


28<sup>th</sup> March, 2023

Counsel for the appellant present. Mr. Fazal Shah Mohmand, Addl. A.G alongwith Faheemullah Assistant and Muhammad Imran, Assistant for the respondents present.

Learned AAG stated at the bar that he relied on behalf of respondent No. 1, on the written reply of respondents No. 2 & 3 already submitted by them. To come up for rejoinder, if any, and arguments on 01.06.2023 before the D.B. Parcha Peshi given to the parties.


SCANNED  
KPST  
Peshawar

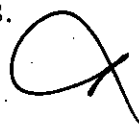
  
(Fareeha Paul)  
Member(E)

1<sup>st</sup> June, 2023

1. Learned counsel for appellant present. Mr. Fazal Shah Mohmand, Additional Advocate General for respondents present.
2. Being not prepared, learned counsel for appellant requested for adjournment. Adjourned. To come up for arguments on 13.09.2023 before D.B. P.P given to the parties.

SCANNED  
KPST  
Peshawar

  
(Salah-Ud-Din)  
Member (J)

  
(Kalim Arshad Khan)  
Chairman

\*Mutazem Shah.\*

22<sup>nd</sup> Dec, 2022

Learned counsel for the appellant present.

*All the respondents  
were put on notice*

*Rs-100/-*  
Appellant Deposited  
Security & Process Fee

Learned counsel for the appellant submitted an application for depositing security and process fee. Application is placed on file. He may do so within three days, thereafter notices be issued to the respondents for submission of written reply/comments. To come up on 07.02.2023 before S.B.

*K. Arshad Khan*  
5/1/23




(Kalim Arshad Khan)  
Chairman

07<sup>th</sup> Feb. 2023

Husband of the appellant present. Mr. Uzair Azam Khan, learned Additional Advocate General for the respondents present.


**SCANNED**  
**KPST**  
**Peshawar**

Reply/comments on behalf of respondents not submitted. On the request of learned AAG another chance is given to the respondents. To come up for reply/comments on 28.03.2023 before the S.B

  
(Fareeha Paul)  
Member(E)

6<sup>th</sup> September, 2022 Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

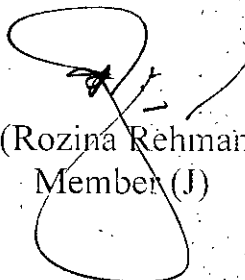
Learned counsel for the appellant seeks adjournment. Last opportunity granted. To come up for preliminary hearing on 18 / 10 / 2022 before S.B.

  
(Kalim Arshad Khan)  
Chairman

18.10.2022 Appellant present through counsel.

Preliminary arguments heard and record perused.

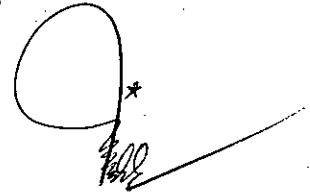
Points raised need consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of reply/comments. To come up for reply/comments on 22.12.2022 before S.B.

  
(Rozina Rehman)  
Member (J)

25.05.2022

Learned counsel for the appellant present. Mr. Noor Zaman Khattak, District Attorney alongwith Mr. Mudassir Shah, ADEO (Litigation) for the respondents present.


Written reply/comments on behalf of respondents not submitted. Last opportunity was granted to the respondents for submission of written reply/comments vide order sheet dated 02.12.2021. Today representative of the respondents present and submitted his arrival report bearing Endstt. No. 10751-56 dated 17.05.2022 with the request that time may be granted for submission of written reply/comments. Copy of the same is placed on file. Adjourned. To come up for written reply/comment on 04.07.2022 before S.B.



(Mian Muhammad)  
Member (E)

4<sup>th</sup> July, 2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Buti, Addl; AG alongwith Mr. Mudassir Shah, ADEO for respondents present..

Written reply on behalf of the respondents submitted. A copy of the same is also handed over to the learned counsel for the appellant. Learned counsel wants to go through the written reply/comments. To come up for preliminary hearing ~~on 06.07.2022~~ before S.B. 



