

Urgent Form

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

SERVICE APPEAL NO: _____/2023

Mst.Imtiaz Begum (PSHT) at GGPS Civil Quarters Peshawar.

.....Appellant

V E R S U S

DEO (F) District education Office Peshawar and others.....

.....Respondents

The ground of urgency are:

Since the matter is of urgent nature, as the transferred order in question is going to be implemented, if done so, the purpose of the instant appeal will become infructuous and the appellant will suffer irreparable loss, therefore, there is urgency for placing the case before this Honorable tribunal.

Date: - 25-08-2023

Imtiaz Begum
Appellant

Through,

Adnan Riaz Mughal
Adnan Riaz Mughal

&

Hassan Sardar Burq
Hassan Sardar Burq

(Advocates High Court Peshawar).

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

SERVICE APPEAL NO: 1736/2023

Mst. Imtiaz Begum (PSHT) at GGPS Civil Quarters Peshawar,
D/O Mohd: Lisaan R/O Civil Quarters Peshawar.

..... Appellant

VERSUS

1. Govt of Khyber Pakhtunkhuwa, through Secretary Education, Elementary and Secondary education, KPK Peshawar and Others.

..... Respondents

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Date:- 25-08-2023

Appellant

Through,

Adnan Riaz Mughal

&

Hassan Sardar Burq

(Advocates High Court Peshawar).

VAKEEL LAW ASSOCIATES

Office: Beside PBA Library

Mob : 03018889989

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

SERVICE APPEAL NO: 1736/2023

Mst. Imtiaz Begum (PSHT) at GGPS Civil Quarters Peshawar,
D/O Mohd: Lisaan R/O Civil Quarters Peshawar.

.....Appellant

- V E R S U S -

1. Govt of Khyber Pakhtunkhwa, through Secretary Education, Elementary and Secondary education, KPK Peshawar.
2. DEO (F) District education Office Peshawar.
3. SDEO (F) Town 3, Civil Quarters, Peshawar.
4. Director Education KPK, directorate of education, GT road, KPK Peshawar.
5. Secretary Education, Elementary and Secondary education, Civil Secretariat, KPK Peshawar.

.....Respondents

APPEAL UNDER SECTION-4 OF KHYBER PUKHTUNKHWA SERVICES TRIBUNAL'S ACT 1974, AGAINST THE IMPUGNED TRANSFER ORDERS DATED 03/05/2023 AND 22/05/2023, WHEREBY THE APPELLANT WAS TRANSFERRED FROM GGPS CIVIL QUARTERS PESHAWAR TO GGPS SYEDNA ZAINAB PESHAWAR, WHICH WAS THEN MODIFIED VIDE ORDER DATED 22/05/2023 AND THE APPELLANT WAS TRANSFERRED TO GGPS PALOSI MAGHDAZAI PESHAWAR.

PRAYER:

That on acceptance of this appeal the impugned transfer order dated 03/05/2023 and then modified through order dated 22/05/2023 by the respondent No.2 whereby the appellant was transferred from GGPS Civil quarters Peshawar to GGPS palosi maghdazai Peshawar may graciously be set-aside being, against the law and rules, unjust, based on malafide and discrimination towards the appellant further the

appellant may kindly be allowed to stay at the present station(School) being aged, medically infirm.

Respectfully Sheweth:-

Brief facts giving rise to the present appeal areas under:-

1. That through the instant appeal, the appellant humbly seeks indulgence of indulgence of this Honorable Court for declaring the impugned transfer orders, dated 03/05/2023 and then modified through order dated 22/05/2023 by the respondent i.e. No.2, as illegal, against the law and rules and an outcome of malafide, whereby the petitioner was transferred from GGPS Civil quarters to GGPS Syedna Zainab Peshawar, and then to GGPS palosi maghdazai Peshawar. **(Copies of the transfer orders are appended herewith as Annex A).**
2. Laconic facts of the matter in hand in the nutshell is that the appellant had been appointed to the post of P.T.C Teacher on **29.09.1987** and after her appointed she was posted at GGPS Granga payan Peshawar. The appellant has an unblemished service record. Not even a single complaint from any quarter has ever been received by the superiors of the appellant against her. **(Copy of the first Appointment letter is attached as B).**
3. That during the course of her services the appellant performed her duties with due diligence, and she was transferred to different stations so many times i.e. GGPS railway Quarters through order dated 06-12-1988, and then transferred to dehri baghbanan through order dated 28-11-2000, further the petitioner was transferred to GGPS Civil quarters Peshawar vide order dated 08-04-2014, which has already penalize her. **(Copies of some of the transferred orders with charge report are appended herewith as Annex C).**
4. That the appellant was currently posted at GGPS civil quarters Peshawar as head Teacher from 2014, whereby the SDEO (town 3) i.e. respondent no 3 was upset at the appellant due to her personal likes and dislikes further the behavior of the respondent no 3 was also very unpleasant towards the petitioner.
5. That it is very important to mention here that since long there was a dispute between the locals of civil quarters and a local representative (Consular) from area dehri baghbanan, on the quarter/flat situated at civil quarters which is allotted to the school for dehri baghbanan, whereby appellant has nothing to do with above mentioned clash.
6. That the appellant was shocked while it came into her knowledge through order dated 03/05/2023, for exchange of her post with Mst. Fatima head

teacher GGPS Syedna Zainab Peshawar, where the appellant and the teacher on the other hand don't have their mutual consent, further it was against rule/principle for mutual transfer which clearly tells about the ill will and malafide of the respondents i.e. no 2 & 3 and order mentioned above was not done in good faith, further without any valid reason /justification or prior information but under the influence and on political interference for the reason mentioned above in Para no 5.

7. That the appellant then filed an application/appeal before the director education KPK i.e. respondent No.4 against the impugned transfer order dated **23/05/23** with Dairy No. 684, which remained un responded till dated. **(Copy of the application is appended herewith).**
8. That it is very important to mentioned here that during the pendency of the application/appeal before i.e. respondent no 4, that an inquiry was initiated by the deputy secretary (inquires) E&SE department, vide notification dated 24th may 2023, on the complaint submitted by the locals of civil quarters to inquire the matter mentioned in Para no 5, further the transfer order was also held in abeyance. **(Copy of the notification is attached).**
9. Surprisingly that in the moment the transfer order was modified by the respondent i.e.no 2 vide order dated 22nd of may 2023 and even the enquiry notification was also withdrawn vide order dated **29th of may 2023**, without knowing the actual reason and clash behind the transfer of the petitioner. **(Copy of the withdrawal Notification is attached).**
10. That it is pertinent to mentioned here that the appellant requested/approached before respondent i.e. no 4 for the cancelation of her transfer order being outcome of malafide, further as she is medically infirm and aged women, whereafter the respondent i.e. no 2 was positively directed by the respondent i.e. no 5 to adjust the petitioner at her current school/station which was then disregarded. **(Copy of the directions/remarks letter is attached).**
11. That the appellant than also filed a sympathetic application/appeal before the respondent i.e. 4 being higher authority dated: **07-06-2023** against the impugned transfer order which also remained un responded till date. **(Copy of the application/appeal is attached).**
12. That it is pertinent to mention here that the appellant have already filed an appeal before this Honorable KP Service Tribunal, which was then returned dated **20-06-2023** on the ground that the appeal was premature. **(Copy of the appeal with objection letter is attached).**
13. That feeling aggrieved and disappointed the appellant then filed a writ petition before the honorable Peshawar high court Peshawar, which was fixed before the honorable bench on dated **13-07-2023**, and whereafter the constitutional petition was dismissed for the reason mentioned therein. **(Copy of the writ petition and order is attached).**

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14. That furthermore the appellant wants to lay down that her salary was also stopped without any legal justification and a valid reason but with ulterior motives, which also amounts to financial harassment and appellant was discriminated time and again.
 15. That it also very important to mention here that a request letter was also filed dated **28-07-2023** before respondents i.e. no 4 and 5, wherein it was requested by the appellant that her appeal may kindly be decided as per policy (**Posting/Transfer policy of the provincial Government**) which was also turned down and no reply of same was given. (**Copy of the request letter is attached**).
 16. That the appellant for the sake of his legitimate rights has approached and practiced, activated all the available legal forums prior to this appeal, which remained un responded till date and having no other adequate, speedy, efficacious and alternate remedy available to him under the law except to invoke the jurisdiction of this honorable court/Tribunal inter alia on the following facts and circumstantial grounds.

GROUND OF APPEAL.

- A. That the impugned action apropos of transfer/posting is against the law, rules, Policy and regulations and against the administration of natural justice.
- B. The appellant has not been treated in accordance with law, as certain in article 4 of Constitution, further the respondents have not followed the law and rules governing services rules, thus the secured and guaranteed rights of the appellant has been vehemently violated.
- C. That impugned office orders with regard to transfer and posting mentioned above are illegal, without lawful authority, and are liable to be set aside and are infective upon the rights of the appellant.
- D. That the appellant is aged women further, weak and medically unfit and having a joint disease which improves her illness and it is not possible for her to travel from one place to other which was also endorsed by the respondent i.e. no 5. (**Copy of the medical certificates are attached as Annexed D**).
- E. That even the transfer of the appellant is against the policy that no women can be transfer from his native union council to other union council.
- F. That a glaring malafide, political victimization is spelled out from a cursory glance of the impugned office orders, hence are liable to be set aside, being void-ab-initio and ineffective upon the rights of the appellant.

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- G. That the subject transfer orders can't be term as " in public interest" as the transfer of the appellant from GGPS Civil quarters Peshawar to GGPS Syedna zainab and then to GGPS palosi maghdazai Peshawar done on political bases and will not only increase distress and deprivation and physical health of appellant but will also adversely affect the students at GGPS civil Quarter Peshawar.
- H. That there is clear malafide and discrimination met out from the departmental proceedings carried out on the aforesaid matter and appellant was deprived of the benefit of the equality of citizen as ordained in article 25 f the constitution.
- I. That the appellant seeks the permission of this honorable tribunal to rely on additional grounds at the hearing of this appeal.

In aforementioned circumstances, it is humbly prayed that on acceptance of the instant appeal, relief as prayed for may kindly graciously be granted.

Any other relief which this Honorable Court deems fit and appropriate may kindly also be granted.

