

S.A No. 494/2015

07.09.2016


Counsel for the appellant and Mr. Bashir Ahmad, Headmaster alongwith Mr. Muhammad Zubair, Sr.GP for the respondents present. Learned counsel for the appellant requested for withdrawal of the appeal as grievances of the appellant has been redressed by the department.

In the light of request of the learned counsel for the appellant, the appeal is dismissed as withdrawn. File be consigned to the record room.

ANNOUNCED

07.09.2016


Member


Chairman
Camp court, Swat,

07.09.16

2.11.2015

Mr.Hazrat Muhammad on behalf of appellant and Mr.Bashir Ahmad, Headmaster alongwith Mr.Muhammad Zubair, Sr.G.P for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 7.3.2016 at Camp Court Swat.


Chairman
Camp Court Swat

07.03.2016

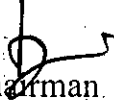
Counsel for the appellant and Mr.Bashir Ahmad, Headmaster alongwith Mr. Muhammad Zubair, Sr.G.P for respondents present. Due to non-availability of D.B arguments could not be heard. To come up for rejoinder and final hearing before D.B on 11.7.2016 at Camp Court Swat.


Chairman
Camp Court Swat

11.07.2016

Appellant in person and Mr. Bashir Ahmad, Headmaster alongwith Mr. Muhammad Zubair, Sr. G.P for the respondents present. Counsel for the appellant is not in attendance due to strike of the bar. Adjourned for final hearing on 7.09.2016 before D.B at camp court, Swat.


Member


Chairman
Camp court, Swat.

03.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as PST (BPS-14) when vide impugned order dated 16.8.2014 she was transferred from GGPS Kharkai Banda to GGPS Garang Dara regarding which she preferred departmental appeal on 21.8.2014 followed by writ petition dated 28.11.2014 which was dismissed vide judgment dated 28.1.2015 on the ground of lack of jurisdiction and hence the instant service appeal on 29.4.2015.

That the impugned order is against facts and law as the appellant has already forgone her promotion from BPS-14 to BPS-15 as she was not in a position to afford the impugned transfer.

That the limitation would not run as the impugned order still subsistence and appellant has not yet relinquished the charge.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 07.9.2015 before S.B at Camp Court Swat as the appeal pertains to the territorial limits of Malakand Division.


Chairman

07.09.2015

None present for appellant. Mr. Bashir Ahmed, Headmaster alongwith Mr. Muhammad Zubair, Sr. GP for respondents present. Requested for adjournment. To come up for written reply/comments on 2.11.2015 before S.B at Camp Court Swat.


Chairman
Camp Court Swat





Appellant Deposited
Security - Process Fee



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 494/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	26.05.2015	<p>The appeal of Mst. Jamila resubmitted today by Mr. Umar Ali Shah Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	27-5-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>29-5-15</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
3	29.05.2015	<p>Counsel for the appellant present. Seeks adjournment. Adjourned for preliminary hearing to 12.6.2015 before S.B.</p> <p style="text-align: right;"> Chairman</p>
4	12.06.2015	<p>Junior to counsel for the appellant present. Requested for adjournment as senior counsel is not in attendance. Adjourned for preliminary hearing to 3.7.2015 before S.B.</p> <p style="text-align: right;"> Chairman</p>

The appeal of Mst. Jamila W/o Khan Muhammad PST Teacher resubmitted to-day i.e. on 20.05.2015 is incomplete on the following score which is returned again to the counsel for the appellant for completion and resubmission within 15 days.

One copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

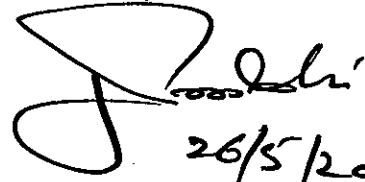
No. 776 /S.T,

Dt. 21/5 /2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Umar Ali Shah Adv. Pesh.

Resubmitted after completion. Terms for order
dt 16-8-2014 is placed at Page no-8 of the
present appeal.


26/5/2015

George Jones

2/2/50
J. Jones

17-8-2011
17-8-2011
17-8-2011

112
112

The joint appeal of Mst. Arifa, Jamila and Badshahi Bakht received to-day i.e. on 28.04.2015 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellants.
- 2- Copy of transfer order of appellant ^{No. 1} is not attached with the appeal which may be placed on it.
- 3- Appeal rules 1986 requires that every affected civil servant shall prefer the appeal separately/individually, therefore the appeal of the above named appellant may be filed separately/individually.
- 4- Three copies/sets of the appeal along with annexures i.e. complete in all respect for Tribunal and one for each respondent in each appeal be submitted.

No. 640 /S.T.

Dt. 29/4 /2015

[Signature]
 REGISTRAR
 SERVICE TRIBUNAL
 KHYBER PAKHTUNKHWA
 PESHAWAR.

29/4/15

Mr. Umar Ali Shah Adv. Pesh.

Re- Submitted today i.e. 29.04.15
 with complete documents and file.

Submitted by
 Adv. Umar Ali
 Shah.

(Request For extension of time.)

Aman Sami

are were extended.

[Signature]
 13/5/15

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 494 /2015

Mst. Jamila.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa & others.Respondents

I N D E X

S.No	DESCRIPTION OF DOCUMENTS	ANNEX	PAGES
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Addresses of the parties		7
4.	Copy of order dated 16.08.2014 with better copy		8-9
5.	Copy of the application		10
6.	Copy of order dated 28.01.2015 of Darul Qaza, Swat		11-13
7.	Copy of affidavit		14
8.	Copy of the guideline for posting with better copy		15-16
9.	Copy of the application		17
10.	Wakalatnama		18

Through

Umar Ali Shah
Appellant

Umar Ali Shah
Umar Ali Shah

Advocate, Peshawar

Dated: 18.05.2015

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

Service Appeal No. 494 /2015

Mst. Jamila W/o Khan Muhammad
Primary School Teacher (PST),
R/o Village Kharki, Dargai, District Malakand. . . . Appellant

Versus

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. Director, Elementary & Secondary Education, Peshawar.
3. District Education Officer (Female), District Malakand at Batkhela.
4. Deputy Commissioner, District Malakand.

.....Respondents

**APPEAL U/S 4 OF THE KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT,
1974, AGAINST THE ORDER NO.3161-68
OF RESPONDENT NO.3 (DEO), DATED
16.08.2014, WHEREBY THE APPELLANT
HAS BEEN TRANSFERRED TO FAR, FROM
HER UNION COUNCIL/ VILLAGES
AGAINST THE ABOVE MENTIONED
ORDER, THE APPELLANT HAS FILED THE
APPLICATION/ REPRESENTATION WHICH
HAS NOT BEEN REPLIED BY THE
RESPONDENTS, SO FAR.**

Ac-submitted to-day
and filed.