(Kalim Arshad Khan)  
Chairman



HP LaserJet M402dn

06.10.2021

# Job Storage

Ms. Roeda Khan, Advocate, for the appellant present.

Syed Naseer-ud-Din, Assistant alongwith Mr. Kabirullah Khattak,

~~Additional Advocate General for the respondents present and~~

sought time for submission of reply/comments. Last opportunity

## Job Storage Description

Job Storage allows you to send the print job to the printer and have it stored there until you print it from the printer's associated with the job for extra security. ~~given. To come up for submission of reply/comments as well as preliminary hearing before the S.B on 02.12.2021.~~

## Job Storage USB Installation

To enable Job Storage, you must first insert a dedicated USB storage device (with at least 16GB of memory) in the rear USB slot. This USB storage device will hold the Job Storage jobs sent to the printer. If this USB storage device is removed, Job Storage will be disabled on the printer.

Insert the USB drive in the rear USB slot and follow the instructions on the control panel. This USB drive will be dedicated to Job Storage. The front USB slot will not work for Job Storage.

1. The USB cover may need to be removed to reveal the USB slot on some printer models. If there is a cover, remove it.
2. Insert a USB drive with at least 16GB of memory.
3. Follow the Control Panel messages to format the USB drive for Job Storage.

You may need to update your printer driver if you do not find the "Job Storage" tab after enabling the feature in the printer. Go to the following URL for instructions on how to update the printer driver.

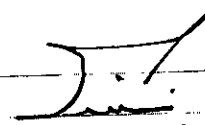
<http://www.hp.com/support/jobstorage>

time to contact the respondents for submission of written reply/comments. Request is acceded <sup>to</sup> but as a last chance. To come up for written reply/comments as well as preliminary hearing on 24.02.2022 before S.B.

24.02.2022

Due to retirement of the <sup>(MIAN MUHAMMAD)</sup> ~~Worthy Chairman~~ the Tribunal is defunct, therefore, case is adjourned to 25.05.2022 for the same as before.

  
Reader.

  
SYED NASEER-UD-DIN  
MEMBER (JUDICIAL)

02.12.2021

Counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.


Written reply/comments not submitted. Learned AAG seeks

The appeal of Mst. Mehnaz Jehan PST GGPS Dargai Charsadda received today i.e. on 12.02.2020 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexure-A of the appeal is illegible which may be replaced by legible/better one.
- 2- Copy of impugned order is not attached with the appeal which may be placed on it.


No. 397 /S.T.

Dt. 13-02 /2020.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Roeeda Khan Adv. Pesh.

objection has been  
removed

  
14/6/2021

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In Re S.A. 6175 /2021

Mst. Mehnaz Jehan

**VERSUS**


Govt of Khyber Pakhtunkhwa & Others

**INDEX**

<b>S#</b>	<b>Description of Documents</b>	<b>Annex</b>	<b>Pages</b>
1.	Grounds of Appeal		1-4
2.	Affidavit		5
3.	Address of the Parties		6
4.	Condonation of delay		7-8
5.	Copy of charge report	"A"	9
6.	Copy of service record	"B"	10
7.	Copy of transfer order	"C"	11
8.	Copy of FIR	"D"	12 To 15
9.	Copy of Departmental Appeal	"E"	16
10.	Wakalatnama		32

Dated : 11/02/2020

  
Appellant

Through 

Roeda Khan  
Advocate, High Court,  
Peshawar.



11

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In Re S.A \_\_\_\_\_/2020

Mst. Mehnaz Jehan PST Government Girls  
Primary School Dargi Charsadda.

-----(*Appellant*)

**VERSUS**

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

-----(*Respondents*).

