
13	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
14	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
15	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	10:25	NA
16	c. leave				7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
17	SUNDAY				SUNDAY				SUNDAY			
18	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
19	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
20	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
21	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
22	7:30	mejida	12:15	mejida	c. leave				7:30	NA	10:25	NA
23	c. leave				c. leave				7:30	NA	12:15	NA
24	SUNDAY				SUNDAY				SUNDAY			
25	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
26	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
27	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
28	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	c. leave			
29	7:30	mejida	12:15	mejida	7:30	Sumaira	12:15	Sumaira	7:30	NA	12:15	NA
30	c. leave				c. leave				7:30	NA	12:15	NA
31												

STATEMENT OF LEAVES TAKEN.

	No. 01				No. 02				Sick
	Sick	Casual	Pri.	Total	Sick	Casual	Pri.	Total	
This month.		03				03			
Previous									
Total									

HEAD MISTRESS
 of Govt. Girls High School
 Tano (Swabi)

TEACHER'S ATTENDANCE REGISTER

-15-

For the month of March 20 22

No. 01 No. 02 No. 03

Name: Magide Gul Designation: SST G
 Sumaira
 No. gina
 S. PET

Phone # 0313-9267674
 0311-910824
 0311-9250174

NLC # 1901-64501-6
 1701-2071079-2
 16201-06637602

Dates	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
1	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
2	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
3	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
4	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
5	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
6	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
7	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
8	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
9	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
10	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
11	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
12	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
13	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
14	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
15	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
16	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
17	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
18	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
19	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
20	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
21	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
22	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
23	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
24	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
25	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
26	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
27	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
28	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
29	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
30	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira
31	8:15	Magide Gul	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira	8:15	Sumaira

STATEMENT OF LEAVES TAKEN

Month	Sick	Casual	Pr.	Total	Month	Sick	Casual	Pr.	Total
02					03				
02					02				
Total					Total				

HEAD MISTRESS
 Govt Girls High School
 Tano (Swabi)

Headmistress/Headmaster

Master Book Center, 16 Urdu Bazar Lahore

Date:

TEACHER'S ATTENDANCE REGISTER -16-

For the month of Jan 2022

No. 01 No. 02 No. 03

Name: <u>Majida GLL</u>	Sumaira	Nazina
Designation: <u>SST (G)</u>	<u>SST (G)</u>	<u>SPET</u>
Phone # <u>0313-9767627</u>	<u>0311-9210234</u>	<u>0311-9250174</u>
N.I.C # <u>17201-6645301-6</u>	<u>17201-2071079-2</u>	<u>16201-0663760-2</u>

Dates	No. 01				No. 02				No. 03			
	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
1		C-leave			8:15	S	2:20	S	8:15	N/A	2:20	N/A
2					8:15	S	2:20	S	8:15	N/A	2:20	N/A
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13		C-leave			8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
14					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
15					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
16					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
17					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
18					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
19					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
20					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
21					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
22						C-leave			8:15	N/A	12:00	N/A
23					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
24												
25					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
26					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
27					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
28					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
29					8:15	Sumaira	2:20	Sumaira	8:15	N/A	2:20	N/A
30						C-leave			8:15	N/A	2:20	N/A
31						SUNDAY						

STATEMENT OF LEAVES TAKEN.

	No. 01				No. 02				No. 03			
	Sick	Casual	Pri.	Total	Sick	Casual	Pri.	Total	Sick	Casual	Pri.	Total
This month.		02				02				00		
Previous		00				00				00		
Total		02				02				00		

HEAD MISTRESS
Govt. Girls High School
Tano (Swabi)

Dated: _____

Master Book Center, 16-Urdu Bazar Lahore.
Tel: 3723255, 3723722 Email: mbc@bookcenter.org.pk

Headmistress/Headmaster

TEACHER'S ATTENDANCE REGISTER

For the month of DECEMBER 2021

17-

Name: MAJIDA Gul	Sumaira	No. 02
Designation: SST (G)	SST (G)	No. 03
Phone # 0313-9767627	0311-9210834	
NIC # 17201-6645301-6	17201-2071079-2	
	16201-0663760-2	