Registrar

26/5/15

PRAYER: On acceptance of this appeal, the impugned transfer order No.3161-68 dated 16.08.2014 may be set aside and the respondents may be directed to remain the appellant on her previous station.

Respectfully Sheweth:

F A C T S:

1. That the appellant is permanent residents of District Malakand and is serving as (PST) in Tehsil Dargai, District Malakand, for the last several years.
2. That the respondent No.3 vide his order dated 16.08.2014, transferred the appellant from her Union Council to another Union Council/ Station. (Copy of the transfer order dated 16.08.2014 attached).
3. That the appellant has submitted application against the above mentioned transfer order, which has not been replied yet by the respondents. (Copy of the application is attached).
4. That the appellant and other colleagues challenged the above mentioned transfer order through Writ Petition No.597-M/2014 before Peshawar High Court,

Mingora Bench/Darul Qaza, Swat, which was dismissed, being not maintainable. (Copy of the order dated 28.01.2015 is attached).

5. That the appellant aggrieved with the transfer order dated 16.08.2014, filed this appeal, on the following grounds, amongst others;

GROUND S:

- A. That the impugned transfer order dated 16.08.2014 is illegal, unjustified, against the Government policy, void-ab-initio and based on malafide on the part of the respondents.
- B. That the appellant is the permanent resident of District Malakand and she is rendering her services without any complaint since 1997, therefore, her transfer order is ineffective upon her rights.
- C. That the appellant has been promoted to BPS-15, but she refused to be prompted and in this regard she has submitted the affidavit with the competent authorities, stating therein that having domestic problems she may be remained in her respective Union Council. (Copy of affidavit is attached).
- D. That it is the policy of Khyber Pakhtunkhwa Elementary & Secondary Education that the most

junior may be transferred and the most senior be retained in their school on existing post, therefore, on this score alone the impugned transfer order needs cancellation. (Copy of the guideline for posting is attached).

- E. That the transfer order had been made politically and the manner adopted by the respondents was just pick and choose. The rules/ law provide that the employees may be adjusted specially in case of spouses.
- F. That the Headmistress of the concerned school requested the competent authorities that there is shortage of teachers as compared to the strength of the students, but this fact was also ignored by the respondents. (Copy of the application is attached).
- G. That the appellant has been discriminated, which is violation of the provision of Constitution of Islamic Republic of Pakistan, 1973, Article-25 provides equal treatment to every citizen of Pakistan.
- H. That the act of respondents is clear violation of fundamental rights, which are guaranteed by the constitution of Pakistan, 1973, therefore, the impugned transfer order, needs interference.

- I. That the appellant seeks permission from this Honourable Tribunal to rely on additional grounds at the time of arguments.

It is, therefore, respectfully prayed that on acceptance of this appeal, this Honourable Tribunal may be pleased to declare the transfer order dated 16.08.2014 issued by the respondents No.3 (EDO) illegal, unjustified, without jurisdiction and the same may be set aside, and the appellant may be remained on her previous station/union council.

Any other relief, which this Honourable Tribunal deems fit may also be granted in the favour the appellant.


Appellant

Through


Umar Ali Shah
Advocate, Peshawar

Dated: 18.05.2015

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

Service Appeal No. _____/2015

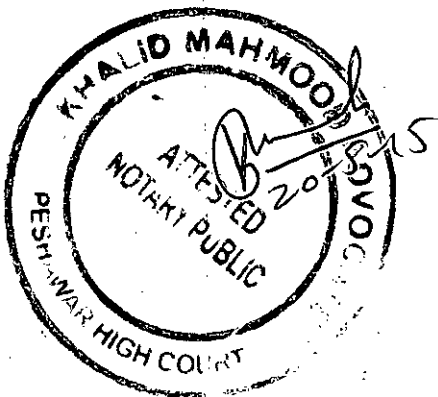
Mst. Jamila.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa & others.....Respondents

AFFIDAVIT

I, Mst. Jamila W/o Khan Muhammad, Primary School Teacher (PST), R/o Village Kharki, Dargai, District Malakand, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Tribunal.



[Signature]
DEPONENT

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

Service Appeal No. _____/2015

Mst. Jamila.....Appellant

Versus

Govt. of Khyber Pakhtunkhwa & others.....Respondents

ADDRESSES OF THE PARTIES**APPELLANT:**

Mst. Jamila W/o Khan Muhammad
 Primary School Teacher (PST),
 R/o Village Kharki, Dargai, District Malakand.

RESPONDENTS:

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Peshawar.
2. Director, Elementary & Secondary Education, Peshawar.
3. District Education Officer (Female), District Malakand at Batkhela.
4. Deputy Commissioner, District Malakand.

Through

Appellant


 Umar Ali Shah

Advocate, Peshawar


Dated: 18.05.2015

Office Of The District Education Officer (F) Malakand At Batkhela

TRANSFER/ADJUSTMENT UNDER RATIONALIZATION SCHEME 2014

In pursuance of the rationalization policy of emanatory and secondary education department and with reference to the Director (E&SE) KPK Peshawar, letter No.610459/rationalization/estab: dated Peshawar the 1/4/2014, transfer/ adjustment of the following supprlu: Female Primary School Teachers alongwith post occupied by them in Govt. Girls Primary Schools in District Malakand are herby ordered with immediate effect in the interest of public service.