**SERVICES APPEAL U/S 4 OF THE  
KHYBER PAKHTUNKHWA ACT -1974 FOR  
THE ADJUSTMENT AND BACK  
BENEFITS OF SERVICE TO THE  
APPELLANT BY THE RESPONDENT  
DEPARTMENT ALONG WITH ALL BACK  
BENEFITS.**

**Prayer on appeal**

On acceptance of this service appeal the  
appellant may kindly be treated  
according to law and rules and adjusted  
the appellant on his original post and  
granted back benefits of service to the  
appellant along with all back benefits.

**Respectfully Sheweth;**

1. That the Appellant was initially  
appoint as PST on 16.05.2007 by the

(2)

District Education of Charssadda  
(Copy of order Annexure "A").

2. That the appellant take over the charge of the said post on 23.05.2007 (Copy of charge report Annexure "B").
3. That the Appellant perform her duty with full devotion and hard work and no complain what so ever has been made against her. (Copy of Service card attached as Annexure "C").
4. That the Appellant has been transferred from GGPS Hassan Zai to GGPS Umerabad Dergai on 08.09.2007 (Copy of Transferred order is attached as Annexure "D").
5. That on 2010 the appellant along with family shifted to Peshawar due to some domestic dispute i.e. enemy and lastly the dispute of the appellant have been solved on 2019 (Copy of FIR is attached as Annexure "E").
6. That after solving the dispute of the appellant, the appellant visited to respondent department for her adjustment and moved a departmental appeal to respondent department on

08-11-2019 but no response has been given by the respondent department. (Copy of Departmental appeal attached as Annexure "F").

7. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

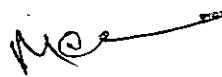
**GROUND:-**

- A. That not allowing of the appellant on his original post is an illegality on the part of the Respondent Department and utter violation of law and rules on the subject.
- B. That the appellant has not been treated according to law and mandatory provisions of law have been violated by Respondents.
- C. That the appellant is a Civil Servant and it is the responsibility of the Department to allow the appellant.
- D. That the appellant has not been removed or dismissed from service so not allowing of the appellant on his job is clear cut malafidely on part of Respondent department.

- e. That not allowing of the appellant is void and not in according to law because not allowing of the appellant for his service is an illegality on part of respondent department.
- f. That the appellant seeks permission of this Hon'ble Tribunal for further additional grounds at the time of arguments.

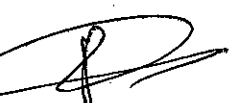
It is, therefore, most humbly prayed that on acceptance of this service appeal the appellant may kindly be treated according to law and rules and adjusted the appellant on his original post and granted back benefits of service to the appellant along with all back benefits.

Any other relief not specifically asked for, may graciously be extended in the favor of Appellant, in the circumstances of the instant appeal.



Appellant

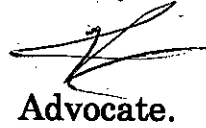
Through



**Roeeda Khan**  
Advocate, High Court  
Peshawar

**NOTE:-**

No such like appeal for the same appellant upon the same subject matter has earlier been filed by me before this Hon'ble Tribunal.



Advocate.

51

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In Re S.A \_\_\_\_\_/2020

Mst. Mehnaz Jehan

**VERSUS**

Government of Khyber Pakhtunkhwa & Others

----- (Appellant)

**AFFIDAVIT**

I, Mst. Mehnaz Jehan PST Government Girls Primary School Dargai Charsadda., do hereby solemnly affirm and declare that all the contents of the accompanied appeal is true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Tribunal.

*Mehnaz*  
**DEPONENT**

**CNIC#17101-3026988-8**

Identified By:

*Roeda Khan*  
Roeda Khan  
Advocate High Court  
Peshawar.

(6)

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In Re S.A \_\_\_\_\_/2020

Mst. Mehnaz Jehan

**VERSUS**

Government of Khyber Pakhtunkhwa & Others

**ADDRESSES OF PARTIES**

**APPELLANT.**

Mst. Mehnaz Jehan PST Government Girls  
Primary School Dargai Charsadda.

