

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,

PESHAWAR

S.A.No.15693/2020

Mst.Samina Khatoon ..... APPELLANT

Versus

D.E.O and others ..... RESPONDENTS

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شہینہ خاتون

Appellant

Through

محمد اسف

Muhammad Asif

Advocate

Supreme Court of Pakistan

Date

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,

PESHAWAR

S.A.No.15693/2020

8259  
12-10-23

Mst.Samina Khatoon ..... **APPELLANT**

**Versus**

D.E.O and others ..... **RESPONDENTS**

APPLICATION FOR PERMISSION OF  
CORRECTION IN FACTS IN APPEAL.

*Respectfully Sheweth;*

Petitioner/ appellant submits as under:

- 1) That the above noted appeal is fixed for today i.e. 18.10.2023.
- 2) That at the time of filing the appeal, petitioner contacted the advocate through servant.
- 3) That after preparing the appeal as petitioner was seriously ill, therefore, petitioner signed the appeal without reading the facts of appeal.
- 4) That as the advocate has also filed appeals for other teachers, therefore, inadvertently true facts have not been written in the appeal of petitioner.
- 5) That petitioner wants to add following facts in the appeal.
  - a) Petitioner was appointed in BPS-6 (Rs.315 fixed) plus usual allowances on 09.02.1981 and served the department for 2 ½ years. (Copy of order is Annexure "A").
  - b) Petitioner joined the service on Qari Post against leave post on 09.01.1996 in BPS-7 in Govt. Middle School Shareen Mela, FR, Kohat. (Photocopy of the order is Annexure "B" and charge report is Annexure "C").

- 6) That petitioner served the department on the said post for 10 months.
- 7) That on the recommendation of Village Education Committee petitioner was appointed against project post of PTC in BPS-7 in female communal school/ Govt. Girls School Sheikhi Maraj Gul Kili vide order dated 08.02.1999. (Photocopy of the order is Annexure "D").
- 8) That petitioner was regularized on the vacant post of PST in BPS-12. (Copy of order is Annexure "E").
- 9) That para-4 of the appeal, petitioner wants to correct to the extent "that on 03.12.2010 respondents circulated a circular that services of petitioner was terminated since 31.12.2010" but in fact services were not terminated and the teachers and students were attending the school and teachers including the petitioner was receiving the monthly pay regularly.
- 10) That during pendency of appeal before this Hon'ble Tribunal, petitioner has retired from service on 04.01.2020 due to superannuation of age. (Photocopy of the order is Annexure "F").
- 11) That in the prayer petitioner wants to add that the temporary service/ service against leave post and service on project post may kindly be calculated for the benefit of monetary benefits and the petitioner may kindly be granted pension and pensionary benefit.

It is, therefore, requested that the petitioner may kindly be allowed for correction of the facts in appeal.

شہینہ خانم  
Appellant

Through

Mohammad Asif  
Advocate

Supreme Court of Pakistan

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,  
PESHAWAR

S.A.No.15693/2020

Mst.Samina Khatoon ..... APPELLANT

Versus

D.E.O and others ..... RESPONDENTS

AFFIDAVIT

I, Samina Khatoon d/o Saeed Shah R/o Koocha Chiragh Shah, House No.74, Mohallah Sangerh Kohat, (appellant), do hereby affirm and declare that the contents of the accompanying **Application** are true and correct and nothing has been concealed from this Hon'ble Tribunal.

شہینہ خاتون

Deponent

CNIC No. 14301-9482500-4



OFFICE OF THE AGENCY INSPECTOR OF SCHOOLS ORAKZAI AGENCY & F.R. KOHAT

APPOINTMENTS

Appointments of the following candidates as below are hereby ordered in NPS No.6 Rs.315/-p.m.(fixed) plus usual allowances in the interest of public service from the date of their taking over charges:-

S.NO.	Name / Father name	Appointed at	Remarks
1.	Mr. Saad Khan S/O Dawal Khan	GPS Pirwal Khel as PTC in NPS No.6	Vice Saiful Ibrar PTC transferred.
2.	Miss Samina Khatoon D/O Saad Shah.	GPS Samandi Mela as T.T. NPS No.6	Against the vacant post.

- Notes:-
- NO TA/DA is allowed.
  - Charge reports should be submitted to this office.
  - They will produce their health and age certificates from Distt: HQ Civil Hospital Kohat.
  - Their appointments are purely on temporary basis and will be liable to termination at any time without assigning any notice / reasons.

*[Signature]*  
 Agency Inspector of Schools,  
 Orakzai Agency & F.R. Kohat.

Enclat: No. 105-8 /PTC/TT Dated, Kohat the 9th Feb: 81

Copy forwarded to:-

- The A.A.I.S. F.R. Kohat for n/a please.
- The D.A.O. Kohat for information please.

*[Signature]*  
 Agency Inspector of Schools,  
 Orakzai Agency & F.R. Kohat.

