


FORM OF ORDER SHEET

Court of _____

Appeal No. 1851/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/09/2023	<p>The appeal of Mst. Saima Bibi resubmitted today by Mr. Abdul Aziz 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>

The appeal of Mst. Saima Bibi D/O Muhammad Hanif i/o Khwaja P.O. Ghanbar P. Abad received today i.e. on 05.09.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures-A & B of the appeal are illegible which may be replaced by legible/better one.
- 2- Annexures of the appeal are unattested.
- 3- Appeal has not been flagged/marked with annexures marks.
- 4- Check list is not attached with the appeal.
- 5- Affidavit is not attested by the Oath Commissioner.
- 6- Chamber/Gmail address and contact number of the Counsel engaged is not mentioned on the index of the appeal.

No. 3164 /S.T.

Dt. 6/9 /2023.

A. M.

REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Abdul Aziz Tanoli Adv.
High Court Abbottabad.

Re submitted

after completion

13-9-23

G. M.

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

Service Appeal No. 185 / 2023

Saima Bibi, Daughter of Muhammad Hanif, Resident of Kohas, P.O
Ghambir, Ropar, Tehsil Lora, District Abbottabad..

...Appellant

Versus

Secretary, Education, Khyber Pakhtunkhwa, Peshawar, and Others

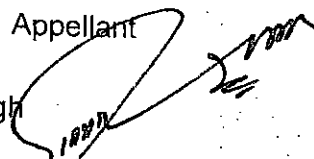
...Respondents

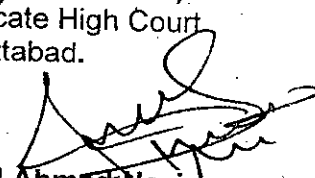
SERVICE APPEAL

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Dated: 20-03-2023

Appellant
Through 
(Abdul Aziz Tanoli)
Advocate High Court
Abbottabad.


(Adeel Ahmed Nazir)
Advocate High Court
Abbottabad.

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

Service Appeal No. 1857 / 2023

Saima Bibi, (PST) Daughter of Muhammad Hanif, Resident of Kohas,
P.O Ghambir, Ropar, Tehsil Lora, District Abbottabad.

...Appellant

Versus

- 1- Secretary, Education, Khyber Pakhtunkhwa, Peshawar.
- 2- Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3- District Education Officer (Female), Abbottabad.
- 4- Shehla Naz Daughter of Sher Zaman, PSHT Chankot Tehsil Lora, District Abbottabad.

.....Respondents

**SERVICE APPEAL UNDER SECTION-
4 OF KHYBER PAKHTUNKHWA
SERVICES TRIBUNAL ACT, 1973
AGAINST THE IMPUGNED
CORRIGENDUM ISSUED BY
RESPONDENT NO-2 BEARING
NUMBER ENDST NO.3647-53 DATED
08-05-2023, WHEREIN THE
REPLACEMENT OF APPELLANT WAS
TRANSFERRED TO GGPS RIALA,
RENDERING THE TRANSFER ORDER
OF APPELLANT ENDST: NO 2485-92
DATED 30-03-2023 INEFFECTIVE, IN
BLATANT VIOLATION OF LAW,
RULES, AND POLICY OF THE
DEPARTMENT AND THE APPEAL OF
THE APPELLANT DATED 12-05-2023,
WHICH IS UNDECIDED BY
RESPONDENT NUMBER-2, SEVERLY**

AFFECTING THE RIGHTS OF APPELLANT.

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE IMPUGNED CORRIGENDUM ISSUED BY THE RESPONDENT NO-2 BEARING NUMBER ENDST NO.3647-53 DATED 08-05-2023, IN NOTIFICATION ENDST : NO 2714-19 EB-II/ PROMOTION SPST TO PSHT, DATED 07-04-2023 WHEREIN THE APPELLANT WAS DEPRIVED OF HER LEGITIMATE TRANSFER VIDE ORDER ENDST: NO 2485-92 DATED 30-03-2023 BY WITHDRAWL TRANSFER ORDER IBID THROUGH IMPUGNED CORRIGENDUM DATED 08-05-2023. THAT THE IMPUGNED CORRIGENDUM WAS ISSUED IN BLATANT VIOLATION OF LAW, RULES, AND POLICY OF THE DEPARTMENT, WHICH MAY KINDLY BE SET ASIDE. AND THE APPELLANT MAY KINDLY BE ALLOWED TO ASSUME CHARGE AT GALI GHAMBIR IN COMPLIANCE OF TRANSFER ORDER DATED 30-03-2023. AS PER THE POSITION PRIOR TO THE IMPUGNED CORRIGENDUM.

