


# FORM OF ORDER SHEET

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

**Appeal No. 1784/2023**

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/09/2023	<p>The appeal of Mst. Bibi Fatima presented today by Mr. Muhammad Arshad Khan Tanoli Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on</p> <p>By the order of Chairman</p> <p> REGISTRAR</p>

**BEFORE CHAIRMAN KHYBER PAKHTUNKWA  
SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 1784 /2023

Mst. Bibi Fatima daughter of Khemia Khan resident of Dadeer Bhariyar  
Tehsil Dassu District Upper Kohistan.

...APPELLANT

VERSUS

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

...RESPONDENTS

**SERVICE APPEAL**

**INDEX**

S.#	Description	Page No.	Annexure
1.	Service appeal along with affidavit	1 to 8	
2.	Copy of Sanad of Shahdat-ul-Allamia Fil Ulloom Islamic Wal Arabia	9	"A"
3.	Copy of Domicile Certificate and Appointment order dated 20/05/2014 of the appellant	10 - 12	"B" & "C"
4.	Copy of removal from the Service Order dated 23/06/2021	12 13	"D"
5.	Copy of Departmental Appeal of the appellant dated 20/05/2023	14 - 15	"E"
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Bibi Fatima

...APPELLANT

Dated: \_\_\_\_\_ /2023

Through

(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad

&

(Muhammad Ibrahim Khan)  
Advocate High Court, Abbottabad

1

**BEFORE CHAIRMAN KHYBER PAKHTUNKWA**  
**SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. 1784/2023

Mst. Bibi Fatima daughter of Khemia Khan resident of Dadeer Bhariyar  
Tehsil Dassu District Upper Kohistan.

...APPELLANT

VERSUS

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

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF  
KPK SERVICE TRIBUNAL ACT, 1974, FOR  
DECLARATION TO THE EFFECT THAT THE  
APPELLANT WAS APPOINTED AS  
THEOLOGY TEACHER (T.T) VIDE  
APPOINTMENT ORDER DATED 05/05/2014  
AND THEREAFTER, WITHOUT ISSUING  
ANY SHOW CAUSE NOTICE, PROVIDING  
OPPORTUNITY OF PERSONAL HEARING AS  
WELL AS CONDUCTING ANY INQUIRY, THE  
APPELLANT HAS REMOVED FROM  
SERVICE ON 23/06/2021 AND THE

APPELLANT RECEIVED THE IMPUGNED  
REMOVAL FROM SERVICE ORDER DATED  
23/06/2021 ON 20/05/2023. THE IMPUGNED  
REMOVAL FROM SERVICE ORDER DATED  
23/06/2021 IS PERVERSE DISCRIMINATORY  
IS RESULT OF WITHOUT FOLLOWING THE  
PRESCRIBED, MANDATORY PROCEDURE  
AS PER SECTION 9 OF E & D RULES 2011.  
HENCE, IMPUGNED REMOVAL FROM  
SERVICE ORDER DATED 23/06/2021 IS  
LIABLE TO BE SET ASIDE.

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**PRAYER:** ON ACCEPTANCE OF THE  
INSTANT APPEAL, IMPUGNED REMOVAL  
FROM SERVICE ORDER DATED 23/06/2021  
OF THE APPELLANT MAY BE SET ASIDE  
AND RESPONDENTS MAY BE DIRECTED TO  
REINSTATE THE APPELLANT IN SERVICE  
WITH ALL THE SERVICE BACK BENEFITS  
ANY OTHER RELIEF WITH HIS  
HONOURABLE TRIBUNAL DEEM  
APPROPRIATE MAY ALSO BE GRANTED TO  
THE APPELLANT ACCORDINGLY.