**RESPONDENTS:**

1. Govt. of Khyber Pakhtunkhwa through Secretary  
Elementary & Secondary Education Khyber  
Pakhtunkhwa Peshawar.
2. Director Elementary and Secondary Education  
Department Khyber Pakhtunkhwa Peshawar.
3. Executive District Officer (Elementary & Secondary  
Education) District Charsadda.

Dated : 11/02/2020

*Mehnaz*  
Appellant

Through *Roeeda Khan*

Roeeda Khan  
Advocate, High Court,  
Peshawar.

7

**BEFORE THE HONBLE KHYBER PAKHTUNKHWA  
SERVICES TRIBUNAL PESHAWAR**

In Re S.A \_\_\_\_\_/2020

Mst. Mehnaz Jehan

**Versus**

Government of Khyber Pakhtunkhwa through Secretary  
Education Department Peshawar and others

**APPLICATION FOR CONDONATION OF DELAY (if any)**

*Respectfully Sheweth,*

Petitioner submits as under:

1. That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.
2. That on 2010 the appellant along with family shifted to Peshawar due to some domestic dispute i.e. enemy and lastly the dispute of the appellant have been solved on 2019.
3. That after solving the dispute of the appellant, the appellant visited to respondent department for her adjustment and moved a departmental appeal to respondent department on 08-11-2019 but no response has been given by the respondent department.

4

4. That the appellant has not been dismissed nor removal from service by the Respondent Department and still the appellant has been on the strength of department.
5. That it has been the consistent view of the Superior Courts that causes should be decided on merit rather than technicalities included limitation. The same is reported in 2004 PLC (CS) 1014 2003 PLC (CS) 769.

**It is, therefore, requested that the limitation period (if any) may kindly be condone in the interest of justice.**

**Dated : 11/02/2020**

**Appellant**

**Through**

**Roeeda Khan  
Advocate, High Court,  
Peshawar.**



(18) Change Report

I have Take my charge as  
P.S.T Teacher at Govt - Civil Primary  
School Hassan Zai Shahrales Fort-

Dist Chansadde Uda order No  
3661-3815 at-

16/5/07 at 9 AM  
on 23/5/07

Submitted for information and

Further necessary action please

Date 23/5/07

Your obediently

Mehnaz Jaham

Dist-9 Tehsil Chansadde

~~HEAD MISTRESS~~  
G.G.P.S. HASSANZAI  
SHABADAR  
23/5/2007

Ann 1/8/03 (10)

Service certificate

Certified that Mrs. Mehnaz Jehan is a permanent Govt. servant of the Schools and Literacy Department.

At present she is working as PST teacher at GGPS Hasanzai Charsadda.

Deputy District Officer (F)  
Education Charsadda

(F) 1/8/03

~~DISTRICT OFFICER  
S&L CHARASADDA~~

under the rules.

She & her family members are entitled for free medical treatment

Department as PST at GGPS Umer Abad Dargai.

Certified that Mst Mehnaz Jehan is working in Education

SERVICE CERTIFICATE

Phone No 510963

OFFICE OF THE EXECUTIVE DISTRICT OFFICER S&L CHARSAKDA

OFFICE ORDER

Miss Mehnaz Jehan PST GGPS Hassanzai is hereby transferred to GGPS Umerabad Dargai ( Under Rationalization policy) on her own pay & BPS in the interest of public service with immediate effect

(MASAL KHAN)  
I/C EXECUTIVE DISTRICT OFFICER  
S&L CHARSAKDA

Endst:No 8023-29 / Dated 08/09 /07

Copy for information to the:

1. District Coordination Officer Charsakda.
2. PS to District Nazim Charsakda.
3. District Accounts Officer Charsakda.
4. Deputy District Officer (F) Charsakda.
5. A.D.O B&AO/Supdt: Local Office.
6. Official concerned.
7. Office File.