Samina Khatoon  
 D/O Saad Shah.  
 S/O Degree College Kohat -  
 Rawalpindi Road.  
 Mazra' Ahmed Ali Shah.  
 Kohat -  
 Asst

**OFFICE OF THE AGENCY INSPECTOR OF SCHOOLS ORAKZAI  
AGENCY & F.R, KOHAT**

**APPOINTMENTS**

Appointments of the following candidates as blow are hereby order in NPS No.6 Rs. 315/- PM (Fixed) Plus usual allowance in the interest of public service from the date of their taking over charge:-

S. No.	Name/ Father name	Appointed at	Remarks
1	Mr. Saud Kan S/o Dawai Khan	GPS Pirwal Khel as PTC in NPS No.6	Vie Saidul Ibrar PTC transferred.
2	Miss Samina Khatoon D/o Said Shah	GGPS Samandi Mela as TT NPS No. 6	Against the vacant post

Notes: No TA/ DA is allowed

2. Charge reports should be submitted to this office.

3.They will produce their health and age certificates from Distt HQ Civil Hospital Kohat.

4. Their appointments are purely on temporary basis and will be liable to termination at any time without assigning any notification/ reasons.

Sd/-  
Agency Inspector of schools,  
Orakzai Agency & F.R Kohat

Endst No. 105-8/PTC/TT dated Kohat on 9<sup>th</sup> Feb 81s

Copy forwarded to;

1. The A.A.I.S F.R Kohat for n/a Please.
2. The DAO Kohat for information please.

Sd/-  
Agency Inspector of Schools,  
Orakzai Agency & F.R Kohat

Asif  
ATTACHED

Annex B (5)

OFFICE OF THE AGENCY EDUCATION OFFICER, ORAKZAI AGENCY & FR KOHAT.

APPOINTMENT OF QARI ON LEAVE VACANCY.

Mst: Samina Khatoon D/O Saeed Shah is hereby appointed against leave vacancy on Qari post at GGMS Sherin Mela FR Kohat, (vice Farida Sultana on long leave) in BPS 7 plus usual allowances in the interest of public service w.e.f her taking over charge.

Note:- 1. Charge report should be submitted in duplicate to this office.

*[Signature]*  
Agency Education Officer,  
Orakzai Agency & FR Kohat.

Endst NO 41-45 Dated FR KT the 8 / 1 / 95.

Copy to the:-

1. H/M GGMS Sherin Mela FR Kohat.
2. A.A, E.O (F) Orakzai & FR Kohat.
3. Candidate Concerned .
4. Acctt: in this Office.
5. Office File.

*[Signature]*  
Agency Education Officer,  
Orakzai Agency & FR Kohat.

ASIT  
ATTESTED

حصہ ۱۷/۹

Annex C (6)

حصہ ۱۷/۹ اور حصہ ۱۸/۹ کے تحت دو کمرے کے لیے اجرت

لیجی اسٹیشن آفیسر صاحبہ کے لیے اجرت

۱۷/۹ - ۱۸/۹ کے لیے اجرت ۱۸/۹ کے لیے اجرت

حصہ ۱۷/۹ کے لیے اجرت

حصہ ۱۷/۹ کے لیے

حصہ ۱۷/۹ کے لیے

کمیٹی خاتون

حصہ ۱۷/۹ کے لیے

Ratin  
Head Mistress  
G.C.M.S. Shifra Mata  
P. P. Kohat

۹/۱/۹۶

قاری معلمہ گورنمنٹ سکول

حصہ ۱۷/۹ کے لیے

ایف آر کوٹ

۹-۱-۹۶

Asif



APPOINTMENT ORDER.

Annex D (7)

Consequent upon the recommendation of the Village Education Committee  
and endorsed by Agency Education Officer on proper agreement forms and stamp papers  
Miss/Mrs. Sarina Khateen D/O Saeed Shah R/O Kohat  
having qualification of Matric is hereby appointed against the project post  
of P.T.C. in BPS-7 for the project period at Female Communal School GCS Sheraki -  
Maraj Gul Killa (w.e.f.) her taking over charge.

NOTES:-

1. The employee shall serve the Govt. as Communal Schools Teacher from the date of assumption of charge.
2. She shall devote her whole time to her duties as Communal school teacher.
3. She shall carry out such administrative and teaching functions in relation to her duties.
4. She shall submit herself to the lawful orders of the Govt. Officers as well as V.E.C.
5. She shall motivate the parents to send their children to school.
6. She shall keep in contact with the V.E.C. & inform them of school progress, issues & problems.
7. These postings will not be transferable, however, local teachers preferably trained can be adjusted against regular posts on case to case basis.
8. They should produce their Health & age certificate to the Agency Education Officer Office.

(PROF. SHAMSHER KHAN)  
DIRECTOR OF EDUCATION  
(FATA), NWFP, PESHAWAR.

