13th June, 2023

Learned counsel for the petitioner present. Mr. Asad Ali
 Khan, Assistant Advocate General present.

2. On the previous date, last opportunity was granted to the appellant but today again an adjournment was sought. Therefore, this case is adjourned but subject to payment of cost of Rs. 2000/- to be paid on behalf of the appellant. To come up for arguments on 31.10.2023 before the D.B. P.P given to the parties.

SCANNED KPST Peshawar

(Rashida Bano) Member (J)

(Kalim Arshad Khan) Chairman

Mutazem Shah

O1.02.2023 Learned counsel for the appellant present. Mr.

Muhammad Riaz Khan Paindakhel, Assistant Advocate

General for the respondents present.

Learned counsel for the appellant seeks adjournment for preparation of brief of the instant appeal. Adjourned. To come

SCANNED

up for arguments on 02.05.2023 before the D.B.

(FAREEHA PAUL) Member(E)

(SALAH-UD-DIN) Member (J)

02nd May, 2023

- 1. Learned counsel for the appellant present. Mr. Asif Masood
 Ali Shah, Deputy District Attorney alongwith Mr. Munawar
 Khan, ADEO for the respondents present.
- 2. Learned counsel for the appellant seeks adjournment on the ground that he has not made preparation for arguments. Last opportunity is granted. To come up for arguments on 03.07.2023 before the D.B. Parcha Peshi is given to the parties.

SCANNED ST Pesnawag

> (Salah-ud-Din) Member (J)

(Kalim Arshad Khan) Chairman

Naeem Amin

Clerk of learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Clerk of learned counsel for the appellant requested for adjournment on the ground that learned counsel for the appellant is busy in the august Peshawar High Court, Peshawar. Adjourned. To come up for arguments before the D.B on 05.12.2022.

(Mian Muhammad) Member (E) (Salah-ud-Din) Member (J)

05.12.2022

Learned counsel for the appellant present. Mr. Muhammad Jan, District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not gone through the record. Adjourned. To come up for arguments on 01.02.2023 before D.B.

POSTANED

(Mian Muhaminad) Member (E)

(Salah-ud-Din) Member (J) 09.05.2022

Learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 07.06.2022 before the D.B.

(Mian Muhammad) Member (E)

(Salah-ud-Din) Member (J)

7.6.22

præfes DB is av Tour, Therefore the case is afjanned to 25-8 -2022 for fance.

1

25.08.2022

Clerk of learned counsel for the appellant present. Mr. Naseer-ud-Din Shah, Assistant Advocate General for the respondents present.

Learned Member (Judicial) Ms. Rozina Rehman is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 27.10.2022 before the D.B.

(Salah-Ud-Din) Member (Judicial) Clerk of counsel for the appellant present.

Mr. Usman Ghani, learned District Attorney for respondents present.

Clerk of counsel for the appellant seeks adjournment as learned counsel is not available today. Adjourned. To come up for arguments on 16.12.2021 before D.B.

(Rozina Rehman) Member(J) Charman

16.12.21

DB is on Tour case to come up For the Same on Dated 31-3-22

Rideo

31.03.2022

Counsel for the appellant present. Mr. Munawar Khan, ADO (Litigation) alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant sought adjournment on the ground that he has not made preparation for arguments. Adjourned. To come up for arguments on 09.05.2022 before the D.B.

(Rozina Rehman) Member (J) (Salah-ud-Din) Member (J) 31.08:2020

Nemo for the appellant. Mr. Kabirullah Khattak learned Addl AG alongwith M/S Irfan Assistant for respondent No. 1 & 2 and Munawar Khan SST for respondent No.3 present.

Representative of the respondent No.3 submitted written reply/comments which is placed on file. Representative of the respondent No. 1 & 2 rely on the same. Case to come up for rejoinder if any, and arguments on 20.10.2020 before D.B.

Member (E)

20.10.2020

Junior to counsel for the appellant and Muhammad Jan, DDA alongwith Munawar Khan, SST, for the respondents present.

The Bar is observing general strike today, therefore, the matter is adjourned to 31.12.2020 for hearing before the D.B.

(Mian Muhammad)

Member

Due to summer vacation, case is adjourned to 31.12.2020 12.04.2021 for the same as before.

12.04.2021

Due to demise of the Worthy Chairman, the Tribunal is adjourned non-functional, therefore, case 27.07.2021 for the same as before.

Reader

04.03.2020

Counsel for the appellant present. Nemo for the respondents.

Fresh notices be issued to the respondents for submission of written reply/comments on 13.04.2020 by way of last chance.

Member

13.04.2020

Due to public holiday on account of COVID-19, the case is adjourned to 07.07.2020 for the same. To come up for the same as before S.B. \bigcirc

Reader

07.07.2020

Counsel for the appellant present.

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Mr. Kabir Ullah Khattak learned Additional Advocate General alongwith Munawar Khan SST for the respondents present.