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Respectfully Sheweth;-

Following are the facts, giving rise to filling the instant appeal are as under;-

1. That the appellant having qualification of Shahdat-ul-Allamia Fil Ulloom Islamia Wal Arabia and was eligible from appointment as Theology Teacher (T.T). Copy of Sanad of Shahdat-ul-Allamia Fil Ulloom Islamic Wal Arabia is annexed as Annexure "A".
2. That the appellant is permanent resident of Tehsil Dassu District Upper Kohistan was appointed as (T.T) on 20/05/2014. Copy of Domicile Certificate and Appointment order dated 20/05/2014 of the appellant are annexed as Annexure "B" & "C".
3. That the appellant was posted in Government Girls Middle School Lohi Dadeer Jalkote District Upper Kohistan.
4. That the appellant served the respondent department as per law with utmost complete devotions but the respondent department

without following the prescribe procedure i.e. show cause notice, opportunity of personal hearing and proper Inquiry, removed the appellant from the service on 23/06/2021. The impugned removal from service order dated 23/06/2021 which was received by the appellant on 20/05/2023. Copy of removal from the Service Order dated 23/06/2021 is annexed as Annexure "D".

5. That the appellant feeling aggrieved filed that departmental appeal against the removal from service order dated 23/06/2021 which was received on 20/05/2023 but the respondent department did not bother to reply to the appellant. Copy of Departmental Appeal of the appellant dated 20/05/2023 is annexed as Annexure "E". Hence, the Instant Service Appeal is filed inter-alia on following grounds;-

**GRUNDS:-**

- a. That the impugned removal from service order is one sided, Arbitrary, discriminatory against the law and is result without following requisite procedure as per E & D Rules 2011. Hence, the same is liable to be set aside.
- b. That as per law prescribed procedure to sift the grain from the chaff, to reach to the correct conclusion, proper Inquiry is to be conducted as per E & D Rules 2011. Therefore impugned removal form service order dated 23/06/2021 is not maintainable in eyes of law.
- c. That the impugned removal from service order dated 23/06/2021 has been issued without associating the appellant principle of Adulate Plectrum does not recognized arbitrary orders without providing opportunity of defending the case.

Hence, the impugned removal from service order is liable to be set aside.

d. That the appellant was properly service in the respondent school and this fact could be established once, proper Inquiry is to be conducted so, the appellant has been made scape goat and on his post, respondent department is going to appoint some other blued eye.

e. That the removal form service order dated 23/06/2021 of the appellant is absolutely alien to the rules invonge no one can be removed unless proper prescribe procedure is to be followed. Hence, impugned removal form service order is illegal and same is liable to be set aside.

f. That being a service matter, this Honourable Tribunal has jurisdiction to entertain the lis.



- g. That the instant service appeal is being filed well within time.

It is therefore, humbly prayed that on acceptance of the instant appeal, impugned removal from service order dated 23/06/2021 of the appellant may be set aside and respondents may be directed to reinstate the appellant in service with all the service back benefits. Any other relief with his honourable tribunal deem appropriate may also be granted to the appellant accordingly.

*Bibi Fatima*  
...APPELLANT

Through

Dated: \_\_\_\_\_/2023

  
(Muhammad Arshad Khan Tanoli)  
Advocate High Court, Abbottabad

&

(Muhammad Ibrahim Khan)  
Advocate High Court, Abbottabad

**VERIFICATION:-**

Verified on oath that the contents of foregoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal

*Bibi Fatima*  
...APPELLANT

**BEFORE CHAIRMAN KHYBER PAKHTUNKWA**  
**SERVICE TRIBUNAL PESHAWAR**

Service Appeal No. \_\_\_\_\_/2023

Mst. Bibi Fatima daughter of Khemia Khan resident of Dadeer Bhariyar Tehsil Dassu District Upper Kohistan.

...APPELLANT

VERSUS

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

...RESPONDENTS

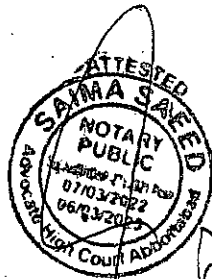
**SERVICE APPEAL**

**AFFIDAVIT**

I, *Mst. Bibi Fatima daughter of Khemia Khan resident of Dadeer Bhariyar Tehsil Dassu District Upper Kohistan*, do hereby solemnly affirm and declare that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.