~~\_\_\_\_\_~~  
I/C EXECUTIVE DISTRICT OFFICER  
S&L CHARSAKDA







حتمیاً حتمیاً کے اخبار جان کر کھانڈاٹ گئے وہ سب سحر نے اور فہرہ جی لفظ  
 اور وہ سب سحر نے کبھی کبھی اخبار ہی نہیں، حالات و واقعات سے صورت قلم با  
 کا پائی خاطر و اس کے حوالہ میں کئی لفظیں خامی مقدم بہ سبب کا ٹیل اس 232P  
 لکھو سبیل رپورٹ ہو گیا تھا ہے۔ آفسر باہ کو لکھو سبیل رپورٹ  
 ایچ دی جاوے۔ مقدمہ درج ہے نفیس کی صاف، دستخط آگسٹ  
 صرف تہہ حال کے اخبار سیکورٹی کیمپ اور دارم 14/16 کا پائی  
 ظاہر ہے وہ سب سحر نے صرف صرف درج 14/16 اس 232P  
 لکھو، 14/16 اس 232P اس 232P اس 232P اس 232P  
 کے خانہ میں صدر آفسر باہ کو لکھو سبیل رپورٹ ایچ دی  
 جاتی ہے درج لکھو سبیل رپورٹ گراؤ ہے۔

Wm  
 811 Pst City  
 16-12-11

\_\_\_\_\_ دستخط \_\_\_\_\_  
 \_\_\_\_\_

اطلاع کے لیے دہندہ دستخط ہو گیا اس کی تہہ نشان لگایا جائے گا۔ اور اس پر تحریر کنندہ ابتدائی اطلاع کا دستخط بطور تصدیق ہوگا۔ حروف الفبا ب سرخ رنگ  
 ایک نظم یا شعر غزل، ترتیب واسطے باشندگان علاقہ غیر یا وسط ایشیا یا افغانستان جہاں موزوں ہوں لکھتا ہے۔





حالیہ وقت میں ان کے ساتھ ساتھ کچھ اور بھی لکھے گئے ہیں۔ ان کے بارے میں پتہ چلنا چاہیے۔  
ان کے بارے میں پتہ چلنا چاہیے۔ ان کے بارے میں پتہ چلنا چاہیے۔



Dr. P. S. K. S. K.

اگرچہ اس کے لیے وہ دیکھ کر حیرت منگوا رہا ہے۔ اس کی اطلاع کا دستخط بطور تعین ہو گا۔ حروف الف بیاں سرخ روشنائی سے ہاتھ لگائی جائیں گی۔  
ایک نزم یا شعر علی الترتیب واسطے لکھنا چاہیے۔

۱۶۱  
۱۶۱  
۱۶۱

گوت خان ڈاٹ کام، ٹیکسٹنگ، ایچ ایم آر، سٹینڈرڈ

ایجوکیشن غیر محنتی قواعد

ڈیپارٹمنٹل ایڈجسٹمنٹ

Allowance اور ایڈوانس

آف ایسروٹس

صوبہ عالی

ایڈوانس حسب ذیل رقم میں ارسال

1) یہ کہ ایڈوانس 2007 میں رٹورن P-5-A

کھری ہوئی تھی

2) یہ کہ ایڈوانس مافا کے بین ایڈیڈ ہوئی ہے

دے دیے تھے

3) یہ کہ ایڈوانس 2010 میں ایڈیٹنگ کے سائیکل

میں کل اور ڈسٹنٹی کی وجہ سے چھ ماہوں میں




4) یہ کہ ایڈوانس ڈسٹنٹی 2019 میں ختم ہو کر

لیہا اسٹریٹجی کے ایڈوانس کو ایڈیٹنگ

میں آج بھی ایڈوانس (پیسے) کے Allowance کے ساتھ اور

سروس کے Back Benches بھی دیا جائے

8/11/2019

قیمت 50 روپے	38727			
ایڈویٹ:		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل ایسوسی ایشن نمبر:				
رابطہ نمبر:				
63335265955				

بعدالت جناب: محمد سید سید

منجانب: <u>اسلام</u>	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
<b>باعت تحریر آئکہ</b>	

منجانب: اسلام  
 مہمانہ سید بنام  
سید

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیروی و جواب وہی کاروائی متعلقہ

آن مقام دلہ کیلئے روٹی کے اندر سکھو کیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و 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 بیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و بیروی 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 با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ بیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 2/2/2024

العبد محمد العبد  
 مقام دلہ کے لیے منظور ہے۔

To

The District Education Officer  
(Female) Charsadda.