Respectfully Sheweth,

The Appellant very humbly submits as under:

1. That the appellant is serving as PST teacher and performing her duties inn GGPS Chankot since 22-04-2019.

2. That the GGPS Chankot is a hard area and the Appellant has been facing hardships in performing her duties in the said school.
3. That that upon several requests of Appellant and after serving for more than three years, the appellant was transferred from GGPS Chankot to GGPS Gali Ghambir vide order ENDST: NO 2485-92 DATED 30-03-2023. **(Copy of the Transfer order ENDST: NO 2485-92 DATED 30-03-2023 is attached as annexure "A")**
4. That the order of the transfer was made conditional and the phrase against the name of appellant read as "The order will be applicable after taken over charge of PSHT at said School."
5. That the respondent no-4 in compliance of ENDST : NO 2714-19 EB-II/ PROMOTION SPST TO PSHT, DATED 07-04-2023 was to report at GGPS Chankot and relieve the Appellant to proceed to the transferred destination i.e. GGPS Gali Ghambir. **(Copy of the ENDST : NO 2714-19 EB-II/ PROMOTION SPST TO PSHT, DATED 07-04-2023 is attached as annexure "B")**
6. That the respondent no-2 in blatant violation of law and rules issued the impugned corrigendum Endst No. 3647-53 dated 08-05-2023. And transferred the respondent no-4 from GGPS Chankot to GGPS Raila Roupper; rendering the transfer order of appellant in-effective. **(Copy of the impugned Corrigendum Endst No. 3647-53 dated 08-05-2023 attached as annexure "C")**
7. That the Appellant preferred a departmental appeal on 12-05-2023 before the respondent no-2 which is still undecided. **(Copy of departmental Appeal attached as annexure "D")**
8. That feeling aggrieved, the Appellant has approached the August Tribunal on the following *inter Alia* amongst many other:

GROUNDS

- a. That the impugned order/ Corrigendum is arbitrary based on malafide against the law, just to extend unwarranted and unlawful relief of posting of choice to blue eyed one, (Respondent no-4).

- b. That the impugned order is against the Transfer/Posting Policy & Rules in the field, as it is settled principle of law that in a case where law provides a procedure for doing a thing in a particular manner, that thing should be done in that manner and not otherwise.
- c. That all government servants are prohibited to exert political, administrative or any other pressures upon the posting/transfer authorities for seeking posting/transfers of their choice and against the public interest. All such prohibitions seem floating on the surface and unduly advancing favor to respondent no-4.
- d. That it is worth mentioning here that the respondent No-4 is being transferred from GGPS Chankot to GGPS Raila Rouper which squarely means that she at the first place has reported and assumed charge as GGPS Chankot. By this exercise the condition in the transfer order of Appellant stands fulfilled. The respondents are now committing grave illegality by not allowing the appellant to assume charge at GGPS Gali Ghambir.
- e. That the act of respondents falls within the definition of colorable exercise of power, on part of respondents which is nether permissible nor warranted in the eyes of law.
- f. That the act of respondents squarely falls within the definition of exploitation as defined in the constitution of Islamic Republic of Pakistan.
- g. That the act of respondents is not only against the norms of justice but also discriminatory, against the law and un-warranted.
- h. That the addresses of the parties are correctly given at title of appeal.
- i. That the appeal is well within time.
- j. That the other grounds will be urged at the time of arguments.

IT IS THEREFORE, VERY RESPECTFULLY PRAYED THAT ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE IMPUGNED CORRIGENDUM ISSUED BY THE RESPONDENT NO-2 BEARING NUMBER ENDST NO.3647-53 DATED 08-05-

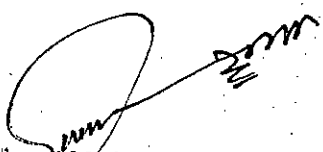
2023, IN NOTIFICATION ENDST : NO 2714-19 EB-III/ PROMOTION SPST TO PSHT, DATED 07-04-2023. WHEREIN THE APPELLANT WAS DEPRIVED OF HER LEGITIMATE TRANSFER VIDE ORDER ENDST: NO 2485-92 DATED 30-03-2023 BY WITHDRAWL TRANSFER ORDER IBID THROUGH IMPUGNED CORRIGENDUM DATED 08-05-2023. THAT THE IMPUGNED CORRIGENDUM WAS ISSUED IN BLATANT VIOLATION OF LAW, RULES, AND POLICY OF THE DEPARTMENT, WHICH MAY KINDLY BE SET ASIDE; AND THE APPELLANT MAY KINDLY BE ALLOWED TO ASSUME CHARGE AT GALI GHAMBIR IN COMPLIANCE OF TRANSFER ORDER DATED 30-03-2023, AS PER THE POSITION PRIOR TO THE IMPUGNED CORRIGENDUM.

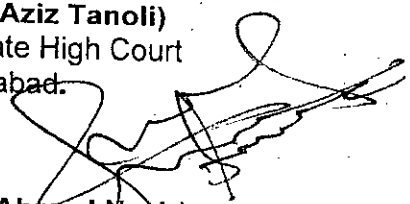
APPELLANT

Saima

Through:

Dated: 28-08-2023


(Abdul Aziz Tanoli)
Advocate High Court
Abbottabad.


(Adeel Ahmed Nazir)
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 mis-stated or concealed from this Honourable Court.

Dated: 28-08-2023

Appellant

Saima

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

Service Appeal No. _____ / 2023

Saima Bibi, Daughter of Muhammad Hanif, Resident of Kohas, P.O
Ghambir, Ropar, Tehsil Lora, District Abbottabad..

...Appellant

Versus

Secretary, Education, Khyber Pakhtunkhwa, Peshawar, and Others

...Respondents

SERVICE APPEAL

AFFIDAVIT

I, Saima Bibi, Daughter of Muhammad Hanif, Resident of Kohas, P.O
Ghambir, Ropar, Tehsil Lora, District Abbottabad (*Appellant*), do hereby
affirm and declare that the contents of instant Service Appeal are true
and correct to the best of my knowledge and belief and that nothing has
been concealed from this Honourable Tribunal.