S.N	Senio rity No.	Name of teacher	Design.	From	To	Against
1.	530	MUMLIKAT BEGUM	SPST	GGPS Gat Koto	GGPS LAL COLONY	ZULFIA KHANAM
2.	377	SALMA KHURSHID	"	GGPS Thana No.1	GGPS CC THANDA	ISHRAT BEGUM
3.	430	SHAZIA	"	GGPS Jalala	GGPS CC THANDA	TASLEEM BEGUM
4.	484	ZAHINA	"	GGPS Nal No.11	GGPS CC THANDA	DILSHAD GHULAM
5.		TAUHEED KAUSAR	"	GGPS Nal No.11	GGPS CC THANDA	SHAHEED ZAREEN
6.	270	MARYAM BEGUM	"	GGPS Thana No.11	GGPS CC THANDA	RAFIA PST
7.	574	SADIA NAWAB	"	GGPS Thana No.11	GGPS HAIBATGRAM	NARGUS JABIN
8.	464	ALIA SUIBHANI	"	GGPS Maizara Thana	GGPS L.C. TANDA	SHAHIDA WAHID
9.	348		"	GGPS Maizara Thana	GGPS ZOORMANDI	ZAHIDA NASREEN
10.		ROMINA	"	GGPS Nall No.1	GGCMS MALANG ABAD	NAHEED PST
11.	376	NASIRA	"	GGPS Thana No.1	GGPS CC THANDA	HAJIRA GHULAM
12.	526	MALKUN NISA	"	GGPS Thana No.1	GGPS BATKHELA No.11	MUMLIKAT PST
13.	382	RISALAT	"	GGPS ALLHADAND	GGCMS SAID ABAD	SHANILA PST
14.	405	SHAHNAZ AKHTAR	"	GGPS ALLHADAND	GGCMS MALANGABAD	SHAZIA PST
15.	436	CHAND BIBI	"	GGPS ALLHADAND	GGCMS MALANGABAD	KHAIST BIBI PST
16.	371	NASIM AKHTAR	"	GGPS Maizara Btk	GGPS KANDAKO	BAS PARI PST
17.	474	ZEENAT ARA	"	Gharibabad Btk	GGPS AMANDARA	KHAIST BIBI PST
18.	527	HINA GUL	"	GGPS Kandako Kass	GGCMS KARKANI	KAUSAR PST
19.	390	AZRA NAZ	"	GGPS totakan No.11	GGPS TOTAKAN No.1	KHATIMA PST
20.		ISRAJ	"	GGPS Rahmat Abad	GGSA SAIDRA JAWAR	AGAINST VACANT POST
21.		NUSKAT	"	GGPS Mehardai	GGPS SHARIF ABAD	ANEELA
22.		HUBULWARA	"	GGPS Khattak Korona	GGPS ASHAKAI	FARZANA
23.		SHAMIM	"	GGPS Khattak Korona	GGPS GHANI DHERAI	AGAINST VACANT POST
24.		HIDAYAT	"	GGPS Mehardai	GGPS MAKHNAWALA	MADIHA
25.		DILSHAD	"	GGPS Kharkai No.2	GGPS MUSA MINA	HAVIDA
26.		ALIMAT	"	GGPS Kharkai No.1	GGPS SALGARO	MUSLIMA
27.		BIBI AYESHA	"	GGPS Sakhakot No.1	GGPS PALOWATAL	AFSHEENA
28.		NOOR JEHAN	"	GGPS Sakhakot No.1	GGPS GULO SHAH	AGAINST VACANT POST
29.		SHAHEEN	"	GGPS Sakhakot No.1	GGPS SAKHAKOT No.2	MADIHA
30.		ZUBAIDA	"	GGPS Dargai	GGPS BADRAGGA	HAVIDA
31.		NARGUS AMEER	"	GGPS Sakhakot No.1	GGPS JABBAN No.2	MUSLIMA
32.		SHAZIA HALIM	"	GGPS Dargai	GGPS SAKHAKOT No.2	AFSHEEN
33.		MINHAS	"	GGPS Sakhakat No1	GGPS JHARAI	AGAINST VACANT POST
34.		RAKHT SULTANA	"	GGPS Bana Kandow	GGPS KACHI KOPER	FARIDA
35.		NOREENA	"	GGPS Kas Korona Koper	GGCMS WARTAIR	AGAINST VACANT POST
36.		FOUZIA	"	GGPS Wartair	GGPS G.U.WARTAIR	NIZAKAT
37.		FARIDA	"	GGPS Anar Tangai	GGPS G.U.KHAIL	SABINA
38.		SAFIA	"	GGPS Khaikai Banda	GGPS ZANGAL BANDA	AGAINST VACANT POST
39.		JAMILA	"	GGPS Khaikai Banda	GGPS SORANA	AGAINST VACANT POST
40.		RASHIDA	"	GGPS Hero Shah No.1	GGPS GARANG DARA	HARGUS
41.		BADSHAI BAKHT	"	GGPS Dargai	GGCMS ZOORMANDI	AGAINST VACANT POST
42.		REHANA	"	GGPS Dargai	GGPS GARANG DARA	AGAINST VACANT POST
43.		NAHEED	"	GGPS Mir Ahmad Banda	GGPS BADRAGGA	AGAINST VACANT POST

For copy


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Better Copy No.9

Disciplinary action will be initiated against defaulter teachers under the Khyber Pakhtunkhwa govt. Servants (E&D) Rules 2011 which may entail their removal from services.

Charge report should be submitted to all concerned.

District Education Officer
(F) Malakand at Batkhela)

Endst: 3161-681

Dated 16/8/2014

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

1. Section Officer (General) (E&SE) Deptt: Khyber Pakhtunkhwa Peshawar
2. Director (E&SE) Deptt. Khyber Pakhtunkhwa Peshawar with reference to his letter No.6104-59/rationalization/estab: Dated Peshawar the 1/4/2014.
- 3-4 SDEOs (F) Bakhela & Dargai with the direction to implement the above order and in case of non compliance by the concerned teachers with fifteen days, timely report against the defaulters teacher to be furnished to this office.
5. District Accounts Officer Malakand.
6. Assistant Programmer (DEMIS) Cell Local Office
7. Teachers concerned for compliance.
8. Head teacher of the concerned schools.

Sd/-

District Education Officer
(F) Malakandi at Batkhela

Taseer Khan
[Signature]

(8)

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) MALAKAND AT BATHKHELA

TRANSFER / ADJUSTMENT UNDER RATIONALIZATION SCHEME 2014

In pursuance of the rationalization policy of the elementary and secondary education Department and with reference to the Director (E&SE) KPK Peshawar, letter No. 6104 59/rationalization/estab: dated Peshawar the 1/4/2014, transfer/adjustment of the following surplus female Primary School Teachers along with post occupied by them in Govt. Girls Primary Schools in District Malakand are hereby ordered with immediate effect in the interest of public service.