Imtiaz Begum
Appellant

Dated: 25/08/2023

Through,

Adnan Riaz
Adnan Riaz Mughal

&

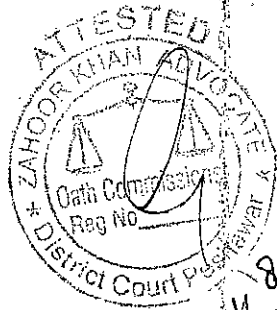
Hassan Sardar
Hassan Sardar Burq

(Advocates High Court Peshawar).

CERTIFICATE:-

It is certified that upon instructions of my client it is the 1st appeal filed before this Honorable Tribunal in the instant matter.

Adnan Riaz
ADVOCATE



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BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

SERVICE APPEAL NO: _____/2023

Mst.Imtiaz Begum (PSHT) at GGPS Civil Quarters Peshawar.

.....Appellant

VERSUS

DEO (F) District education Office Peshawar and others.....

.....Respondents

ADDRESSES OF THE PARTIES

Appellant

Mst.Imtiaz Begum (PSHT) at GGPS Civil Quarters Peshawar.

Respondents

1. DEO (F) District education Office Peshawar.
2. SDEO (F) Town 3, District education Office Peshawar.
3. Director Education KPK directorate of education KPK Peshawar.
4. Secretary education KPK Peshawar.

Appellant

Through,

Dated: 25/08/2023


Adnan Riaz Mughal

&

Hassan Sardar Burq

(Advocates High Court Peshawar).



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

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Annex

OFFICE ORDER

This office order issued under Endst:No.4507-14 dated 03/05/2023 is hereby modified in the best public interest as under:-

| S.No. | Name of Teacher/ Design | Present School | Transferred to | Remarks. |
|-------|----------------------------|-------------------------------|----------------------------------|-------------|
| 1. | Mst. Sariat Begum PSHT | GGPS Palosi Maghdazai Pesh | GGPS Civil Quarters Pesh | Vice S.No.2 |
| 2. | Mst. Imtiaz Begum PSHT | GGPS Civil Quarters Pesh | GGPS Palosi Maghdazai Pesh | Vice S.No.1 |

Note- Charge reports should be submitted to all concerned.

District Education Officer
(Female) Peshawar

Endst: No. 5067-74

Dated: 22/5 /2023

Copy of the above forwarded to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director E&SED Khyber Pakhtunkhwa Peshawar with reference to his order dated 18-05-2023.
3. Haji Zubair Ali Mayor Sahab Metropolitan City Peshawar.
4. District Monitoring Officer Peshawar.
5. SDEO (F) Town III.
6. Head Teachers Concerned.
7. Supdt Local office.
8. ASDEO(P) Local Office.
9. Master File.

Dy: District Education Officer
(Female) Peshawar

Attested to
be true copy

8

Better Copy

OFFICE ORDER

Exchange of posts between Mst. Imtiaz Begum PSHT GGPS Civil Quarter Peshawar and Mst. Fatima Head Teacher GGPS Syedna Zainab is hereby ordered on their own pay & scale in the interest of public service with immediate effect.

**District Education Officer
(Female) Peshawar**

Endst No. 4507-14 dated: 03/05/2023 Copy of the above forwarded to the:

**Dy: District Education Officer
(Female) Peshawar**

Annex(A) 8(b)



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

OFFICE ORDER

Exchange of posts between Mst. Inqilab Begum PSIT GGPS Civil Quarters Peshawar and Mst. Fatima Hameed Teacher GGPS Syeda Zainab is hereby ordered on their own pay & seat in the interest of public service with immediate effect.

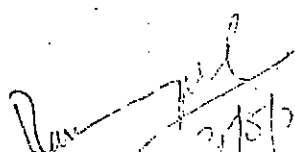
District Education Officer
(Female) Peshawar

Enclst: No. 1507-14

Dated: 03 / 05 / 2023

Copy of the above forwarded to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director E&SED Khyber Pakhtunkhwa Peshawar with reference to his order dated 03-05-2023.
3. Haji Zubair Ali Mayor Sahab Metropolitan City Peshawar.
4. District Monitoring Officer Peshawar.
5. SDEO (F) Town III.
6. Head Teachers Concerned.
7. Supdt: Local office.
8. ASDEO(P) Local Office.
9. Master File.


Dy: District Education Officer
(Female) Peshawar

Attested to be
true copy



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.APPOINTMENT.

Appointment of the following P.T.C. trained candidates are hereby ordered in the B.P.S.No.7(Rs.750-31-1370) on Rs.750/-P.M plus usual allowances as admissible under the rules in the schools given against their names with effect from the dates of their taking over charge under the terms & conditions given below:-

| S.No. | Name of Candidates/FathersName.& Address. | Posted at | Remarks. |
|-------|---|--------------------------------------|------------------------------------|
| 1. | Nasim Akhter D/O Pir Baksh Pepalz Col:Ukab Ghalla Godam Bahana Mari Peshawar. | GGPS, Afghan Colony Peshawar. | Against the newly created post. |
| 2. | Nasim D/O Syed Ahmad Shah I.No.1741-42 Moh:Kalo Khan Gunj Gate Peshawar. | GGPS, Dalaxak Pesh: | -do- |
| 3. | Amina Begum D/O/Jamshid Nisar Qtr:No.D-I Irrig:Col:Pesh: | GGPS, Pir Bala Pesh: | -do- |
| 4. | Dilshad Begum D/O Abdul Latif Qtr:No.24 Block No.F Sadar Bazar Risalpur Cantt:NSR: | GGPS, NSR:Kalan. | -do- |
| 5. | Iffat Naheed D/O Ghulam Mohd: Shakir Tailers Shaheen Bazar Peshawar. | GGPS, Daman Hindki Peshawar. | -do- |
| 6. | Samia Jabeen D/O Allah Bakhsh H.No.5737 PT Opposit Ziarat Sattar Shah Dabgari Pesh: | GGPS, Railway Qtr: Peshawar. | -do- |
| 7. | Nasim Subhani D/O Ghulam Subhani D/O Abdul Wadood 74 B Civil Qtr:Peshawar. | GGPS, Sarkhana Pesh: | -do- |
| 8. | Khushnood Begum D/O Abbas Ali Shah Moh:Shahi Abad A/Khattak. | GGMS, NSR:Kalan. | -do- |
| 9. | Mehar Nigar D/O Sher Mohd:Khan Vill:Prang Moh:Khshta Khel Chd: | GGPS, Sheikh Killi Chd: | -do- |
| 10. | Shaheen Bano D/O Mohd:Yaqub H.No.59/4 Bari Lal Kurti Pesh: | GGPS, Jatti Bala Pesh: | -do- |
| 11. | Azra Begum D/O Rizwanullah Vill:Tarnab China Moh:Abu Bakery Chd: | GGPS, Tarnab No.1 Chd: | -do- |
| 12. | Musarrat Shaheen D/O Qazi Faizul Haq Vill:& P/O Rajjar. | GGPS, Dheri Palosi Chd: | -do- |
| 13. | Shafqat Ara D/O Mohd:Younas C/O Shah Zamah Khan Qtr:No. 142/B Railway Col:Pesh: | GGPS, Garhi Amir Khan Peshawar. | -do- |
| 14. | Sarvia Nasira D/O Saifur Rehman Moh:Khan Khel Chd:Town Chd: | GGPS, Agra Payan Chd: | -do- |
| 15. | Samina Anwar D/O Taj Mohd: Muthlan Gunj Peshawar. | GGPS, Gara Tajik Pesh: | -do- |
| 16. | Safia Bano D/O Ayub Shah Budget Section F.D.NWFP, Pesh: | GGPS, Mashogagar Pesh: | -do- |
| 17. | Nafisa Abbas D/O Syed Abbas Ali Moh:Shahi Abad A/Khattak | GGPS, Chashmai NSR: | Against the Vacant Post. |
| 18. | Misbahia D/O Fazal Ali Kandi Awarimai Vill:Umarzai Chd: | GGPS, Inan Abad Chd: | Against the newly created post. |
| 19. | Bushra Jabeen D/O Mohd:Shafi Qtr:No.S-2/4 Civil Qtr:Pesh: | GGPS, Garhi Abdus Samad Peshawar. | -do- |
| 20. | Bushra Noreen D/O Ashiq Hussain Moh:Telian Illaqa Dabgari H.No.2154 Pesh: | GGPS, Garhi Shah Mohd: Peshawar. | -do- |
| 21. | Mobina Noor D/O Allah Noor Moh:Haleem Abad Utmanzai Chd: | GGPS, Wardaga Chd: | -do- |
| 22. | Shamim William D/O William NSR:Kalan Lain No.12 Block No. 15 H.No.2 Nowshera. | GGPS, Marhatti Banda NSR: | -do- |
| 23. | Saeeda Naz D/O Abdur Rauf Moh:Bajori Kalan Dabgari, Pesh: | GGPS, Railway Qtr: Peshawar. | -do- |

Attended
copy
[Signature]