**SUBJECT:- ARRIVAL REPORT**

R/Madam

In compliance with the order Endstt No. 3354-59 dated 13/05/2022 issued by Directorate E&SE, Khyber Pakhtunkhwa Peshawar I do hereby submit my arrival report on 17/05/2022 before Noon, being ADEO Litigation ( Legal Representative) of this office.

I beg to submit my arrival for duty at office of the undersigned.

*P. 1 18/5/22*  
Mr Mudasir Shah ADEO / Legal  
Representative of this office  
Dated, 17/05/2022.

*[Signature]*  
District Education Officer  
(Female) Charsadda.

Endstt No. 10787-56 /Dated/ 17/05 /2022.  
Copy to the:

1. Registrar Peshawar High Court Peshawar.
2. PA to Director E&SE Khyber Pakhtunkhwa Peshawar.
3. District Account Office Charsadda.
4. DMO Charsadda.
5. Master File.

*[Signature]*  
District Education Officer  
(Female) Charsadda.

4/7/22 (PR)  
1/10/22 (OB)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

**Service Appeal No.6175/2021**

**Mst Mehnaz Jehan**

**VS**

**Govt of Khyber pukhtun khwa**

**INDEX**

S No.	Description	Annexure	Page
1	Comments		1-2
2	Affidavit		3
3	Annexure	A	4

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Service Appeal No.6175/2021

Mst Mehnaz Jehan

Vs

Govt. of Khyber Pakhtunkhwa

Written Reply on behalf of Respondents

Respectfully Sheweth:

Preliminary Objections:

- A. The Appellant has no locus standi and cause of action.
- B. That the present Appeal is wrong, baseless hence not tenable in the eyes of law, and not maintainable, it shows no cause to be taken for adjudication, therefore the same Appeal is liable to be rejected/ dismissed.
- C. That the Appeal is bad for misjoinder and no joinder of necessary parties.
- D. That no legal right of the appellant has been violated, therefore the appellant has no right to file the instant appeal.
- E. That the appeal is wholly incompetent, misconceived & not maintainable in its present form..
- F. The Appellant is completely estopped/precluded by her conduct to file this Appeal.
- G. Appellant has not come to this Hon' able Tribunal with clean hands. The Appeal also suffers from mis-statements and concealments of facts and as such the Appellant is not entitled to equitable relief.
- H. That the the Hon' able Tribunal has got no jurisdiction to adjudicate upon and the Appeal is liable to be dismissed.
- I That the appeal is not maintainable under section ( 4) of service tribunal Act hence the instant appeal is barred by law and limitation.

PARA WISE REPLY ON FACTS:

1. Para 1 personal information of the appellant.
2. Incorrect, false and concocted hence denied, in fact the Appellant is habitually not taking interest in her official duties and remains disappear without any sanction before segregation of male and female wing in 2013.

3. Incorrect, false and misleading, the appellant awake from deep long slumber after a period of more or less 14 years to demand for job without any proof of rendering services to the government hence the appellant not filed an appeal in statutory period.
- 4 Para 4 related to the personal information of the Appellant, the appellant disappear from his lawful duty without any sanction (**Page of log book place on the record annexure A**)
- 5 That there are major contradiction and discrepancy between the statement of the appellant , FIR registered in 2016 in Mardan district and appellant shifted to Peshawar, along with family in 2010 hence this sole ground is sufficient for the dismissal of the appeal.
- 6 Incorrect, that in this regard the concerned school head mistress given categorically statement in written form in Urdu language (**Photo copy of the statement of the concerned teacher**)
- 7 Incorrect and misleading there is no departmental appeal submitted to the respondents department no diary dispatch number available on the appeal.
- 8 That the instant appeal is barred by law.