Written reply on behalf of respondents is still awaited. Learned AAG requested for further time to furnish written reply/comments. Another last chance is given but on cost of Rs.2000/-. To come up for written reply/comments on 31.08.2020 before S.B.

Member (J)

04.11.2019

Counsel for the appellant and Addl. AG for the respondents present.

Learned AAG seeks adjournment to contact the respondents for furnishing comments. Adjourned to 16.12.2019 on which date the requisite reply/comments shall positively be submitted.

Chairman

16.12.2019

Counsel for the appellant and Addl. AG for the respondents present.

Learned AAG requests for time to contact the respondents and procure the requisite reply/comments. Adjourned to 28.01.2020 on which date reply/comments shall positively be submitted.

Chairman

28.01.2020 None present on behalf of appellant. Written reply not submitted. Waheed Ullah ADO representative of the respondent department present and seeks time to furnish reply. Granted. To come up for written reply/comments on 04.03.2020 before S.B.

Member

03.07.2019

Counsel for the appellant Mst. Shakeela Begum present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Education Department as Primary School Teacher. She was imposed major penalty of dismissal from service vide order dated 09.02.2019 on the allegation of fake appointment. It was further contended that the appellant filed departmental appeal on 02.03.2019 but the same was not responded hence, the present service appeal. It was further contended that the appellant having 21 year service in her credit but the respondent-department has imposed major penalty of dismissal from service without proper inquiry nor she was given opportunity of personal hearing and defence nor her service for about 21 years was considered at the time of passing the impugned order therefore, the impugned order is illegal and liable to be set-aside.

The contentions raised by the learned counsel for the appellant need consideration. The appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days, thereafter, notice be issued to the respondents for written reply/comments for 02.09.2019 before S.B.

(Muhammad Amin Khan Kundi) Member

02.09.2019

Mr. Daris Khan, Advocate for appellant present. .

An application for extension of time to deposit security and process fee has been submitted.

The application is allowed and the period for making the deposit is extended for another period of three days. After the requisite deposit notices be issued to the respondents for submission of written reply/comments on 04.11.2019 before S.B.

S.B

Chairman

Form- A FORM OF ORDER SHEET

Court of		
•		
Case No	746/ 2019	•

	Case No	746/ 2019
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/06/2019	The appeal of Mst. Shakeela Begum presented today by Mr. Daris Khan Advocate may be entered in the Institution Register and put up to
2-	24/06/19	This case is entrusted to S. Bench for preliminary hearing to be put up there on
		CHAIRMAN
	· .	

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S.A NO 746/2019

Service Appeal No _____/2019

Mst.Shakeela BegumAppellant

VERSUS

INDEX

S.No.	Description of documents.	Annexure	Pages.
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2.	Application for temporary injunction/ suspension with affidavit.		4-5
3.	Addresses of the parties.		6
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5.	Copy of relevant documents	В	12-4
6.	Copy of the impugned Notification dated 09.02.2019	C	42
7.	Copy of the representation	D	43
8.	Wakalatnama		44

Dated: 11.06.2019

Appellant

Through

Daris Khan // Advocate High Court

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

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/2019

Service Appeal No

1. Govt. of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat Peshawar.

VERSUS

- 2. Director of Elementary and Secondary Education Khyber Pakhtunkhwa, near GHSS No.1, G.T. Road, Peshawar.
- 3. District Education Officer Khyber Tribal District at Jamrud
 Respondents

APPEAL UNDER SECTION 4 OF THE KPK SERVICE TRIBUNAL ACT 1974 AGAINST THE NOTIFICATION NO.3612-16 DATED 09.02.2019 ISSUED BY RESPONDENT NO.3 NAME OF THE WHEREBY THE APPELLANT WAS STRUCK OFF FROM **EDUCATION ROLL** THE PAY OF DEPARTMENT DISTRICT KHYBER AND SERVICE AND: DISMISSED FROM REPRESENTATION OF THE APPELLANT DECIDED WITHIN THE NOT WAS STATUTORY PERIOD OF 90 DAYS

Respectfully Sheweth:



- 1) That the appellant was appointed as primary school teacher after adopting required and prescribed by the respondent department vide order/ Notification endorsement No.5616-24 dated 19.09.1998, took charge on 20.09.1998. (Copies of appointment order, charge report and medical etc. are annexed as annexure A).
- 2) That the appellant was performing her duty regularly, punctually and full devotion since her appointment. (Copy of relevant documents are annexed as annexure B).
- 3) That the respondent No.3 has issued a Notification Endst: 3612-16 dated 09.2.2019 the name of the appellant was struck off from the pay roll of the Education Department District Khyber and dismissed from service. (Copy of the impugned Notification dated 09.02.2019 is annexed as annexure C).
- 4) That thereafter the appellant filed an representation on 02.03.2019 after getting information of the said Notification but no response was paid to that representation within statutory period. (Copy of the representation is annexed as annexure D).
- 5) That being aggrieved from aforementioned Notification, the appellant is filing the instant appeal on the following grounds amongst others;

GROUNDS

- a) That impugned Notification is illegal, whimsical, unlawful, against law, rules and policy.
- b) That neither notice was given to appellant nor opportunity was given to her to be heard which is inalienable right of the appellant thus on this score alone the said notification is not tenable in the eye of law.
- c) That respondent have not followed the prescribed procedure and issued the impugned Notification.

