

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

**AMENDED SERVICE APPEAL NO. 1443/2023**

Mst. Bibi Amina

VS

Govt. of KP etc

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**RESPONDENT NO.4**

THROUGH:

*M. Asif Yousafzai*

**M.ASIF YOUSAFZAI**  
**ADVOCATE SUPREME COURT**

*& Taimur Ali Khan*

**TAIMUR ALI KHAN**  
**ADVOCATE HIGH COURT**

Cell No.03339390916

①

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

**Khyber Pakhtunkhwa**  
**Service Tribunal**

**AMENDED SERVICE APPEAL NO. 1443/2023**

Diary No. 6969

Dated 10/08/23

Mst. Bibi Amina Principal GGHS Mathra, Peshawar,  
R/O of House No.56. Street No.3 Sector, N/1, Phase-4 Hayatabad, Peshawar.

**APPELLANT**

**VERSUS**

1. Government of Khyber Pakhtunkhwa, through Chief Secretary Civil Secretariat, Peshawar.
2. Government of Khyber Pakhtunkhwa, through Elementary & Secondary Education Department, Civil Secretariat, Peshawar.
3. Director of Education, Directorate of Elementary & Secondary Education Department, Main G.T Road, Peshawar.
4. Mst. Alia Iqbal Principal (BPS-19) GGHSS, Mathra, Peshawar.

**RESPONDENTS**

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**PARA-WISE COMMENTS ON BEHALF OF**  
**RESPONDENTS NO.4**  
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**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

1. That the appellant has got no cause of action to file the instant appeal.
2. That the appellant is not aggrieved person within the meaning of Article 212 of the Constitution of Islamic Republic of Pakistan 1973.
3. That appellant is stopped by his own conduct to approach this Honorable Tribunal.
4. That no vested right of the appellant has been infringed nor any provisions of the KP Civil Servant Act 1973 have been violated, therefore, the instant Service Appeal is not maintainable in the circumstances.
5. That the instant appeal is based on malafide intention just to put pressure on the respondents for stay at her own choice of station.
6. The present appeal has been filed to entangle the Department unnecessarily in litigation and to waste the precious time of the respondents as well as of the Honorable Tribunal.

7. That the present appeal is against the relevant provision of law and rules.
8. That the appellant has filed the instant service appeal along with suspension application against the order notification dated 16.05.2023, whereby her transfer and posting notification dated 15.05.2023 at GGHSS Mathra as Principal was withdrawn, which was fixed on 21.07.2023 before this Honorable Tribunal for preliminary hearing and private respondent No.4 (Alia Iqbal) was transferred and posted as Principal on the vacant post at GGHSS Mathra vide notification dated 14.07.2023 and also took charge on the vacant post at GGHSS as Principal on 15.07.2023, however, the appellant has concealed the transfer and posting notification dated 14.07.2023 of private respondent No.4 from this Honorable Tribunal on dated fixed i.e 21.07.2023 during preliminary hearing, which shows that the appellant has concealed material facts from this Honorable Tribunal and did not come with this Honorable Tribunal with clean hands.
9. That private respondent No.4 (Alia Iqbal) was transferred and posted as Principal on the vacant post at GGHSS Mathra vide notification dated 14.07.2023 and also took charge on the vacant post at GGHSS as Principal on 15.07.2023. The Honorable Tribunal admitted the case of the appellant for regular hearing on 21.07.2023 and also suspended the impugned notification dated 16.05.2023 with condition that operation of impugned order shall remain suspended if already not acted upon, but before the suspension of impugned notification dated 16.05.2023 on 21.07.2023 the private respondent No.4 (Alia Iqbal) was transferred and posted as Principal on the vacant post at GGHSS Mathra vide notification dated 14.07.2023 and also took charge on the vacant post at GGHSS as Principal on 15.07.2023, which means that the impugned notification dated 16.05.2023 has already acted upon. but despite that appellant is working on the post of Principal at GGHSS Mathra, which is clear violation the order dated 21.07.2023 of this Honorable Tribunal.
10. That the departmental appeal of the appellant is barred by time and as per Superior Court judgments, the instant appeal is also barred by time.
11. That the appellant did not filed departmental appeal against the posting order 14.07.2023 of the private respondent No.4 and as per Act service appeal is not maintainable without departmental appeal.

**REPLY TO FACTS.**

1. Pertains to record.
2. The appellant is basically belong to Takhti Nusrati Karak, which is evident from her CNIC and on her promotion from PS-18 to BS-19 she was transferred from GGHS Chamkani Peshawar to her home District at GGHSS Teri Karak, but she did not take charge at GGHSS Teri Karak and filed application to transfer her against the vacant post at GGHSS Main Gujjar, Peshawar on the ground of spouse policy despite that spouse policy is applied to the servants whose both husband and wife are Government servant while the husband is working in private sector. Moreover the private respondent No.4 (Alia Iqbal) is the

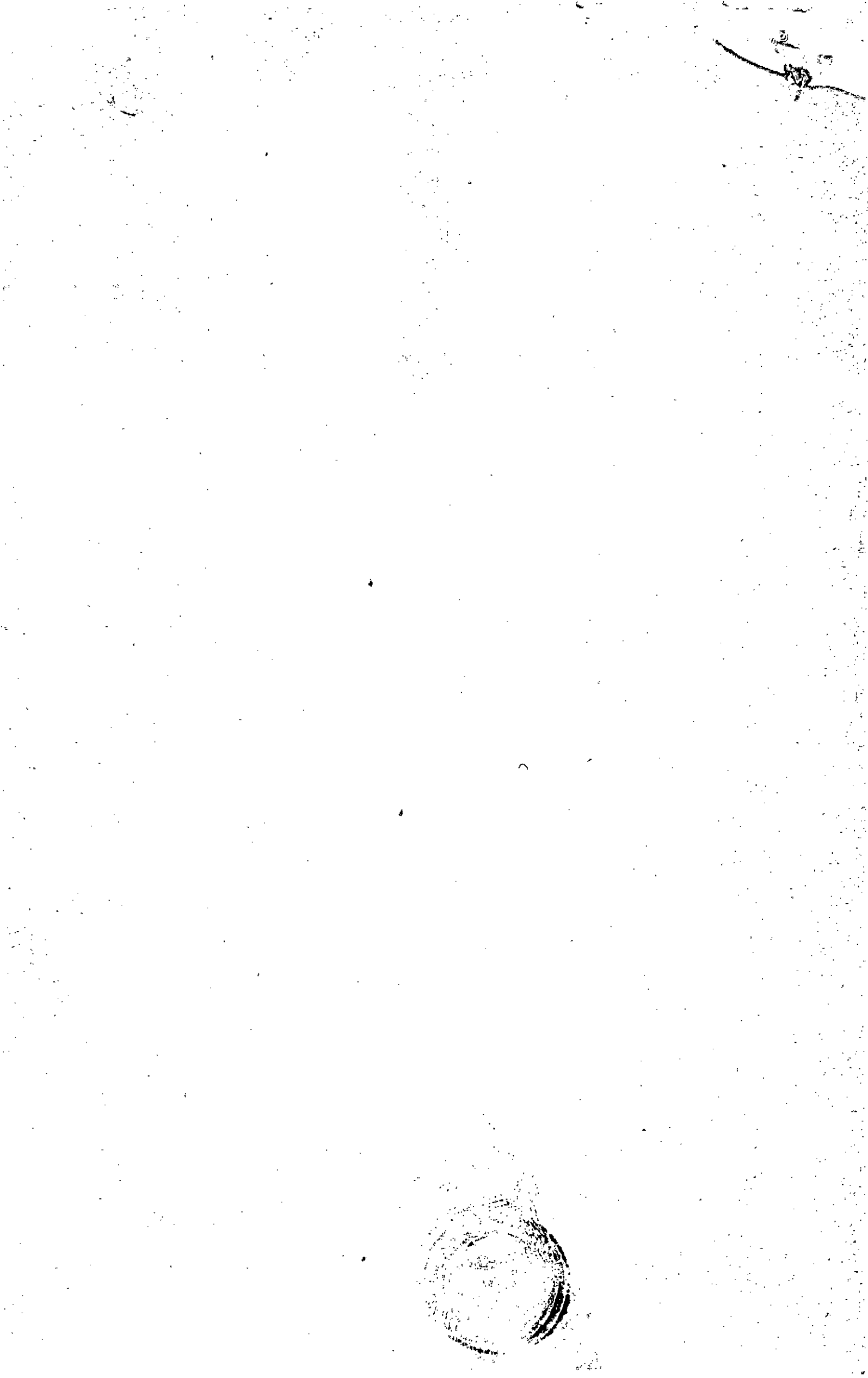
permanent resident of Peshawar which is evident from her domicile and on her promotion from PS-18 to BS-19 she was transferred from GGHS Chamkani Peshawar to GGHS Shakar Dara Kohat vide notification dated 14.09.2022 and she took over charge on the said post and as the private respondent No.4 was divorced which is evident from the dissolution of Marriage order dated 09.12.2010 and being alone living with her mother with little kids, therefore, she filed application on 16.03.2023 to respondent No.2 to transfer her to GGHS Mathra as the post of the Principal becoming vacant due to the retirement of Principal namely Raffit Nasim in that School which was submitted to respondent No 2 for approval vide letter dated 15.05.2023 and after approval from competent authority his application was then forwarded to Election Commissioner KP Peshawar for NOC, which was further forwarded to Secretary ECP Islamabad on which NOC was issued on 11.04.2023 and request of the private respondent NO.4 for transfer/posting at GGHS was acceded by the ECP which was forwarded to respondent No.2 through letter dated 14.04.2023 for further necessary action on which respondent No.2 transferred the private respondent No.4 from GGHS Shakar Dar Kohat to GGHS Mathra against the vacant post of principal vide notification dated 14.07.2023. **(Copies of relevant documents are attached as Annexure-R-1)**