Dates	Majida Gul		Sumaira	
	Arr.	Sig.	Arr.	Sig.
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				

STATEMENT OF LEAVES TAKEN

This month	Previous month	Total	This month			Previous month			Total
			Sick	Casual	PA	Sick	Casual	PA	

HEAD MISTRESS
Govt. Girls High School
Tano (Swabi)

Dated: _____
Headmistress/Headmaster
Khatir Block Center, 16-Uddu Bazar Lahore

TEACHER'S ATTENDANCE REGISTER

18-

For the month of November 2021

No. 01

No. 02

No. 03

Name: MAJIDA GUL					SUMARA				NAGINA			
Designation: SST (G)					SST (G)				S. PET			
Phone # 0313-9767627					0311-9210834				0311-9250174			
N.I.C # 17201-6645301-6					17201-2071079-2				16201-0663760-2			
Dates	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
1	8:15	Majida	2:20	Majida	8:15				8:15			
2	8:15	Majida	2:20	Majida					DEFENSE DAY TRAINING			
3	8:15	Majida	2:20	Majida					8:15	N/A	2:20	N/A
4	8:15	Majida	2:20	Majida					8:15	N/A	2:20	N/A
5	8:15	Majida	2:20	Majida	8:15	Request	Sumari		8:15	N/A	2:20	N/A
6	8:15	Majida	2:20	Majida					8:15	N/A	2:20	N/A
7	SUNDAY				SUNDAY				SUNDAY			
8	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
9	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
10	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
11	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
12	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
13	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
14	SUNDAY				SUNDAY				SUNDAY			
15	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
16	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
17	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
18	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
19	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
20	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
21	SUNDAY				SUNDAY				SUNDAY			
22	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
23	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
24	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
25	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
26	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
27	SUNDAY				SUNDAY				SUNDAY			
28	SUNDAY				SUNDAY				SUNDAY			
29	8:15	Majida	2:20	Majida	8:15	Sumari	2:20	Sumari	8:15	N/A	2:20	N/A
30	SUNDAY				SUNDAY				SUNDAY			
31	SUNDAY				SUNDAY				SUNDAY			

STATEMENT OF LEAVES TAKEN.

This month.	Sick	Casual	Pri.	Total	Sick	Casual	Pri.	Total	Sick	Casual	Pri.	Total
			02					02				
Previous		15				21				02		
Total		17				23				02		

HEAD MISTRESS
Govt. Girls High School
Tano (Swabi)

TEACHER'S ATTENDANCE REGISTER

For the month of **OCTOBER 20 21**

19

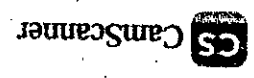
Name: **MASITA GUL** Designation: **SST(g)**
 Phone # **0313-976727** N.I.C # **17201-6645301-6**
Sumaira **SST(g)**
S.P.T
0311-9250174
16201-0663760-2

Dates	Arr.		Sig.		Total	Casual		Sick		Total
	Dep.	Sig.	Dep.	Sig.		Ph.	Total	Ph.	Total	
1	7:30	Magda	7:30	Magda	03					03
2	7:30	Magda	7:30	Magda	03					03
3		SUNDAY								
4	8:15	Magda	8:15	Magda	03					03
5	8:15	Magda	8:15	Magda	03					03
6		SUNDAY								
7	8:15	Magda	8:15	Magda	03					03
8	8:15	Magda	8:15	Magda	03					03
9	8:15	Magda	8:15	Magda	03					03
10		SUNDAY								
11	8:15	Magda	8:15	Magda	03					03
12	8:30	Magda	8:30	Magda	03					03
13	8:30	Magda	8:30	Magda	03					03
14	8:15	Magda	8:15	Magda	03					03
15	8:15	Magda	8:15	Magda	03					03
16	8:15	Magda	8:15	Magda	03					03
17		SUNDAY								
18	8:15	Magda	8:15	Magda	03					03
19	8:15	Magda	8:15	Magda	03					03
20	8:15	Magda	8:15	Magda	03					03
21	8:15	Magda	8:15	Magda	03					03
22	8:15	Magda	8:15	Magda	03					03
23	8:15	Magda	8:15	Magda	03					03
24		SUNDAY								
25	8:15	Magda	8:15	Magda	03					03
26	8:15	Magda	8:15	Magda	03					03
27	8:15	Magda	8:15	Magda	03					03
28	8:15	Magda	8:15	Magda	03					03
29	8:15	Magda	8:15	Magda	03					03
30	8:15	Magda	8:15	Magda	03					03
31		SUNDAY								