24. Komana Firdous D/O Mohd:Younas GGPS, Bruj Nasir Khan Against the newly
C/O Aziz Fatima PTC, GGPS, Peshawar. created Post.
25. Zahida Begum D/O Mohd:Mustaqeem GGPS, Umar Payan NSR: -do- 10
C/O Shop No.172 R.A. Bazar NSR:Cantt: B
26. Shahnaz Begum D/O Ghulam Mehdi GGPS, Pabbi No:1 NSR: Against the vacan
Punjab Hair Cutting Salloon PTC, post.
Pabbi Nowshera.
27. Kausar Shaheen D/O Ahmad Din GGPS, Kankula Pesh: Against the newly
Moh:Mirpura Yakka Toot Pesh: created post.
28. Taslim Kausar D/O Roshan Khan GGPS, Kas Koroona -do-
Qtr:No.G-31 Irrig:Col:Pesh: Peshawar.
29. Taslim Akhter D/O Syed Lal GGPS, Shah Kot NSR: -do-
Badshah Vill & P/O Akbar Pura.
30. Fozia Begum D/O Safdar Ali GGPS, Bobak Chd: -do-
Vill:Qaid Abad C/O Safdar Ali Autos Mardan Road Chd:
31. Rukhsana Yasmin D/O Fida GGPS, Mama Khel Chd: -do-
Mohd:Qtr:No.5-III/3 Civ:Col:
32. Nighat Seema D/O Lal Shah GGPS, Pir Sabaq NSR: -do-
Moh:Khattak Vill:& P/O A/Khattak
33. Umme Kalsoom D/O Atta Mohd: GGPS, Banda Payan Pesh: -do-
Gul Afshan Col:Opposite Distt: Council Near Civl:Qtr:Pesh:
34. Noorun Nisa D/O Abdul Hamid GGPS, Tarkha NSR: Against the vacan
C/O Abdul Hamid & Sons Karyana PTC post.
Merchant Sadar Bazar Risalpr Cantt:Nowshera.
35. Gulnaz Begum D/O H.Ikramullah GGPS, Niami Pesh: Against the newly
Jan Moh:Ahmad Abad Supply Road created Post.
City Station Peshawar.
36. Mumtaz Begum D/O Abdul Karim GGPS, Ibrahimzai Chd: -do-
Vill:Utmanzai Kandi Piran Dhd:
37. Roheeda Wahid D/O Mohd:Anwar GGPS, Garhi Sharif Gul -do-
Gul Faisal Colony Dalazak Road Peshawar.
38. Adeeba Khanum D/O Mohd:Sharif GGPS, Shagai Pesh: -do-
Tatari H.No.1862 Tatari Shopping Centre Bazar Chari Kuban Pesh:
39. Tahira Jabeen D/C Fazli Karim GGPS, Haryana Bala Pesh: -do-
C/O Fazli Karim Master Makki Peshawar.
Bazar Vill:& P/O Pakha Ghulam.
40. Zahida Parveen D/O Abdul Qudus GGPS, Sadar Garhi Chd: -do-
Moh:Agar Khel Vill:& P/O Tangi.
41. Bibi Amina D/O Rafiullah H.No. GGPS, Hazar Khawani. Pesh: -do-
2009 Moh:Qowati Islam Illaqa Dabgari Peshawar.
42. Farzana Begum D/O Hamidullah GGPS, Kot Chd: -do-
Village Kot Teh:Chd:
43. Bibi Hajira D/O Rafiullah H.No. GGPS, Hazar Khawani Pesh: -do-
2009 Moh:Qowati Islam Illaqa Dabgari Peshawar.
44. Rafia Parveen D/O Farmanullah GGPS, Pirpai NSR: -do-
W/O Syed Rahat Shah Vill:& P/O Pirpai Moh:Sadat Teh:NSR:
45. Ruqia Khatoon D/O Abdul Hamid GGPS, Rashaki NSR: -do-
C/O Abdul Hamid & Sons Karyaana Merchant Risalpur Cantt:NSR:
46. Imtiaz Begum D/O Mohd:Lisan GGPS, Garanga Payan Pesh: -do-
R.D.E.Deptt:Peshawar.
47. Safia Begum D/O Mohd:Shah GGPS, Sheikho Sardheri -do-
Village Rajjar Chd: Chd:
48. Farzana Begum D/O Fazal Haleem GGPS, Amin Jan Killi Chd: -do-
Vill:Qazi Khel Qadeem P/O & Tehsil Charsadda.
49. Shagufta D/O Sarwar Khan ~~xxx~~ GGPS, Abdullah Abad Chd: -do-
Buthi Koroona Nishat Abad Vill:Utmanzai Teh:Chd:
50. Naheed Begum D/O Rustam Khan GGPS, Nasir Pur Pesh: -do-
Moh:Mirpura Yakka Toot Pesh:

Attested to
be true
[Signature]

Annex (B)

Page...3....

51. Nargis Siraj D/O Siraj Mohd: GGPS, Nasir Pur Pesh: Against the newly
Vill: Chamkani Peshawar. created Post.
52. Ghazala D/O Dilawar Khan GGPS, Bela Baramad Khai -do-
Moh: Lalazar Col: Pesh: Peshawar.
53. Zahida Nawab D/O Nawab Masih GGPS, Bela Mohmandan Pesh: -do-
Moh: Sanda Godam Teh: Pesh:
54. Anjilina Siraj D/O Siraj H.No. GGPS, Garanga Payan Pesh: -do-
948 Moh: Hitang Abad Pesh:
55. Sajida Begum D/O Muslihud Din GGPS, Khulay Chd: -do-
Vill: & P/O Rajjar.
56. Mumtaz Begum D/O Ziarat Gul GGPS, Kaptan Killi Chd: -do-
C/O H.M. GGPS, Mir Abad Chd:
57. Shafqat Safir D/O Safirullah GGPS, Pishtakhara Bala -do-
Nodeh Payan Near Tube Well Peshawar.
Nawa Killi Peshawar Cantt:

TERMS AND CONDITIONS.

1. Their appointment are purely temporarily and liable to termination any time without any assigning/reasons or notice.
2. In case of resignation they/he/she will have to submit one Month's prior notice to the Deptt: or forfeit one Month's Pay in lieu thereof to the Govt:.
3. He/She/They are required to produce Health & Age Certificates from the Medical Authorities concerned before taking over charge provide they are not in Govt: Service.
4. He/She/They should not be allowed to take over charge if his/her/their age is less than 18 years or above 30 years.
5. His/Her/Their appointment is/are subject to further condition that/he/she/they are domicile of NWFP.
6. His/Her/Their antecedents forms should be obtained duly verified by the local Police authorities and submit to this office together with application for appointment on prescribed form and under taking, declaration of moveable and immoveable property for record in this office.
7. All Educational, Character and Domicile Certificates should be through checked before handing over charge if necessary it should be verified from the Institutions concerned.
8. If he/she they fails to take over charge of the post within a week of the receipt of these order the offer of appointment shall stand cancelled.
9. Charge reports should be submitted to all concerned.
10. No TA/DA etc, is allowed.
11. He/She/They should be given test in Nazira Quran and Pakistan Studies and submit result intimated to this office.

(MRS, R.A. BUKHARI)
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR.

Endst: No. 1463-1582 /A-I/ Appt: /PTC/DA-IV/ Dated Pesh: the 29/9/1987.

Copy of the above is forwarded for information and necessary action to the:-

- 1/- All the Sub Divisional Education Officers (Female) Peshawar/Nowshera & Charsadda.
- 2/- All the Headmistresses, Govt: Girls Middle/Primary Schools concerned.
- 3/- All Candidates concerned.
- 4/- Suptd: Local Office.

R.A. Bukhari
District Education Officer
(Female) Peshawar.

Z. Gul
M. Zahir.

Attested to be
the

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&S) EDUCATION PESHAWAR.

OFFICE ORDER/

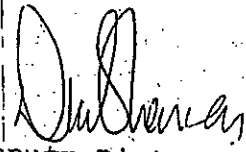
1. The Head Ship order in respect of Mst:Yasmin Akhtar D/O Mohammad Latif Govt:Girls Primary School Dheri Baghbanan Peshawar issued vide this Office Endst;NO.8327-29 / Dated 19-12- /2011 is hereby cancelled with immediate effect.
2. Mst:Imtiaz Begum PST Govt:Girls Primary School Dheri Baghbanan Peshawar is hereby declared as Head Mistress for the said school.

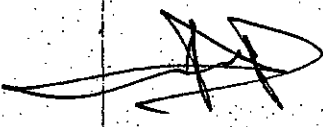
sd/-
Executive District Officer,
(E&S) Education Peshawar

Endst;NO. 416-19/Head Ship/Dated Peshawar the 10/1 /2012

Copy for information to the:-

1. District Account Officer Peshawar
2. P.S to Minister for (E&S) Education Peshawar.
3. A.E.O Circle concerned.
4. Teacher concerned.
5. P/File.


Deputy District Officer,
(Female) Peshawar.

Attested to
be true copy


OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) PESHAWAR.

OFFICE ORDER :-

Mst: Heena Gul P.T.C Mistress Govt: Girls Primary School Sara Khowra Peshawar is hereby transferred to Govt: Girls Primary School Railways Quater vice Mst: Intez Begum P.T.C Mistress in the interest of Public service with immediate effect:-

(MST: AFIYA KOUSAR)
SUB DIVISIONAL EDUCATION OFFICER (FEMALE) PESHAWAR.

Order No. 2243-48/1-AB/PTC/Transfer/. Dated Peshawar the 23-5/95.

Copy forwarded to the :-

- 1:- Director Primary Education NWFP Peshawar.
- 2:- District Education Officer (F) Peshawar.
- 3:- ~~XXXXXX~~ H/M GGGPS Sara Khowra Peshawar.
- 4:- F/M GGPS Railways Quater Peshawar.
- 5:- 1.4A Local Office.
- 6:- P.File.

Afiya Kousar
SUB DIVISIONAL EDUCATION OFFICER (FEMALE) PESHAWAR.

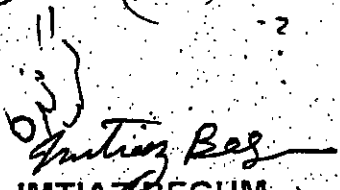
Attested to
be true
[Signature]

محترمات جناب اے ڈی اے اے اے سبٹ سکول
انچارج (زنانه)

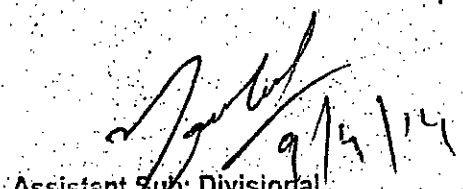
جناب عالیہ!