3. Correct that the appellant was posted as Principal at GGHS vide corrigendum dated 15.05.2023, but, that corrigendum was withdrawn through notification dated 16.05.2023, but despite that appellant is working on the post of Principal at GGHS Mathra illegally, which means that the appellant is violating to obey the legal order of competent authority.
4. Incorrect. The corrigendum dated 15.05.2023 through which the appellant was posted on the post of Principal at GGHS Mathra was withdrawn through another notification dated 16.05.2023, but despite that the appellant illegally took over charge on the post of Principal on 01.06.2023 after the retirement of then Riffat Naseem.
5. The corrigendum dated 15.05.2023 through which the appellant was posted on the post of Principal at GGHS Mathra was withdrawn through another notification dated 16.05.2023, but despite that the appellant with the connivance with the District Account Officer illegally drawn her salary on the post of Principal at GGHS Mathra.
6. Incorrect. The appellant belongs to Takhti Nusrati Karak and spouse policy is applied to the servants whose both husband and wife are Government servant while the husband is working in private sector. Moreover, the private respondent No.4 (Alia Iqbal) is the permanent resident of Peshawar and being divorced living with her mother with little kids and was posted against the vacant post of Principal at GGHS Mathra vide notification dated 14.07.2023 after proper NOC of posting at GGHS Mathra from ECP.

- ④
7. Incorrect. the appellant transfer notification dated 15.05.2023 was withdrawn without political influence and issued in public interest. Moreover, every civil servant is bound to serve anywhere, where his/her service require for the department under section-10 of the KP Civil Servant Act 1973.
  8. Incorrect. the appellant transfer notification dated 15.05.2023 was withdrawn through notification dated 16.05.2023 without political influence and issued in public interest and her departmental appeal is barred by time and was rightly rejected by the competent authority as every civil servant is bound to serve anywhere, where his/her service require for the department under section-10 of the KP Civil Servant Act 1973.
  9. Incorrect. the appellant is not aggrieved person under section-10 of the Khyber Pakhtunkhwa Civil Servant Act 1973 and has no cause of action to file the instant appeal which may be dismissed inter-alia on the following grounds.

**REPLY ON GROUND.**

- A. Incorrect and denied, the impugned orders issued by the competent authority are in accordance with law and rules and are liable to be maintained.
- B. Incorrect. The impugned notification dated 16.05.2023 and rejection order dated 05.07.2023 are passed by the competent authority in accordance with law and rule and has not violated spouse policy and posting/transfer policy. Moreover, every Civil Servant is bound to serve anywhere, where his/her service required for the department under Section-10 of the KP Civil Servant Act 1973 and the impugned order issued within legal sphere and is liable to be maintained in favour of respondent department in the interest of justice and under the mandatory provision of Section 10 of KP Civil Servant Act, 1973.
- C. Incorrect and not admitted. The appellant belongs to Takhti Nusrati Karak and was also transferred to her home district karak on her promotion to BPS-19 and the appellant also endorsed that spouse policy is apply to Government servants while the husband of the appellant is working in private sector, while the private respondent No.4 (Alia Iqbal) is the permanent resident of Peshawar and being divorced living with her mother with little kids and was posted on the post of Principal at GGHSS Mathra vide notification dated 14.07.2023 after proper approval and NOC of posting at GGHSS Mathra from Election Commission of Pakistan.
- D. Incorrect. The private respondent No.4 (Alia Iqbal) is the permanent resident of Peshawar and on her promotion from PS-18 to BS-19 she



was transferred from GGHS Chamkani Peshawar to GGHSS Shakar Dara Kohat vide notification dated 14.09.2022 and she took over charge on the said post but as the private respondent No.4 was divorced and being alone living with her mother with little kids, therefore, she filed application on 16.03.2023 to respondent No.2 to transfer her to GGHSS Mathra as the post of the Principal becoming vacant due to the retirement of Principal namely Raffit Nasim in that School which was submitted to respondent No 2 for approval vide letter dated 15.05.2023 and after approval from competent authority his application was then forwarded to Election Commissioner KP Peshawar for NOC, which was further forwarded to Secretary ECP Islamabad on which NOC was issued on 11.04.2023 and request of the private respondent for transfer/posting at GGHSS was acceded by the Election Commission of Pakistan which was forwarded to respondent No.2 through letter dated 14.04.2023 for further necessary action on which respondent No.2 transferred the private respondent No.4 from GGHSS Shakar Dar Kohat to GGHSS Mathra against the vacant post of principal vide notification dated 14.07.2023. which means that the private respondent No.4 was transferred and posted at GGHSS Mathra after adopting proper procedure and both notification dated 16.05.2023 and 14.07.2023 are accordance with law and liable to be maintained.

E. The private respondent No.4 also seek permission of this Honorable Tribunal to provide other grounds and proof at the time of arguments.

In view of the above submission, it is therefore, most humbly prayed that the Honorable Tribunal may very graciously be pleased to dismiss the instant service appeal with cost in favour of the respondent No.4 in the interest of justice.

*Alia Iqbal*  
RESPONDENT NO.4

THROUGH:

*Asif Yousafzai*  
M.ASIF YOUSAFZAI  
ADVOCATE SUPREME COURT

*Taimur Ali Khan*  
&  
TAIMUR ALI KHAN  
ADVOCATE HIGH COURT

**AFFIDAVIT**

It is solemnly affirmed and declared that the content of this reply are true and correct and nothing has been concealed from this Honorable Tribunal.



