

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

**APPEAL NO. 1/2022**

**DR. SALMA SAMI**

**VS**

**EDUCATION DEPTT:**

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**APPELLANT**

**THROUGH:**

  
**MIR ZAMAN SAFI**

**ADVOCATE**

Office: Room No. 6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, Hashtnagri,  
Peshawar.

Cell: 0333-9991564

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

**Service Appeal No.01/2022**

**Dr. Salma Sami**

**VS**

**Education Deptt:**

**REPLY ON BEHALF OF THE PRIVATE RESPONDENTS No. 6  
(SUGHRA SADAF) IN RESPONSE TO THE SERVICE APPEAL  
SUBMITTED BY THE APPELLANT**

**PRELIMINARY OBJECTIONS:**

1. That the appellant has got no cause of action or locus standi to file the instant appeal.
2. That the appeal in hand is not maintainable in its present form and liable to dismissed.
3. That the appellant has misinterpreted the rules and law, and drawn up the meaning according to his own sweet will, besides concealing the important facts and not came to this Honourable Court with clean hands.
4. That the appeal is based on malafide intention and concealed material facts from this august Tribunal.
7. That the appellant is estopped by his own conduct to file the instant appeal.

**ON FACTS PARAWISE COMMENTS / REPLY ON BEHALF OF THE  
PRIVATE RESPONDENTS No. 6.**

Para-1. Pertains to the record, hence needs no comments.

Para-2. Related to the official respondents, hence needs no comments.

Para-3. Pertains to the record, hence needs no comments.

Para-4. Pertains to record. Furthermore, the appellant was basically working in BPS-18 but she was posted at GGHS Irrigation Colony, Warsak Road, Peshawar against the post of Principal (BPS-19) on her own pay & scale and later on vide Notification dated 14.12.2021 as per transfer/posting policy a proper person i.e. Mst. Noshaba, Principal (BPS-19) posted at GGHS Irrigation Colony, Warsak Road, Peshawar and the appellant was transferred to GGHS Gul Abad Jamrud, District Khyber vide order dated 21.12.2021. Copies of the Notification & order are attached as annexure.....R & R1.

Para-5. Related to the official respondents, hence needs no comments.

**Khyber Pakhtunkhwa  
Service Tribunal**

Diary No. 8001  
Dated 02/10/23

Para-6. Related to the official respondents, hence needs no comments.

Para-7. Correct to the extent of order dated 14.09.2022 while rest of the Para is incorrect and baseless. That the appellant was transferred GGHS Irrigation Colony, Warsak Road, Peshawar on 14.12.2022 and she had been properly relieved the same post. That it is pertinent to mention here that the replying respondent No.6 was transferred and posted at GGHS Irrigation Colony, Warsak Road, Peshawar vide general order dated 14.09.2022 and the appellant was transferred to GGHS Malogo, Peshawar. Furthermore, the replying respondent No.6 took over the charge against the post of Principal (BPS-19) and till date the appellant is performing her duty at the same station quite efficiently. Copy of the order is attached as annexure.....R1.

Para-8. Related to the official respondents, hence needs no comments.

Para-9. Related to the official respondents, hence needs no comments.

Para-10. Pertains to record, hence needs no comments.

Para-11. Pertains to record, hence needs no comments.

**GROUND:**

All the grounds of main appeal are incorrect, baseless and not in accordance with law and rules.

It is, therefore, most humbly prayed that on acceptance of this reply the appeal of appellant may kindly be dismissed with cost.

P/RESPONDENT NO. 6

MST; SUGHRA SADAF

THROUGH:

  
**MIR ZAMAN SAFI**  
**ADVOCATE**



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

APPEAL NO. 1/2022

DR. SALMA SAMI

VS

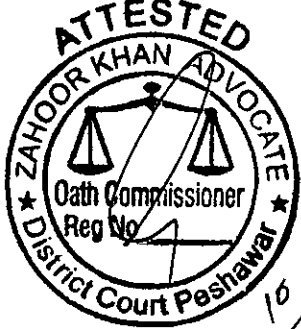
EDUCATION DEPTT:

**AFFIDAVIT**

I Mir Zaman Safi, Advocate, High Court Peshawar, on the instructions and on behalf of my client do hereby solemnly affirm and declare that the contents of this **Reply** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

It is further stated on oath that in this appeal, the answering respondents have not been placed EX-Parte nor their defence is struck off.