- d) That there is nothing as such in the instant case which may constitute a ground under Rule 3 of KP Government Servants (E&D) Rules, 2011 for proceeding against appellant, therefore proceeding against the appellant under Rule 4 of the said rules is ab-initio void.
- e) That the appellant is rendering services for the respondent department since long period which is spread over span of 21/22 years, curbing the same without informing her is infringement of golden principles of natural justice.
- f) That the appellant was appointed after adopting the prescribed procedure and performed her duty regularly thus issuance of the impugned notification is against the norms of justice.
- g) That the respondents have violated the mandatory provision of law rules by issuing the impugned Notification.
- h) That the appellant seeks permission of this honorable tribunal to advance any other ground / point at the time of arguments.

It is therefore humbly prayed that on acceptance of this appeal this honorable tribunal may be pleased to set aside the impugned Notification No.3612-16 dated 09.02.2019 issued by respondent No.3 and this honorable Tribunal may further be pleased to reinstate/restore the appellant in service with all back benefits.

Any other relief which this honorable tribunal deems appropriate in the circumstances of the case and not specifically asked for may also be granted to the appellant.

Appellant

Through

Advocate Permayo

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No/2019		•
Mst.Shakeela Begum	***************************************	Appellant
VERSUS		
Govt. Fhyber Pakhtunkhwa through Secre	tary Education	
and others	R	espondents

APPLICATION FOR SUSPENSION OF OPERATION OF NOTIFICATION NO.3612-16 DATED 09.02.2019

Respectfully Sheweth;

- 1) That the instant service appeal is being filed before this Hon'ble Tribunal in which no date of hearing has been fixed.
- 2) That grounds of appeal may kindly be considered as part and parcel of this application.
- 3) That the applicant has got a prima facie case and sanguine about its success.
- 4) That balance of convenience also lies in favour of petitioner/appellant.
- 5) That the applicant/ appellant will suffer irreparable loss if interim relief is not granted as prayed for in the heading of application.

It is, therefore, prayed that on acceptance of this application, operation of impugned Notification No.3612-16 dated 09.02.2019 may kindly be suspended till final disposal of instant service appeal.

م شبل المسرم Appellant

Through

Daris Khan

Advocate High Cour



BEFORE THE FEDERAL SERVICE TRIBUNAL, ISLAMABAD.

Service Appe	al No/2019	
	di qi	
Mst.Shakeela	Begum	Appellant
	VERSUS	5
	ber Pakhtunkhwa through Se	
and others		Respondents

AFFIDAVIT

I, Mst.Shakeela Begum PST GGPS Tauda Cheena Bara District Khyber, do hereby affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Deponent



BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

S.A NO/2019	• •					
Service Appeal No/2019			. •			
			-			
Mst.Shakeela Begum		Арр	ellant			
Į.	ERSUS					
Govt. of Khyber Pakhtunkhwa through Secretary Education and others						

ADDRESSES OF THE PARTIES

APPELLANT:

Mst.Shakeela Begum
PST GGPS Tauda Cheena Bara District Khyber

RESPONDENTS:

- 1. Govt. of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat Peshawar.
- 2. Director of Elementary and Secondary Education Khyber Pakhtunkhwa, near GHSS No.1, G.T. Road, Peshawar.
- 3. District Education Officer Khyber Tribal District at Jamrud

Appellant

Through

Daris Khan

Advocate High Court

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Awal Khan L/Shilma

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Jasmin Ara D/O Sarfaraz Mahásas (1)

Tromin D/O Haider Tensi

Endia Akhter D/O Marin Ahmad.

Sylkon talla-D/C Bolam Mahsi

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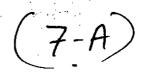
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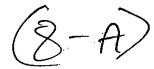
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Consequent upon the selection of the Departmental Selection Committee the following PTC (Female) Local candidates are temporarily (Rs; 1480-81-2695) plus usual allowances as admissible under the rules with effect from the date of their taking charge I the interest of public service.