*Alia Iqbal*  
DEPONENT

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

**AMENDED SERVICE APPEAL NO. 1443/2023**

Mst. Bibi Amina

VS

Govt. of KP etc

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**REPLY TO APPLICATION FOR INTERIM RELIEF ON THE  
BEHALF OF RESPONDENT NO.4.**

1. No comments.
2. The reply to the facts and grounds may kindly be consider for reply of this application. No doubt the Honorable Tribunal have power to set aside the impugned order, but the Honorable Tribunal always decide the cases on merit and the impugned order dated 16.05.2023 was passed by the Secretary (E&SE) according to law and rules and private respondent No.4 was transferred against the vacant post at GGHSS Mathra after proper approval of summary and NOC from ECP, hence the impugned orders are liable to be maintained.
3. Incorrect. The prime facie exist in the favour of private respondent No.4 as private respondent No.4 was transferred against the vacant post at GGHSS Mathra after proper approval of summary and NOC from ECP and no political intervention was involved in the transfer notification of respondent No.4 and the appellant has illegally withdrawn the salaries on the post of Principal at GGHSS Mathra as her transfer order dated 15.05.2023 was withdrawn on 16.05.2023.
4. Incorrect. the impugned notification is in accordance with law and rules and the appellant was transferred at GGHSS Mathra on 15.05.2023 which was withdrawn on 16.05.2023 and illegally drawn her salaries on the post of Principal at GGHSS Mathra and the private respondent No.4 s being divorced living with her mother in Peshawar with kids and if the Honorable Tribunal set aside the impugned order the respondent will be badly effect along with her kids.

It is therefore most humbly prayed that on the basis of above submission, the suspension order dated 21.07.2023 may kindly be



recalled/cancelled as the private respondent No.4 is badly effect effecting due to the suspension of order dated 21.07.2023 of this Honorable Tribunal.

RESPONDENT NO.4

THROUGH:

*M. Masif*  
M. ASIF YOUSAFZAI  
ADVOCATE SUPREME COURT

*T. Ali Khan*  
&  
TAIMUR ALI KHAN  
ADVOCATE HIGH COURT

AFFIDAVIT

It is solemnly affirmed and declared that the content of this reply are true and correct and nothing has been concealed from this Honorable Tribunal and the answering respondent has neither been placed ex-parte nor her defense has been struck off.



*Alia Iqbal*  
DEPONENT

A (8)

**PAKISTAN** National Identity Card  
FEDERAL BUREAU OF INVESTIGATION

Name  
Khalid Amin

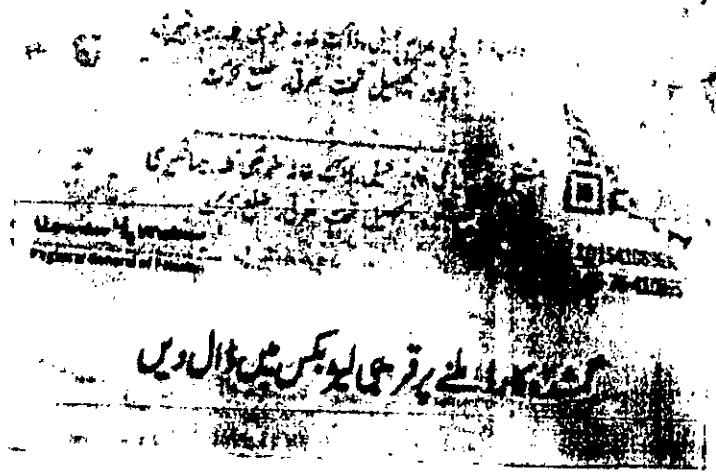
Serial No. Pakistan

Gender / Country of Birth  
F / Pakistan

Issuance Date / Date of Birth  
14.03.2017 / 11.08.1976

Card No. / Date of Expiry  
08.11.2017 / 08.11.2027

ATTSTED



(9)

# DOMICILE CERTIFICATE

I declare that I was born of parents who are permanently domiciled in North-West Frontier Province having been born in this Province.

I was born at Village/Mohallah Chughat Pina P.T.R. Peshawar city  
Tehsil Peshawar Distt. Peshawar

Alia Iqbal  
Signature of the Applicant  
Dated 18-8-86

Pursuance to the declaration dated 18-8-1986  
filled by Miss ALIA IQBAL D/o MOHD IQBAL KHAN  
domiciled in North-West Frontier Province, it is hereby certified that  
the said ALIA IQBAL is born of parents who are resident of  
the North-West Frontier Province having been born/settled within it.

Rozal Khan

I have satisfied myself from personal knowledge/verification that the above declaration is true and certify accordingly.

This 26/8 day of August 1986

~~3708~~ ~~370~~ 3807A  
26/8/87  
COUNTER SIGNED

[Signature]  
MAGISTRATE-1st CLASS

[Signature]  
DISTRICT MAGISTRATE

Strike of which ever is not applicable

**ATTSTED**



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
BLOCK A OPPOSITE MPA,S HOSTEL, CIVIL SECRETARIAT PESHAWAR  
PHONE NO 091-9223588

Dated Peshawar, September 14<sup>th</sup>, 2022

**NOTIFICATION**

NO.SO(S/F)E&SED/4-16/2022/Posting/Transfer/51: Upon their promotion vide notification  
No.SO(S/F)E&SED/2-3/2022/Promotion dated:20.04.2022 the following Teaching Cadre (BS-19)  
Officers are hereby posted against the post mentioned against each.

Sr. #	Name/ Designation	Present Posting	To	Remarks
1	Mst. Atia Bano	GGHSS Dhamtor Abbottabad	GGHSS Sherwan Abbottabad	AVP of Principal (BS-19)
2	Mst. Tahira Tabassum	GGHSS Shahdand Baba Mardan	GGHSS Jalala Mardan	AVP of Principal (BS-19)
3	Mst. Salma Kalsoom	GGHSS Lahor Swabi	GGHS Panjpir Swabi	Vice Sr. No.12
4	Mst. Noreen Afzal	RPDC (Female) Peshawar	GGHS Prang Charsadda	AVP of Principal (BS-19)
5	Mst. Azra Begum	RPDC Malakand	RPDC Malakand	Against Sr. No.45
6	Mst. Gul E Rana	GGHSS Jogiwara Peshawar	GGHS KSK Swabi	AVP of Principal (BS-19)
7	Mst. Alia Iqbal	GGHSS Chamkani Peshawar	Shakar Dara Kohat	AVP of Principal (BS-19)
8	Mst. Ambareen Fatima	GGHSS No.2 D.I Khan	GGHSS Jandola Tank	AVP of Principal (BS-19)
9	Mst. Nusrat Parveen	GGCMHSS No.6 D.I Khan	GGHSS Karak No.1	AVP of Principal (BS-19)
10	Mst. Salima	GGHSS Toru Mardan	GGHSS Palai Malakand	AVP of Principal (BS-19)
11	Mst. Shabana Rehman	GGHS No.1 Lakki Marwat	GGHSS No.1 Scrai Nurang Lakki Marwat	Vice Sr. No. 42
12	Mst. Zubaida Bibi	GGHSS Panjpir Swabi	GGHS Zaida Swabi.	AVP of Principal (BS-19)
13	Mst. Fareeda Sabeen	GGHSS University Town Peshawar	GGHSS Matta Palanzai Charsadda	AVP of Principal (BS-19)
14	Mst. Shaheen Shehriaz	GGHS Takhti Nasrati Karak	GGHS Chokara Karak	AVP of Principal (BS-19)



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
BLOCK A OPPOSITE MPAS HOSTEL, CIVIL SECRETARIAT PESHAWAR  
PHONE NO 091-9723588