*Bibi Fatime*

DEPONENT



Annex - A

34083072832

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

P-9

068550

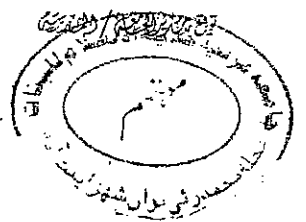


شهادة العالمية  
في اللغة العربية  
والتفكير الناقد



الحمد لله رب العالمين. والصلاة والسلام على خاتم الانبياء والمرسلين، وعلى آله وصحبه أجمعين. أما بعد، فإن رسالة  
وفاء المدارس العربية بباكستان، تشهد بأن الطالبة ..... بي بي فاطمه بنت كماء خان من ابيث آباد  
المولودة في عام 01-05-1990. قد أتمت الدراسة الشهائية في جامعة عربية حديثة الاسلام للبنات ..... ونجحت في الامتحان النهائي المنعقد  
تحت إشراف وفاق المدارس العربية بباكستان في الاختبار العملي 1433هـ بتقدير مقبول ..... وبسبب ذلك استحققت الشهادة،  
ورئيس الوفاق اذ يمنحها هذه الشهادة، يوصيها بتقوى الله تعالى ويسأل الله عز وجل ان يسلك بها سبيل العالقات العاملات،  
2013

بجمل  
محمد  
Muhammad  
Advoc  
Office No  
Dist



بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ  
م. س. خان

رقم التسجيل 1431-05-005214  
رقم الملف 1168  
الدرجات 268 / 10  
محل الإصدار: (القطعة الأولى من الوثيقة)  
التاريخ 12-10-2013



N.W.F.P.  
DISTRICT KOHISTAN.

P-10

**DOMICILE CERTIFICATE**

I BIBI FATIMA declare that I was born of parents who are permanently domiciled in N.W.F.P having belonged to it by birth/settled in it.

I belonged by birth to village/Mohalla Dadeer Beryar  
Tehsil Dassu District KOHISTAN



Signature of the applicant

Dated \_\_\_\_\_

Pursuance to the declaration dated \_\_\_\_\_

Filed by Bibi Fatima Son/Daughter of Kiama Khan

dwelling in the N.W.F.P. It is hereby certified that the said \_\_\_\_\_

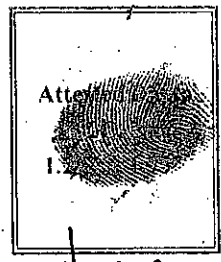
Bibi Fatima is born of parents who are permanent residents of the N.W.F.P. Having belonged to it by birth/settled in.

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

This 21st January Day of 2008

No 1059/DDCR 96

*Attested*  
*[Signature]*



Deputy District Officer.  
~~Deputy District~~  
Office Revenue & Estate  
DASSU.

**COUNTERSIGNED**

*[Signature]*

District Officer.  
Revenue & Estate  
District Officer  
Kohistan  
Revenue & Estate  
Kohistan.

M. Mammad Arshad Khan  
Advocate High Court  
Office No 33 Adjacent  
[Address]

No. 32/110805/64

Dated: 22.01.08

باقراصلح بیان کرتے ہیں کہ مسماۃ محبی بی فاطمہ ولد ادختر کیمیا خاں  
 قوم نارنگ شاہل ساکن دادیر بٹری ربار تحصیل داسو

ضلع کوہستان کا اکی آباد اجداد سے پیدائشی، رہائشی، سکونتی باشندہ ہے۔ اس کے والد دیہہ ہذا میں صاحب  
 جائیداد ہیں۔ مسماۃ مذکورہ کو ذاتی طور پر جانتے ہیں۔ ڈویسائل دیا جانا درست ہے۔  
 جسکی ہم تصدیق کرتے ہیں۔