STATEMENT OF LEAVES TAKEN

This month	Sick		Casual		Total	Sick		Casual		Total
	Ph.	Total	Ph.	Total		Ph.	Total	Ph.	Total	
02					03					03
13					03					03
15					03					03
Total					03					03

HEAD MISTRESS
 Govt. Girls High School
 Tano (Swabi)




M.H.D. ONI/MA/CA/1921
 Master Book Centre, 12, Hindu Bazar Lahore.



H 14"
-20-
Government of
Khyber Pakhtunkhwa
حکومت خیبر پختونخوا

ATTENDANCE CERTIFICATE

Certified that Mst: Sumaira SST(General) of Govt : Girls High School Tano (Swabi) has been attended the school during academic year 2021-22, and upto date and gives best result for SSC Annual Examination 2021-22, there is no pendency against her from school office record.


HEAD MISTRESS
Govt. Girls High School
Tano (Swabi)
GGHS, TANO (SWABI)

ATTENDANCE CERTIFICATE

21-

Certified that Mst: Sumaira SST (General) of

Govt: Girls High School Tano (Swabi)

has been attended the school during academic year 2022-23 and upto

date (14-01-2023) and gave best

result for SSC Annual Examination

(2021-22). There is no Pendancy

against her from School Office record.

M. Sumaira

HEAD MISTRESS

Govt: Girls High School

Tano (Swabi)

HEAD MISTRESS

Govt: Girls High School Tano (Swabi)

14-01-2023



17

22

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT KHYBER PAKHTUNKHWA, PESHAWAR**

NOTIFICATION

1. Whereas, that the District Education Officer (Female) Swabi vide memo No. 2017 dated 22-08-2021 has reported that Mst. Sumaira inducted herself as SST (G) in E&SE Department through fake & bogus appointment Notification bearing Endst: No. 5139-5197 dated 25-11-2008. The DEO concerned also requested vide the afore-noted letter that the appointment order dated 25-11-2008 may be disowned and FIR may be lodged against the
2. teacher concerned.
3. **And whereas**, in pursuance of the aforementioned report of the District Education Officer (Female) Swabi, the Directorate E&SE constituted the following enquiry committee vide Notification bearing No. 3650-54 dated 14-09-2022 to investigate the matter in issue pertaining to the illegal, unlawful appointment of the teacher concerned against the SST (G) post in the E&SE Department.
 - a. Mst. Sadia Aziz District Education Officer (F) Haripur.....Chairman
 - b. Mr. Irfan Ali District Education Officer (M) Swabi Member
4. **And whereas**, the enquiry committee submitted its report to the Directorate E&SE on dated 22-12-2022, wherein, the enquiry committee has categorically concluded that the teacher concerned got appointed as SST (G) post in E&SE Department through fake, forged & bogus appointment order bearing Endst: No. 5139-5197 dated 25-11-2008. Moreover, the committee has recommended that an appropriate penalty under the law may be imposed upon the said teacher in terms of her fake & bogus appointment order as SST (G) in E&SE Department.
5. **And whereas**, in view of the findings & recommendations of the enquiry committee, a show cause notice bearing Endst: No. 5602-06 dated 06-01-2023 was served upon the teacher concerned & an opportunity of personal hearing was also afforded to the accused vide letter dated 03-02-2023, however, the teacher concerned did not appear before the committee to defend herself in response to the already proved allegations pertaining to the fake & bogus appointment order dated 25-11-2008 & even service record, meaning thereby, that the teacher concerned has nothing to defend herself before the committee on the date fixed & has thus adopted an evasive approach on malafide.