11

15	Mst. Gul E' Rama Sidiq	GGHSS Peshawar BSD	GGHSS No.1 Hanju	AVP of Principal (BS-19)
16	Mst. Saeeda Tabassum	GGHSS Kotha Swabi	GGHSS Shewa Swabi	AVP of Principal (BS-19)
17	Mst. Bibi Amina	GGHSS Parkho Dheri Mardan	GGHSS Hathian Mardan.	AVP of Principal (BS-19)
18	Mst. Banaras Begum	GGHSS Akora Khattak Nowshera	GGHSS Totakan Malakand	AVP of Principal (BS-19)
19	Mst. Yasmin Ara Bibi	GGHSS Shahdand Baba Mardan	GGHSS Rustam Mardan	AVP of Principal (BS-19)
20	Mst. Shamila Tabassum	GGHSS Naivafa D.I Khan	GGHSS Ismaili Mama Khel Bannu	AVP of Principal (BS-19)
21	Mst. Jamila Begum	GGHSS Matkani Malakand	GGHSS Dheri Alladand Malakand	AVP of Principal (BS-19)
22	Mst. Shaista Kanwal	GGHSS Jungle Khel Kohat	GGHSS Gumbat Kohat	AVP of Principal (BS-19)
23	Mst. Irshad Begum	GGHSS No.4 Bannu City	GGHSS Bilawar Khan Bannu	AVP of Principal (BS-19)
24	Mst. Farrah Deba	GGHSS Lahore Swabi	GGHSS Kalukhan Swabi	AVP of Principal (BS-19)
25	Mst. Farzana Yasmin	GGHSS Jungle Khel Kohat	GGHSS Qamar Zaman Mandeev Bannu	AVP of Principal (BS-19)
26	Mst. Shaista Gul	GGHSS University Town Peshawar	GGHSS Mandani Charsadda	AVP of Principal (BS-19)
27	Mst. Romaisa Sadiya	GGHSS Sahibzada Umar Khan Shahced Peshawar	GGHSS Tehkal Peshawar	AVP of Principal (BS-19)
28	Mst. Farhana	RPDC Swabi	GGHSS Kunda Swabi	AVP of Principal (BS-19)
29	Mst. Sadaf Rehana Malik	GGHSS Comprehensive Abbottabad	GGHSS Siri Kot Haripur	AVP of Principal (BS-19)
30	Mst. Syeda Tayyaba	GGHSS Comprehensive Abbottabad	GGHSS Kot NajibUllah Haripur	AVP of Principal (BS-19)
31	Mst. Shagufta Khanam	GGHSS Peshawar BSD	GGHSS Titter Khel Lakki Marwat	AVP of Principal (BS-19)
32	Mst. Iffat Begum	GGHSS Sahibzada Umar Khan Shahced Peshawar	RPDC Peshawar	AVP of Principal (BS-19)

M

ATTSTED



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
BLOCK A OPPOSITE MPA.S HOSTEL, CIVIL SECRETARIAT PESHAWAR  
PHONE NO 091-9223588

12

33	Mst. Sughra Sadaf	DPD Peshawar	GGHSS Irrigation Colony Peshawar.	Vice Sr.44
34	Mst. Nusrat Hussain	GGHSS Garhi Habibullah Manshara	GGHSS Thathi Khurd Manshara	Vice Sr. No. 41
35	Mst. Samia Danish	DC TE Abbottabad	GGHSS Balakot	AVP of Principal (BS-19)
36	Mst. Roshan Ara	GGHSS Ningolai Swat	GGHSS Mutta Swat	AVP of Principal (BS-19)
37	Mst. Ishrat Jabeen	GGHSS BSD Peshawar	GGHSS Jamrud Khyber	Vice Sr. No.43
38	Mst. Robina Farooq	GGHSS Dhamtor Abbottabad	GGHSS KTS Sector No. 2 Haripur	AVP of Principal (BS-19)
39	Mst. Zeb Jehan	GGHSS Chamkani Peshawar	GGHSS Saidu No. 1 Swat	AVP of Principal (BS-19)
40	Mst. Shela Nauman	GGHSS University Town Peshawar	GGHSS Koper Malakand	AVP of Principal (BS-19)

CONSEQUENTIAL POSTING

41	Mst. Fehmida Malik, Principal (BS-18) working against the post of (BS-19) in OPS	GGHSS Thathi Khurd Manshara	GGHSS Darband Manshara	AVP of Principal (BS-18)
42	Mst. Shabana Noreen, (BS-18)	GGHSS Serai Naurang Lakki Marwat	GGHSS No. 06 D.I Khan	Vice Sr. No. 09
43	Najma Niaz, Principal (BS-18)	GGHSS Jamrud Khyber	DPD Peshawar	Vice Sr. No.33
44	Dr. Salma Sami Principal (BS-18)	GGHSS Irrigation Colony	GGHSS Malogi, Peshawar	AVP of Principal (BS-18)
45	Dr. Dil Ara Begum Principal (BS-19)	Instructor (BS-19), RPDC (Female) Malakand	RPDC (Female) Malakand (BS-20)	Against Vacant Post of Principal (BS-20) in OPS

ATTN

Adjudex = B

13

20

Order.....  
15/11/2010

Parties present. Proceedings

adjourned to strike of the lawyers. To come up for

3/12/10

*[Signature]*

IRUM NOSHEEN  
Civil Judge-II/JFC, Peshawar.

Order.....8  
03/12/2010

Plaintiff alongwith her counsel present. Exparte evidence recorded and closed. To come up for arguments/order on

9/12/10

*[Signature]*  
Judge Family Court,  
Peshawar.

Order.....09  
09.12.2010

Plaintiff present. Arguments heard and file perused.

Brief facts of the case are that the plaintiff Mst. Alia Iqbal co joined with her minor children lodged the instant suit against her husband Syed Murad Ali for:-

1. Dissolution of her marriage.
2. Recovery of Rs: 500,000/- cash and golden ornaments weighing 20 tolas in lieu of dower.
3. Possession of landed property measuring 2 kanals details given in the heading of the plaint in lieu of dower

*[Signature]*

RECEIVED

*[Signature]*  
Court Peshawar

6/11/11

ATTSTED



14

- 4. Recovery of maintenance allowance for plaintiff No.1 at the rate of Rs. 7000/- per month from May, 2007, and till expiry of iddat.
- 5. Recovery of maintenance allowance for plaintiffs No.2 &3 each at rate of Rs: 4000/- per month from May, 2007 till their majority.

Summons were issued to the defendant through registered A.D as well as through publication. But he failed to turn up before the court. Thus he was placed and proceeded exparte on 19/10/2010. Exparte evidence recorded.

Plaintiff entered appearance and recorded her statement as PW-1, while she produced two other witnesses in support of her contention. Since the defendant failed to refute the claim of the plaintiff either by filing W/S or by cross examining the PWS. Resultantly, I allow decree for dissolution of marriage in favour of the plaintiff No.1 against the defendant. The plaintiff No.1 is further allowed to recover her dower as prayed for. She is also allowed to recover her maintenance allowance at the rate of Rs: 2000/- per month from May, 2007 till her period of iddat expires. Plaintiffs No.2&3 are allowed to get maintenance allowance each at the rate of Rs: 2000/- per month from May, 2007 till the time they forfeit their right by operation of law or any valid reason. The period starts from today. Certified copies of the order sheet be sent to the defendant as also to the Union Council concerned. No order as to costs.

File be consigned to record room after its

completion.

Announced  
09.12.2010

*[Signature]*  
Civil Judge-II/Judge,  
Family Court, Peshawar

CERTIFIED TO BE TRUE

(By name)  
Copying Agency Civil Court  
Peshawar

*[Signature]*

\* Please take copies of J, D, S  
through court.  
\* Aggins Madam Jaga not  
if Commit & infact.

2 fine  
2 28 000  
38000

ATTSTED

Case No. 4713  
Name of Plaintiff: *[Handwritten]*  
Name of Defendant: *[Handwritten]*  
Date of Filing: *[Handwritten]*  
Signature: *[Handwritten]*  
Dated: *[Handwritten]*  
Date of Decree: *[Handwritten]*

(B) 21

IN THE COURT OF NAZMA SHAH JUDGE FAMILY COURT-III,  
PESHAWAR

*Suit No. 19/2-Neem of 2014.*

*Date of Institution. 16.06.2014.*

*Date of Decision. 10.03.2020.*

*Syed Murad Ali Shah S/O Janab Shah R/O Mohib Banda Mardan  
..... (Petitioner)*

*Versus*

*Ahmad Ali, Saifullah and Mst: Aaliya Iqbal R/O Chughal Pura,  
Peshawar..... (Respondents)*

CUSTODY OF MINORS

JUDGMENT

My this judgment is intended to dispose of petition in hand filed by Syed Murad Ali shah, hereinafter called petitioner against Ahmad Ali, Saifullah and Mst: Aaliya Iqbal, hereinafter called respondent for custody of his minor kids.