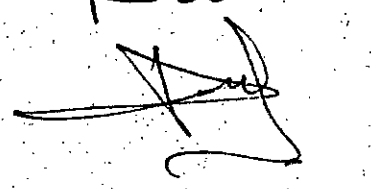
وہاں گزرتا ہے کہ صہبی اجنبانہ بیگم ولدہ
محمد اسحاق نے ڈسٹرکٹ ایجوکیشن آفسر فونڈل کے
آرڈر نمبر 6782-96 کے تحت آج 8.4.2014ء کو
قہقہہ اور دوپٹہ کو گورنمنٹ گریڈ پرائمری سکول سکول
ڈائریکشن میں اپنے لیے لے لی جا رہی ہے۔

جانج کنتہ


IMTIAZ BEGUM
PSHT
Govt. Girl Primary School
Civil Quarters

جانج دستہ


9/4/14
Assistant Sub-Divisional
Education
Officer (F) Circle Cantt.
Peshawar

Attested


محترم جناب ڈسٹرکٹ ایجوکیشن آفیسر صاحبہ ضلع بہاولپور

جنابہ عالیہ

پودمانہ لڈارسنگ پتہ میں سے آرڈر

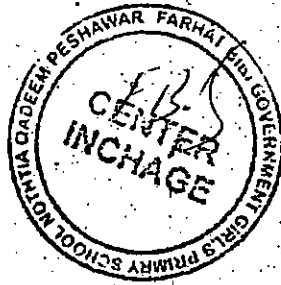
2157-60 کے تحت گورنمنٹ گائز ہائی اسکول ڈھیرا باغ بہاولپور

میں مورخہ : 3/10/2011 کو کاپی ارسال ہوئی ہے گا چارج سنبھال لیا

الحمد للہ علیٰ اللہ تعالیٰ

طیاری ادارت

Intiaz Begum



دستخط

Farhat Bibi Government Girls Primary School
Shari Bakhsh

Attested to be true copy

چارج رپورٹ

میں نے زیر حکم ڈی ای او صاحبہ پشاور کے آرڈر نمبر 4626 - 4597

مورخہ 28/11/2006ء آج مورخہ 30/11/2006ء قبل از دوپہر گورنمنٹ گڈنز ہراٹری

سکول ڈھیری باغبانان میں رہی ڈیوٹی کا چارج لے لیا ہے۔

دستخط چارج گذرندہ۔

Imtiaz Begum

دستخط چارج دیندہ: 10-

[Signature]

ڈورہ ایڈیشنل سیکرٹری پشاور
ڈی ای او باغبانان پشاور

Attested
[Signature]

چارج رپورٹ -

لقد لیتوی جاتی ہے۔ کہ من اسماء استیاز بیگم
نمبر ٹی بی بی۔ ٹی۔ سی۔ آج مورخہ 1/10/87
بجگم آرڈر نمبر 10582-10463 مورخہ 29.9.87
آمدہ از دفتر ڈسٹرکٹ ایجوکیشن آفیسر صاحب
پشاور آج قبل از دوپہر سنبھالے۔

چارج گیر بندہ

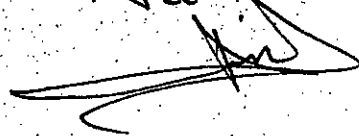
چارج دہندہ

X.

Intiaz Begum

Headmistress
Smt Girls Primary School,
Zalangi Bala

Attested



Attached to
be five

Handwritten text in Urdu script, appearing to be a list or series of notes. The text is written in a cursive style and is somewhat difficult to decipher due to the handwriting and the quality of the scan. It seems to contain several lines of text, possibly related to a document or a set of instructions.

Handwritten text in Urdu script, possibly a signature or a concluding note. It includes the word "امین" (Amin) and other characters.

Handwritten text in Urdu script, possibly a date or a reference. It includes the word "تاریخ" (Tareekh) and other characters.

Mon Tue Wed Thu Fri Sat

تاریخ

کے گوشے میں سیاسی اثر و تعلق پر
 ملیر تیار کرنا ویسے جیل میں
 اس سارے معاملے سے کوئی تعلق
 نہیں ہے۔

آپ صاحبان سے گزارش ہے کہ
 مہربانی فرما کر ملیر تیار نہ منسوخ
 کیا جائے اور جو سیاسی دشمنی
 کا نشانہ نہ بنایا جائے۔

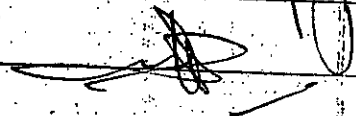
دعا گو

بیتا محمد مس امتیاز بیگم
 GGPS CIVIL QUARTERS

مورف 23/05/23

684 DNO

Attested to
 be true
 copy





GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Annex E (20)

Dated Peshawar 24th May, 2023

NOTIFICATION

No. SO(Inq)E&SED/1-1/2023/Civil Qtr Peshawar The office order bearing Endst. No.5067-74 dated 22.05.2023 issued by the District Education Officer (Female), Peshawar is hereby held in abeyance till the final proceedings of the complaint submitted by the residents of the Civil Quarters Colony, Peshawar.

DEPUTY SECRETARY (INQUIRIES)
E&SE DEPARTMENT

Endst. Number & date even.

Copy to:-

1. Director, E&SE Khyber Pakhtunkhwa.
2. District Education Officer (F), Peshawar
3. District Monitoring Officer, Peshawar
4. Head Teachers Concerned.
5. Supdt Local Office
6. PS to Secretary, E&SE Department


(ARSALAN AHMAD)
SECTION OFFICER (INQUIRIES)

Section Officer (Inquiries)
Elementary & Secondary Education
Peshawar, Khyber Pakhtunkhwa

Attested to
be true copy



Annex (F)

21

Better Copy

Dated Peshawar the 29.05.2023

ORDER

No.SO(PE)/ E&SED/2-1/Sariat/Imtiaz Begum/2023. The Competent authority is Pleased to withdraw /cancel this department notification No.SO(Inq)/E&SED/1-1/223/Civil Quarter Peshawar dated: 24.05.2023 with immediate effect in the public interest.

**SECRETARY TO GOVT: OF KPK
ELEMENTARY & SECONDRY EDUCATION
DEPARTMENT**



GOVERNMENT OF KARNATAKA
DEPARTMENT OF ELEMENTARY & SECONDARY EDUCATION
BANGALORE

Dated: 14/01/2025

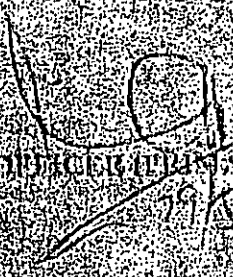
GENERAL

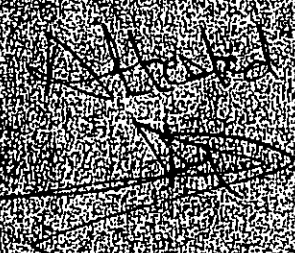
No. EDU/13/C&S/1177/SaCh/11/10/2025 - The Government Authority is pleased to withdraw/cancel the Government notification No. SCh/13/1177/S/2024/10/1301 dated 10/01/2024 with regard to the withdrawal of the Government Authority.

SECRETARY TO GOVT. OF KARNATAKA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Order No. V/11/13/11/10/2025

- 1. Copy to be sent to
- 1. The Director, Elementary & Secondary Education, Government of Karnataka
- 2. The District Education Officer, Chikballapur
- 3. District Monitoring Office, Chikballapur
- 4. SDO (H), A.S.E.D. Chikballapur, Chikballapur
- 5. Head Teacher, Concerned
- 6. Master, etc.


SECTION OFFICER (GENERAL)



Annex (G)

220

Better Copy
(Remarks on order dated 29-05-2023)

DEO(f) Peshawar.

Mst. Imtiaz Begum PSHT has been transfer so many times within short time. You are directed to adjust her at GGPS Civil Quarter being aged as medically unfit for long traveling.

Dated: 5/06/2023

**Additional Secretary (General)
Elementary & Secoondry Edu. Dept
Govt. Of KPK.**

DEPARTMENT OF
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

1960-61 Performance

The student's progress is
very good and is very
satisfactory.

to original
classroom
work

has a good grasp of
the subject matter
and is very
thorough.

[Signature]
F. S. [unclear]

Attested to
be true copy

[Signature]

(23)

خدمت جناب سیکرٹری ایجوکیشن، مہاراجہ ایجوکیشنل ایسوسی ایشن سکول
ایجوکیشن سٹور خیبر پختونخواہ

عنوان: ایس ایس اے کے لئے ایسوسی ایشن سکول
جناب عالی

مؤرخہ 22-05-2023 کو ایس ایس اے کے لئے ایسوسی ایشن سکول
سول کوارٹرز میں کسٹم ہڈ سٹور میں ایس ایس اے کے لئے ایسوسی ایشن سکول
کے لئے ایسوسی ایشن سکول میں ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول
4507-14 کے تحت میرا شمارہ GPS @ Mil Qadri سے
GPS Syedna Zainab کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول
کے خلاف ڈی ایس ایس اے کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول
میرے ایس ایس اے کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول
22-05-2023 کو آرڈر نمبر 5067-74 کے تحت میرا شمارہ

GPS Palosaai Maghdazai Pesh کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول
ڈی ایس ایس اے کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول
کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول
میں اس ایس ایس اے کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول
کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول
کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول
22-06-2023 کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول
23-05-2023 کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول
کیاں کا انصاف ہے۔

میں بہت زیادہ بوجھ ایس ایس اے کے لئے ایسوسی ایشن سکول کے لئے ایسوسی ایشن سکول

Attested to
be true
AD

(H)



Gap ہے جس کی وجہ سے جو جملہ کمرے میں سٹارڈ
 تکلیف کا سامنا کرنا پڑتا ہے۔ اتنا دور جانا ضروری ہے
 مشکل ہے۔
 لہذا آپ سے گزارش کی جاتی ہے کہ اس وقت کے
 تقاضوں کو مدنظر رکھ کر ہرگز کسی بھی صورت میں
 دیا جائے کیونکہ شدید بیماری کے دوران ایسے
 آنا جانا مشکل ہے۔
 مہربانی درخواست ہے کہ نظر ثانی فرمائی جائے۔
 مہربانی کا موقع ہمارے فرمائیں۔
 دعاگو

سر
 مینسٹریس
 گورنمنٹ ہسپتال
 7-06-2023

نوٹ: مہربانی میں رپورٹ اور آڈٹ کی ذمہ داریاں
 درخواست کے ساتھ لے کر
 مہربانی درخواست میں Inquiry کرنا
 اترورسوج پر Reject کر دی گئی اور جملہ کمرے میں
 سے اور دوسری میں کارڈ رکھا گیا ہے جس میں
 وہاں پر Charge لے ہوئے گا اور اس کے لئے
 ہی مکمل میں ہوا اور Management کو مطلع کیا گیا ہے۔

Attested

Dr. Pir Muhammad Zahid

MBBS
MRCP (London)
MRCP (Glasgow)
MRCP (Edinburgh)
FCPS (Medicine)
FCPS (Rheumatology)
Consultant Rheumatologist
& Medical Specialist
Hayatabad Medical Complex Peshawar



Pain & Arthritis Clinic

کلینک (درد مفاصل و مفاصل) ایڈمزڈیکل کمپلس
حیات آباد میڈیکل کمپلس پشاور

ڈاکٹر پیر محمد زاہد

ایم بی بی ایس
ایم آر سی بی (لندن)
ایم آر سی بی (گلاسگو)
ایم آر سی بی (ایڈنبرا)
ایف سی بی ایس (میڈیسن)
ایف سی بی ایس (ریمیٹولوجی)