العبد

العبد

نام \_\_\_\_\_ ولدیت \_\_\_\_\_

قوم \_\_\_\_\_ ساکن \_\_\_\_\_ تحصیل \_\_\_\_\_

N.I.C No: \_\_\_\_\_

Muhammad Rehman  
 P/Worker  
 Tehsil Dasu Distt. Kohistan

رپورٹ پیواری حلقہ:-

ضلع کوہستان \_\_\_\_\_ حسب تصدیق درج بالا ممبران لوکل گورنمنٹ تحصیل داسو

مسماۃ محبی بی فاطمہ ولد ادختر کیمیا خاں 7-3783854-13101

قوم نارنگ شاہل ساکن دادیر بٹری ربار تحصیل داسو ضلع کوہستان کا اکی

آباد اجداد سے پیدائشی، رہائشی، سکونتی باشندہ تصدیق ہوتا ہوتی ہے

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

ATTESTED

رپورٹ عرض ہے۔

Tehsildar, Dasu

دستخط پیواری 18/8/08

# Annex-C



Office of the District Education Officer (F) Kohistan  
PHONE & FAX # 0998-407225

P-12

## APPOINTMENT

Consequent upon recommendation of the District Selection Committee, appointment of the following candidates are hereby ordered against the post of TT, School based BPS-15 (Rs.8500-700-29500) or Rs. 8500/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy of the Provincial Government, on the terms and condition given below with effect from the date of their taking over charge:-

Sl. No.	Roll No.	Name	Father's Name	Domicile/District	Home / Address	Place of Posting	Score
1	2250087	Roqia Bibi	Muhammad Younas	Manshra	Tehsil Bala Koh District Manshra	CGMS Padsac Village	100.54
2	2250095	Bibi Maryam	Mehboob ur Rehman	Manshra	Dharyal Tehsil & District Manshra	CGMS Mindan Kalni	99.8
3	2250100	Nazia Yousaf	Qasr Muhammad Yousaf	Manshra	Tehsil Bala Koh District Manshra	CGMS Padsac	93.3
4	2250108	Roman	Bakht Rashid	Swat	Panggram Tehsil Bala Koh District Swat	CGMS Sulkhin Abad	82.27
5	2250088	Bibi Aisha	Noor Muhammad	Kohistan	Gushali Tehsil Dasso District Kohistan	CGMS Chakai	77.71
6	2250103	Fozia	Khoshal	Kohistan	Bar Sheryal Tehsil Parnas District Kohistan	CGMS Baraha	75.17
7	2250104	Bibi Fatima	Khemia Khan	Kohistan	Dadeer Baryar Tehsil Dasso District Kohistan	CGMS Labi	73.72

### TERMS & CONDITIONS

- NO TV/DA etc is allowed.
- Change reports should be submitted to all concerned in duplicate.
- Appointment is purely on temporary & contract basis initially for one year with effect from the date of issue.
- They should not be handed over charge if she exceeds 35 years or below 20 years of age. Age relaxation case may be submitted to the competent authority.
- Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities. By the DEO any one found producing bogus Certificate will be reported to the law enforcing agencies for further action.
- Her services are liable to termination on one month's notice from either side. In case of resignation without notice her one-month pay/allowances shall be forfeited to the Government.
- Pay will not be drawn until and unless a certificate to the effect by DEO is issued that her certificates are verified.
- She should join her post within 10 days of the issuance of this notification. In case of failure to join their post within 10 days of the issuance of this notification, her appointment will expire automatically and no subsequent appeal etc shall be entertained.
- Health and Age Certificate should be produced from the Medical Superintendent Kohistan before taking over charge.
- She will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Her services shall be terminated at any time, in case her performance is found unsatisfactory during her contract period. In case of misconduct, he shall be proceeded under the rules framed from time to time.
- Her appointment is made on School based, she will have to serve at the place of posting; and Her service is not transferable to any other station.
- Before handing over charge once again their document may be checked if they have not the required qualifications they may not be handed over charge.
- Before handing over charge she will sign an agreement with the department, otherwise this order will not be valid.