Briefly narrated facts of the case as to appear from the petition are that marriage of the petitioner was solemnized with respondent No.3 as per Shari Muhammadi in year 2003. Out of the wedlock minors respondent No.1 and 2 were born who are presently residing with their mother. That petitioner is the real father of minors. That marriage of the petitioner with respondent

**ATTESTED**

20 APR 2020

(Examiner)  
Civil Court Peshawar

**ATTESTED**

No.1 is dissolved and minors are residing with their mother since 2007. That minors are residing in unfavorable environment, so custody of minors be granted to the petitioner being their real father.

Respondent No.3 was summoned who put appearance and contested the petition by filing reply while respondents No.1 and 2 are minors. Out of the divergent pleadings of the parties, following issues were framed by my learned predecessor-in-office.

### ISSUES

1. Whether petitioner has got cause of action?
2. With whom welfare of minor lies?
3. Relief

Parties were directed to produce evidence upto their own satisfaction which they did.

After conclusion of evidence of both the parties, arguments of learned counsel for both the parties heard. Record gone through. In the light of both issue wise findings of this court are as follows:

### ISSUE # 2:

Petitioner claims custody of his minor sons on the ground that he is real father of minors namely Ahmad Ali and Saifullah who are presently in the custody of their mother.

Petitioner himself appeared as PW-1 stated that he works as

Government Servant in BPS-17 and nowadays posted in Swabi. That his marriage with respondent No.3 was solemnized in year 2003. Out of wedlock minors/respondents No. 1 and 2 were born. That respondent No.3 left his house with her own sweet will and now divorce is effected between

**ATTESTED**

20 APR 2020

(Examiner)

**ATTESTED**

17

the parties. That respondent No.3 is working lady and cannot take care of minors as compare to petitioner. That as per law petitioner/father is entitled for the custody of minor sons as both minors are above the age of seven years.. That respondent No.3 is reluctant to allow the minors for the visitation with petitioner. That respondent No.3 is living in joint family system in her parent's house. That father of respondent No.3 contracted two marriages out of which he has 11 children and all of them are residing in one house. That such environment effects the minors who are living in same house. Pw-2 namely Sabz Ali Khan supported the stance of petitioner by stating that he convened jirga for Abadi of the respondent No.3 but of no vain. That petitioner can take better care of minors. Pw-3 namely Muhammad Salim also supported the stance of petitioner that petitioner was taking care of minor but attitude of respondent of No.3 was not good towards petitioner. That petitioner has strong financial position having landed property in District Mardan. That minors are living with their mother in joint family system in the house of parents of respondent No.3. which is an unfavourable environment for them and affects their studies.

10/3/2020

Respondents No.3 appeared as Rw-1 stated that she serves as Senior Subject Specialist in BPS-18. That she is having degree of Master in English and is also resource person in Illama Iqbal Open University. That she has achievement and performance certificate which are ExRw 1/1 to ExRw 1/9.

**ATTESTED**

20 APR 2020

(Examiner)

Chief Court Officer

That her family is highly qualified as her sister in law is Deputy Director in QEC and another one is Assistant Professor in Benazir Bhattu University. That her sister also serves in education department in grade -17. That minor Ahmad Ali was born on 20.11.2004 while Saifullah was born on 09.09.2007.

**ATTESTED**

18

That she has borne all their expenses. That she has admitted minor Ahmad Ali in ICMS School System. Record is ExRw 1/11. That she admitted minor Ahmad Ali in Cadet College. Record is exhibited as ExRw 1/14. She admitted minor Ahmad Ali in Akram Khan Durrani College Bannu in year 2017 in class-7<sup>th</sup>. Record of educational expenses is "annexure I". Receipts are ExRw 1/15 to ExRw 1/16. That as per College report minor was not adjusted in said college so for the welfare of minor she admitted him in Peshawar in Muslim education complex in year 2018 in grade-08. That minor Ahmad Ali is now studying in class-9<sup>th</sup>. Receipts of tuition fee and transport are ExRw 1/17 to ExRw 1/21 and record of vaccination is ExRw 1/26. That she admitted minor in Jamia Arabia Hadiqatul Aloom Peshawar for the translation of Quran. Registration is ExRw 1/27. That she has registered the minors for their fitness in sports complex. Record of their registration is ExRw 1/24 and ExRw 1/25. That she went to Umra along with minor Ahmad Ali in year 2015. Copy of passport and vaccination form is ExRw 1/28, ExRw 28-A and Annexure "K". Achievement certificates of minors are ExRw 1/29 to ExRw 1/32 while birth certificates of minors are ExRw 1/33. That she made Insurance in Life Insurance Ltd: and Adamjee Insurance Company for minors. That original documents of Insurance are ExRw 1/36 to ExRw 1/38. That vide mutation No.5123 dated 16.11.2007 her ancestral property was transferred in her name which consists of four shops and one office. That she earns 37,000/- from said property. Mutation

10/3/2020

**ATTESTED**

20 APR 2020

(Examiner)

is Annexure "P". That minors are getting their religious education too and she has arranged tutors for them. That petitioner was suspended vide office order No. 3703-DC-MPS dated 14.05.2015 which is Annexure "Y" due to

**ATTESTED**

19

his negligence in official duties. Respondent No.3 produced one namely Khalid Khan as Rw-3 in her support. He stated that minors are getting religious education from him and respondent No.3 is paying Rs.5000/- to him. He produced his education record and degree as ExRw 2/1 to ExRw 2/4. Rw-3(inadvertently written as Rw-2) namely Haroon Iqbal/brother of plaintiff supported the stance of plaintiff. He produced his educational record of B-pharmacy which is ExRw 2/2 to ExRw 2/6. He stated that respondent No.3 was also elected in British Council. Record is ExRw 1/9. He stated that his wife is posted as Deputy Director in Quality Enhancement Cell while his sister in law is Assistant professor in BPS-19 and all his family members are educated. Result of terminal examination of 2019 of minor Ahmad Ali is Annexure "25". That respondent No.3 takes proper care of minors being an educated lady. He produced pictures of his house as Annexure 25 (consisting upon five pictures). Rw-3 namely Syed Ahmad Ali Shah supported the stance of respondent. He stated that he used to go to house of respondent to teach minors for the subject of Urdu, Pak Study and English and respondent No.3 is paying Rs.8000/- per month. Rw-4 namely Muhammad Azhar supported the stance of plaintiff that he is teaching science subject to the minors since 2018 and respondent No.3 is paying Rs.6000/- per month.

10/3/2020

**ATTESTED**

20 APR 2020

(Examiner)

Civil Court Peshawar

Perusal of record shows that marriage of parents of minors had ended in divorce and minors are living with the mother at the house of parents of respondent No.3. Record shows that minor Ahmad Ali is 16/17 years old while Saifullah is of 12/13 years. That minors are presently residing with their mother. It is on the record that mother of minors is highly educated

**ATTESTED**

*(Handwritten initials)*

lady and is leading her respectable life. There is nothing on record to indicate that she is a woman of bad character, contracted second marriage or showed her negligence in grooming of minors. Mere allegations of general nature that mother is acquainted with her job and do not give time to minors is not sufficient. Minors in custody of mother are getting proper education and enjoying good health. Father/petitioner has failed to establish that atmosphere where minors are living are detrimental to their future in any manner or their mother failed to take proper care of them. On the other hand, respondent proved that she belongs to highly educated family. As minors are living with their mother since their birth so change of their custody would naturally damage their personality which would not be in the welfare of minors. Depriving minors from company of their mother with whom they are living since their birth would create deprivation in their lives which could not be restored back. Admittedly father of minors had contracted second <sup>marriage</sup> with respondent No.3 and has first wife too. Mother of minors had not contracted second marriage and is contesting for custody of minors, in this situation custody of minors could not be given to father in presence of step mother. Nothing is on the record to show anything which might adversely affect the well being of minors while they are in custody of mother. Mother being an educated lady is capable enough to manage the education and well-being of minors. Minors are well settled in School and attending their school regularly. Academic results of minors are good and if their custody will be removed at this stage, their education will likely to be suffered adversely. Rights of parents regarding interest and control of children is not to be exercised in the interest and benefits of parents but in

*10/3/2020*  
*(Handwritten notes)*

**ATTESTED**

20 APR 2020

(Examiner)

Civil Court P...