**ON GROUNDS:**

- A. Incorrect the respondents acted accordance with law.
- B. Incorrect and baseless, the appellant misleading the Hon,ble Tribunal by self-made and self-engineered story.
- C. Incorrect and against the facts of the case.A detail reply has been given in above paras.
- D. Incorrect as replied in para 3, the appellant has no valid ground to rely on.

***It is, therefore, most humbly prayed that the appeal of the appellant may be dismissed with cost.***

Respondents:

1; District Education "officer Female Charsadda,

2 Director E&SE Khyber Pakhtoon khwa-----

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR**

**Service Appeal No.6175/2021**

**Mst Mehnaz Jehan**

**Vs**

**Govt. of Khyber Pakhtunkhwa**

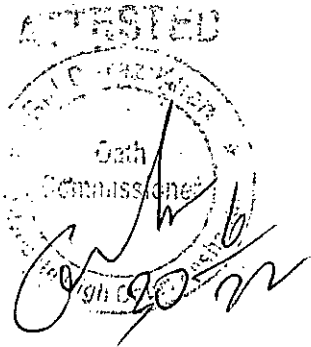
**Written Reply on behalf of Respondents**

**AFFIDAVIT**

I Mst Mudassir shah ADEO Litigation of the DEO (F) Charsadda do hereby as per information conveyed to me by DEO (F) Office solemnly affirm and declared that the contents of para wise reply are true and correct to the best of my knowledge and nothing has been intentionally concealed from this Hon'ble Tribunal.

Deponent

Mudassir shah ADEO Litigation  
O/O DEO (FEMALE)  
Charsadda CNIC: 17101-6347249-1





# لاگ بک (حصہ دوم)

رپورٹ کی روشنی میں سکول  
انتھارٹی نے جو کارروائی کی۔

## رائے / رپورٹ معائنہ

سوال نمبر 1

کوئٹہ گریڈ 1 اسکول عمر آباد  
آج مورخہ 29 فروری 2022ء کو سکول  
معاینہ کیا گیا۔ معائنہ معائنہ کیا گیا۔ پونت  
معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔

معاینہ

معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔

معاینہ

معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔  
معاینہ کیا گیا۔ معائنہ کیا گیا۔

معاینہ

29.6.2022

P.S.H.T  
G.G.P.S Umarabai  
Dargai Charsada

11/13 د 8/11 د 13/15 د 17/18 د 19/27 د

معاینہ

# لاگ بک (حصہ دوم)

رپورٹ کی روشنی میں سکول  
اتھارٹی نے جو کارروائی کی۔

## رائے / رپورٹ معائنہ

تعلیمی جائزہ

اول ادنیٰ کلاس میں اخراج میں رشتہ دار  
ریاضی اور اردو میں ایچے کنیز درجے  
پر بنیادی کلاس ہے سمیت محنت کی  
ضرورت ہے۔

اول اعلیٰ کلاس میں اخراج میں رشتہ دار  
بچوں کی تعلیمی کارکردگی بہتر تھی۔

سوئم اور دوم کلاس میں اخراج میں سوئم اور  
فائنل دوم اور سوئم کے ایچے ریاضی  
اور انگلش میں کنیز درجے باقی رہنا  
میں ایچے قدرے بہتر تھے مگر لا محنت  
کی ضرورت ہے۔

تیسرے کلاس میں اخراج میں کلاسز  
انگلش اور ریاضی میں بچوں کی تعلیمی  
حالت کنیز درجے تا ایچے باقی رہنا  
میں بچوں کے سوالات کے درجہ  
جوابات دیں۔

چوتھے کلاس میں اخراج میں کنیز درجہ

بچوں کی انگلش ریاضی اور اردو  
میں تعلیمی جائزہ ایچے تا ایچے  
بچوں کی تعلیمی حالت قدرے  
بہتر تھی۔