S.NO	SENIORITY NO	NAME OF TEACHER	Design	FROM	TO	AGAINST
1	530	Mumlikat Begum	SPST	GGPS, GAT KOYO	GGPS, LAL COLONY	ZULFIA KHANAM
2	375	SAHNA KHURSHID	"	GGPS, THIANA NO.1	GGPS, CC THIANA	ISHIRAT BEGUM P
3	430	SHAZIA	"	GGPS, JALALA	GGPS, CC THIANA	TASLEM BEGUM
4	484	ZAHINA	"	GGPS, NAL NO. II	GGPS, CC THANA	DILSHAD GHULAM NU
5		TAUHEED KAUSAR	"	GGPS, NAL NO. II	GGPS, CC THANA	SHAHJEEN ZAHED
6	270	MARYAM BEGUM	"	GGPS, THIANA NO. II	GGPS, CC THIANA	HAFA PST
7	574	SADIA MAWAR	"	GGPS, THIANA NO. II	GGPS, HAHMATGHAM	NARGUS JADIN PS
8	464	ALIA SIBTHANI	"	GGPS, MAIZARA THIANA	GGPS, L.C. THIANA	SHAHIDA WAHID
9	544	NASIRA	"	GGPS, MAIZARA THIANA	GGPS, ZOOIMANDI	ZAHIDA NASHREEN
10	776	HUBINA	"	GGPS, NAL NO. I	GGCMS, MALANG ABAD	NAHEED PST
11	376	NASIRA	"	GGPS, THANA NO. I	GGPS, CC THANA	HAJIRA GHULAM
12	526	MALKUN NISA	"	GGPS, THANA NO. I	GGPS, BATKHELA NO. II	MUMLIKAT PST
13	389	RISALAT	"	GGPS, ALLAHDAND	GGCMS, SAID ABAD	SHANILA PST
14	405	SHAHNAZ AKHTAR	"	GGPS, ALLAHDAND	GGCMS, MALANGABAD	SHAZIA PST
15	436	CHAND BIBI	"	GGPS, ALLHADAND	GGCMS, MALANGABAD	KHAIST BIBI PST
16	373	NASIM AKHTAR	"	GGPS, MAIZARA BTK	GGPS, KANDAKO	DAS PAH PST
17	474	ZENAT ARA	"	GHARIBABAD BTK	GGPS, AMANDARA	KHAIST BIBI PST
18	527	HINA GUL	"	GGPS, KANDAKO KASS	GGCMS, KARKANI	KAUSAR PST
19	390	AZIA NAZ	"	GGPS, TOTAKAN NO. 11	GGPS, TOTAKAN NO. I	KHATIMA PST
20		ISRAJ	"	GGPS, RAHMAT ABOD	GGPS SAIDRA JOWAH	Against Vacant pos
21	✓	NUSHAT	"	GGPS MCHARDAI	GGPS SHARIF ABOD	ANEELA
22		HUBUL WARA	"	GGPS KHATAK KORONA	GGPS ASHAKAI	FARZANA
23		SIAMIM	"	GGPS KHATAK KORONA	GGPS GHANI DHERAI	Against Vacant pos
24	✓	HIDAYAT	"	GGPS MCHARDAI	GGPS MAKHNAWALA	MADHIA
25		DILSHAD	"	GGPS KHARKAI NO. 2	GGPS MUSA MINA	HAVIDAI
26	✓	ALIMAT	"	GGPS KHARKAI NO. 1	GGPS SALGARO	MUSLIMA
27	✓	BIBI AYESHA	"	GGPS SAKHAKOT NO. 1	GGPS PALOWTAL	AFSHEEN
28	✓	NOOR JEHAN	"	GGPS SAKHAKOT NO. 1	GGPS GULO SHAH	Against Vacant pos
29	✓	SHAHJEEN	"	GGPS SAKHAKOT NO. 1	GGPS SAKHAKOT NO. 2	FARIDA
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32	✓	SHAZIA HALIM	"	GGPS SAKHAKOT NO. 1	GGPS SAKHAKOT NO. 2	NIZAKAT
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34	✓	DAKHT SULTANA	"	GGPS KAS KORONA KOPER	GGPS KACHI KOPER	Against Vacant pos
35	✓	NOREENA	"	GGPS WARTAIR	GGCMS WARTAIR	NCELAM
36		FOUZIA	"	GGPS ANAR TANGAI	GGPS G.U. KHAIL	SHAHNAZ
37		FARIDA	"	GGPS KHARKAI BANDA	GGPS ZANIGAL BANDA	SADINA
38		SAFIA	"	GGPS KHARKAI BANDA	GGPS SORAJIA	Against Vacant post
39	✓	JAMILA	"	GGPS KHARKAI BANDA	GGPS GARANG DARA	Against Vacant post
40	✓	HASHIDA	"	GGPS HERO SHAH NO. 1	GGCMS ZORRANABAD	NARGUS
41		DADSHAHI DAKHT	"	GGPS DARGAI	GGPS GARANG DARA	Against Vacant post
42		REHANA	"	GGPS DARGAI	GGPS MATAR	Against Vacant post
43		NAHEED	"	GGPS MUR AHMED BANDA	GGPS BADRAGGA	Against Vacant post

True Copy

(Signature)

disciplinary action will be initiated against the defaulter teachers under the Khyber Pakhtunkhwa Govt: Servants (E&D) Rules, 2011 which may entail their removal from services.

Charge report should be submitted to all concerned.

9

(DISTRICT EDUCATION OFFICER
(F) MALAKAND AT BATHKHELA)

Endst: 3161-68,

Dated: 16, 8 /2014

Copy for information and necessary action is forwarded to the:

1. Section Officer (General) (E&SE) Deptt: Khyber Pakhtunkhwa Peshawar.
2. Director (E&SE) Deptt: Khyber Pakhtunkhwa Peshawar with reference to his letter No. 6104-59/rationalization/estab: dated Peshawar the 1/4/2014.
- 3-4 SDEOs (F) Bathkela & Dargai with the direction to implement the above order and in case of non-compliance by the concerned teachers with fifteen days, timely report against the defaulters' teacher to be furnished to this office.
5. District Accounts Officer Malakand.
6. Assistant Programmer (DEMIS) Cell Local office.
7. Teachers concerned for compliance.
8. Head teachers of the concerned schools.