Clinical Notes and Rx

Date: 20-5-23

Patient Name: Imtiaz Begum

Age: 54y

Gender: F

Marital Status: _____

Comorbid: Hypertension

HO Allergy: _____

BP/Weight: 130/80

Smoker/Nonsmoker: _____

Last Visit: _____

Other: _____

Investigations:

- CBC - ESR
- S. ACT
- RBS
- S. Cr. CPK
- Anti-CCP
- ANCA

Diagnosis: NCB

H/O
- Polyarthralgia for last 1 year
but aggravated for last 1 month
- unable to comb her hair &
difficultly in steady non
sitting position
- H/O numbness in both hand
- H/O tingling
- H/O Depression
- 84 wt loss
- 2nd MCP (1st) tend & swollen
- RT 1st MPJ tend
- LT knee crepitation
- Tenderness in glenohumeral muscle
of RT
- H/O depression
- some kidney problem
- 100 mg prednisolone 10mg
3/3

Not Valid For Court

For Appointment:
0334-9090829
0348-8123519

کلینک: B-49، دوسری منزل خیبر میڈیکل سنٹر ڈگری گارڈن پشاور

Attested

Dr. Pir Muhammad Zahid

MBBS
 MRCP (London)
 MRCP (Glasgow)
 MRCP (Edinburgh)
 FCPS (Medicine)
 FCPS (Rheumatology)
 Consultant Rheumatologist
 & Medical Specialist
 Hayatabad Medical Complex Peshawar



Pain & Arthritis Clinic

کسٹنٹ (روماتوئیسٹ) ایڈمزیکل اسپیشلسٹ
 حیات آباد میڈیکل کمپلیکس پشاور

ڈاکٹر پیر محمد زاہد

ایم بی بی ایس
 ایم آر سی پی (لندن)
 ایم آر سی پی (گلاسگو)
 ایم آر سی پی (ایڈنبرا)
 ایف سی پی ایس (میڈیسن)
 ایف سی پی ایس (ریمیٹولوجی)

Clinical Notes and Rx

Date: 20-5-23

Patient Name: Amber Begam

Age: 54y

Gender: F

Marital Status: _____

Comorbid: HTN (H2)

HO Allergy: _____

BP/Weight: 130/80

Smoker/Nonsmoker: _____

Last Visit: _____

Other: _____

Investigations:

→ CBC - ESR

→ S-ACR

- RBS

- S-Cr, CPK

- Anti-CCP

Diagnosis: ACB

SNRA

H/O
 - Polyarthritits for last 1 year
 but aggravated for last 1 month
 - unable to comb her back &
 difficulty in standy from
 sitting position
 → H/O numbness in both hand
 - H/O Finnhus
 H/O Depression
 - B/L wrist tend:
 → 2nd MCP (L) tend & swollen
 → RT tend 1st & 2nd
 → LT knee crepus
 → Tenderness in plantar muscle
 of RL

Rx:
 1) Tab Phenylbutazone 100mg
 2) Tab Paracetamol 500mg
 3) Tab Celecoxib 200mg
 4) Tab Tramadol 50mg
 5) Tab Gabapentin 300mg
 6) Tab Pregabalin 150mg
 7) Tab Amitriptyline 25mg
 8) Tab Fluoxetine 20mg
 9) Tab Escitalopram 10mg
 10) Tab Sertraline 50mg
 11) Tab Venlafaxine 75mg
 12) Tab Duloxetine 60mg
 13) Tab Milnacipran 35mg
 14) Tab Desvenlafaxine 50mg
 15) Tab Levamisole 500mg
 16) Tab Levamisole 500mg
 17) Tab Levamisole 500mg
 18) Tab Levamisole 500mg
 19) Tab Levamisole 500mg
 20) Tab Levamisole 500mg

Not Valid For Court

For Appointment:
 0334-9090829
 0348-8123519

کلینک: B-49، دوسری منزل خیبر میڈیکل سنٹر ڈگری گارڈن پشاور

Attested

27



Master

MEDICAL LABORATORY

PATIENT NAME IMTIYAZ BEGUM
 Sex FEMALE
 Age 7
 Lab # 000
 Referred By Dr PEER MUHAMMAD ZAHID
 Date In 30.05 2023

COMPLETE BLOOD COUNT

| Test | Results | Unit | Normal range |
|----------------|---------|-----------------------|--------------|
| TLC | 9.8 | x10 ⁹ /L | 4-11 |
| Lym | 24 | % | 20-40 |
| Mono | 4 | % | 1-10 |
| Eosin | 4 | % | 1-6 |
| Nue | 68 | % | 50-70 |
| RBC count | 3.93 | x10 ¹² /L | 3.5-5.5 |
| Hb | 10.0 | g/dL | 11-16 |
| HCT | 29.5 | % | |
| MCV | 75.3 | f | 83-101 |
| MCH | 25.4 | pg | 27-30 |
| MCHC | 33.9 | g/dl | 31.5-35 |
| Platelet count | 587 | x10 ⁹ /L | 150-450 |
| ESR | 110 | MM/1 ST HR | 07 - 14 |

Consultant Pathologist
Dr. Tariq Jamal
 MBBS, RMP, PMDC, DCP

Lab. Incharge
Mulhtar Ahmad
 0330-6184218

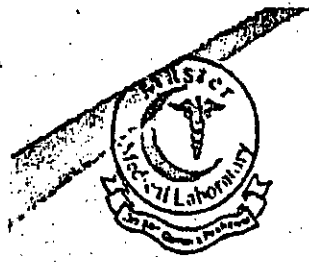
Mr. Asmat Ullah
 DMLT (PATH) Medical
 Faculty Govt. of KPK

Attested

Signature.....

Quality Services For All Diagnostic Tests

Master Medical Laboratory Behind Khyber Medical Center Dabgarl Garden Peshawar. Mob: 0300-5888040



Master

MEDICAL LABORATORY

PATIENT NAME INTIYAZ BEGUM
Sex FEMALE
Age ?
Lab # 000
Referred By Dr. PEER MUHAMMAD ZAHID
Date In 30 05.2023

RBS, SGPT, CRT

| Test | Results | Unit | Normal range |
|--------------|---------|-------|--------------|
| RBS | 102 | Mg/dl | Upto 150 |
| SGPT | 29 | U/l | 10 -- 40 |
| S Creatinine | 1.8 | Mg/dl | 0.6 -- 2.0 |

Attended

Consultant Pathologist
Dr. Tariq Jamal
 MBBS, RMP, FMOG, DCP

Lab. Incharge
Mukhtar Ahmad
 0330-9104218

Mr. Asmat Ullah
 DMLT (PATH) Medical
 Faculty Govt. of KPK

Signature.....

Quality Services For All Diagnostic Tests

Master Medical Laboratory Behind Khyber Medical Center Dabgarl Garden Peshawar. Mob: 0300-5888040

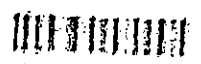
29


98

The Rescue

Medical Laboratory & Research Center

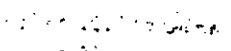
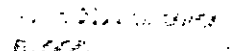
091-2311588, 091-2560058, 0312-5981833 PAFIC No: 14247-5 1104 911 40375

Patient # 

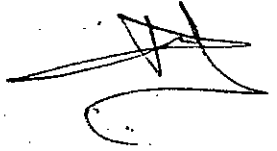
Case # 

NAME: IMHAZ BEGUM
LAB: MASTER LAB
CPK, Anti CCP

Labi ID: 12291
Gender: Female
Age: ? Years

Sample Code: 
Report Code: 
Specimen: EGG
Sample Source: 1015 of Sample

| TEST | RESULT | NORMAL RANGE |
|-----------------------|--------|------------------------------------|
| Cardiac Enzyme CPK | 63 U/L | Men: Up to 171 Women: Up to 145 |

Attested


Quality Lab Services for all Diagnostic Tests

Dr. Farooq Khan
Pathologist

Dr. Ansa Haroon
Pathologist

Dr. Iftikhar
Pathologist

Mr. Yaqub Khan
Pathologist

Dr. Sohail Ahmed
Pathologist

Near Khushal Medical Center Dabpuri Garden Peshawar, Pakistan

Scanned with CamScanner


The Rescue

Medical Laboratory & Research Center

091-2211588, 091-2560058, 0312-5981833 PMDC NO: 14249-N IIRA NO: 00231

30

Patient #: 

Case #: 

M.R. #: 23-12162

Patient: IMTIAZ BEGUM

S/O :

Ref. By: MASTER LAB

Request: CPK, Anti CCP

Lab ID : 12291

Gender: Female

Age : 7 Years

Sample Date : 30-05-2023 08:04PM

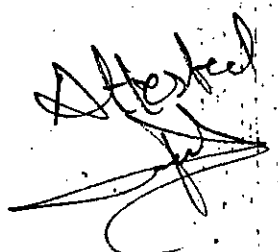
Report Date : 30-05-2023 09:06PM

Specimen : BLOOD

Sample Source : OUTSIDE Sample

| TEST | RESULT | NORMAL RANGE |
|----------|------------|---------------------------------------|
| Anti CCP | | |
| Anti CCP | 8.590 U/ml | Negative : <20.0 Positive : > 20.0 |

Method: Enzyme-Linked Immunosorbent Assay for Antibodies to Cyclic Citrullinated Peptides.