public	e service.		
S.No	Name of Candidate/ Father's name	School were appointed	Remarks
1)	Fazeelat Rasul D/o Rasul Khan	GGPS Ahmed Khan Killi Hawaldar Chowk Jamrud	Against created post
2)	Ulfat Bibi D?o Noor Ul Islam	GGPS Gouder Area Guwt Khan Jamrud	-do-
3)	Shaheen Akhtar D/o Noor ul Islam	-do-	-do-
4)	Uneeda Sardar D/o Sardar Khan	GGPS Sardar Kilii Jamrud	Against Vacant post
5)	Afsana Begum D/o Sabz Ali	GGPS Mughal Baz Killi Jamrud	Against Vacant Post
6)	Rifaqat D/o Muhammad Nadar	GGPS Jaffar Shah Killi Jamrud	Against Vacant post
7)	Musarat D/o Nazir Mohd,	GGPS Molvi Juma Gul Jamrud	Against Vacant Post
8)	Jehan Zeba D/o Muhd Din	GGPS N Sub Khan AKbar Killi Jamrud	-do-
9)	Shazia Begum D/o Umer Khan	GGPS Mughal Baz Killi Jamrud	-do-
10)	Nahima Nilam D/o Rehman ud Din	GGPS Ghoundi (Fida) Jamrud	Against Vacant Post
11)	Zertaja Begum D/o Mehtab Khan	GGPS Abdur Rahman Killi Jmrud	-do-
12)	Maryum Bahadar D/o S Bahadar Shah	GGPS Sultan Khel (Jehan zeb) Landi Kotal.	Against Newly created post.
13)	Sadia Akhtar D/o Nazir . Ahmad	GGPS Jamidl Khan (Sultan Khel) LK	-do-
14)	Kaveeta D/o Balam Mahsi	GGPS Mukhtiar Khel LKL	-do-
15)	Yasmin Ara D?o Sarfaraz Mahsi	GGPS Basi Khel Kandow Khel LKL	-do-
16)	Shakontala D/o Balam Mahsi	GGPS Musa Khan Killi Loi Shalman LKL	-do-
17)	Yasmin D/o Hader Mahsi	GGPS Awal Khan L Shilman	-do-
18)	Rozina Rhat D/o Iqbal Mahsi	Kam Shalman No.2 LKL (Spin Gud)	Against vacant post
19)	Rani D.o Fitruss Mahsi	Ram Shilman No.1 Maj Anwar LKL	-do-
	Naseem Begum D/o Shah Hussain	GGPS Shin Darang (Imran) Bara	Against newly created post.
21)	Musarat Nazeer D/o Badshah Gul.	GGPS Ayub Killi (Spin Dhand) Bara	Against Vacant Post
22)	Taslim D/o Ali Mast Khan	GGPS Kala Khel No.1 Bara	-do-
23)	Ysmin D/o Mustfa Kamal	GGPS Maj Adam Khel Bara	-do-





24)	Saima Sarwar D/o Ghulam Sarwar	GGPS Aqil Jan Killi Bara	Against Newly created post
25)	Shakila Begu D/o Fazli Maboob	GGPS Navi Qamar Bara	Against vacant post.
26)	Aneel Sabir D/o Ghulam sabir	GGPS Said Karim Killi (Jan Khan Killi) Bara	Against newly created post

Note.

- 1. Charge report should be submitted in duplicate to all concerned.
- 2. The appointment of the candidates are being made purely and temporary basis and are liable to termination at any time without assigning any reason. In case if any one wishes to resign her post he/ she shall have to give one month prior notice of forfeit one month pay to the Govt in lieu thereto.
- 3. Their original academic certificates, date of birth, domicile certificates should be checked and verified from the concerned, otherwise their pay should not be drawn.
- 4. They should produce Health and Age certificate of from, the Medial Supdtt, Landi Kotal Khyber Agency.
- 5. I case They fails to report their arrival with in 15 days the order will be treated as cancelled.

Sd/-Haji Yar Mast Khan Agency Education Officer

Endst No. 5616-24 /Appt/ (F)/Khy

Dated the Jamrud the

Copy forwarded for information and necessary action to the:-

- 1. Director of Education (FATA) NWFP, Peshawar.
- 2. Regional Director of Education (FATA) Peshawar.
- 3. Agency Accounts Officer, Khyber Agency at Peshawar.
- 4. Pay Clerk Khyber.
- 5. Candidates Concerned.

Haji Yar Mast Khan Agency Education Officer





N.W.F.P. Med. No.4

GS&PD-NWFP-596 F.S. 2,800 Ps of 100-19,3,91(19)