True Copy
[Signature]

[Signature]
DISTRICT EDUCATION OFFICER
(F) MALAKAND AT BATHKHELA

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بھضور جناب E.D.O صاحب محكمه پرائمرى اينڈ سيكنڈرى

ايجو كيشن بمقام بٹ خيله، مالاكنڈ

عنوان: درخواست بمراء كه سائله كى ٹرانسفر آرڈر كو كنسل كر كه سائله كو اپنے سكلولز ميں ڈيوٲى جارى
كرنے كا حكم صادر فرمايا جائے۔

جناب عاليه! حسب ذيل عرض ہے۔

- ۱۔ يه كه سائله صلح مالاكنڈ كه رهائشى هول اور آپ كه زير سايه PST پوسٹ پر ڈيوٲى سرانجام دے رهى هول۔
- ۲۔ يه كه اپ صاحبان نے سائله كو بذريعه آرڈر نمبر 68-3161 مورخه 16-08-2014 اپنے يونين
كونسل سے دور دراز ٹرانسفر كى ہے۔
- ۳۔ يه كه سائله چونكه زنانہ ذات هول اور اپنے يونين كونسل سے كسى دوسرے يونين كونسل ميں آنے جانے
ميں كافى مشكلات كا سامنا ہے۔
- ۴۔ يه كه سائله چونكه اپنے هي سكيل ميں ڈيوٲى جارى ركهنا چاهتى ہے اس لئے اس نسبت سائله نے بيان
حلفى بهي دى ہے۔
- ۵۔ يه كه سائله كاند كوره ٹرانسفر آرڈر كنسل كرنے كا حكم صادر فرمايا جا كر سائله كو اپنے هي سكلولز ميں ڈيوٲى
جارى ركنے كا حكم صادر فرمايا جائے۔ اس لئے درخواست هذا كى ضرورت لاق هوئى۔

لهذا استدعا ہے كه بمنظورى درخواست هذا حسب عنوان عرضى

درخواست احكامات صادر فرمائے جائے۔

استدعا
عبدالله

عريضه
جميله بنيم

مسماة جميله ----- سائله

مورخه 20-08-2014

(13) (11)

BEFORE THE PESHAWAR HIGH COURT BENCH
MINGORA / DARUL OAZA SWAT

Writ Petition No. 597-M of 2014

1. Mst. Arifa wife of Hazrat Muhammad Resident of Village & P.O Dargai, District Malakand.
2. Mst. Jamila wife of Khan Muhammad Resident of Kharkai, Dargai, District Malakand.
3. Mst. Badshahi Bakht wife of Muhammad Rahman Resident of Meherdi, Dargai, District Malakand.

.....Petitioner

VERSUS

1. Government of KPK through Secretary Elementary & Secondary Education at Peshawar.
2. Director Elementary & Secondary Education at Peshawar.
3. District Education Officer Female Malakand at Batkhela.
4. Deputy Commissioner District Malakand.

.....Respondents

Writ Petition under article 199 of the
constitution of Islamic Republic of
Pakistan, 1973.

FILED TODAY

Additional Registrar

2 DEC 2014

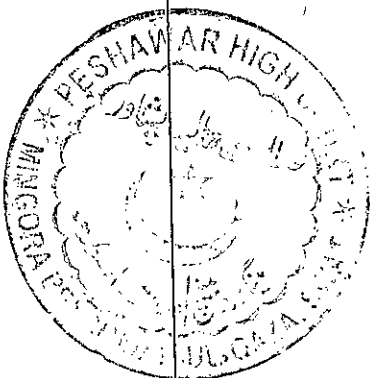
PESHAWAR HIGH COURT, MINGORA BENCH
(DAR-UL-QAZA), SWAT

FORM OF ORDER SHEET

Court of

Case No..... of.....

Serial No. of order or proceeding	Date of Order or Proceedings	Order or other Proceedings with Signature of Judge or Magistrate and that of parties or counsel where necessary.
1	2	3
	28.01.2015	<p><u>W.P. No.597-M/2014 with Interim Relief.</u></p> <p>Present: Mr. Zia-ur-Rahman, advocate for the petitioners.</p> <p style="text-align: center;">***</p> <p><u>HAIDER ALI KHAN, J.-</u> Petitioners through the instant writ petition under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973, have prayed for setting aside the impugned order dated 16.8.2014 with regard to their transfer.</p> <p><u>2.</u> Having heard the learned counsel for petitioners, perusal of record would reveal that petitioners have challenged the transfer order bearing Endst: No.3161-68 dated 16.8.2014 of District Education Officer (F) Malakand at Batkhela/respondent No.3, whereby they have been transferred to different stations. The claim of petitioners squarely falls under Chapter II (Terms and Conditions of Service) of the Civil Servant Act, 1973, wherein jurisdiction of this Court under</p>



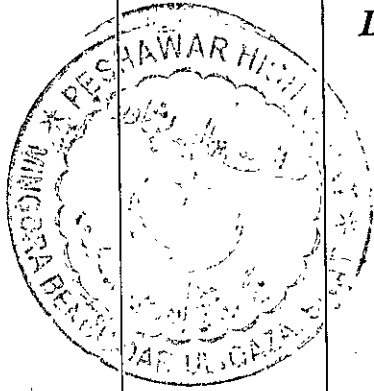
16/1

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Article 212 of the Constitution of Islamic Republic of Pakistan, 1973 is exclusively barred.

3. In view of the above, this writ petition, being not maintainable, is dismissed in *limine*.

Announced.
Dt: 28.01.2015.



S.No 1405
Name of Applicant [Signature]
Date of Presentation of Petition 6-4-15
Date of Completion of Petition 7-4-15
No. of Copies 3-P
Fee Charged 6/-
Date of Delivery of Copies 7-4-15

Certified to be true copy

EXAMINER

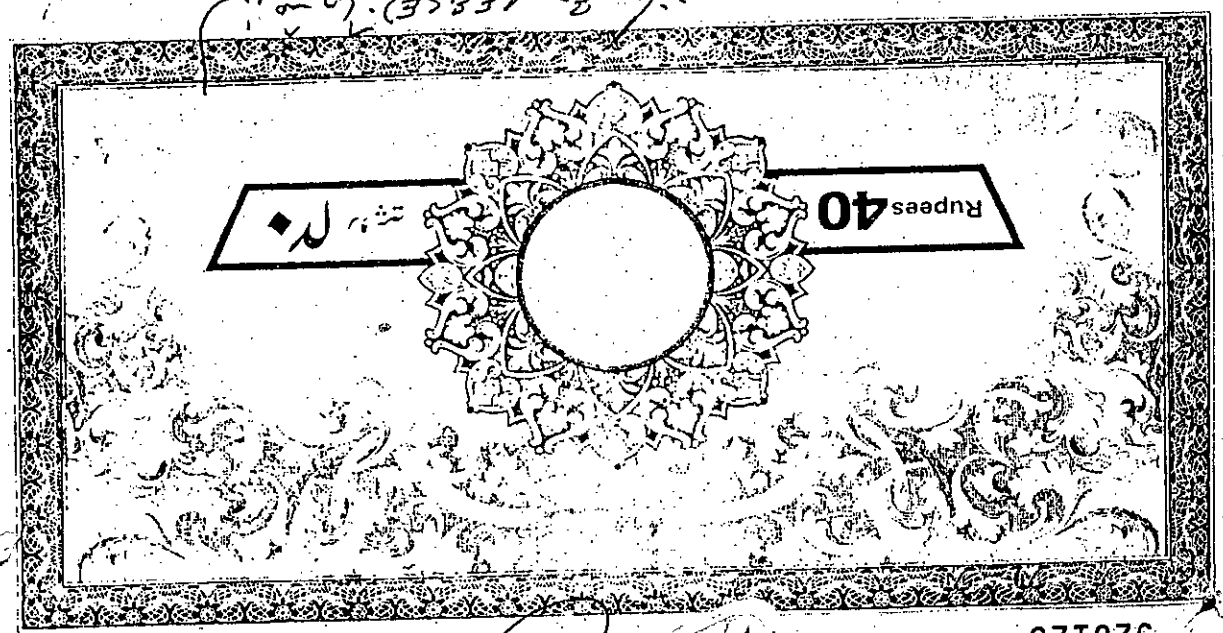
Peshawar High Court, Mingora/Dar-el-Qaza, Swat
Authorized Under Article 87 of Jansaz-e-Shahadat Order 1988