Quality Lab Services for all Diagnostic Tests

Dr. Farooq Khan

Asst Prof of Pathology
M.D.S. M.Phil (MMB)
DCP (I)

Dr. Ansa Haroon

Consultant Pathologist
M.D.S. FCPS
Histopathology Cytology

Dr. Irtza Hassan

Consultant Molecular
Biologist
M. Phil PhD Microbiology

Mr. Yasin Ullah

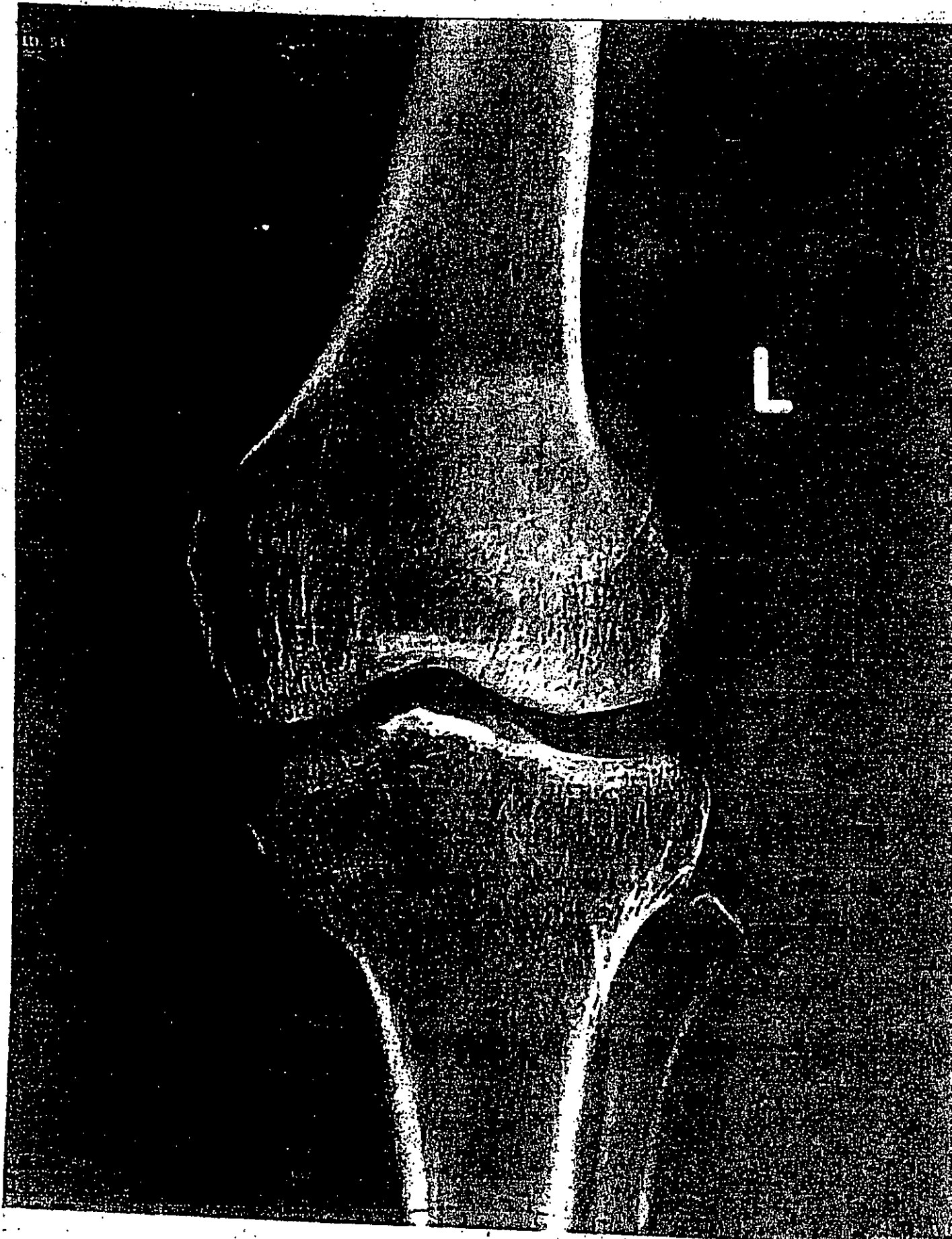
Chief Medical
M. Phil Microbiology
GAU Islamabad

Mr. Sohail Ahmad

Lab Technologist
DAR F RPK Medical
Faculty Peshawar

Near Khushal Medical Center Dabgari Garden Peshawar, Pakistan, email: Lab@anshab3k@gmail.com Ph: 091-2211588, Mob: 0312-5981833

301



3

Alfred
[Signature]

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

SERVICE APPEAL NO: _____/2023

Mst.Imtiaz Begum (PSHT) at GGPS Civil Quarters Peshawar.

.....Appellant

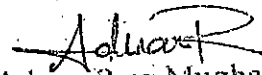
V E R S U S

1. DEO (F) District education Office Peshawar.
2. SDEO (F) Town 3, District education Office Peshawar..
3. Director Education KPK directorate of education kpk Peshawar.
4. Secretary education KPK Peshawar.

.....Respondents

Subject: Notice for filing Services Appeal.**Please take notice that I am filing Services Appeal before the KHYBER PAKHTUNKHWA SERVICE TRIBUNAL Peshawar.**

Dated: 12/06/2023

Petitioner/Appellant
Through,

 Adnan Riaz Mughal
 Advocate
 Peshawar High Court

 Adnan Riaz Mughal
 &
 Hassan Sardar Burq
 (Advocate High Court Peshawar).
VAKEEL LAW ASSOCIATES
 Office: Beside PBA Library
 Mob : 03018889989

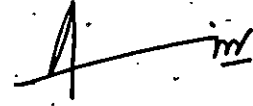


This is an appeal filed by Mst. Imtiaz Begum today on 19/05/2023 against the order dated 03.05.2023 & 22.05.2023 against which she made/preferred departmental appeal/representation on 23.05.2023 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/Counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action


No. 1808 /ST,

Dt. 20/6 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Adnan Riaz Mughal Adv.
High Court Peshawar.

Attested to be
true 

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL.

SERVICE APPEAL NO: _____/2023

Mst.Imtiaz Begum (PSHT) at GGPS Civil Quarters Peshawar.

.....Appellant

V E R S U S

1. DEO (F) District education Office Peshawar.
2. SDEO (F) Town 3, District education Office Peshawar.
3. Director Education KPK, directorate of education KPK Peshawar.
4. Secretary education KPK Peshawar.

.....Respondents

APPEAL UNDER SECTION-4 OF KHYBER PUKHTUNKHWA SERVICES TRIBUNAL'S ACT 1974, AGAINST THE IMPUGNED TRANSFER ORDERS DATED 03/05/2023 AND 22/05/2023, WHEREBY THE APPELLANT WAS TRANSFERRED FROM GGPS CIVIL QUARTERS PESHAWAR TO GGPS SYEDNA ZAINAB PESHAWAR, WHICH WAS THEN MODIFIED VIDE ORDER DATED 22/05/2023 AND THE APPELLANT WAS TRANSFERRED TO GGPS PALOSI MAGHDAZAI PESHAWAR.

PRAYER:

That on acceptance of this appeal the impugned transfer order dated 03/05/2023 and then modified through order dated 22/05/2023 by the respondent No.1 whereby the appellant was transferred from GGPS Civil quarters Peshawar to GGPS palosi maghdazai Peshawar may graciously be set-aside being, against the law and rules, unjust, based on malafide and discrimination towards the appellant further the appellant may kindly be allowed to stay at the present station(School) being aged, medically infirm.

Respectfully Sheweth:-

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Brief facts giving rise to the present appeal areas under:

1. That through the instant appeal, the appellant humbly seeks indulgence of this Honorable Tribunal for setting aside transfer order dated 03/05/2023 and then modified through order dated 22/05/2023 by the respondent No.1 whereby the appellant was transferred from GGPS Civil quarters to GGPS syedna Zainab Peshawar, and then to GGPS palosi maghdazai Peshawar. **(Copies of the transfer orders are appended herewith as Annex A).**
2. That succinctly stated facts giving rise to the filing of instant appeal are that the appellant was selected as P.T.C Teacher on **29.09.1987** and after his appointed he was posted at GGPS Granga payan Peshawar. The appellant has an unblemished service record. Not even a single complaint from any quarter has ever been received by the superiors of the appellant against her. **(Copy of the first Appointment letter is attached).**
3. That during the course of her services the appellant performed her duties with due diligence, and she was transferred to different stations so many times in very short time which has already penalize her. **(Copies of some of the transferred orders are appended herewith as Annex C).**
4. That the appellant was currently posted at GGPS civil quarters Peshawar whereby the SDEO (town 3) i.e. respondent no 2 was upset at the appellant due to her personal likes and dislikes further the behavior of the respondent no 2 was very unpleasant towards the appellant.
5. That it very important to mention here that there was a dispute between the locals of civil quarters and a local representative (Consular) from area dehri baghbana, on the quarter/flat situated at civil quarters which is allotted to the school for dehri bahgbana, whereby appellant has nothing to do with above mentioned clash.
6. That the appellant was shocked while it came into her knowledge that she was transferred from GGPS Civil quarters Peshawar to GGPS Syedna zainab and then to GGPS palosi maghdazai Peshawar without any valid reason /justification or prior information but on political interference for the reason mentioned above in Para no 5.
7. That the appellant filed an application/appeal before the director education KPK i.e. respondent No 3 against the impugned transfer order dated: **23/05/23** with Dairy No. 684, which remained un responded till dated. **(Copy of the application is appended herewith).**

8. That it is very important to mentioned here that during the pendency of the appeal before i.e. respondent no 3 an inquiry was initiated by the deputy secretary (inquires) E&SE department vide notification dated 24th may 2023 to inquire the matter mentioned in Para no 5, further the transfer order was held in abeyance. (**Copy of the notification is attached**).
9. That in the meanwhile the transfer order was modified by the respondent i.e.no 1 vide order dated 22nd of may 2023 and even the enquiry notification was withdrawn vide order dated 29th of may 2023, without knowing the actual reason and clash behind the transfer of the appellant. (**Copy of the withdrawal Notification is attached**).
10. That it is pertinent to mentioned here that the appellant requested/approached before respondent i.e. no 4 for the cancelation of her transfer order being outcome of malafide, further as she is medically infirm and aged women, whereafter the respondent i.e. no 1 was positively directed by the respondent i.e. no 4 to adjust the appellant at her current school/station. (**Copy of the directions/remarks letter is attached**).
11. That the appellant also filed an appeal before the respondent i.e. 4 being competent authority dated: **07-06-2023** against the impugned transfer order which also remained un responded till date. (**Copy of the appeal is attached**).
12. That the appellant for the sake of his legitimate rights has approached and practiced, activated all the available legal forums prior to this appeal, which remained un responded till date and having no other adequate, speedy, efficacious and alternate remedy available to him under the law except to invoke the jurisdiction of this honorable court/Tribunal inter alia on the following facts and circumstantial grounds.

GROUND OF APPEAL.