MEDICAL CERTIFICATE.
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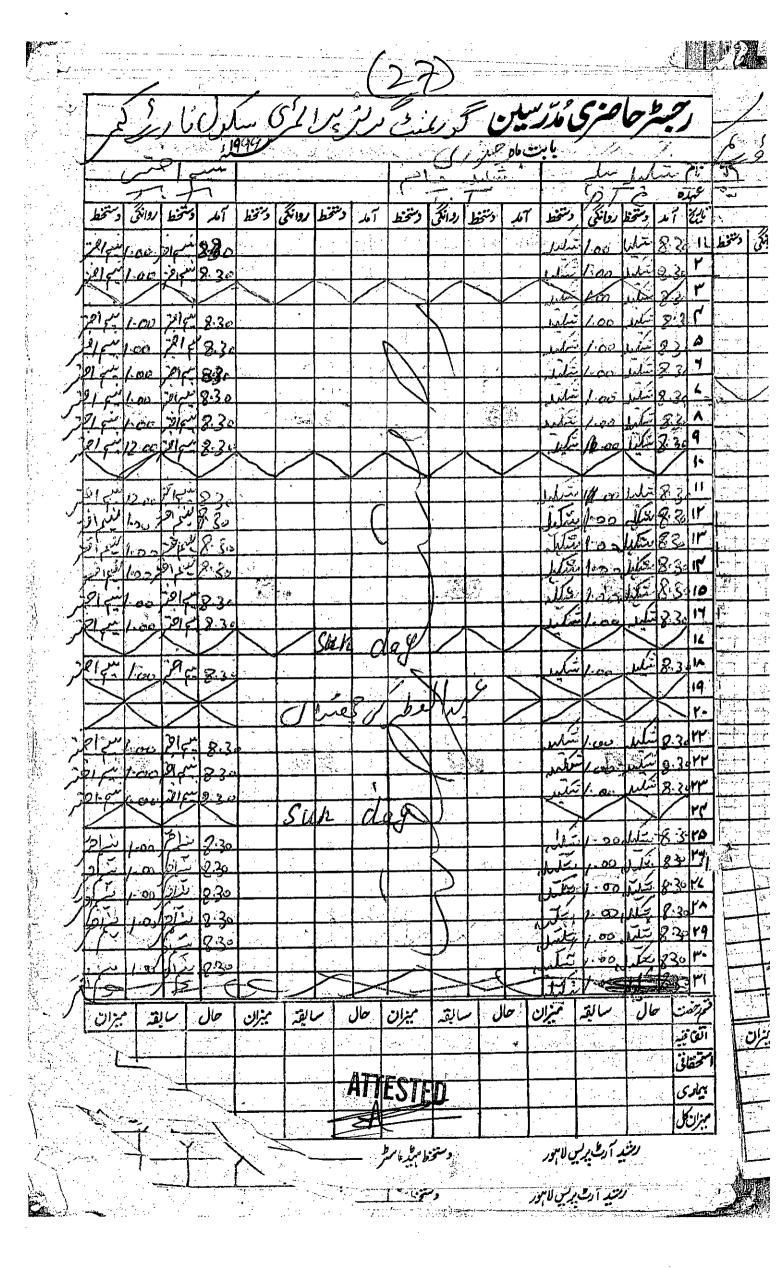
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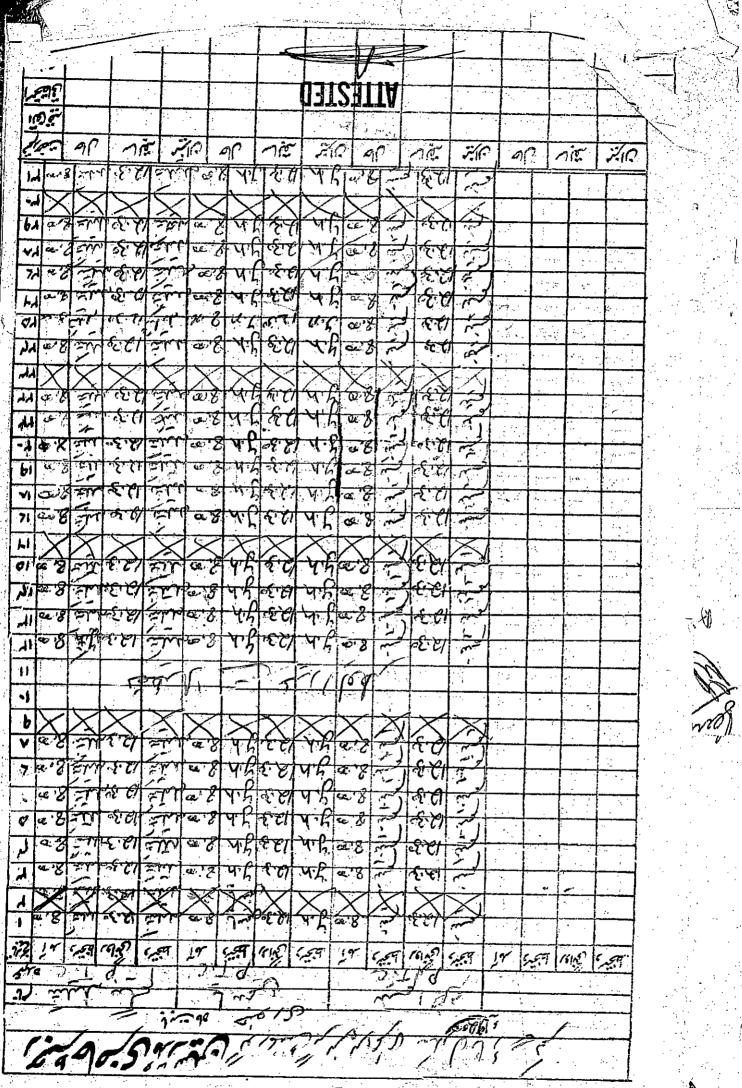
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(42)

Annexure C"

District Education Office No Noted

Phone. 091-5820265 Fax 091-5820265

Notification

You Mst: Shakeela Begum PST P.No. (423514) CNIC No. 220130477007 GGPS Tauda Cheena Bara District Khyber submitted an application for compulsory retirement Mst: Khlida Shah Principal GGHSS Kalanga Bara District Khyber was nominated as Inquiry Officer Vide AEO Endst; No. 3617-22 dated 20-11-2017. She submitted report that the said teacher did not appear before the Inquiry Officer for physical verification. Subsequently warning was issued vide Endst: No. 3206 dated 21-0102019 to appear for physical verification before the under signed, but she failed to appear.