Saima
DEPONENT

Dated: 28-08-2023

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

Service Appeal No. _____ / 2023

Saima Bibi, Daughter of Muhammad Hanif, Resident of Kohas, P.O
Ghambir, Ropar, Tehsil Lora, District Abbottabad..

...Appellant

Versus

Secretary, Education, Khyber Pakhtunkhwa, Peshawar, and Others

... Respondents

SERVICE APPEAL

**APPLICATION FOR SUSPENSION OF
IMPUGNED CORRIGENDUM ISSUED BY
THE RESPONDENT NO-2 BEARING
NUMBER ENDST NO.3647-53 DATED 08-
05-2023, IN NOTIFICATION ENDST : NO
2714-19 EB-II/ PROMOTION SPST TO
PSHT, DATED 07-04-2023; AND THE
APPELLANT MAY KINDLY BE ALLOWED
TO ASSUME CHARGE IN GGPS GALI
GHAMBIR TILL THE FINAL DECISION OF
MAIN APPEAL OF APPELLANT.**

Respectfully Sheweth

1. That the title service appeal is being filed before this Honourable Tribunal and the instant application, for suspension of impugned notification, may kindly be consider the integral part of main service appeal.
2. That the appellant has got good prima facie case against the respondents.
3. That balance of convenience lies in favor of appellant.
4. That an irreparable loss will be caused to appellant in case, the impugned order/ notification is not suspended.

5. That the valuable rights of appellant are involved in the instant appeal.

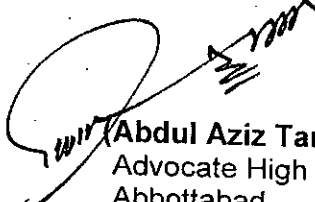
It is therefore very humbly prayed that the impugned corrigendum issued by the respondent No-2 bearing number Endst No.3647-53 Dated 08-05-2023, in notification Endst : No 2714-19 EB-II/ PROMOTION SPST TO PSHT, dated 07-04-2023; and the appellant may kindly be allowed to assume charge in GGPS Gali Ghambir till the final decision of main appeal of appellant.


Appellant

Saima

Through:

Dated: 10-01-2022


(Abdul Aziz Tanoli)
Advocate High Court
Abbottabad.


(Adeel Ahmed Nazir)
Advocate High Court
Abbottabad.

AFFIDAVIT:

I, Saima Bibi, Daughter of Muhammad Hanif, Resident of Kohas, P.O Ghambir, Ropar, Tehsil Lora, District Abbottabad. (*Appellant*), do hereby affirm and declare that the contents of instant application for suspension are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honorable Court.

Saima
DEPONENT

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD

TRANSFER/ADJUSTMENT

Consequent upon the approval of Competent Authority, the following teachers are hereby transferred against vacant post on their own pay and scale in the school noted against their names in the interest of public service with effect from the date of taking over charge.

Sr. No.	Name	Designation	From	To	Remarks
1	Sumbal David	PST	GGPS Kullu Namal Maira	GGPS Guddi	A.V.P
2	Komal Thomas	PST	GGPS Charanah	GGPS Guddi	A.V.P
3	Nusrat Rasheed	PST	GGPS Basoot	GGPS Tupla	A.V.P
4	Salma Bibi	PST	GGPS Chan Kot	GGPS Gali Chambir	The order will be applicable after the taken over charge of PSHT at said School
5	Kishwar Baloch	SPST	GGPS Bandi Drundari	GGPS Tal	A.V.P
6	Mehwish Kiran	IPST	GGPS Faver Bandi	GGPS Jabbarian	A.V.P
7	Shazia Bibi	PSHT	GGPS Mairah	GGPS Kiyala	A.V.P
8	Saeeda Begum	PSHT	GGPS Chak Hall	GGPS Bandi Barseen 02	A.V.P
9	Ayesha Dahi	PSHT	GGPS Kiyala	GGPS Shari Phulfran	A.V.P
10	Nargis Bibi	PST	GGPS Sumbal Dhara	GGPS Termutian	The order will be applicable after the taken over charge of PSHT at said School
11	Nimra Malik	PST	GGPS Gaggan	GGPS Bandi Barseen 02	A.V.P
12	Bushra Bibi	PST	GGPS Chattay Mohr	GGPS Chamak Maira No.01	A.V.P
13	Rida Sarder	PST	GGPS Rariyan	GGPS Kakul No. 02	A.V.P
14	Farha Naz	SPST	GGPS Nagri Poth	GGPS Maira Ruhmal	A.V.P
15	Nasreen Akhter	PST	GGPS Garga	GGPS Jaster	Mutual Transfer
16	Kiran	PST	GGPS Jaster	GGPS Garga	Mutual Transfer
17	Zahida Bibi	SPST	GGPS Tupla	GGPS Chan Kot	A.V.P
18	Aaraga U Rehman	PST	GGPS Chan Kot	GGPS Gali Chambir	A.V.P
19	Adesha Irshad	PS	GGPS Hotla	GGPS Amanah	Mutual Transfer
20	Shumaila Bibi	PS	GGPS Amanah	GGPS Hotla	Mutual Transfer
21	Sana Rafique	PST	GGPS Beram Gali	GGPS Shekul Bandi No.01	A.V.P
22	Rubina Nasir	PS	GGPS Faver Bandi	GGPS Chamak Maira No.02	A.V.P