7/4/15

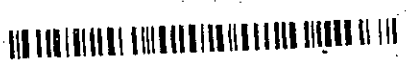
Handwritten signature or name in the top right corner.



Main body of handwritten text in Urdu, including dates like '18/03/2012' and '20/03/2012', and various phrases.



526129



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**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa, Peshawar**

PH No.091-9201389, 9210938,

9210437, 9210957, 9210468

Fax 091-9210936 0800-33857

No.2412-2550/A/Promotion/Estab

Dated Peshawar the 21/01/2013

To

All the District Education Officers,
(Male & Female), in Khyber Pakhtunkhwa.

Subject:


Guidelines for Posting of PST B-12 on Promotion to the post of Senior PST B-14 and PSHT B-15, Qari B-12 to B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16.

Memo:

I am directed to refer to the subject noted above and to clarify that posts of PST B-12/Senior PST B-14/ PSHT B-15 may be rationalized and re-distributed among the Primary schools in the following manner and on Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted as under:-

Up gradation of Posts in Primary Schools (Female) After Rationalization @ 1-40 ratio												
S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization								
				SST B-16	CT B-16	PSHT B-15	SPST B-14	PST B-12	NQ	Caller	Chow	
1	25288	GGPMS A (HCA)	208	1	2	0	2	3	1	1	1	
2	25048	GGPMS B (HCA)	306	1	2	0	2	6	1	1	1	
3	25143	GGCMS C	173	1	0	0	2	3	1	1	1	
4	30056	GGCMS D	50	0	0	1	0	1	0	0	1	
5	25224	GGPS E	110	0	0	1	1	1	0	0	1	
6	25244	GGPS F	160	0	0	1	1	2	0	0	1	
7	25277	GGPS G	198	0	0	1	1	3	0	0	1	
8	25221	GGPS H	240	0	0	1	2	3	0	0	1	
9	22912	GGPS I	285	0	0	1	2	4	0	0	1	
10	25097	GGPS J	120	0	0	1	2	5	0	0	1	
11	25138	GGPS K	360	0	0	1	2	6	0	0	1	
12	32606	GGPS L	400	0	0	1	3	6	0	0	1	
13	25278	GGPS M	440	0	0	1	3	7	0	0	1	
Total			3250	3	4	10	23	50	3	3	13	

Up gradation of Posts in Primary Schools (Male) After Rationalization @ 1-40 ratio							
S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization			
				PSHT B-15	SPST B-14	PST B-12	Chow
1	30056	GPS A	50	1	0	1	1
2	25224	GPS B	110	1	1	1	1
3	25244	GPS C	160	1	1	2	1
4	25277	GPS D	198	1	1	3	1

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5	25277	GPSE	240	1	2	3	1
6	32912	GPSF	285	1	2	4	1
7	25097	GPSG	320	1	2	5	1
8	25138	GPSH	360	1	2	6	1
9	32606	GPSI	400	1	3	6	1
10	25278	GPSJ	440	1	3	7	1
Total			2563	10	17	38	10

Note:-

1. Each Primary School (except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15.
2. There will be no post of PSHT B-15 & SPST B-14 in MPS.
3. No of posts of PSHT B-15, SPST B-14 & PST B-12 will not exceed the already communicated sanctioned posts.

Posting on Promotion

4. On Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted in the same UCs Subject to the provisions of sanctioned post.
5. Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the school of their present posting and junior most may be transferred to other schools.
6. In their promotion order it should be mentioned that their Inter-se -Seniority on lower post will remain intact.
7. If anyone forego promotion, Entry to this effect may be made if his/her Service book.
8. Minimum qualifications for the above posts have already been prescribed in the Service Rules notified vide Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre Dated the November 13, 2012.

I am further directed to further clarify that:

1. On promotion Qari B-12 to the post of Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15, to Senior DM B-16 and PET B-15 to Senior PET B-16, will be posted in High and Higher Secondary Schools.
2. 1/3 Qari B-12 posts will be upgraded to Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15, to Senior DM B-16 and PET B-15 to Senior PET B-16 in High and Higher Secondary Schools only in Elementary and Secondary Education Department at District level.
3. No post of CT B-15, PET B-15, AT B-15, DM B-15, TT-15, will be upgraded to B-16 in Middle Schools.
4. Senior most Senior CT B-16, Senior AT B-16, Senior DM B-16, Senior PET B-16, Senior TT B-16 (According to the Seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.
- 5.

Sd/-

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst: No. _____/File No.1/A-88/KC/S.list: Dated Peshawar the 18/01/2013.

Copy forwarded for information and necessary action to the:-

1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. M/File.

Sd/-

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

True Copy
[Signature]

**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9201389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936 0800-33857
No. 2112-358A // Promotion/Estab
Dated Peshawar the 23/01/2013.

15

To: All the District Education Officers,
(Male & Female), in Khyber Pakhtunkhwa.

Subject: Guidelines for Posting of PST B-12 on Promotion to the post of Senior PST B-14 and PSHT B-15, Qari B-12 to B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PFT B-15 to Senior PFT B-16.