(Ran Khattar)  
DISTRICT EDUCATION OFFICER,  
(FEMALE) KOHISTAN

Indst: No. 771-804/116 No. TT Adhoc /appointment/Posted Kohistan the 20 May 2014

- Copy forwarded for information and necessary action to the:-
- The Director, Elementary & Secondary Education Peshawar.
  - District Accounts Officer Kohistan
  - Head Mistress School concerned
  - PA to Secretary Khyber Pakhtunkhwa E&SE Department Peshawar.
  - Official Concerned.
  - Office File

DISTRICT EDUCATION OFFICER,  
(FEMALE) KOHISTAN

Attested  
Mue

Muhammad Aslam  
Advocate High  
Office No. 23 A  
Dost Garh

District Office  
Female Kohistan

**BETTER COPY**

**OFFICE OF THE DISTRICT EDUCATION OFFICER (F) KOHISTAN**

**PHONE & FAX # 0998-407225**

**APPOINTMENT**

*Consequent upon recommendation of the District Selection Committee, appointment of the following candidates are hereby ordered against the post of TT, School based BPS-15 (Rs. 8500-700-29500) @ Rs. 8500/- fixed plus usual allowance as admissible under the rules on adhoc basis on contract under the existing policy of the Provincial Government, on the terms and condition given below with effect from the date of their taking over charge,-*

S.#	Roll No	Name	Father name	Domicile/ District	Home/address	Place of posting	Score	
1	2	2250087	Roqia Bibi	Muhammad Younas	Mansehra	Tehsil Balakot, District Mansehra	GGMS Dubair Village	101.51
2	1	2250095	Bibi Maryam	Mehboob ur Rehman	Mansehra	Dharyal Tehsil & District Mansehra	GGMS Miadan Kolai	99.8
3	2	2250106	Nazia Yousaf	Qazi Muhammad Yousaf	Mansehra	Bissian Tehsil Balakot, District Mansehra	GGMS Pattan	93.3
4	1	2250108	Roman	Bakhta Rashid	Swat	Pangigram Tehsil Babo Zai District Swat	GGMS Shilkhan Abad	82.27
5	8	2250088	Bibi Aisha	Noor Muhammad	Kohistan	Goshali Tehsil Dassu District Kohistan	GGMS Chakai	77.71
6	9	2250193	Fozia	Khoshal	Kohistan	Bar Sheryai Tehsil Palas District Kohistan	GGHS Battbira	75.17
7	9	2250104	Bibi Fatima	Khemia Khan	Kohistan	Dadeer Baryar Tehsil Dassu District Kohistan	GGMS Lahi	73.72

**TERMS & CONDITIONS:**

1. No TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year with effect from the date of issue.
4. They should not be handed over charge if she exceeds 35 years or below 20 years of age. Age relaxation case may be submitted to the competent authority.
5. Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the DEO any one found producing bogus certificate will be reported to the law enforcing agencies for further action.
6. Her services are liable to termination on one month's notice from either side. In case of resignation without notice her one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate to the effect by DEO is issued that her certificates are verified.
8. She should join her post within 10 days of the issuance of this notification. In case of failure to join their post within days of the issuance of this notification, her appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent Kohistan before taking over charge.
10. She will be governed by such rules and regulations as may be issued from time to time by the Govt.
11. Her services shall be terminated at any time, in case her performance is found unsatisfactory during her contract period. In case of misconduct, he shall be preceded under the rules framed from time to time.
12. Her appointment is made on School based, she will have to serve at the place of posting, and Her service is not transferable to any other station.
13. before holding over charge once again their document may be checked if they have not the required qualification they may not be handed over charge.
14. Before handing over charge she will sign an agreement with the department, otherwise this order will not be valid.