10

23	Sadia Iqbal	PST	GGPS Jabriyan	GGPS Choona Kari	The order will be applicable after the taken over charge of PSHT at said School
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Note


1. No TA/DA Allowed
2. Charge report should be submitted to all concerned

DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

Endst No: 2485-QA Dated: 30/03/2023

Copy forwarded for information and necessary action to the

1. District Accounts Officer Abbottabad
2. DMO/EMA Abbottabad
3. SDIOs Concerned
4. Head Teachers concerned
5. EMIS Branch Local Office
6. Officials Concerned
7. M/Fil

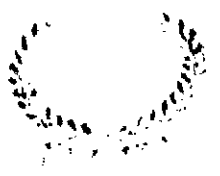


DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD



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Vivo AI camera

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTABAD

Annexure B

NOTICE

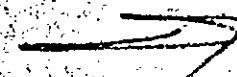
For the purpose of the recruitment of the ...

S.NO	SU NO	NAME OF TEACHER	FATHI UNANI	SCHOOL NAME	NEW PLACE OF POSTING
1	11	HUKMUNNISA BIBI	MUHAMMAD HAJI	GCPS BETHAL	GCPS BETHAL
2	12	HUSNAINA BIBI	MADANI	GCPS CHAKHU	GCPS CHAKHU
3	13	QURAN KHAN	MUHAMMAD ILMU	GCPS DILLI	GCPS DILLI
4	14	HASHTHA	MUHAMMAD ASLAM	GCPS BANNU BANNU	GCPS BANNU BANNU
5	15	HUSNAINA BIBI	MUHAMMAD NAWAZ	GCPS BANNU BANNU	GCPS BANNU BANNU
6	16	HUSNAINA BIBI	M. ZAMAN	GCPS GARGA	GCPS GARGA
7	17	HUSNAINA BIBI	M. MUHAMMAD	GCPS PAWA	GCPS PAWA
8	18	HUSNAINA BIBI	MUHAMMAD FARUQI	GCPS HROOTA	GCPS HROOTA
9	19	HUSNAINA BIBI	MUHAMMAD AN	GCPS CHITAUD	GCPS CHITAUD
10	20	HUSNAINA BIBI	MUHAMMAD SADEK	GCPS WALHAD	GCPS WALHAD
11	21	HUSNAINA BIBI	FARUQI ZAMAN	GCPS MAHOI BALA	GCPS MAHOI BALA
12	22	HUSNAINA BIBI	QAZI	GCPS JANDA DILAZAR	GCPS JANDA DILAZAR
13	23	HUSNAINA BIBI	ASLAM KHAN	GCPS CHAPRI	GCPS CHAPRI
14	24	HUSNAINA BIBI	ABDULGHAFOOR	GCPS CHANDI MAIRA	GCPS CHANDI MAIRA
15	25	HUSNAINA BIBI	MUHAMMAD YOUSUF	GCPS HROOTA	GCPS HROOTA
16	26	HUSNAINA BIBI	HAFIZ ULLAH ASHRAF	GCPS HROOTA	GCPS HROOTA
17	27	HUSNAINA BIBI	ABDULGHAFUR	GCPS HROOTA	GCPS HROOTA
18	28	HUSNAINA BIBI	FARUQI SHAH	GCPS CHANDI MAIRA	GCPS CHANDI MAIRA
19	29	HUSNAINA BIBI	M. FARUQI	GCPS CHANDI MAIRA	GCPS CHANDI MAIRA
20	30	HUSNAINA BIBI	M. MUSTAFI	GCPS CHANDI MAIRA	GCPS CHANDI MAIRA
21	31	HUSNAINA BIBI	JAVIED KHAN	GCPS NOWSHERA	GCPS NOWSHERA
22	32	HUSNAINA BIBI	M. ASHRAF KHAN	GCPS SHEIKH UL BANO NO 1	GCPS SHEIKH UL BANO NO 1
23	33	HUSNAINA BIBI	ABDULREHMAN	GCPS MORHAN	GCPS MORHAN
24	34	HUSNAINA BIBI	LAZAM ULLAH	GCPS SAHOTE NO 1	GCPS SAHOTE NO 1
25	35	HUSNAINA BIBI	M. ILLI KHAN	GCPS NAWAN SHEER NO 3	GCPS NAWAN SHEER NO 3
26	36	HUSNAINA BIBI	ABDULGHAFOOR	GCPS TURK ABAD	GCPS TURK ABAD
27	37	HUSNAINA BIBI	M. FARUQI	GCPS CHATTAI NATH	GCPS CHATTAI NATH
28	38	HUSNAINA BIBI	M. NAWAZ	GCPS DAKAN CHAMNARA	GCPS DAKAN CHAMNARA
29	39	HUSNAINA BIBI	ABDULGHAFOOR	GCPS DILLI DILLI	GCPS DILLI DILLI
30	40	HUSNAINA BIBI	SUBHAN KHAN	GCPS DILLI DILLI	GCPS DILLI DILLI
31	41	HUSNAINA BIBI	ABDULGHAFOOR	GCPS DILLI DILLI	GCPS DILLI DILLI
32	42	HUSNAINA BIBI	M. BAZ	GCPS KUTUBWA	GCPS KUTUBWA
33	43	HUSNAINA BIBI	MUHAMMAD ANWAR	GCPS SHEIKH UL BANO NO 1	GCPS SHEIKH UL BANO NO 1
34	44	HUSNAINA BIBI	ABDULGHAFOOR	GCPS DILLI DILLI	GCPS DILLI DILLI
35	45	HUSNAINA BIBI	ABDULGHAFOOR	GCPS DILLI DILLI	GCPS DILLI DILLI
36	46	HUSNAINA BIBI	M. BAZ	GCPS KUTUBWA	GCPS KUTUBWA
37	47	HUSNAINA BIBI	ABDULGHAFOOR	GCPS DILLI DILLI	GCPS DILLI DILLI
38	48	HUSNAINA BIBI	ABDULGHAFOOR	GCPS DILLI DILLI	GCPS DILLI DILLI
39	49	HUSNAINA BIBI	ABDULGHAFOOR	GCPS DILLI DILLI	GCPS DILLI DILLI
40	50	HUSNAINA BIBI	ABDULGHAFOOR	GCPS DILLI DILLI	GCPS DILLI DILLI
41	51	HUSNAINA BIBI	ABDULGHAFOOR	GCPS DILLI DILLI	GCPS DILLI DILLI