Keeping in view the Inquiry Report and subsequent direction issued by the unider signed to said teacher for physical verification and personal hearing, but no response was paid from the said end.

It was found from all sources that the said teacher was ghost/fictitious symbolic name utilized for the purpose of illegal drawn of monthly salaries/payment under head KH(a) &

Therefore the under signed being competent authority struck off the said name from the pay roll of Education Department District Khyber, and Dismissed from service under "E&D Rolls 2011 4 (b) (IV), for ascertaining other facts like receiving of payments including of such fictitious figures in the Education Department District Khyber, further investigation is recommended to be conducted through special team of Directorate of Education Khyber, Pukhtunkhwa/NMTD.

(MUHAMMAD JADOON KHAN)
DISTRICT EDUCATION OFFICER
KHYBER TRIBAL DISTRICT AT JAMRUD

Endst: No: 36/2 - 16

Dated: 09/02/2019.

Copy of the above is forwarded to:

- 1. Director of Elementary & Secondary Education KPK at Peshawar.
- 2. Deputy Commissioner District Khyber at Peshawar.
- 3. ADEO Khyber (Bara Female)
- 4. Principal GGHSS Kalanga Bara
- 5. Agency Account Office Kliyber.

DISTRICT EDUCATION OF REER KITYBER TRIBAL DISTRICK AT JAMRUD

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حمقئرحه. وعوبل خُورِيهِ يُحرُ يزم باعث تحرير آنکه مقارمه مندرج عنوان بالامين الخي طرز است واسط بيروى وجواب دي وكل كارد والكرم تعلقه آن مقان کناور کیا دارس مان ریزولیک مقر کرے افرار کیا جاتا ہے۔ کہ صاحب موصوف کومقدمہ کی کل کا روائی کا کامل اختیارہ وگا۔ بیز . و کیل به ساحب کورامنی نامه کر...تے وتقر ر ثالیت و فیصله برحلف دسیے جواب دہی اورا قبال دعویٰ اور الله درت ذکری کرنے اجراءا درصولی چیک درویبار عرضی دعوی ادر درخواست برسم کی تقدیق زرایی به دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیروی یا ڈگری میطرفہ یا ایل کی براید گی اورمنسوخی نیز دا ترکریا این ترانی ونظر دانی دبیروی کرنے کا ختیار ہوگا۔ از بصورت ضرورت مقدمہ ندکور کے کُل باجز دی کا دوائی کے واسطے اور وکیل یا مختار قانونی کواینے ہمراہ ٹیاا سینے بجائے تفر رکا اختیار . ہوگا ۔ اور صاحب مفرر شدہ کو بھی وہی جملہ مذکورہ باا ختیارات حاصل ہوں مے اوراس کا سا کھتہ ے واخشه منظور قبول اموگا۔ دوران مقدمہ میں جوخر چہد ہرجاندالتوائے مقدمہ کے سبب سے و مولال کوئی تاریخ بیشی مقام دورہ پر ہویا حدے باہر ہوتو وکیل صاحب یابند ہوں گے۔ کہ پیروی ند کورکر میں۔لہزاوکالت نا م^یکھدیا کی^{ہ ندر} ہے۔ ا، محل ___ 19 معر ، ا ے لئے بخور ہے۔ flece ptuel Daras Khan Adeu

BEFORE THE SERVICE TRIBUNAL, PESHAWAR,

Appeal NO. 746/2019

Mst: Shakeela Begum...... Appellant

Versus

Govt. of KPK through Secretary ------Respondent

Education Peshawar and others ------Respondent

Para wise comments on behalf of respondents No.2 & 3.

Preliminary objections:

- 1. That the appellant has got no cause of action/locos standi to file instant appeal.
- 2. That the appellant has not come to this Honorable Tribunal with clean hands.
- 3. That the appellant concealed material facts from this Honorable Tribunal.
- 4. The appellant is estopped by her own conduct to bring the present appeal.
- 5. That the appellant is bad due to mis-joinder and non-joinder of necessary parties.
- 6. That the appeal is barred by law.