(Khan Muhammad)  
DISTRICT EDUCATION OFFICER  
(FEMALE) KOHISTAN

Endst: No. \_\_\_\_\_ /File No. \_\_\_\_\_ /TT Adhoc/appointment/Dated Kohistan the 20 May, 2014.

*Copy forwarded for information and necessary action to the:-*

1. The Director, Elementary & Secondary Education Peshawar.
2. District Accounts Officer Kohistan.
3. Head Mistress School concerned.
4. PA to Secretary Khyber Pakhtunkhwa E&SE Department Peshawar.
5. Official concerned.
6. Office Fiel.

DISTRICT EDUCATION OFFICER  
(FEMALE) KOHISTAN



Annex - D

OFFICE OF THE DISTRICT EDUCATION OFFICER (D), KOHISTAN (UPPER)

Email: deo@malekohistanupper@gmail.com

P-13

OFFICE ORDER/ REMOVAL FROM SERVICE

1. Whereas Mst. Fatema TT GGMS Lohi Jalkot Kohistan Upper remained willfully absent from her duty without proper permission and violation of the rules.
2. Whereas she has been reported absent by EMA several times in the past in the show cause.
3. Whereas she was called several times to resume her school duty properly but she had failed to comply the Departmental Orders.
4. Whereas she has drawn her salary illegally during her absence period without performing her duty.
5. Whereas a show cause notice was served upon her vide this office order No. 946/S3 Dated 23-04-2021, which was delivered to her vide her proper acknowledgement on the date signature.
6. Whereas she badly failed to reply to the show cause within stipulated period.
7. She badly failed to avail the chance of personal hearing.
8. Whereas while going through the material on record and verified the absenteeism of the said Teacher by SDEO & ASDEO concerned in the morning and personal observation daily undersigned, all the charges/allegations leveled against her have been proved to the satisfaction of the undersigned.

Therefore the undersigned being the Competent Authority hereby imposes Major Penalty of Removal from Service upon Mst. Fatema TT GGMS Lohi Jalkot Kohistan Upper in the Rule 4(b) of E&D Rules 2011, with immediate effect in the interest of public service.

(MUHAMMAD AMIN)  
District Education Officer (F)  
District Kohistan Upper

Sl. No. 1742-44

Dated: 23/05/2021

Copy for information and necessary action for all as follows:-

1. The PA to Director Elementary & Secondary Education, Khuzdar/Jalundhar, Balochistan
2. The Deputy Commissioner Kohistan Upper
3. The District Accounts Officer Kohistan Upper
4. The PA to District Education Officer (F) Kohistan Upper
5. The Sub-Divisional Education Officer (F) Derasa Kohistan Upper
6. The DDO/BXAO local office to stop the pay while concerned teacher and may report back to the undersigned.
7. The Ex. TT, Mst. Fatema GGMS Lohi Jalkot Kohistan Upper
8. Copy to Master File for record.

*Ali Akbar*  
*Ali*

District Education Officer (F)  
District Kohistan Upper

Office No. 33-Adp  
Dist. Bar Abot



OFFICE OF THE DISTRICT EDUCATION OFFICER (F) KOHISTAN (UPPER)

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

OFFICE ORDER/ REMOVAL FROM SERVICE

1. Whereas Mst. Fatema TT GGMS Lohi Jalkot Kohistan Upper remained willfully absent from her duty without proper permission intimation or leave.
2. Whereas she has been reported assent by EMA several times, as indicated in the show cause.
3. Whereas she was called several times to resume her school duty properly, but she badly failed to comply the Department Orders.
4. Whereas she has drawn her salary illegally during her absent period without performing her duty.
5. Whereas a show cause notice was served upon her vide this office order No. 948-53 Dated 21.04.2021 which was delivered to her vide her proper acknowledgment and dated signature.
6. Whereas she badly failed to reply to the show cause within stipulated period.
7. She badly failed to avail the chance of personal hearing.
8. Whereas while going through the material on record and verified the absentecism of the said teacher by SDEO & ASDEO concerned in the meeting and personal observations of the undersigned, all the charge/allegations leveled against her have been proved to the full satisfaction of the undersigned.