[Signature]

S. NO	S/I NO	NAME OF TEACHER	FATHER NAME	SCHOOL NAME	POSTING
44	169	FARHAT NAZ	FAZAL UR REHMAN	GGPS HAV/ VILLAGI	GGPS HAV/ VILLAGI
45	170	RABIA SADIQ	SADIQ	GGPS LAHRA BASLA	GGPS LAHRA BASLA
46	171	FUKHANA	MUHAMMAD ASLAM	GGPS B/ JALAL KHAN	GGPS B/ JALAL KHAN
47	172	SOMIA BIBI	SHAH SAWAR	GGPS PALLIAN	GGPS PALLIAN
48	173	ABDUL NAZ	MUJAWAR KHAN	GGPS RAJOYA	GGPS RAJOYA
49	174	HUMAIRA	SAFAR	GGPS CHONIA KARI	GGPS CHONIA KARI
48	181	SAIMA BIBI	MUNSWAR HUSSAIN	GGPS PALOTY	GGPS PALOTY
49	182	RIZAL SULTANA	SULTAN MUHAMMAD	GGPS HAWANSHI H.P.O	GGPS HAWANSHI H.P.O
50	183	RAHEELA BIBI	ABDUL AZIZ	GGPS HARODIA	GGPS HARODIA
51	185	AASIMA AFI ASGHAR	ALI ASGHAR	GGPS JICA MODFI MIRPUR	GGPS JICA MODFI MIRPUR
52	186	SAIMA BIBI	SHAMPAIZ	GGPS THANDA PARI	GGPS THANDA PARI
53	187	FOZIA BIBI	M AMAN	GGPS SERI BAGNOTAR	GGPS SERI BAGNOTAR
54	189	NADIA BANO	MUHAMMAD SULAMAN	GGPS BANDI ABUL JIBAR	GGPS BANDI ABUL JIBAR
55	190	HAFILA RAHQUE	HAFIQUE AHMED	GGPS COMPREHENSIVE	GGPS UTTERA
56	191	AMBIHEEN BIBI	SHAFIQ UR REHMAN	GGPS PHALLAN	GGPS PHALLAN
57	192	SHUKARIA BIBI	M. AKBAR	GGPS BANDI PIR KHAN	GGPS KALIDHAR
58	193	FOZIA JAVED	JAVED KHAN	GGPS M.B. BHIAN	GGPS CHONIA
59	194	RUBINA BIBI	NOOR AHMED	GGPS DEESAI	GGPS KARI B/ GALLI
60	195	SHEHLA NAZ	SHER ZAMAN	GGPS SALAG BAGHOIRA	GGPS CHANKOT
61	196	SHAGUFTA SHAHEEN	M. IQBAL	GGPS CITY ATD	GGPS CITY ATD
62	197	FOZIA NAZEER	S. NAZEER AHMED	GGPS HAV/ ST	GGPS HAV/ ST
63	198	JAMSHID BIBI	KALA KHAN	GGPS KALANDA	GGPS KALANDA
64	200	ASIMA BANO	MUZAMAL DIN	GGPS BANDI ATAN KHAN	GGPS SARHAR
65	201	SALMA BIBI	M. BUSTAN	GGPS DOBATHUR	GGPS DOBATHUR
66	203	SAIMA BIBI	MUHAMMAD SARWAR	GGPS SAJKOTE NO 1	GGPS SAJKOTE
67	204	SAMINA BIBI	RAHEEM KHAN	GGPS DHAMTOUR	GGPS DHAMTOUR
68	205	ZOBIA RANI	BANARIS KHAN	GGPS AKHRELA	GGPS AKHRELA
69	206	SHAMIM ABBASI	KHANI ZAMAN ABBASI	GGPS TARLA KHAN	GGPS TARLA KHAN
70	208	RUKHSANA BIBI	M. MUHAMMAD IQBAL	GGPS SAMWALA	GGPS SAMWALA
71	209	TANVEER BIBI	M. IMTIAZ	GGPS NAGRI TOTIAL	GGPS NAGRI TOTIAL
72	211	AL SAMEERAT NOOR	SAHFAZ KHAN ABBASI	CMS LOIRA	GGPS SERI
73	213	BIBI LULFAT	S. HUSSAIN SHAH	GGPS BARBEEN	GGPS BARBEEN
74	214	ANJUM SHAHEEN	ALI AFSAR	GGPS GARGA	GGPS PARITER GARGA
75	217	NOREEN YOUSAF	MUHAMMAD YOUSAF	GGPS DHILLI MAIRA	GGPS BANHI PHULAN
76	218	RIZWANA RAMZAN	M. RAMZAN	GGPS SARHANA	GGPS CHANDIA
77	219	MUSARAT BIBI	A. JIRANGZEB	GGPS KHOKHAR	GGPS KHOKHAR
78	221	NUSRAT BIBI	DALANDAN KHAN	GGPS CHATTI	GGPS BASALA
79	222	NAJMA BIBI	M. HASSAN	GGPS JABRIAN	GGPS PULI
80	223	RUKHSANA BIBI	BALAND KHAN	GGPS TARKHANA	GGPS SEWANA
81	225	SHAMIM AKHTAR	SHEIKH FAHID	GGPS BANDA LAMBA	GGPS TARKHANA
82	226	HOSHEEN BIBI	AEDUL SABOOR SHAH KAZMI	GGPS HAVLIAN STATION	GGPS BAWATHUR
83	227	FARHAT NAZ	KHAN AKSAR	GGPS NAGRI TOTIAL	GGPS JANUAKA
84	228	HASHIDA KHATOON	M. HUSSAIN KHAN	GGPS KAREEMPURA	GGPS MAIRA RIHANI
85	229	FAIRA ASGHAR	ALI ASGHAR	GGPS KASEEL	GGPS CHANDIA
86	231	SHABANA	M. USA KALIM	GGPS JAGAN	MAIRA 3
87	233	MAH JABELI	JULIAMA KHAN	GGPS MUJAHAI	GGPS BANI LIA
88	234	GUL SHAHZADI	M. ASLAM	GGPS KANGAR WALLI MASJID	GGPS KERRI MAIRA
89	235	AMEESA BIBI	M. ALYAS	GGPS BAGNOTER	GGPS MAHIL
90	236	NOREEN BANO	MUHAMMAD SAFFED	GGPS DITSAL	GGPS BANO BAGLA
91	238	SHAZIA FAZAL	FAZAL E. RAZZAQ	GGPS SANGAL	GGPS MALACH
92	239	MABILA KOUSAR	ABDUL QADIR	GGPS SERI KHAN KALAN	GGPS KALACH
93	240	HAZIA NARETH	FAZAL DAD KHAN	GGPS MANDROCH	GGPS SERI KHAN KALAN