**ATTESTED**  
*(Handwritten signature)*

21

the interest and benefits of children themselves. Father is entitled to the custody of son above the age of seven years as per section 357 of Muhammadan Law which is reproduced below:

*The father is entitled to the custody of a boy over seven years of age and of an unmarried girl who has attained puberty."*

Prime consideration for appointment of Guardian is the welfare of minor is irrespective of provision of personal law. Overriding, fundamental and paramount consideration is always the welfare of minors rather that is the sole criteria which must prevail. No one could take care of minor more than their real mother for being their first institution. There can be no other better institution than lap of loving mother and in this case minors are living with their mother since their birth so they are more attached with her.

Section 17(3) of Guardian and Ward Act 1890 provides that if the minor is old enough to perform intelligent pre reference the Court may consider that preference.

10/12/2020

Minors are examined by this Court. They seemed to be happy with their mother and wished to live with her. They were quite intelligent enough to make their opinion. They were well groomed as reflected from their communication.

In the light of above discussion, it is very much clear that welfare of minors lies with their mother hence petition is hereby dismissed while in order to strengthen parental bonding, petitioner is allowed to meet minors twice in a month within the court premises.

Issue decided accordingly.

**ATTESTED**

20 APR 2020

(Examiner)  
Civil Court

ATTSTEL



22

**ISSUE # 1:**

The petitioner being father of the minors has got cause of action but as is discussed under issues No. 2 he remained unsuccessful to prove that welfare of minors lies with him.

Issue decided in the light of above observations.

**RELIEF**

Consequent upon the findings of this Court on issues discussed above, it is very much clear that welfare of minors lies with their mother hence petition is hereby dismissed while in order to strengthen parental bonding petitioner is allowed to meet minors twice in a month within the court premises.

Parties are left to bear their own costs. File be consigned to record room after necessary completion and compilation

Announced  
10.03.2020.

*(Signature)*  
10/3/2020

(NAZMA SHAH)  
Judge Family Court-III, Peshawar

**CERTIFICATE**

This judgment of mine consists of eight (08) pages. Each page has been read, signed and corrected by me wherever, deemed necessary.

*(Signature)*  
10/3/2020

(NAZMA SHAH)  
Judge Family Court-III, Peshawar

No.	9353
Date	20/04/2020
Page	15
Volume	2
Case No.	
Date	20/04/2020

CERTIFIED TO BE TRUE COPY

(Examiner)  
Copying Agency Civil  
Peshawar

ATTSTED

23

Consequent upon the findings of this Court on issues discussed above, it is very much clear that welfare of minors lies with their mother hence petition is hereby dismissed while in order to strengthen parental bonding petitioner is allowed to meet minors twice in a month within the court premises.

Parties are left to bear their own costs. File be consigned to record room after necessary completion and compilation

Announced  
10.03.2020.

*(Signature)*  
(NAZMA SHAH)  
Judge Family Court-III, Peshawar  
10/3/2020

درخواست نامہ	خرچہ نامہ	مذبحہ
	سٹامپ عرضی دعویٰ سٹامپ وکالت نامہ سٹامپ وجہ ثبوت فیس اہل کمیشن خرچہ گواہان اجرا حکم نامہ مختانہ وکیل متفرق	

یہ فیصلہ آج مورخہ 10/3/2020 کو پیشرفت و اختتام پر ہر مدارک سے جاری کیا گیا۔

*(Signature)*  
10/3/2020  
جج فیملی کورٹ - III - پشاور



CERTIFIED TO BE TRUE COPY.

*(Signature)*  
(Examiner)  
Copying Agency Civil Court  
Peshawar  
9

No. 9553  
Date 20/04/2020  
P-2  
Date 20/04/2020

Order...87  
10.03.2020

24

Parties present. Vide my detail judgment of even date it is very much clear that welfare of minors lies with their mother hence petition is hereby dismissed while in order to strengthen parental bonding petitioner is allowed to meet minors twice in a month within the court premises.

Parties are left to bear their own costs. File be consigned to record room after necessary completion and compilation

Announced  
10.03.2020.

*Naзма شاہ*  
10/3/2020  
(NAZMA SHAH)  
Judge Family Court-III, Peshawar

**ATTESTED**

20 FEB 2020

(Examiner)  
Civil Court Peshawar

**ATTESTED**

25

WEB GENERATED



Board of Intermediate & Secondary Education Peshawar

قلمی و لکھی بورڈ پشاور

Our motive is Pen to Pixel



HSSC (PART-II-ANNUAL-I) Exam-2023

Regular Candidate

Roll No: 517670 Reg No: 20211102150020  
 Name: Ahmad Ali Father Name: Murad Ali Shah  
 Gender: Male Apper Status: Fresh  
 Group: Pro-Medical  
 College: The City College Of Arts & Science Shahi Bagh Road Peshawar



Center Name: The City College Of Arts & Science Shahi Bagh Road Peshawar (h) Hall

Paper Date	Day	Paper Name	Class	From	To
04/08/2023	Saturday	PAK-STAT-ENGLISH	11	9:30 AM	12:00 PM
01/08/2023	Monday	ARABIC	11	9:30 AM	12:00 PM
09/08/2023	Thursday	ENGLISH	11	9:30 AM	12:00 PM
17/08/2023	Tuesday	ARABIC	11	9:30 AM	12:00 PM
14/08/2023	Sunday	ENGLISH	11	9:30 AM	12:00 PM
21/08/2023	Friday	ARABIC	11	9:30 AM	12:00 PM



Practical : (Morning 09:00 am to 12:00 Noon) . (Evening 02:00 pm to 05:00 pm)

Lab :The City College Of Arts & Science Shahi Bagh Road Peshawar

Practical Date	Day	Practical Name	Examiner	Shift
11/07/2023	Monday	PHYSICS		11:00 AM
16/07/2023	Saturday	PHYSICS		11:00 AM
20/07/2023	Tuesday	PHYSICS		11:00 AM

Signature

Deputy Controller

- Errors/Omissions accepted. Confirm your papers with datesheet at [www.bise-p.edu.pk](http://www.bise-p.edu.pk)
- This Roll No slip is acceptable in Exam Center subject to validation by center Superintendent

نوٹس

یہ رول نمبر سلیپ صرف امتحان کے روز استعمال کیا جائے گا۔ اس کے بغیر اس کی کوئی بھی دوسری کاپی قبول نہیں کی جائے گی۔

OR: اس رول نمبر سلیپ کے ساتھ ساتھ امتحان کے دن صبح 9:00 بجے تک اس کے ساتھ ساتھ

اپنی کاپی (Paper Board) کے ساتھ ساتھ

اپنی کاپی کے ساتھ ساتھ

اپنی کاپی کے ساتھ ساتھ (Objective Type) پر مشتمل ہے۔

(Objective Type) پر مشتمل ہے۔ اس کے ساتھ ساتھ

اس کے ساتھ ساتھ

اس کے ساتھ ساتھ

اس کے ساتھ ساتھ

اس کے ساتھ ساتھ UFM

اس کے ساتھ ساتھ

Malpractices Act 1995

اس کے ساتھ ساتھ

Print Date & Time: 2023-07-04 10:32:25

bdn290465722651ar (5.1.12) (15.1.2023) 5016644412nd

ATTSTED

Nine hundred  
thirty three thousand  
six hundred  
seventy two

Board of Intermediate & Secondary Education, Peshawar

بانی و بنیادی تعلیمی اداروں کے لیے

SSC (2016-ANNUAL - I) EXAM - 2023

Roll No: 233072 Enroll No: 20229010670051  
 Name: ABBIDAN Father Name: MURAD ALI SHAH  
 Date of birth: 09-MAR-2008 Gender: Male  
 Group: Science Appear Status: Fresh  
 School: Warsak Model School Warsak Road Peshawar