FACTS:

Respectfully submitted as;

1. Subject to record.

2. Incorrect. Hence denied. The appellant submitted an application for compulsory retirement through Shera Gul claiming her as relative. Copy attached as annexure "A". The undersigned nominated Khalida Shah Principal BS- 20, GGHSS Kalanga as inquiry officer for conducting an impartial inquiry vide DEO office No. 3617-22, dated 20/11/2017. Copy attached as annexure "B". The inquiry officer submitted report vide letter No.2154, dated 11/12/2017 and stated that the applicant did not appear before the inquiry officer. The undersigned again called the inquiry officer to DEO office for inquiry of the appellant. The inquiry officer vide office letter No. 2012, dated 20/06/2018, submitted report with the observations that the appellant did not respond and were given remarks of her absence and disobedience. Copies attached as annexures "C & D".

Subsequently, last warming was issued vide Endst No. 3206-10, dated 21/01/2019 to attend the office for personal hearing before the inquiry officer, copy attached as annexure "E".

The inquiry officer submitted the report vide letter No. 3070, dated 11/01/2019, copy attached as annexure "F".

The report revealed that the appellant was making fake excuses for just not attending the office for inquiry.

1-6-

From the above facts, the undersigned came to the conclusion that the appellant was using proxy teacher and even there is no female teacher on this name i.e. she has no existence. She used a symbolic/factitious name.

The Honorable Court is requested to call the appellant personally to check her Bio Data.

The undersigned finally dismissed the appellant from services under E & D rules 2011, 4 (b) (iv), copy attached as annexure "G".

- 3. Incorrect, hence denied. The whole detail is mentioned in para 2 above.
- 4. Incorrect, hence denied. As elucidated in para 2 above.
- 5. No comments.

Grounds

- a. Incorrect. Hence denied. The action of the respondents is in accordance with laws/rules.
- b. Incorrect. Hence denied. The appellant was time and again asked to attend her duty and again through an inquiry the appellant was asked to appear but she failed. Further details are given on para 2 on facts above.
- c. Incorrect. Hence denied. The respondents department adopted all the codal formalities and time and again opportunities were given but the appellant failed, thus finally the respondent Department dismissed the appellant from service.
- d. Incorrect. Hence denied. As elucidated in para 2 on facts above.
- e. Incorrect. Hence denied. As mentioned in para 2 on facts above.
- f. Incorrect. Hence denied. As mentioned in para 2 on facts above.
- g. Incorrect. Hence denied. The respondent Department never violates the rules and always acts in accordance with law/rules.
- h. The respondents also seek permission of this Honorable Tribunal to present other grounds at the time of hearing the instant appeal.

Pray:

Keeping in view the above legal and factual position, it is humbly requested that the instant appeal may kindly be dismissed with cost.

Respondent No. 03

District Education Officer, Khyber Tribal District at Jamrud ,

AFFIDAVIT

We the above respondents do hereby declare and affirm the above comments Are true and correct to the best of our knowledge and nothing has been concealed from this Honorable Tribunal.

Respondent No. 03

District Education

Khyber Tribal Distric

submitted for to vetter

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EDUCATION OFFICE · KHYBER AGENCY AT JAMRUD

OPFICE ORDER

Msc.Khalida Shab Principal GG: 88 Kalana i Bara Khyber Agency is hereby. nominated as a lactory Offic rate (medical stationary and find facility position regard) application submitted by MscShakeeta Begum PST Govt Cirls Primary School Taw Cheena Bara Khyber Agency for her compulsory retirement.

The jumpile is a second wast this office within a weak time positively.

(МСПАММАР ТУРООЎ КНАХ) AGENCY EDUCATION OFFICER KHYBER AGENCY AT JAMRUD

Dated Iz __/II/DITE Endst No. 3 617-22 Copies forwarded to the :-

- Director of Education FATA Peshawar.
- Agency Accounts Office Khyber Agency at Januard. ..1.. 2.
- Francipal GCHSS Kalifraa Bara Khyber ACeancy. ¿ ; ;;

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KINBER TOWN

P-6) &

OFFICE OF THE PRINCIPAL GGHSS, KALANGA BARA KHYBER AGENCY

154 dated 111 121 20.1

TO

The Agency Education Officer Khyber Agency at Jamrud.

Subject:-

INQUIRY AGAINST MST SHAKEELA BEGUM PST GGPS. TAWDA CHEENA BARA KHYBER AGENCY.

Please refer to youe endst No.3617-22 dated 20.11.2017

on the subject noted above. It is submitted for your kind information that the undersigned have informed the above name teacher through telephonic Memo : message from time to time and AAEO Female Bara Mils Naveeda has also informed her twicely to attend the office of undersigned, So she may be able to conduct the inquiry regarding her application(attached) but after passing ten days, she has not attend the office for her inquiry, Nor she reply In this critical situation, the under signed is unable to do the under signed verbally or in written .

task of conducted inquiry against Mst Shakeela Begum PST GGPS, Tawda Therefroe, the letter is issued to inform you about the real Cheena Bara Khyber Agency.

situation. Further if it possible, to inform her strictly, to attend the offic4e of the undersigned, she may be do the job assigned her in the due time.

Hope for co-operation.