12



M. HODIA

13

S NO	S/L NO	NAME OF TEACHER	FATHER NAME	SCHOOL NAME	NEW PLACE OF POSTING
94	241	SPIA NAWAZ	MALIK NAWAZ	GGPS MANDRUCHI	GGPS PATIARI
95	243	RIFAT BIBI	M. YOUNIS	GGPS KALODI	GGPS KALODI
96	244	NAHID GUL	M. SABIR	GGPS BAND KALODI	GGPS TOGARI
97	245	NAZIA BIBI	S.M. MISKEEN	GGPS TARIANA	GGPS TAZIARI
98	248	AMINA BIBI	ISAM DAD	GGPS NAKAR MUJWAL	GGPS NAKAR MUJWAL
99	249	ARHANA NAZ	MUHAMMAD NASIM	GGPS BIRCH	GGPS NAKAR UTRIA
100	250	VAZIA SIKANDAR	SIKANDAR SHAH	GGPS DARLA SAHAD	GGPS SIAL
101	251	RUKSANA BIBI	DUR-I-AMAN	GGPS MARA PHUGLA	GGPS SUJMA GARA
102	252	RIZWANA KOUSAR	MUHAMMAD MUNTAZ	GGPS MUBARUK	GGPS MANGAL DARA
103	253	ATTIA BIBI	KALA KHAN	GGPS DARLA SAHAD	GGPS BARDIA
104	254	SAMIA GUL	SARDAR GUL NAWAZ	GGPS HAVI HAN	GGPS UTRIA
105	256	HCMANA BATOOL	SABIR HUSSAIN SHAH	GGPS B/SAID KHAN	JANAKA
106	258	NASHA BIBI	M. AKRAM	GGPS DHIRI KIALA	GGPS NAGAKI NO 2
107	259	SARKA SALEEM	M. SALEEM	GGPS KOTLI NO 7	GGPS KHAWAL
108	260	SHJAMILA BIBI	HAKAM DAD KHAN	GGPS KUTNALI	GGPS KOTLI NO 7
109	261	FARLEEDA BEGUM	NAZAR MUHAMMAD	GGPS JIANGI	GGPS KUTNALI
110	262	KIFAN SHAHZADI	ALI AKBAR	GGPS KOTHIJALA	GGPS BELGAKOTI
					GGPS KOTHIJALA

Terms and Conditions:-

01. They would be on probation for a period of one year extendable for another one year.
02. They will be governed by such rules and regulations as may be issued from time to time by the Government.
03. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In such a case, they shall be proceeded under the rules framed from time to time.
04. Charge report should be submitted to all concerned.
05. Their seniority on lower post will remain intact.
06. NO A/D is allowed for joining their duty.
07. They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to them in any order, it will be recovered and if she is wrongly promoted she will be reversed.
08. Before handing over charge, once again their document may be checked and if they have not provided the required qualifications as per rules, they may not be handed over the charge of the post.