Regular Candidate



Center Name: Warsak Model School Warsak Road Peshawar

Roll No.	Day	Subject Name	From	To
08-05-2023	Tuesday	ISLAMIC EDUCATION (I)	09:00 AM	11:00 AM
08-05-2023	Tuesday	MUZALIM EDUCATION (I)	09:00 AM	11:00 AM
08-05-2023	Wednesday	ENGLISH (I)	09:00 AM	11:00 AM
08-05-2023	Thursday	URDU (I)	09:00 AM	11:00 AM
08-05-2023	Thursday	PHYSICS (I)	09:00 AM	11:00 AM
11-05-2023	Thursday	MATHE (I)	09:00 AM	11:00 AM
13-05-2023	Monday	CHEMISTRY (I)	09:00 AM	11:00 AM
14-05-2023	Tuesday	BIOLOGY (I)	09:00 AM	11:00 AM
18-05-2023	Thursday	PAKISTAN STUDIES (I)	09:00 AM	11:00 AM

Practical (Morning 09:00 am to 11:00 am) (Noon 12:00 pm to 02:00 pm) (Evening 03:00 pm to 05:00 pm)

Lab: Warsak Model School Warsak Road Peshawar

Practical Date	Day	Practical Name	Examiner	Shift
25-05-2023	Tuesday	PHYSICS (I)	2	EVENING
26-05-2023	Thursday	CHEMISTRY (I)	2	EVENING
27-05-2023	Saturday	BIOLOGY (I)	2	EVENING

*(Signature)*

- Errors/Omission accepted. Confirm your papers with datasheet at www.bisgp.edu.pk
- This Roll No slip is acceptable in Exam Center subject to validation by center Superintendent

Deputy Controller of Exams

برائے آئندہ امان

- امیدوار پر لازم ہے کہ وہ سال نمبر سلیپ کے ساتھ ہی مضامین اور پریکٹیکل مضامین میں لکھنے کی صورت میں امتحان شروع ہونے سے پہلے بورڈ کو ذرا مطلع کر دے۔ اور اس کی کاپی محفوظ رکھ کر دے۔
- رول نمبر، شیپ، پیزو، QR کو کراخ یا غراب کرنے کی صورت میں طالب علم غیر حاضر تصور ہوگا۔
- اسکاٹی نگر / پیزو بورڈ (Paper Board) امتحانی ہال میں لانا لازمی ہے۔
- پیزو شروع ہونے سے تقریباً 30 منٹ پہلے امتحانی ہال پہنچنا لازمی ہے۔

حصہ اول یعنی ( Objective Type ) پیزو مشین سے چیک کیا جائے گا۔ ہذا پیزو فولڈ نہ کریں۔ نہ ہی پیزو پر کوئی دوسرا نشان مثلاً ( Rough Work ) لکھیں۔

1- ( Objective Type ) پیزو پر رول نمبر اور نام پہلے سے لکھا ہوا ہے۔ پیزو شروع ہونے سے پہلے رول نمبر اور نام چیک کریں کہ کوئی لکھی ہوئی نہیں۔

2- ہر سوال کے لئے صرف ایک دائرہ بھریں۔ ایک سے زیادہ دائرے بھرنے کی صورت میں سوال غلط تصور ہوگا۔

3- صرف کالے یا نیلے رنگ کا ہال پوائنٹ یا مارکر استعمال کریں۔ اس کے علاوہ دوسرے رنگ کے ہال پوائنٹ استعمال نہ کریں۔

4- ایسا مواد کروا امتحان میں لائے کی ممانعت ہے جس سے نقل کا اندیشہ ہو۔ نیز کروا امتحان میں اس طرح کی حرکت منع ہے۔

5- کروا امتحان میں سوہاگل فن لائن ممانعت ہے۔ سوہاگل فن لائن کی صورت میں سوہاگل میٹ جیلا کہا جائے گا اور UFM تصور ہوگا۔ جس کی مزید امتحانات کیلئے ہال ہے۔

6- مضامین سوہاگل فن لائن کی خرابی یا کشیدگی کی ذمہ داری امتحانی عملہ کی نہیں ہوگی۔

7- امتحان میں ناجائز ذرائع استعمال کرنا Malpractices Act 1995 کے مطابق قابل مجرم ہے۔

تفصیل: جیوٹ فریب اور دوسروں کی حق تلفی کا دوسرا نام ہے۔ اس میں کسی بھی طرح سے حصہ دار بننا حقدار کا حق مارنے کے ساتھ ہی برابر کا شریک ہونا ہے۔

Print Date & Time: 2023-04-17 08:52:02

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*(Signature)*

10

27

Dated: 16 March, 2023

To  
The Secretary  
Government of Khyber Pakhtunkhwa  
Elementary and Secondary Education Department.

**SUBJECT: REQUEST FOR POSTING/TRANSFER IN PESHAWAR.**

Dear Sir/Madam,

It is submitted that I Miss. Afia Iqbal Principal B-18 GGHS Chamkani  
was promoted to B-19 and posted at GGHS Shakar Dara District Kohat vide  
NO. SO (S/P) E&SE 4-16/2022/posting Transfer dated 14-09-2022.  
As my mother is ill and she is suffering from gallstones (Gall Bladder Stones). The  
doctor has referred her for an immediate operation. Along with it, she also has heart problem. I  
cannot take care of her health as she needs my support the required reports are attached with the  
letter. For your information I am permanent resident of Peshawar and my domicile is also of  
Peshawar.

Sir a post of B-19 is being vacated at GGHS Mithra Peshawar due to retirement of  
Rifat Nadeem on 21-05-2023

It is therefore requested being a female and how distant I may kindly be posted/adjusted on the  
above mentioned vacancy and oblige

Thanks,

Yours Obediently,  
Ms. Afia Iqbal

Under promotion to GGHS Shakar Dara Kohat.

AS CE-1  
P/4 Nadeem  
24-03-23

SECRETARY DIARY  
4012  
122

ATTSTED

28



**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION**  
**DEPARTMENT**

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

091-9223588

No. SO(S/F) E&SED/4-16/2023

Dated Peshawar the March 30<sup>th</sup>, 2023

To

Deputy Director (Elections)  
O/O Election Commissioner,  
Khyber Pakhtunkhwa Peshawar.

*[Handwritten Signature]*  
20/11/23

**SUBJECT: TRANSFER/POSTING**

Elementary & Secondary Education Department proposes posting transfer of Mst. Alia Iqbal (BS-19) from GGHSS Shakar Dara Kohat to GGHSS Mathra Peshawar in the best public interest.

2. It is therefore, requested that NOC may be granted in this particular case for issuance of transfer Notification, please.

*[Handwritten Signature]*  
(SHAYANA HALEEM)  
SECTION OFFICER (S/F)

Endst: of even No. & Date:

Copy forwarded for information to: PS to Secretary, E&SE Department

*[Handwritten Signature]*  
SECTION OFFICER (S/F)

**ATTACHED**

*[Large Handwritten Signature]*



No.F 3 (1)/2023-Els (PEC) Vol IX (B)  
OFFICE OF THE  
PROVINCIAL ELECTION COMMISSIONER  
KHYBER PAKHTUNKHWA

29

Shami Road, Peshawar Cantt.  
April 5, 2023

To

✓ The Secretary  
Election Commission of Pakistan  
Islamabad.

Subject ISSUANCE OF NOC.