MIR ZAMAN SAFI  
ADVOCATE



02/10/23



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223588

Dated Peshawar the December 14<sup>th</sup>, 2021

**NOTIFICATION**

**NO. SO(SF)E&SE/4-16/2021/POSTING/TRANSFER/TC:** The Competent Authority, in light of the judgment of the Khyber Pakhtunkhwa Service Tribunal Peshawar dated 25-06-2021 in Service Appeal No-10297/2020, is pleased to order the following posting/transfer, with immediate effect, in the public interest: -

Sr. No	Name & designation	From	To
1.	Mst. Noshaba, Principal (BS-19)	GGHS Kernal Sher Khan Swabi.	Principal GGHS, Irrigation Colony, Warsak Road Peshawar (Vice No-2)
2.	Dr. Salina Sami, Principal (BS-18)	GGHS, Irrigation Colony, Warsak Road Peshawar.	Principal GGHS Gulabad Jamrud, Khyber against the vacant post.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst. of even No. & date:

Copy forwarded for information to the: -

1. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Female) Peshawar, Swabi & Khyber.
5. District Accounts Officer Swabi & Khyber.
6. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
7. Section Officer (Litigation-II), E&SE Department, Khyber Pakhtunkhwa.
8. PS to Minister for E&SE, Khyber Pakhtunkhwa.
9. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
10. Principal concerned.
10. Master file.

(SAMIRA MEHSOOD)

SECTION OFFICER (SCHOOLS FEMALE)

TESTED

TESTED



GOVERNMENT OF KHYBER PAKHTUNKHWA.  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223588

Dated Peshawar the December 20<sup>th</sup>, 2021

**NOTIFICATION**

**NO. SO(SF)E&SED/4-16/2021/POSTING/TRANSFER/TC:** In partial modification of this Department's Notification of even number dated 14-12-2021, the place of posting of Dr. Salma Sami Principal (BS-18) may be read as GGHS Matta Palangzai District Charsadda instead of GGHS Gulabad Jamrud District Khyber.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

**Endst: of even No. & date:**

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Peshawar, Swabi & Khyber.
4. District Accounts Officer Swabi & Khyber.
5. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
6. Section Officer (Litigation-II), E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. Mst. Tahira Naz Afridi Principals, GGHS Gulabad Jamrud, Khyber.
9. Principals, GGHS Matta Palangzai District Charsadda.
10. Officer concerned.

(SAMIRA MEHSOOD)  
SECTION OFFICER (SCHOOLS FEMALE)

B



**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
Email: [soe12onoffcoraf@gmail.com](mailto:soe12onoffcoraf@gmail.com)

**091-9223588**

**Dated Peshawar, February 9<sup>th</sup>, 2022**

**S/A**

**RELIEVING ORDER**

**NO.SO(S/F)E&SED/4-16/2022/Posting/Transfer/:** Consequent upon the posting/transfer Notification dated 14.09.2022, Mst. Salma Sami Principal (BS-18) appearing at sr. No.44 is hereby relieved from GGHSS Irrigation Colony Peshawar from the post of Principal (BS-19).

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT**

**Endst: of even No.& date:**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa for further necessary action.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Peshawar.
4. Director EMIS, E&SE Department for uploading at official website at the earliest.
5. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
6. PS to Secretary, E&SE Department.
7. Officers/Official Concerned.
8. Office order file.

*M-Jamal*  
**ATTESTED**

*(Signature)*  
**(SHAWANA HALEEM)  
SECTION OFFICER (S/F)**



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
BLOCK A OPPOSITE MPAS HOSTEL, CIVIL SECRETARIAT PESHAWAR  
PHONE NO 091-9223588

Dated Peshawar, September 14<sup>th</sup>, 2022

**NOTIFICATION**

NO.SO(S/F)E&SED/4-16/2022/Posting/Transfer/51: Upon their promotion vide notification  
No.SO(S/F)E&SED/2-3/2022/Promotion dated:20.04.2022 the following Teaching Cadre (BS-19)  
Officers are hereby posted against the post mentioned against each.