- sd -
DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

Dated 07/04/2023

Endst No: 274-19/II-Promotion SPST to PSIT

Copy for Information to the:-

01. The Director Elementary & Secondary Education (Hyber Pakhtunkhwa Peshawar)
02. The District Account Officer Abbottabad
03. The Concerned Sub Divisional Education Officer (Female) Abbottabad/ (District) Peshawar
04. The ASDEOs Concerned.
05. Office file


DISTRICT EDUCATION OFFICER
(FEMALE)

14

Annexure C

OFFICE OF THE DISTRICT EDUCATION OFFICER, PUNE



पुणे जिल्हा शिक्षण अधिकारी कार्यालय
पुणे

CORRECTION

Consequent upon approval of the names by the District Education Officer, Pune, the following corrections have been made in the original schedule of PCT to the post of PCT in the District of Pune under No. 2014-10 PCT II - Promotion SPST to PCT dated 10/01/2014. The corrections begin and continue with effect from the date of issue of this order.

S.No./Serial No.	Original Name	Original Post	Corrected Name	Corrected Post
01-145	Devi Lalaji	GP's Madhukar	GP's Madhukar	GP's Madhukar
02-153	Shankar Ganesh	GP's Pankaj	GP's Pankaj	GP's Pankaj
19-187	Harish Sakhari	GP's Pankaj	GP's Pankaj	GP's Pankaj
33-189	Rajesh Kumar	GP's Madhukar	GP's Madhukar	GP's Madhukar
34-200	Sanjay Dadas	GP's Madhukar	GP's Madhukar	GP's Madhukar
35-233	Mangaldeo	GP's Madhukar	GP's Madhukar	GP's Madhukar
36-200	Tejender Singh	GP's Madhukar	GP's Madhukar	GP's Madhukar
37-241	Nand Lalaji	GP's Madhukar	GP's Madhukar	GP's Madhukar
38-105	Zohra Khan	GP's Madhukar	GP's Madhukar	GP's Madhukar
00-154	Shobha Ravi	GP's Chankar	GP's Chankar	GP's Chankar
110-278	Shri. Dinkar	GP's Madhukar	GP's Madhukar	GP's Madhukar

District Education Officer,
Pune

30/01/2014 Date: 30/01/2014

Copy of this order is forwarded to:

1. District Education Officer, Pune
2. District Education Officer, Alandi
3. District Education Officer, Chankar/Chankar/Chankar
4. District Education Officer, Chankar
5. All concerned PCTs
6. Office File

(Signature)
District Education Officer,
Pune

Better Copy
Annex 2

15

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD



No _____ / Dated _____ /2023

0992-342533,0992-342314

Deofemale,Abbottabad@gmail.com

CORRIGENDUM:-

Consequent upon approval of the appeals, the following amendments are hereby made in the promotional order of SPST to the post of PSIIT issued vide this office Endst No. 2714-19 EB II/ Promotion SPST to PSIIT dated: 07-04-2023, under the same terms and conditions with effect from the date of taking over charge.

S. No/ Seniority No.	Teacher Name	Posted School	Present School
21-145	Uzma Javed	GGPS Majuhan	GGPS Hairlan
28-153	Nameela Nawaz	GGPS Chinjah	GGPS Manjra
49-182	Riffat Sultana	GGPS Pirkot	GGPS Shaiqa
54-189	Nadia Bano	GGPS Maira Bala	GGPS Mairlan
64-200	Asima Bano	GGPS Sumble Dhara	GGPS Maira Bala
84-233	Mahjabeen	GGPS Marri	GGPS Majuhan
71-209	Tanveer Bibi	GGPS Amana	GGPS Goreen
96-244	Naveed Gul	GGPS Jogan Mar	GGPS Tachen
68-205	Zobia Rani	GGPS Brngiala	GGPS Khan
60-195	Shehla Naz	GSPS Chankot	GGPS Raila Rooper
106-258	Nasra Bibi	GGPS Riawal	GGPS Ghamon

District Education Officer
(Female) Abbottabad

Endst No: _____ dated _____ /2023

Copy of the above is forwarded to:

1. District Monitional officer
2. District Account officer Abbottabad
3. SDEO (F) Abbottabad / Havelian / Lora / Lower Tanawal
4. EMIS Local Branch
5. All Concerned dead
6. Office File

District Education Officer
(Female) Abbottabad

بخدمت جناب ڈائریکٹر صاحب ایسٹری ایڈ سیکنڈری ایجوکیشن KPK پشاور

عنوان: محکمانہ اپیل بابت ٹرانسفر

جناب عالی!