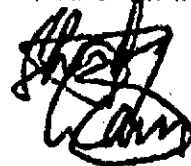
Dear Sir,

With reference to the above mentioned subject I have the honour to submit  
herewith a request of NOC as per following detail

S.No	Department	Letter No & Date	NOC For
1	Elementary & Secondary Education Department	No SO(S/F) E&SED/4-16/2023 Dated: <u>30<sup>th</sup> March, 2023.</u>	Posting/transfer

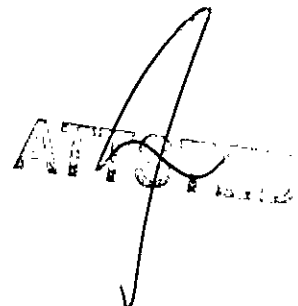
2 Submitted for order as may be deemed appropriate, please.

Yours faithfully,



(SHAMSHAD KHAN)  
Provincial Election Commissioner

Encl - As above.



No.F.10 (1)/2023-Elec-II  
ELECTION COMMISSION OF PAKISTAN  
\*\*\*\*\*

30

Secretariat,  
Constitution Avenue, G-5/2,  
Islamabad 11<sup>th</sup> April 2023



To,

✓ The Provincial Election Commissioner,  
Khyber Pakhtunkhwa,  
Peshawar.

Subject: ISSUANCE OF NOC.

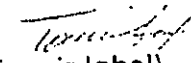
Dear Sir,

I am directed to refer to your letter No. F.3 (1)/2023-Els (PEC) Vol-IX (8) dated 5<sup>th</sup> April, 2023 on the subject noted above and to say that the request of the Section Officer (S/F), Elementary and Secondary Education Department, Government of Khyber Pakhtunkhwa for transfer / posting in respect of Mst. Alia Iqbal (BS-19) GGHSS Shakar Dara Kohat to GGHSS Mathra Peshawar has been acceded by the Hon'ble Commission

2.

The quarter concerned may be informed accordingly.

Yours sincerely,

  
(Tauqir Iqbal)  
Deputy Director (Election-II)

ATTSTED

31

No.F.3 (1)/ 2023-EIs (PEC) Vol - C (1)  
OFFICE OF THE  
PROVINCIAL ELECTION COMMISSIONER



Shami Road Peshawar, Cantt:  
April 14, 2023

To,

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

Subject: - **ISSUANCE OF NOCs.**

Dear Sir,

With reference to your office letter No. SO(S/F) E&SED/4-16/2023 dated 30<sup>th</sup> March, 2023 I am directed to attach herewith the Election Commission of Pakistan, Secretariat, Islamabad letter No.F.10 (1)/2023-Elec-II dated 11<sup>th</sup> April, 2023 (Copy Enclosed), for further necessary action at your end.

Encl: - as Above

(SAID GHAFOR KHAN)  
Assistant Director (Elections)

✓ Copy is forwarded for information and necessary action to Section Officer (S/F) Elementary & Secondary Education Department Government of Khyber Pakhtunkhwa Peshawar.

(SAID GHAFOR KHAN)  
Assistant Director (Elections)

ATTACHED



**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION**  
**DEPARTMENT**

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

091-9223588

Dated Peshawar July 14<sup>th</sup>, 2023

32

**NOTIFICATION**

**NO.SO(S/F)E&SED/4-16/2023/Posting/Transfer/:** Consequent upon provision of NOC by Election Commission of Pakistan vide letter No: F.10 (1)/2023-Elec-II dated 11.04.2023, Mst. Alia Iqbal Principal (BS-19) GGHSS Shakar Dara Kohat is hereby transferred and posted at GGHSS Mathra Peshawar against the vacant post of Principal (BS-19), with immediate effect.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA**  
**E&SE DEPARTMENT.**

**Endst: of even No. & date:**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officers (Female), Kohat and Peshawar
4. District Accounts Officers Kohat.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Secretary, E&SE Department
7. Officer concerned.
8. Office order file.

SECTION OFFICER (S)

14/7/23

ATTSTED

33

OFFICE OF THE PRINCIPAL G S ATIF UR REHMAN GHSS  
SHAKARDARA KOHAT

NO 1327

DATED 14/07/23

RELIEVING CHIT

It is certified that Mst ALIA IQBAL PRINCIPAL BPS-19  
is hereby relived from duty to day on 14/07/23(A/N)  
Vide SECRETARY E & SE GOVT OF KPK No SO(S/F) E&SED/4-  
16/2023 Posting, Transfer:- DATED 14-07-2023 and  
directed to report at GGHSS Mathra Peshawar with  
immediate effect.

Principal [Signature]

Copy To,

1. Secretary E & SE KPK
2. Director E & SE KPK
3. District Education Officer (F) Kohat
4. District Accounts Officer Kohat

Principal [Signature]  
G(S) Atif ur Rehman  
G.H.S.S Shakardara

ATTACHED

34

OFFICE OF THE PRINCIPAL GOVT: GIRLS HIGHER  
SECONDARY SCHOOL MATHRA PESHAWAR.

No. \_\_\_\_\_ / Dated Pesh: the:- \_\_\_\_/07/2023

10

The District Education Officer  
(Female) Peshawar.

**SUBJECT:-** ARRIVAL/JOINING REPORT OF MISS: ALI IQBAL PRINCIPAL BPS-19.

Memo:-

Reference Notification No. SO(S/F) E&SED/4-16/2023/Posting/Transfor/: Dated 14-7-2023. I Submit my arrival/Joining Report as Principal BPS-19 Govt: Girls Higher Secondary School Mathra Warsak Road Peshawar. Kindly Accept my arrival/Joining report for further necessary action please.

*Sc: 16*  
MISS: ALI IQBAL  
PRINCIPAL  
GGHSS MATHRA PESHAWAR

Encl: No. 1356-58/ Dated Peshawar the:- 15/07/2023

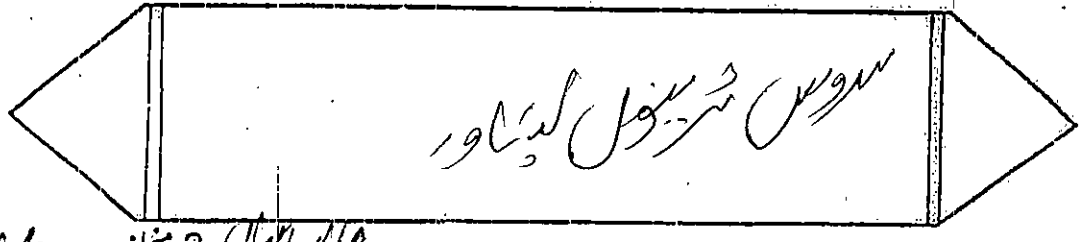
Copy forwarded to the:-

- 1 P.S to Secretary E&SE Department Khyber Pakhtunkhwa Peshawar.
- 2 Director E&SE Khyber Pakhtunkhwa Peshawar.
- 3 P/Fill.

*Ali Iqbal*  
PRINCIPAL 15/7/23  
GGHSS MATHRA PESHAWAR

ATTESTED

### بعدالت



عالمہ اہلیا 2، منجانب R-44  
نبی آئینہ بنام گورنمنٹ آف پاکستان

- مورخہ
- مقدمہ
- دعویٰ
- رقم

### باعث تحریر آئینہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی اور جواب دہی وکل کارروائی متعلقہ  
 آئینہ مقام کیا اور کیا کیلئے محمد آصف بو سفیر جی ایم اے  
 مقررہ کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کابل اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلقہ دینے جواب دہی اور اقبال دعویٰ اور  
 باہر رت ڈگری کرنے اجراء اور صولی چیک ور و پیر اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
 نیز دائر کرنے اپیل نمرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا سہولت  
 پر واختم منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
 نہ کر کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

Accepted  
Attested

المرقوم \_\_\_\_\_ ماہ \_\_\_\_\_ واہ العبد  
20  
Amir

لکھا گیا ہے۔  
عالمہ اہلیا