Sr. #	Name/ Designation	Present Posting	To	Remarks
1	Mst. Attia Bano	GGHSS Dhanitor Abbottabad	GGHSS Sherwan Abbottabad	AVP of Principal (BS-19)
2	Mst. Tahira Tabassum	GGHSS Shahdand Baba Mardan	GGHSS Jalala Mardan	AVP of Principal (BS-19)
3	Mst. Salma Kalsoom	GGHSS Labor Swabi	GGHS Panjpir Swabi	Vice Sr. No.12
4	Mst. Noreen Afzal	RPDC (Female) Peshawar	GGHS Prang Charsadda	AVP of Principal (BS-19)
5	Mst. Azra Begum	RPDC Malakand	RPDC Malakand	Against Sr. No.45
6	Mst. Gul E Rana	GGHSS Jogiwan Peshawar	GGHS KSK Swabi	AVP of Principal (BS-19)
7	Mst. Alia Iqbal	GGHSS Chamkani Peshawar	Shakar Dara Kohat	AVP of Principal (BS-19)
8	Mst. Ambareen Fatima	GGHSS No.2 D.I Khan	GGHSS Jandola Tank	AVP of Principal (BS-19)
9	Mst. Nusrat Parveen	GGCMHSS No.6 D.I Khan	GGHSS Karak No.1	AVP of Principal (BS-19)
10	Mst. Salima	GGHSS Toru Mardan	GGHSS Paki Malakand	AVP of Principal (BS-19)
11	Mst. Shabana Rehman	GGHSS No.1 Lakki Marwat	GGHSS No.1 Serai Nurang Lakki Marwat	Vice Sr. No. 42
12	Mst. Zubaida Bibi	GGHSS Panjpir Swabi	GGHS Zaida Swabi	AVP of Principal (BS-19)
13	Mst. Fareeda Sabeen	GGHSS University Town Peshawar	GGHSS Matta Palanzai Charsadda	AVP of Principal (BS-19)
14	Mst. Shaheen Shehriaz	GGHSS Takhti Nasrati Karak	GGHS Chokara Karak	AVP of Principal (BS-19)

M-Canan

CS CamScanner

CS CamScanner

E

R2-6





GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
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15	Mst. Gul F. Rana Sidiq	GGHSS Peshawar BSD	GGHSS No.1 Hanju	AVP of Principal (BS-19)
16	Mst. Saeeda Tabassum	GGHSS Kotba Swabi	GGHSS Shewa Swabi	AVP of Principal (BS-19)
17	Mst. Dibi Amina	GGHSS Parkho Dheri Mardan	GGHSS Hathim Mardan.	AVP of Principal (BS-19)
18	Mst. Banaras Begum	GGHSS Akora, Khattak Nowshera	GGHSS Totakan Malakand	AVP of Principal (BS-19)
19	Mst. Yasmin Ara Bibi	GGHSS Shahdand Baba Mardan	GGHSS Rustam Mardan	AVP of Principal (BS-19)
20	Mst. Shamila Tabassum	GGHSS Naivaha D.I Khan	GGHSS Ismaili Mama Khel Bannu	AVP of Principal (BS-19)
21	Mst. Jamila Begum	GGHSS Malkani Malakand	GGHSS Dheri Ailadand Malakand	AVP of Principal (BS-19)
22	Mst. Shaista Kanwal	GGHSS Jungle Khel Kohat	GGHSS Gumbat Kohat	AVP of Principal (BS-19)
23	Mst. Irshad Begum	GGHSS No.4 Bannu City	GGHSS Bilayar Khan Bannu	AVP of Principal (BS-19)
24	Mst. Farrah Deba	GGHSS Lahore Swabi	GGHSS Katukhan Swabi	AVP of Principal (BS-19)
25	Mst. Farzana Yasmin	GGHSS Jungle Khel Kohat	GGHSS Qamar Zaman Mandeew Bannu.	AVP of Principal (BS-19)
26	Mst. Shaista Gul	GGHSS University Town Peshawar	GGHSS Mandani Charsadda	AVP of Principal (BS-19)
27	Mst. Romaisa Sadia	GGHSS Sahibzada Umar Khan Shaheed Peshawar	GGHSS Tehkal Peshawar	AVP of Principal (BS-19)
28	Mst. Farhana	RPDC Swabi	GGHSS Kunda Swabi	AVP of Principal (BS-19)
29	Mst. Sadaf Rehana Malik	GGHSS Comprehensive Abbottabad	GGHSS Siri Kot Haripur	AVP of Principal (BS-19)
30	Mst. Syeda Tayyaba	GGHSS Comprehensive Abbottabad	GGHSS Kot Najibullah Haripur	AVP of Principal (BS-19)
31	Mst. Shagufta Khanam	GGHSS BSD Peshawar	GGHSS Titter Khel Lukki Murwat	AVP of Principal (BS-19)
32	Mst. Iffat Begum	GGHSS Sahibzada Umar Khan Shaheed Peshawar	RPDC Peshawar	AVP of Principal (BS-19)