Encl: No. 511-17/11-2/10 School Dated 03-02-1999

Copies to :-

1. Chief (FATA) Govt. of NWFP P&D Department Peshawar.
2. Regional Director of Education (FATA) Kohat Division
3. Agency Education Officer Kohat  
with the remarks to check all their credentials, verify the same from concerned institutions & not to hand over them charge if there is any discrepancy.
4. The ~~Agency~~ District Accounts Officer Kohat
5. S.A.P. (Coordinator) FATA P&D Department Govt. of NWFP, Peshawar.
6. Chairperson Village Education Committee concerned.
7. Candidate concerned.

Asst; Director (P&D)  
For Director of Education  
(FATA), NWFP, Peshawar.

ASIF

Encl: 1

**APPOINTMENT ORDER**

Consequent upon the recommendation of the village Education Committee fully endorsed by agency Education office on proper agreement forms a stamp papers Miss Samina Khaton D/o Saeed Shah R/o Kohat having qualification of Matric is hereby appointed against the project post of PTC in BPS-7 for the project period of Female Communal school GCS Sheraki Maraj Gul Killi (W.e.f) for taking over charge.

**NOTE:-**

1. The employee shall serve the Govt as communal schools Teacher from the date of assumption of charge.
2. She shall devote her whole time to her duties as communal school teacher.
3. She shall carry out such administrative and teaching functions in relation to her duties.
4. She shall submit herself to the lawful orders of the GOvt officers as well as VEC.
5. She shall motivate the parents to send their children to school.
6. She shall keep in contact with the VEC & inform them of school progress issues & Problems.
7. These postings will not be transferable, however local teachers preferably trained to be adjusted against regular posts on case to case basis.
8. They should produce their health and age certificate to the agency education officer office.

Prof Shamsheer Khan  
Director of Education  
(FATA) NWFP Peshawar

Endst No. 511-17/H-2/FC School

Dated 08.02.1999

Copies to:

1. Chief (FATA) Govt of NWFP PE&B Department Peshawar.
2. Regional Director of Education (FATA) Kohat Division.
3. Agency Education Office F R Kohat with the remarks to check all their credentials, verify the same from concerned institutions & not to band over them charge if there is any discrepancy.
4. The District Accounts Officer Kohat.
5. SAP (Coordinator) FATA PE&D Department Govt of NWFP, Peshawar.
6. Chairperson village Education Committee concerned.
7. Candidate concerned.

ASIF  
ATTORNEY

Sd/-  
Assist; Director (P&D)  
For Director of Education  
(FATA) NWFP, Peshawar.

# Annex E

8

OFFICE OF THE AGENCY EDUCATION OFFICER FR PESHAWAR / FR KOHAT

NOTIFICATION:

Consequent upon the selection of the departmental selection committee, the following PST Female Non-Local Community Schools Teachers of F.R Kohat are hereby regularized vide policy No. SO(E)/SSD/CSTR/99-108 dated 11/5/2012 against the regular vacant PST posts in BPS 12 @ (Rs 7000-500-22000) PM plus usual allowances as admissible under the rules and adjusted in the school noted against their names.

SNO	Name	Father Name	School where adjusted	Remarks
1.	Samina Khatoon	Saeed Shah	GGMS Surak Toor Chapper	Against Vacant PST Post & re-deployed to GGPS Gul Khan Kalli Sheraki till further order.
2.	Robina Mushtri	Mushtri Khan	GGPS Qayum Mela Toor Chapper	-Do-, re-deployed to GFCS Missal Khan Kalli till further order.

*[Signature]*  
6.5.2014  
Agency Education Officer  
FR Kohat

Entdues: No. 861-63 / Dated 5/5/14

Copy forwarded to the:-

1. Director Education FATA, Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Kohat
3. Accountant Local Office
4. Assistant Political Agent, FR Kohat
5. Candidate Concerned

**ATTESTED**

\_\_\_\_\_  
Agency Education Officer  
FR Kohat

Annex F 9



**OFFICE OF THE EDUCATION OFFICER  
TSD DARRA KOHAT**  
Gate No.2 K.D.A Kohat  
Phone & Fax No. 0922-9260321

No. 2761 / Dated: 26/5/2020

### **SANCTION OF RETIREMENT/LEAVE ENCASHMENT.**

Consequent upon the completion of sixty years (60) of age on 04/01/2020 (FN) , Mst, Samina Khatoon PST B-12 Govt: Girls Pry School Surak Toor Chapper TSD Darra Kohat is hereby retired from service on superannuation of age on 04/01/2020 (F/N). She is allowed encashment leave w.e.f 03/11/2019 to 03/01/2020 (64 days) on full pay in the best interest of public service.

**NOTE: -** Necessary entries to this effect should be made in her service book and leave account Performa.

**District Education Officer  
TSD Darra Kohat**

**CC:-**

1. District Accounts Officer Kohat.
2. ADEO (Female ) in the local office.
3. Employee concerned.
4. Office Record.0

*Asif*  
**ATTESTED**

*Mae dlu*  
**District Education Officer  
TSD Darra Kohat**