- A. That the impugned action apropos of transfer/posting is against the law, rules, Policy and regulations and against the administration of natural justice.
- B. The appellant has not been treated in accordance with law, as certain in article 4 of Constitution, further the respondents have not followed the law and rules governing services rules, thus the secured and guaranteed rights of the appellant has been vehemently violated.
- C. That impugned office orders with regard to transfer and posting mentioned above are illegal, without lawful authority, and are liable to be set aside and are infective upon the rights of the appellant.
- D. That the appellant is aged women further, weak and medically unfit and having a joint disease which improves her illness and it is not possible for

her to travel from one place to other which was also endorsed by the respondent i.e. no 4. (**Copy of the medical certificates are attached as Annexed D**).

- E. That even the transfer of the appellant is against the policy that no women can be transfer from his native union council to other union council.
- F. That a glaring malafide, is spelled out from a cursory glance of the impugned office orders, hence are liable to be set aside, being void-ab-initio and ineffective upon the rights of the appellant.
- G. That the subject transfer orders can't be term as " in public interest" as the transfer of the appellant from GGPS Civil quarters Peshawar to GGPS Syedna zainab and then to GGPS palosi maghdazai Peshawar done on political bases and will not only increase distress and deprivation and physical health of appellant but will also adversely affect the students at GGPS civil Quarter Peshawar.
- H. That there is clear malafide and discrimination met out from the departmental proceedings carried out on the aforesaid matter and appellant was deprived of the benefit of the equality of citizen as ordained in article 25 f the constitution.
- I. That the appellant seeks the permission of this honorable tribunal to rely on additional grounds at the hearing of this appeal.

In aforementioned circumstances, it is humbly prayed that on acceptance of the instant appeal, relief as prayed for may kindly graciously be granted.

Any other relief which this Honorable Court deems fit and appropriate may kindly also be granted.

Appellant

Amteez Beelum

Through,

Adnan
Adnan Riaz Mughal

&

Hassan Sardar Burq

(Advocates High Court Peshawar).

Dated: 15/06/2023

CERTIFICATE:-

It is certified that upon instructions of my client it is the 1st appeal filed before this Honorable Tribunal in the instant matter.

ADVOCATE *Adnan*

Annex K

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BEFORE THE HON'BLE PESHAWAR HIGH COURT PESHAWAR.

Writ Petition No. _____/2023

Mst. Imtiaz Begum (PSHT) at GGPS Civil Quarters Peshawar,
D/O Mohd. Lisaan R/O Civil Quarters Peshawar.

..... Petitioner

VERSUS

1. Govt of Khyber Pakhtunkhwa, through Secretary Education, Elementary and Secondary education, KPK Peshawar.
2. DEO (F) District education Office Peshawar.
3. SDEO (F) Town 3, Civil Quarters, Peshawar.
4. Director Education KPK, directorate of education, GT road, KPK Peshawar.
5. Secretary Education, Elementary and Secondary education, Civil Secretariat, KPK Peshawar.

..... Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE
CONSTITUTION OF ISLAMIC REPUBLIC OF
PAKISTAN, 1973.

Respectfully Sheweth:-

Brief facts giving rise to the present Writ Petition are as under:

1. That through the instant writ petition, the petitioner humbly seeks indulgence of this Honorable Court for declaring the impugned transfer orders, dated 03/05/2023 and then modified through order dated 22/05/2023 by the respondent i.e. No.2, as illegal, against the law and rules and an outcome of malafide, whereby the petitioner was transferred from GGPS Civil quarters to GGPS Syedna Zainab Peshawar, and then to GGPS palosi maghdazai Peshawar. (Copies of the transfer orders are appended herewith as Annex A).
2. Laconic facts of the matter in hand in the nutshell is that the petitioner had been appointed to the post of P.T.C Teacher on 20.06.1987 and after her appointment she was posted at GGPS Granga payan Peshawar. The petitioner

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knowing the actual reason and clash behind the transfer of the petitioner
(Copy of the withdrawal Notification is attached).

10. That it is pertinent to mentioned here that the petitioner requested/approached before respondent i.e. no 4 for the cancellation of her transfer order being outcome of malafide, further as she is medically infirm and aged women, whereafter the respondent i.e. no 2 was positively directed by the respondent i.e. no 4 to adjust the petitioner at her current school/station which was then disregarded. **(Copy of the directions/remarks letter is attached).**
11. That the petitioner also filed an application/appeal before the respondent i.e. 4 being higher authority dated: **07-06-2023** against the impugned transfer order which also remained un responded till date. **(Copy of the application/appeal is attached).**
12. That it is pertinent to mention here that the petitioner have already filed an appeal before the KP Service Tribunal, which was then returned/rejected on the ground that the appeal was premature. **(Copy of the appeal with objection letter is attached).**
13. That the petitioner for the sake of his legitimate rights has approached and practiced, activated all the available legal forums prior to this writ petition which remained un responded till date and having no other adequate, speedy, efficacious and alternate remedy available to him under the law and being remediless, except to invoke the Constitutional jurisdiction of this honorable court inter alia on the following facts and circumstantial grounds.

GROUND OF WRIT PETITION.

- A. That the impugned action apropos of transfer/posting is against the law, rules, Policy and regulations and against the administration of natural justice.
- B. The petitioner has not been treated in accordance with law, as certain in article 4 of Constitution, further the respondents have not followed the law and rules governing services rules, thus the secured and guaranteed rights of the appellant has been vehemently violated.
- C. That impugned office orders with regard to transfer and posting mentioned above are illegal, without lawful authority, and are liable to be cancel/set aside and are infective upon the rights of the petitioner.
- D. That the petitioner is aged women further, weak and medically unfit and having a joint disease which improves her illness and it is not possible for her to travel from one place to other which was also endorsed by the respondent i.e. no 4. **(Copy of the medical certificates are attached).**

quarter has ever been received by the superiors of the appellant against her. **Copy of the first Appointment letter is attached as B).**

3. That during the course of her services the petitioner performed her duties with due diligence, and she was transferred to different stations so many times i.e. GGPS railway Quarters through order dated 06-12-1988, and then transferred to dehri baghbanan through order dated 28-11-2000, further the petitioner was transferred to GGPS Civil quarters Peshawar vide order dated 08-04-2014, which has already penalize her. (Copies of some of the transferred orders with charge report are appended herewith as Annex C).
4. That the petitioner was currently posted at GGPS civil quarters Peshawar as head Teacher from 2014, whereby the SDEO (town 3) i.e. respondent no 3 was upset at the appellant due to her personal likes and dislikes further the behavior of the respondent no 3 was also very unpleasant towards the petitioner.
5. That it is very important to mention here that since long there was a dispute between the locals of civil quarters and a local representative (Consular from area dehri baghbanan, on the quarter/flat situated at civil quarters which is allotted to the school for dehri baghbanan, whereby petitioner has nothing to do with above mentioned clash.
6. That the petitioner was shocked while it came into her knowledge through order dated 03/05/2023, for exchange of her post with Mst. Fatima head teacher GGPS Syedna Zainab Peshawar, where the petitioner and the teacher on the other hand don't have their mutual consent, further it was against rule/principle for mutual transfer which clearly tells about the ill will and malafide of the respondents i.e. no 2 & 3, and order mentioned above was not done in good faith, further without any valid reason /justification or prior information but under the influence and on political interference for the reason mentioned above in Para no 5.
7. That the petitioner then filed an application/appeal before the director education KPK i.e. respondent No.4 against the impugned transfer order dated 23/05/23 with Dairy No. 684, which remained un responded till dated. (Copy of the application is appended herewith).
8. That it is very important to mentioned here that during the pendency of the application/appeal before i.e. respondent no 4, that an inquiry was initiated by the deputy secretary (inquires) E&SE department, vide notification dated 24th may 2023, on the complaint submitted by the locals of civil quarters to inquire the matter mentioned in Para no 5, further the transfer order was also held in abeyance. (Copy of the notification is attached).
9. Surprisingly that in the moment the transfer order was modified by the respondent i.e no 2 vide order dated 22nd of may 2023 and even the

- E. That the case of the petitioner was not dealt in accordance with the law and also hits the violation of Article 10-A of the constitution of Islamic republic of Pakistan, 1973. His overall diligence efforts for the department were ignored.
- F. That even the transfer of the Petitioner is against the policy that no women can be transfer from his native union council to other union council.
- G. That a glaring malafide, is spelled out from a cursory glance of the impugned office orders, hence are liable to be set aside, being void-ab-initio and ineffective upon the rights of the petitioner.
- H. That the subject transfer orders can't be term as " in public interest" as the transfer of the **Petitioner** from GGPS Civil quarters Peshawar to GGPS Syedna zainab and then to GGPS palosi maghdazai Peshawar done on political bases and will not only increase distress and deprivation and physical health of petitioner but will also adversely affect the students at GGPS civil Quarter Peshawar.
- I. That there is clear malafide and discrimination met out from the departmental proceedings carried out on the aforesaid matter and **Petitioner** was deprived of the benefit of the equality of citizen as ordained in article 25 f the constitution.
- J. That the **Petitioner** seeks the permission of this honorable Court to rely on additional grounds at the hearing of this petition.

It is therefore, most humbly prayed that on acceptance of this writ **Petition** an appropriate Writ may pleased be issued as prayed here under in the following manner:-

Prayer in Writ petition:

- i. *Declare that the impugned transfer orders dated 3-05-2023 and order modified dated 22-05-2023, as being illegal, unlawful, contrary to law and rules, without lawful authority, unjust, an outcome of malafide, and liable to be cancelled and set-aside.*
- ii. *An appropriate direction may also graciously be passed in favor of petitioner against the respondents that the petitioner may graciously be allowed to continue/stay at her present school/station till her retirement being infirm and medically unfit for travelling*

- iii. Any other relief which may have not specifically claimed here, and this court deems fit, Appropriate, just may also be awarded to the petitioner.

INTERIM RELIEF:-

- 1) By way of interim relief and in the best interest of justice equity and good conscience, this honorable Court maybe pleased to suspend the operation of impugned office orders dated 03-05-2023 and modified dated 23-05-2023 in respect of posting/ transfer from GGPS civil quarter to GGPS palosi maghdazai Peshawar in the interest of justice.
- 2) Further interim relief as prayed that respondent DEO(F) Peshawar may pleased be directed to allow the appellant on duty in GGPS Civil Quarter Peshawar till the final disposal of the main appeal and restore the original position of appellant prior to this impugned office order and no adverse action shall not be taken against the appellant.