Memo:

I am directed to refer to the subject noted above and to clarify that posts of PST B-12 /Senior PST B-14/PSHT B-15 may be rationalized and re-distributed among the Primary schools in the following manner and on Promotion of PST B-12 to the post of Senior PST B-14 and PSHT B-15, may be posted as under:-

Up gradation of Posts in Primary Schools (Female) After Rationalization @ 1-10 ratio											
S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization							
				SSP B-16	CT B-15	PSHT B-15	SPST B-14	PST B-12	NQ	Callar	Chow
1	25088	GGPMS A (JICA)	208	1	2	0	2	3	1	1	1
2	25038	GGPMS B (JICA)	306	1	2	0	2	6	1	1	1
3	25143	GGPMS C	173	1	0	0	2	3	1	1	1
4	30056	GGPS D	150	0	0	1	0	1	0	0	1
5	25224	GGPS E	110	0	0	1	1	1	0	0	1
6	25044	GGPS F	100	0	0	1	1	2	0	0	1
7	25277	GGPS G	198	0	0	1	1	3	0	0	1
8	25221	GGPS H	240	0	0	1	2	3	0	0	1
9	25012	GGPS I	285	0	0	1	2	4	0	0	1
10	25097	GGPS J	120	0	0	1	2	5	0	0	1
11	25138	GGPS K	360	0	0	1	2	6	0	0	1
12	26006	GGPS L	400	0	0	1	3	6	0	0	1
13	25278	GGPS M	440	0	0	1	3	7	0	0	1
Total			3250	3	4	10	23	50	3	3	13

Up gradation of Posts in Primary Schools (Male) After Rationalization @ 1-10 ratio							
S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization			
				PSHT B-15	SPST B-14	PST B-12	Chow
1	30056	GPS A	50	1	0	1	1
2	25224	GPS B	110	1	1	1	1
3	25044	GPS C	160	1	1	2	1
4	25277	GPS D	198	1	1	3	1

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5	25221	GPS E	200	1	2	3	1
6	32912	GPS F	205	1	2	4	1
7	25097	GPS G	120	1	2	5	1
8	25138	GPS H	360	1	2	6	1
9	32606	GPS I	400	1	3	6	1
10	25278	GPS J	400	1	3	7	1
Total			2563	10	17	38	10

Note:-

1. Each Primary School (except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15.
2. There will be no post of PSHT B-15 & SPST B-14 in MPS.
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5. Senior most PSHT B-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the school of their present posting and junior most may be transferred to other schools.
6. In their promotion order it should be mentioned that their Inter-se-Seniority on lower post will remain intact.
7. If anyone forego promotion, Entry to this effect may be made in his/her Service book.
8. Minimum qualifications for the above posts have already been prescribed in the Service Rules notified vide Government of Khyber Pakhtunkhwa Elementary and Secondary Education Department Notification No. SO (PE) 4-5/SSRC/Meeting/2012/Teaching Cadre Dated the November 13, 2012.

I am further directed to further clarify that:

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2. 1/3 Qari B-12 posts will be upgraded to Senior Qari B-15, CT B-15 to Senior CT B-16, AT B-15 to Senior AT B-16, TT-15 to Senior TT B-16, DM B-15 to Senior DM B-16 and PET B-15 to Senior PET B-16 in High and Higher Secondary Schools only in Elementary and Secondary Education Department at District Level.
3. No post of CT B-15, PET B-15, AT B-15, DM B-15, TT-15 will be upgraded to B-16 in Middle Schools.
4. Senior most Senior CT B-16, Senior AT B-16, Senior DM B-16, Senior PET B-16, Senior TT B-16 (According to the Seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.

[Handwritten Signature]

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Indst: No. / File No. / A-88/KC/S.list : Dated Peshawar the 13/01/2013.

Copy forwarded for information and necessary action to the:-

1. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
2. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. M/File

Dy: Director (Estab)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

[Handwritten Signature]

16

گورنمنٹ ہائی اسکول ڈھاکہ (جنرل) ضلع ملتان ڈراما اہلیانہم

عنوان: تلمیحاتی آرڈر نمبر 31

17

جنا عالیہ

Amendment

موردیہ گورنمنٹ کیجائی ہے کہ گورنمنٹ گریڈ پرائمری سکول

درگئی میں طالبائے بی تعداد 600 ہے۔ حالیہ ریشٹلائزیشن پروگرام

میں سکول ہذا سے تین معلمات کو تبدیل کر دیا گیا ہے۔ سکول ہذا میں معلمات کی فورت 5 ہے۔

معلمات عارفہ اور بادشاہ بخت کافی تجربہ کار۔ شاہی اور صحتی

ہیں۔ سکول اور بچیوں کی بہترین تعلیم و تربیت کو مدنظر

رکھتے ہوئے ان کے آرڈر پر نظر ثانی کر کے گورنمنٹ

ڈپٹی سپرنٹنڈنٹ

الغرضی

سید مسٹر بی بی جی. جی. پی. س. درگئی

Walid Begum
Head Mistress
G.G.P.S. Daragi
Malakandi Area

June 2017

بعد الت سروس شریعتی خیریت خواتین



2 جناب (عائشہ جمیل) سروس
 عائشہ جمیل زوجہ خلیل محمد بنام حکومت سروس
 سائنس ٹیچر خیریت خواتین
 سروس ملتان

موزعہ - 20/5/2015
 مقدمہ - سروس خیریت
 دعویٰ - سروس
 جرم -

باعث تحریر آنک

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
 آن مقام کے لیے ضابطہ عملیہ کے تحت شاہدہ اللہ سیدہ الغم شہاد
 مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار دیا۔ نیز
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ بر حلف دینے جواب دہی اور اقبال دعویٰ اور
 بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
 زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخی
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
 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 بھی وہی جملہ مذکورہ با اختیار حاصل ہوں گے اور اس کا ساختہ
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المترجم 20 _____ ماہ _____ 2015

بمقام _____
 کے لئے منظور ہے۔
 Anam Sana
 777

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTOONKHWA PESHAWAR

Service Appeal No 494/2015

Mst: Jamila W/O Khan Mohammad PST R/O Village Kharkai,
Dargai District Malakand..... (Appellant)

VERSUS

1. The Government of Khyber Pakhtunkhwa through secretary of (E&SE) Department,
Khyber Pakhtunkhwa, Peshawar.
2. The Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
3. The District Education Officer (F) District Malakand.
4. The Deputy Commissioner, District Malakand. (Respondents)

Para wise comments on behalf of Respondents No 1-4 .

Respectfully Sheweth
Preliminary Objections.

1. That the appeal is badly barred by time and under the rules is not maintainable.
2. That the appellant had concealed material facts from the Honorable Service Tribunal.
3. That the appellant has got no cause of action to file the instant appeal.
4. That the appellant has got no locus standi to ask for claim.
5. That the appellant is estopped by his own conduct to file the present appeal.
6. That the appeal is not maintainable in its present form and is not competent.
7. That the Honorable Tribunal has no jurisdiction to entertain the appeal.
8. That the instant appeal is bad for mis-joinder/ non joinder of necessary parties.