Now therefore, in view of the above made facts, having gone through the whole case record & consulting with findings & recommendations of the inquiry report dated 22-12-2022, discussed herein above, the undersigned being a competent authority in the instant case is of the firm opinion the Teacher namely Mst. Sumaira SST (G) District Swabi got appointed as SST (G) BPS-16 in E&SE Department through fake, forged & bogus appointment order bearing Endst: No. 5139-5197 dated 25-11-2008 which is hereby disowned void ab-initio with immediate effect & interest of public service.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No: 3761-66

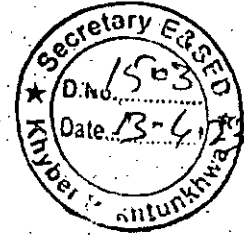
Dated Peshawar the: 10/4/2023

Copy forwarded for information & n/action to the:-

- 1 ✓ Learned Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
- 2 Additional Secretary (G) E&SE Department Khyber Pakhtunkhwa, Peshawar.
- 3 District Education Officer (Female) Swabi.
- 4 Deputy Director (Legal) E&SE Khyber Pakhtunkhwa Peshawar.
- 5 Principal GHS Thanoo, Swabi.
- 6 Mst. Sumaira (G) SST GHS Thanoo, Swabi.
- 7 Master file.

Deputy Director (Estab/F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

(A)
27/4/23



To,

The Secretary Elementary and Secondary Education

Khyber Pakhtunkhwa, Peshawar.

Subject: - Appeal against removal from Service, Notification Endst: No: 3661-66 dated Peshawar the 10/04/2023 By Director Elementary and Secondary Khyber Pakhtunkhwa Peshawar

Sir,

It is stated that I have been legally appointed as SST general BPS 16 Endorsement No 5139-5197 dated 25/11/2008 on contract basis

That after this I have been legally regularized through Endorsement NO 1652-59 dated 15 / 10 /2010.

That I am highly qualified and I have done MA in Urdu and Med.

That from my first appointment till now I regularly have been performing my duty as teacher with honesty and hard work, for the reason I showed very good results throughout my career. As a result my name was recommended for teacher incentive.

That without any sufficient evidence my promotion to personal BPS 17 was withheld, despite of the fact that I have been enlisted in DPC meeting on 10/07/ 2019.

That DEO female distt Swabi illegally stopped my salary on 01/10/2021 without any sufficient grounds, regarding this I have filed a case for releasing my salary before the service tribunal Peshawar in which next date is 16/01/2023, Even then I have been regularly performing my school duty with honesty and hard work, resulting my students showed 100% result and the School got top 5 position in Distt Swabi.

That during my service I never committed any misconduct nor showed any inefficiency, nor is any disciplinary action taken against me.

That after my first appointment all of my education Degrees were verified and found correct.

That an inquiry was initiated against me on baseless ground, the findings of the inquiry is baseless, against the facts and law which is not appreciable and liable to be set aside.

That I was called upon for personal hearing but ironically the Letter was posted to me on the same date on which I was required to appear for personal hearing. This act is based on dishonesty and partiality; in this regard I submitted a letter of explanation to the DEO female District Swabi in Due course.

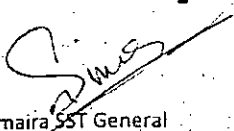
That Director Concern Disowned my Appointment orders on the baseless findings of the above stated inquiry.

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That It is humbly requested that the Notification concern may kindly be withdrawn and my Service may kindly be restored ; so that I may continue my duties with honesty and zeal.

I shall be very thankful to you.

Yours Truly,



Sumaira SST General

GGHS Tano Swabi. Dated 20/04/2023

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Appeal No /2023

Sumaira

(APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

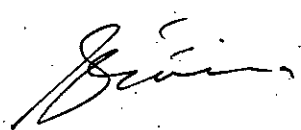
Govt

(RESPONDENT)
(DEFENDANT)

I/We Appellant

Do hereby appoint and constitute **Noor Mohammad Khattak Advocate Supreme Court** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. / /2023



CLIENT

ACCEPTED


NOOR MOHAMMAD KHATTAK
ADVOCATE SUPREME COURT



WALEED ADNAN


KAMRAN KHAN


UMAR FAROOQ MOHMAND


MUHAMMAD AYUB

&


MAHMOOD JAN
ADVOCATES

OFFICE:
Flat No. (TF) 291-292 3rd Floor,
Deans Trade Centre, Peshawar Cantt.
(0311-9314232)