Dated: 26/06/2023

Through,

Adnan Riaz Mughal
&
Hassan Sardar Burq
(Advocates High Court Peshawar).

List Of Books:-

- 1) Constitution, 1973.
- 2) Books according to need.

CERTIFICATE:-

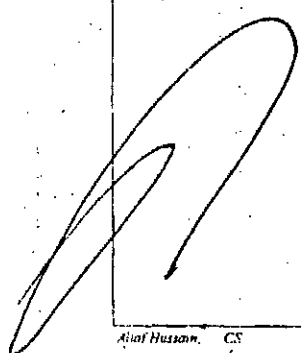
It is certified that upon instructions of my client no similar Writ petition on the same subject between the parties has never been filed previously or concurrently.

ADVOCATE

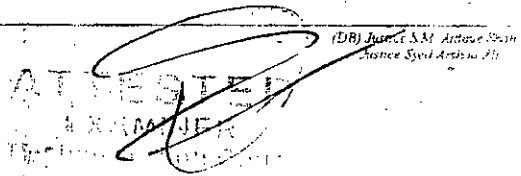
PESHAWAR HIGH COURT, PESHAWAR

ORDER SHEET

| Date of order or proceedings | Order or other proceedings with signature of Judge or Magistrate and that of parties or counsel where necessary. |
|------------------------------|--|
| 1. | 2. |
| 13.07.2023 | <p><u>WP No.2813-P/2023 with IR.</u></p> <p><u>Present:</u> Mr. Adnan Riaz Mughal, Advocate for the petitioner.</p> <p>Barrister Muhammad Yaseen Raza Khan, AAG for the respondents.</p> <p style="text-align: center;">*****</p> <p><u>S. M. ATTIQUE SHAH, J.-</u> Through the petition in hand, the petitioner has prayed as under :-</p> <ul style="list-style-type: none"> ➤ <i>Declare that the impugned transfer orders dated 03.05.2023 and order modified dated 22.05.2023, as being illegal, unlawful, contrary to law and rules, without lawful authority, unjust, an outcome of malafide and liable to be cancelled and set aside.</i> ➤ <i>An appropriate direction may also graciously be passed in favour of petitioner against the respondents that the petitioner may graciously be allowed to continue / stay at her present school station till her retirement being infirm and medically unfit for traveling.</i> <p>2. In essence, the petitioner has questioned her transfer order from the Government Girls Primary School Civil Quarters, Peshawar to Government Girls Primary School Palosi Maghdazai, Peshawar mainly on the medical grounds. Record reflects that the petitioner has already filed a departmental appeal / representation</p> |



Aliof Hussain, CS

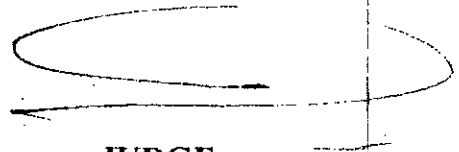

 (DR) Justice S.M. Attique Shah
 Justice Syed Arshad Ali

against the impugned orders before the Competent Authority, which is still pending. Besides that the petitioner had also approached the worthy Tribunal through an appeal, which has been returned in original being pre-mature through order dated 20.06.2023.

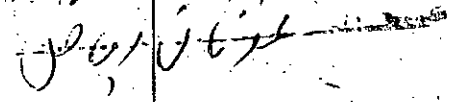
3. Be that as it may, the petitioner is a civil servant and the posting and transfer is a matter pertaining to the terms and conditions of service under Section 10 of Chapter 2 of Civil Servants Act, 1973, which exclusively falls within the domain of worthy Service Tribunal, attracting the constitutional bar under Article 212 of the Constitution of the Islamic Republic of Pakistan, 1973 against entertainment of petition in such like matters.

4. Such being the position, this petition being without any substance stands dismissed.

Announced.
Dated: 13.07.2023.


JUDGE

JUDGE

| | |
|-----------------------------|---|
| Date of Presentation | 19-07-2023 |
| No. of Pages | 9 |
| Copies to | 36-00 |
| Date of Declaration of Copy | 19-07-2023 |
| Copy of Copy | 19-07-2023 |
| Signature |  |

Annex L

TO
Secretary Education,
Elementary and Secondary Education,
Peshawar City.

Subject: REQUEST LETTER.

Respected Sir,

I on behalf of my client Namely **Mst.Imtiaz Begum** PSHT GGPS Civil Quarter Peshawar, humbly lay down few lines with regard to decide the pending departmental appeal/representation of my client herein (**Mst.Imtiaz Begum**) as per policy(**Posting/Transfer policy of the provincial Government**) in the better interest of justice.

- I. That my client **Mst.Imtiaz Begum** was serving as PSHT GGPS Civil Quarters Peshawar whereafter she was transfer from **GGPS civil quarter to GGPS palosi maghdaza Peshawar**, through office orders dated **03-05-2023 & 22-05-2023**.(Copies of the Order are attached).
- II. That soon after receiving the transferred orders, my client **Mst.Imtiaz Begum** moved/submitted an appeal/application vide dated: **23-05-2023** baring dairy no:68 before your good office being the competent authority which remained un responded till date. (Copy of the appeal is attached).
- III. That being disappointed and unsatisfied my client appeared before the Secretary Elementary & Secondary education KPK Peshawar and submitted another application/appeal dated **07-06-2023**, but with great sorry it also remained un responded till date.(copy of the application is attached).
- IV. That having no other adequate remedy but to knock at the doors of the honorable KP Service tribunal and then to Honorable Peshawar High Court Peshawar through constitutional Petition, which were returned due to the reason that the appeal of my client is yet to be decided/responded by your office/Quarter Concern.(Copies of the orders are attached).
- V. That It very important to mention here that my client is infirm and medically unfit for traveling which was also indorsed by the Secretary Elementary and secondary Education KPK Peshawar, and providing my client a needful justice, rather she was victimized and transferred which wasn't made in public interest.

VI. Further it submitted that as per policy (Posting/Transfer policy of the provincial Government) the departmental appeal shall be decided in 15 days after it's submitted same matters as discussed above.

That in view of aforesaid submissions, it is most respectfully submitted that the departmental appeal/application may kindly be decided without any further delay as otherwise the proposed delay will unnecessarily aggravate the mental distress and tension of my client and will serve no useful purpose. For this act of kindness, I shall remain lifelong indebted to your kind honor.

Dated: - 28-07-2023

With Regrds,

Adnan Riaz Mughal
Advocate
Peshawar High Court

Adnan Riaz Mughal
&
Hassan Sardar Burq
(Advocates High Court Peshawar).
VAKEEL LAW ASSOCIATES
Office: Beside PBA Library
Mob : 03018889989

A copy of the instant request letter is restrained in my office for further legal necessary action.

TO
Director Education,
Elementary and Secondary Education,
Peshawar City.

Subject: REQUEST LETTER.

Respected Sir,

I on behalf of my client Namely **Mst.Imtiaz Begum** PSHT GGPS Civil Quarter Peshawar, humbly lay down few lines with regard to decide the pending departmental appeal/representation of my client herein (**Mst.Imtiaz Begum**) as per policy (**Posting/Transfer policy of the provincial Government**) in the better interest of justice.

- I. That my client **Mst.Imtiaz Begum** was serving as PSHT GGPS Civil Quarters Peshawar whereafter she was **transfer from GGPS civil quarter to GGPS patesi maghdaz Peshawar**, through office orders dated **03-05-2023 & 22-05-2023**. (Copies of the Orders are attached).
- II. That soon after receiving the transferred orders, my client **Mst.Imtiaz Begum** moved/submitted an appeal/application vide dated: **23-05-2023** bearing dairy no: **68** before your good office being the competent authority which remained un responded till date. (Copy of the appeal is attached)
- III. That being disappointed and unsatisfied my client appeared before the Secretary Elementary & Secondary education KPK Peshawar and submitted another application/appeal dated **06-05-2023**, but with great sorry it also remained un responded till date. (copy of the application is attached).
- IV. That having no other adequate remedy but to knock at the doors of the honorable KP Service Tribunal and then to Honorable Peshawar High Court Peshawar through constitution Petition, which were returned due to the reason that the appeal of my client is yet to be decided/responded by your office/Quarter Concern. (Copies of the orders are attached).
- V. That it very important to mention here that my client is infirm and medically unfit for traveling which was also indorsed by the Secretary Elementary and secondary Education KPK Peshawar, and providing my client a needful justice, rather she was victimized and transferred which wasn't made in public interest.

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That in view of aforesaid submissions, it is most respectfully submitted that the departmental appeal/application may kindly be decided without any further delay as otherwise the proposed delay will unnecessarily aggravate the mental distress and tension of my client and will serve no useful purpose. For this act of kindness, I shall remain lifelong indebted to your kind honor.

Dated: - 28-07-2023

With Regrds,
Adnan Riaz Mughal
Advocate
Peshawar High Court

Adnan Riaz Mughal
&
Hassan Sardar Burq
(Advocates High Court Peshawar).
VAKEEL LAW ASSOCIATES
Office: Beside PBA Library
Mob : 03018889989

A copy of the instant request letter is restrained in my office for further legal necessary action.

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| 63 | پشاور بار ایسوسی ایشن، خیبر پختونخوا |
| ایڈویکٹ: <u>عزیزان ریاض حسن</u> |    |
| بار کونسل ایسوسی ایشن نمبر: bc 19-1225 رابطہ نمبر: 03018889989 | |

Before Khyber Pakhtunkhwa Services Tribunal, Peshawar
بعد اٹ جٹاب

| | |
|-----------------------------|-------------------------------|
| مخائب: <u>Appellant</u> | دعویٰ: <u>Services Appeal</u> |
| <u>Mst. Intiaz Begum</u> | علت نمبر: _____ |
| بنام | مورخہ: <u>25/06/2023</u> |
| <u>OEO(F) & others.</u> | جرم: _____ |
| | تھانہ: _____ |

امتیاز بیگم
ولرسان سٹین سول کورٹرز ایلم پشاور

بابت تحریر آئکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام پشاور کے صاحب موصوف کو مقدمہ کی کل کاروائی کا کال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقررات فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری ایک طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور ان کا ساختہ پر داخلہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جائے التوائے مقدمہ کے سبب سے ہوگا قانونی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب یا ہند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 25/08/2023

مقام پشاور کے لیے منظور ہے۔

Hasan
Sardar
Adv.

Accepted
& Accepted.