FACTS.

- 1 Pertains, to record. needs no comments.
- 2 Incorrect, the appellant was adjusted in the adjacent union council due to the fulfillment of her native Union Council and in the terms and conditions No 1 of the Rationalization Scheme 2014 it is clearly mentioned that **(On the rationalization surplus teachers in primary schools, PST B-12, Senior PST B-14 may be posted in the nearest school if possible then in the same UCs and then in the same circle and then in the same Sub-Division and then in the same District subject to the provision of need)**
(Annexed pages 15,16 with the appeal)
- 3 Incorrect, the appellant has not obeyed the order vide No 3161-68 dated 16.08.2014 of the Respondent No 3 and wrongly seated on her old station.(Annexure A)

4. That the appellant has got no cause of action to file Writ Petition before Peshawar High Court ,Mingora Branch /Darul Qaza Swat.
5. The appellant has got no cause of action and her appeal is liable to be dismissed on the following grounds.

GROUND.

- A. Incorrect, the impugned transfer/adjustment order dated 16.08.2014 issued by the Respondent 3 is according to law, facts and norms of natural justice and, available materials on the record showed that no violation has been made.
- B. Incorrect, the appellant was transferred/adjusted under the rationalization Scheme 2014 of the Government Khyber Pakhtunkhwa.
- C. Incorrect, the appellant was not promoted to BPS-15 but she was transferred/adjusted under the rationalization Scheme 2014 of the Government Khyber Pakhtunkhwa. being junior as per S/Book.
- D. Replied as para above.
- E. Incorrect, The order dated 16.08.2014 has been issued by the Respondent No 3 in the Public interest and according to the rationalization Scheme 2014 of the Government Khyber Pakhtunkhwa.
- F. Incorrect, the Head Mistress concerned reported against the appellant to Respondent No 3 that the appellant is not obeying the order of department dated 16.08.2014.
(Annexure B)
- G. Incorrect, the appellant has been treated in accordance with law by the Respondent Departments and no violation has been committed against the constitution of Islamic Republic of Pakistan 1973.
- H. Replied as para above.
- I. The Respondents also seeks permission to raise additional grounds at the time of arguments

In light of the above facts it is submitted to kindly dismiss the appeal in hand with cost.

RESPONDENT NO.2&3

**DISTRICT EDUCATION OFFICER
(F) MALAKAND AT BATKHELA.**

RESPONDENT NO 4

**DEPUTY COMMISSIONER
DISTRICT MALAKAND.**

RESPONDENT NO.1

**SECRETARY(E&SE)PEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR.**

AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that all the contents of the accompanying parawise comments are true and correct to the best of my knowledge and belief and all the coddle formalities were fulfilled.

**District Education Officer,
(F) Malakand at Batkhela.**

Annexure (A)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MALAKAND AT BATKHELA.

No. 4777-18 /FNo/Rationalization PST(F)/2010/ Dated 15/10 /2014.

To

The Sub Divisional Education Officer (Female),
Sama Ranizai at Dargai.

Subject:- WRONGLY SITTING/STOPPAGE OF PAY.

Memo:

As per report of the Head Teacher Govt: Girls Primary School Dargai duly forwarded by yourself vide E/No.231 dated 20.9.2014.

You are hereby directed to stop the pay of the following mistresses as they are not obeyed the order.

1. Mst.Arifa SPST GGPS Mayar wrongly sitting at GGPS Dargai. ✓
2. Mst.Badshahi Bakht SPST GGPS Garang Dara (Wartair) wrongly sitting at GGPS Dargai. ✓

DISTRICT EDUCATION OFFICER (FEMALE)
MALAKAND AT BATKHELA.

Endst:No. _____

Copy forwarded to the Director E&SE Department Khyber Pakhtunkhwa,
Peshawar for information please.

DISTRICT EDUCATION OFFICER (FEMALE)
MALAKAND AT BATKHELA.

Abdul Akbar

22/9/14

Annexure

(8)

سید شمیم آف جی جی ای ایس درگن روڈ ڈیسٹرکٹ

توں کہ شمیم سے بادشاہی جنت - میں عارف کو یہاں

ہ جاہلی سے بار بار منع کیا ہے اور جسٹ میں جاہلی

کہی نہیں رہتی۔ لیکن ان دونوں نے اکھٹا کر کے

سکولوں میں خارج نہیں کیا ہے۔ دونوں شیوڑ کا

کتاب ہے کہ ہم عدالت میں اس کو لے آئیں گے اور اس کو

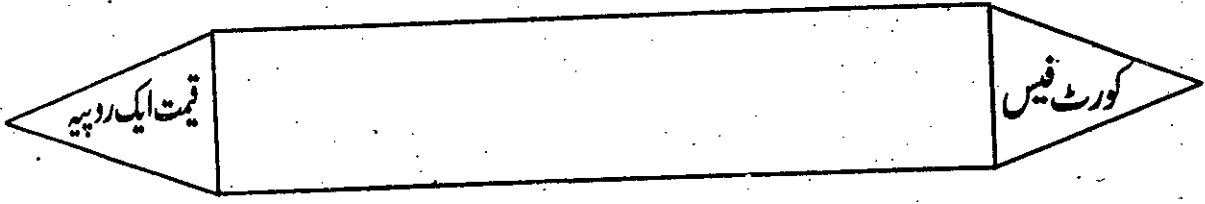
عدالت کرے گا ہم اس سے مطالبہ کر لیں گے۔

Naheed Begum
Head Mistress
G.G.P.S Dargai
Malakand Agency
20.9.014

D.E.O (F) Mkd
Diary 825
Date: 22/9/14
At Batkhela

Emdlt- NO. 231 Dated: 20-9-2014
Forwarded in original to the Distt. Education offices (F) Malakand
at Batkhela for further necessary action please.

Sub Divisional Education
(Female) Sana Razvi Dargai



مورخہ
مقدمہ سجاد جملہ
دعویٰ Service appeal
جرم

۲۰۱۶ منجانب
بنام حکومت ICPIE

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ آن مقام ہوگی صاحبہ الرضا ایدرگت مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل احتیاط ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زرا اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ مذکور کے نسل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقررہ شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ برواختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوا یہ مقدمہ کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرتے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا ک سند رہے

المقوم

۲۰

العبد گداہ شادہ العبد

کے لئے منظور ہے
Accepted
Sd/-
Sd/-
Sd/-

بمقام

محکمہ عدالت
کراچی