S GGHSS Kalanga Bara



P (7)
Amerine - D

OFFICE OF THE PRINCIPAL
GGHSS, Kalanga Bara Khyber Agency
No 2012 dated 20///2018

To:-

The Agency Eductaion Officer Khyber Agency at Jamrud.

Subject:-

INQUIRY AGAINST MST SHAKEELA BEGUM PST GGPS, TAWDA CHEEN BARA KHYBER AGENCY.

Memo: - Reference your letter No.3617-22 dated 22.11.2017 a detail reply regarding the inquiry against the Shakeela Begum PST GGPS, Dawda cheena Bara Khyber Agency has been submitted vide this office letter No. 2154 dated 11/12/2017.

After a month, you are directed me verbally on telephonic, that Mst. Shakeela will attend my office for the same purpose but she was not attend the office nor she contact the under signed doing the job of Inquiry.

Therefore, once again I am submitting her absence disobedience in this reference

For further consideration.

Principal

GGHSS, Kalanga Bara Khyber Agency

Delah Land

2199

Date 25/6/18



District Education Office

A nnemote of the No-

Khyber Tribal District at Jamrud
Phone. 091-5820265 Fax 091-5820265

Τc

Mst: Shakeela Begum PST GGPS Tauda Cheena Bara District Khyber

Sub:-

Last warning

You Mst: Shakeela Begum PST GGPS Tauda Cheena Bara District Khyber is hereby directed to attend the District Education Office District Khyber for personal hearing before the inquiry committee on 29-01-2019 at 10 A.M. In case of failure strict action will be taken against you under E&D rules 2011.

(MUHAMMAD JADOON KHAN)
DISTRICT EDUCATION OFFICER
KHYBER TRIBAL DISTRICT AT JAMRUE

Endst:No:3206-10

Dated: 2/ /01/2019

Copy of the above is forwarded to:

i. Director of (E&SE) KPK at Peshawar.

2. Deputy Commissioner District Khyber at Peshawar.

3. ADEO Khyber (Bara Female)

4. Principal GGHSS Kalanga Bàra

DISTRICT EDUCATION OFFICER KHYBER TRIBAL DISTRICT AT JAMRUD

office of the principal GGHSS Kalanga Basa Dest Khyber NO 3070 Duled 11/01/19 Klyber Agency at Jamsud (America)
Inquisy against on a Inquisy against MST Shakeele Begum
PST GGPS TAWDA CHEENA DAS please right to your endst No 3617-22 dated 20/11/17 on the subject noted above that the undersigned has informed her time to time of AAEO (Naveeda Sahiba) has informed his to attend the office and placed before the under signed for the purpose to descuss her application, But She has attended the office just to meet the She has not Showen her documents - No any medical Under signed Certificate or PR prescription for justifying her request. for retirement on Medical ground Since NOV 17 to up till now she made fake excuses just for not attending the office for the purpose of angusy on 1. 1 las for The Case is finally forwarded for further necessary action on your desposal please) (P)



gmerine-

NoDistrict Education Office Dated Khyber Tribal District at Jamrud

Phone: 091-5820265 Fax 091-5820265

Notification

You Mst. Shakeela Begum PST P.No. (423514) CNIC No. 220130477007 GGPS Tauda Cheena Bara District Khyber submitted an application for compulsory relirement. Mst: Khlida Shah Principal GGHSS Kalanga Bara District Khyber was nominated as Inquiry Officer Vide AEO Endst: No. 3617-22 dated 20-11-2017. She submitted report that the said teacher did not appear before the inquiry Officer for physical verification. Subsequently commun was issued vide Endst. No. 3206 dated 21-0102019 to appear for physical verification before the under signed, but she failed to appear.

Keeping in view the Inquiry Report and subsequent direction issued by the under signed to said teacher for physical verification and personal hearing, but no response was paid:

It was found from all sources that the said teacher was ghost/fictitious symbolic from the said end. name utilized for the purpose of illegal drawn of monthly salaries/payment under head KH0012.

Therefore the under signed being competent authority struck off the said name from the pay roll of Education Department District Khyber, and Dismissed from service under "E&D Rolls 2011 4 (b) (IV), for ascertaining other facts like receiving of payments including of such fightions figures in the Education Department District Khyber, further investigated in recommended to be conducted through special team of Directorate of Education Khyber Pakhrunkhwa/NMTD.

(MUHAMMAD JADOON KHAN) DISTRICT EDUCATION DEFICEE KHYBER TRIBAL DISTRICT AT JAMRUD

EndstiNo: 3612-16

Dated: 09/02/2019

Copy of the above is forwarded to:

- r. Director of Elementary & Secondary Education KPK at Peshawar.
- 2. Deputy Commissioner District Khyber at Peshawai
- 3. ADEO Khyber (Bara Female)
- 4. Principal GCHSS Kalanga Bara
- 5. Agency Account Office Khyber.

DISTRICT YOU CANON CHI KINBER TRIBAL DISTRIC