22.6.22  
P.S.H.T  
G.G.P.S Umarabadi  
Dargai Charsadda

# لاکھ (حصہ دوم)

رپورٹ کی روشنی میں سکول  
انتظامی نے جو کارروائی کی۔

رائے / رپورٹ معائنہ

توجہ سے معائنہ سکول صاف ستھرا تھا۔

ریکارڈس

صدر پبلک سیکرٹری ہدایت دہائی ہے کہ آئندہ

مددنیات

بنیادی دوسروں کے ساتھ ادنیٰ اور اعلیٰ

میں شکر پورہ ناز کے سپرد کریں اور معائنہ

کو بہتر بنانے میں رشتہ داروں سے فوراً اور

میں کلناز آئے ہیں۔ کلاسوں

میں چارٹس آؤٹ لائن کریں اور کام

اوقات تقسیم کار اور پبلک سیکرٹری کے مطابق

کریں تاکہ محلوں کی تعلیمی حالت بہتر

ہو جائے۔

اس رپورٹ کی نشین کاربندیاں سرمد

بھیج دیں۔

نوٹ

Mentor  
23-2-09

24-6-22  
P.S.H.T  
G.G.P.S Umarabad  
Dargai Charsadda

# ANNEXURE B

Date:      /      / 20

Mon Tue Wed Thu Fri Sat

محترم جناب اسپتال کی ایف ڈی ایم فارم سے فارم

صاف لکھ

میں سے تمام روزی لکھ

اگر رعیت کے لئے پہلے کی سہولت کے لئے

27 جنوری 2022 کو جاری ہو گیا ہے۔ اس وقت سہولت

میں موجود رکھا گیا ہے۔ اس وقت سہولت

میں سے یہ چیزیں ہیں جو متعلق کوئی چیز

موجود نہیں ہے۔ اس وقت یہ چیزیں

موجود نہیں ہیں۔

صرف اس لئے اس لئے اس لئے

میں اس لئے اس لئے اس لئے

میں اس لئے اس لئے اس لئے

میں اس لئے اس لئے

اس لئے اس لئے اس لئے اس لئے

24.6.2022

PS.H.T  
G.G.P.S Umarabad  
Dargai Charsadda

Before the Service Tribunal KPK Peshawar

MST-Mehnaz Jehan versus- Education  
Department

Applicant for Depositing  
Security Fees in service  
Appeal No 6175/21

Respectfully shewt:-

(1) That the above titled service appeal  
has been pending before the honorable  
Tribunal which is fixed for today.


(2) That Due to unavoidable circumstances  
the security fees has not been  
deposited by the appellant.

It is therefore humbly prayed  
that the appellant may kindly  
be allowed to deposit for the  
above titled appeal.

Appellant  
Mehnaz Jehan  
22-12-2022  
Rozda Jehan

Reply on the Reply/Comments in S.A #  
Case titled mehna3.

The Respondent NO 1 has no  
objection and Reply on the Comments/  
Reply Submitted by the Respondent NO  
2 9 3.

  
Fahim Khan  
Assistant  
E & S Dept  
28-3-2023

بعدالت رجسٹرار صاحب خیبر پختونخوا سروسز ٹریبونل پشاور

درخواست برائے مہمدمتہ نقول

- 1- اپیل / ایگزیکوشن / ریٹوریشن نمبر \_\_\_\_\_
- 2- ٹائٹیل (نام) \_\_\_\_\_ بنام \_\_\_\_\_
- 3- مطلوبہ نقول / فیصلہ کی کاپی / اپیل کی کاپی / آرڈر شیٹ کی کاپی / جواب دعویٰ / مکمل فائل کی کاپی
- 4- اصل عدد تاریخ: \_\_\_\_\_ / \_\_\_\_\_
- 5- چلہ شدہ گزشتہ اور آنے والا تاریخ: \_\_\_\_\_
- 6- درخواست گزار کا نام، عہدہ اور دستخط: \_\_\_\_\_
- 7- تاریخ درخواست: \_\_\_\_\_
- 8- سوبائل نمبر: \_\_\_\_\_

رجسٹرار سروسز ٹریبونل، پشاور