Therefore the undersigned being the competent authority do hereby impose Major Penalty of Removal from Service, upon Mst. Fatema TT GGMS Lohi Jalkot Kohistan Upper under Rule 4(b) of E&D Rules 2011, with immediate effect, in the interest of public service.

(MUHAMMAD AMIN)  
DISTRICT EDUCATION OFFICER (F)  
DISTRICT KOHISTAN UPPER

End No. \_\_\_\_\_

Dated: 06/2021

Copy for information and necessary action forwarded to:

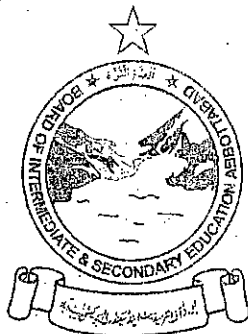
1. The PA to Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
2. The Deputy Commissioner Kohistan Upper.
3. The District Accounts Officer Kohistan Upper.
4. The PA to District Education Officer (F) Kohistan Upper.
5. The Sub Divisional Education Officer (F) Dassu Kohistan Upper.
6. The DDO/B&AO local office to stop the pay of the concerned teacher and make necessary entries in the service book immediately.
7. The Ex. TT, Fatema GGMS Lohi Jalkot Kohistan Upper.
8. Copy to Master File for record.

DISTRICT EDUCATION OFFICER (F)  
DISTRICT KOHISTAN UPPER

Roll No. 41087

ADAN: 105177

BOARD OF INTERMEDIATE & SECONDARY EDUCATION



Abbottabad N.W.F.P. - Pakistan

HIGHER SECONDARY SCHOOL EXAMINATION CERTIFICATE  
SESSION ANNUAL 2009

Humanities Group

This is to certify that BIBI FATIMA

Daughter of KHEMYA KHAN

A candidate from GOVT. GIRLS DEGREE COLLEGE NAWANSHEHR ABBOTTABAD has passed the Higher Secondary School Certificate Examination of the Board of Intermediate and Secondary Education, Abbottabad held in April/May 2009 as a Regular candidate. She has obtained 502 marks out of 1100 and has been placed in Grade D Representing FAIR.

The Examination was taken as a Whole/In Parts and the candidate passed in the following subjects:

- |                   |          |                       |
|-------------------|----------|-----------------------|
| 1.ENGLISH.        | 2.URDU   | 3.ISL.EDU-PAK STUDIES |
| 4.ISLAMIC HISTORY | 5.CIVICS | 6.ISLAMIC STUDIES     |

*Muhammed*

Muhammed  
Advocate  
Office  
Distt. Bar

*[Signature]*  
Asstt. Secretary

This certificate is issued without alteration or erasure.

*[Signature]*  
Secretary

کورٹ فیس

وکالت نامہ

Service Tribunal KPK Peshawar بعدالت

MSI Bibi Fatima نام Govt of KPK عدالت

Appellant منجانب:

Service Appeal نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام  
M. Arshad Khan, Panoli Asst of Pakistan at At-  
کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کمال اختیار ہوگا نیز وکیل  
صاحب موصوف کو کرنے راضی نامہ و تقررات و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری  
کرنے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت  
ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی  
بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا  
ساختہ پر داختمہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے  
مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا  
حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں  
کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست برادر  
استجارت نالاش بصیغہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت ختم تحریر کیا گیا ہے۔

المقوم:

بمقام:

Applied

M. J. Ibrahim Khan Adv

دھاس ٹولٹیٹ بھری (ایب آف آف)

Hc Abbottabad

Bibi Fatima  
Bibi Fatima