M. Omar



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
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33	Mst. Sughra Sadaf	DPD Peshawar	GGHSS Irrigation Colony Peshawar.	Vice Sr.44
34	Mst. Nusrat Hussain	GGHSS Garhi Habibullah Manshra	GGHSS Thathi Khurd Manshra	Vice Sr. No. 41
35	Mst. Samia Danish	DCTE Abbottabad	GGHSS Balakot	AVP of Principal (BS-19)
36	Mst. Roshan Ara	GGHSS Ningolai Swat	GGHSS Matta Swat	AVP of Principal (BS-19)
37	Mst. Ishrat Jabeen	GGHSS BSD Peshawar	GGHSS Jamrud Khyber	Vice Sr. No.43
38	Mst. Robina Farooq	GGHSS Dhamtor Abbottabad.	GGHSS KTS Sector No. 2 Haripur	AVP of Principal (BS-19)
39	Mst. Zeb Jehan	GGHSS Chamkani Peshawar	GGHSS Saidu No. 1 Swat	AVP of Principal (BS-19)
40	Mst. Shela Nauman	GGHSS University Town Peshawar	GGHSS Koper Malakand	AVP of Principal (BS-19)
<b>CONSEQUENTIAL POSTING</b>				
41	Mst. Fehmida Malik, Principal (BS-18) working against the post of (BS-19) in OPS	GGHSS Thathi Khurd Manshra	GGHSS Darband Manshra	AVP of Principal (BS-18)
42	Mst. Shabana Noreen, (BS-18)	GGHSS Serai Naurang Lakki Marwat.	GGHSS No. 06 D.I Khan	Vice Sr. No. 09
43	Najma Niaz, Principal (BS-18)	GGHSS Jamrud Khyber	DPD Peshawar	Vice Sr. No.33
44	Dr. Salmia Sami Principal (BS-18)	GGHSS Irrigation Colony	GGHSS Malogi, Peshawar	AVP of Principal (BS-18)
45	Dr. Dil Ara Begum Principal (BS-19)	Instructor (BS-19), RPDC Malakand (Female)	RPDC Malakand (BS-20) (Female)	Against Vacant Post of Principal (BS-20) in OPS

M. Danar



GOVERNMENT OF KHYBER PAKHTUNKHWA  
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SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: of even No. & date:

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1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. CSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
3. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Female) concerned.
5. District Account Officer, concerned.
6. Director EMIS, E&SE Department for uploading at official website at the earliest.
7. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
8. PS to Secretary, E&SE Department.
9. PA to Additional Secretary, E&SE Department.
10. Officers/Officials Concerned.
11. Office order file.

*Muhammad Faizan Zeb*  
(MUHAMMAD FAIZAN ZEB)  
SECTION OFFICER (S/F)

*M-Raman*  
ATTEST

VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR

11 OF 2023

DR. Salma Sami

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

VERSUS

Education Deptt.

(RESPONDENT)  
(DEFENDANT)

I/we DR. Salma Sami

Do hereby appoint and constitute **MIR ZAMAN SAFI, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 2 / 10 / 2023

Sami  
CLIENT

ACCEPTED  
**MIR ZAMAN SAFI**  
ADVOCATE

OFFICE:

Room No.6-E, 5<sup>th</sup> Floor,  
Rahim Medical Centre, G.T Road,  
Hashtnagri, Peshawar.  
Mobile No.0333-9991564  
0317-9743003