مخودبانہ اپیل کی جاتی ہے کہ فدویہ مورخہ 22-04-2019 عرصہ چار سال سے GGPS چکلوٹ تحصیل لورہ ضلع ایبٹ آباد میں PST پوسٹ پر تعینات ہے۔ یہ ایک Hard area ہے۔ فدویہ نے متعدد بار ٹرانسفر کیلئے Apply کیا اور بمطابق ڈی ای او (زنانہ) ایبٹ آباد آرڈر نمبر 92-2485 مورخہ 30-03-2023 فدویہ کی ٹرانسفر GGPS گلی گھمبیر میں مشروط طور پر کی گئی کہ PSHT کے چارج لینے پر آرڈر لاگو ہوگا۔

بمطابق ڈی ای او (زنانہ) ایبٹ آباد پروموشن آرڈر نمبر 19-2714 مورخہ 07-04-2023 میری جگہ پر ایک PSHT شہلانا زکا آرڈر کیا گیا۔ مگر بمطابق کوریجنڈم نمبر 53-3647 مورخہ 08-05-2023 ڈی ای او (زنانہ) ایبٹ آباد متعلقہ ٹیچر کا Corrigendum کسی دوسرے سکول میں کر کے مجھے میری ٹرانسفر کے حق سے محروم کر دیا گیا۔

اس ضمن میں استدعا ہے کہ میں گھر سے چوبیس کلومیٹر سفر کر کے سیشنل گاڑی پر روزانہ سکول جاتی ہوں اور ماہانہ اخراجات تقریباً 70,000 روپے پڑ جاتے ہیں۔ جبکہ میری تنخواہ 34000 روپے ہے۔ اور میں Hard Area میں چار سال سے سروس کر رہی ہوں۔ جبکہ Tenure دو سال ہے۔ اور میں اب مزید اخراجات کی متحمل نہیں ہو سکتی۔

مندرجہ بالا کی روشنی میں اپیل ہے کہ فدویہ کو GGPS گلی گھمبیر میں چارج لینے کیلئے PSHT کو GGPS چکلوٹ ایبٹ آباد میں بھیجا جائے۔
جناب کی نوازش ہوگی۔

حاضر

مسماة صائمہ بی بی PST گورنمنٹ گریڈ پرائمری سکول چکلوٹ، ایبٹ آباد

شناختی کارڈ نمبر 0-13101-8532002

دستخط: Saima
dated 12/05/2023.

17

No. 1425 For Insured 12/15/23 see reverse. Rs. 50 Ps. 17
 RGL105510088 except in case of
 uninsured letters of not more than
 the initial weight prescribed in the
 Post Office Guide or on which no
 acknowledgement is due.

Received a registered Director Date Stamp _____
 addressed to _____

*Write here "letter", "postcard", "packet" or "parcel"
 with the word "insured" before it, if necessary.


Initials of Receiving Officer F. M. Khan
 Insured for Rs. (in figures) _____ (in words) _____

Insurance fee Rs. _____ Ps. _____ Weight (in words) _____ Grams _____

Name and address of sender F. M. Khan
15/23

مجموعہ: کوہاں ڈاک خانہ محمدیہ روڈ تحصیل لودرا ضلع
 ایٹ آباد

13101-8532002-0



500631047262

سندھ: کوہاں ڈاک خانہ محمدیہ روڈ تحصیل لودرا ضلع
 ایٹ آباد

Registrar General of Pakistan

گمشدہ کارڈ ملنے پر قریبی ایئر بکس میں ڈال دیں

PAKISTAN National Identity Card
 ISLAMIC REPUBLIC OF PAKISTAN


Name: Saima Bibi

Father Name: محمد حنیف
 Muhammad Hanif

Gender: F Country of Stay: Pakistan

Identity Number: 13101-8532002-0 Date of Birth: 09.03.1993

Date of Issue: 21.09.2021 Date of Expiry: 21.09.2031



Holder's Signature

کورٹ فیس

وکالت نامہ

Regane Services Tribunal, Regane

Saima Bibi & Secretary Education,

For Appellant

SERVICE APPEAL

نوعیت مقدمہ:

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے اسے پیروی و جواب دہی کل کارروائی متعلقہ آن مقام

ABDUL AZIZ TANALI & ABDEL AHMED NAZIR
ADVOCATES HIGH COURT

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے 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 کارروائی 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 داختم مجھ کو منظور قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔

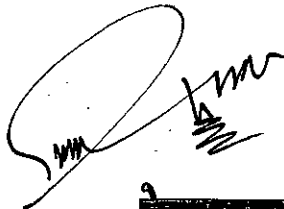
نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف

مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصیغہ مفلسی کے دائرہ کرنے اور اس کے پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

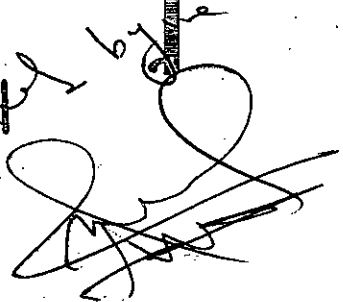
28-08-2023
المترجم:

بمقام:









Saima Bibi D/o Muhammad Hanif

Saima