

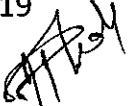
Service Appeal No. 728/2016

24.06.2019

Appellant Mst. Noor Jehan in person and Mr. Farhaj Sikandar, District Attorney for the respondents present. Appellant stated at the bar that her grievance has been redressed and she does not want to pursue the present service appeal. In this regard the appellant also submitted application alongwith copy of CNIC for withdrawal of the present service. The same are placed on record. Accordingly, the present service appeal is dismissed as withdrawn. File be consigned to the record room.

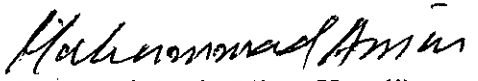
ANNOUNCED

24.06.2019


(Hussain Shah)

Member

Camp Court D.I.Khan



(Muhammad Amin Khan Kundi)

Member

Camp Court D.I.Khan

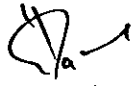
27.02.2019

Son in law of the appellant, on behalf of the appellant present. Mr. Farhaj Sikandar, District Attorney alongwith Mr. Inayatullah, Litigation Officer for the respondents present. Written reply on behalf of respondents not submitted. Representative of the department requested for further adjournment. Last opportunity is granted for filing of written reply. Adjourned to 23.04.2019 for written reply/comments before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan

23.04.2019

Clerk to counsel for the appellant and Mr. Farhaj Sikandar learned District Attorney alongwith Kamran ADEO present. Written reply submitted on behalf of respondents. To come up for rejoinder/arguments on 24.06.2019 before D.B at Camp Court, D.I.Khan.


Member
Camp Court, D.I.Khan.

22.06.2018

Neither appellant nor his counsel present. Mr. Muhammad Ismail, Assistant for the respondents present and again requested for adjournment. Granted but as a last chance. To come up for written reply/comments on 30.08.2018 before S.B at camp court, D.I.Khan.

30-8-18

Chairman
Camp Court, D.I.Khan
As one present on behalf of the appellant Mr. M. J. Gonsan lit. officer for respondent present. Text is hereby cancelled, therefore the case is adjourned for the same on 23-10-18. At camp court D.I.Khan.

23-10-18

Text is hereby cancelled, therefore the case is adjourned for the same on 19-12-18 at camp court D.I.Khan.

19.12.2018

As per direction of the worthy Chairman Khyber Pakhtunkhwa Service Tribunal, D.I.Khan tour dated 19.12.2018 has been rescheduled and the case is re-fixed for 28.12.2018.

Reader

28.12.2018

Husband of the appellant, on behalf of the appellant present. Mr. Farhaj Sikandar, District Attorney for the respondents present. Representative of the department is not in attendance therefore, notice be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned. To come up for written reply/comments on 27.02.2019 before S.B at Camp Court D.I.Khan.

MA
(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

29.12.2017

Clerk of the counsel for appellant present. Mr. Farhaj Sikandar, District Attorney alongwith Mr. Muhammad Ismail, Budget and Account Officer for the respondents also present. Written reply not submitted. Learned District Attorney requested for further adjournment. Adjourned. To come up for written reply/comments on 22.02.2018 before S.B at Camp Court D.I.Khan.



(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

22.02.2018

Clerk of the counsel for appellant present. Mr. Usman Ghani, District Attorney alongwith Mr. Muhammad Imran Shah, Litigation Officer for the respondents also present. Written reply not submitted. Learned District Attorney requested for further adjournment Adjourned. To come up for written reply/comments on 26.04.2018 before S.B at Camp Court D.I.Khan.



(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

25.05.2018

Due to retirement of the Worth Chairman, the Tribunal become non-functional. To come up for the same 22.06.2018. Notice be issued to the parties accordingly.


Member


7228/2016

26.12.2016

Counsel for appellant present. Learned counsel for appellant contended that Mst. Noor Jahan was initially appointed in service on 27.12.2003 and she was promoted to BPS-15 as Senior CT on 02.12.2014 whereas her other colleagues who entered into service after her were granted promotion prior to her and so she has been neglected without any plausible reason.

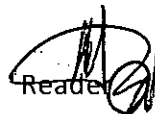
Point raised needs consideration. The appeal is admitted for regular hearing. The appellant is directed to deposit the security and process fee within 10 days, there-after notices be issued to the respondents for written reply/comments for 29.03.2017 before S.B at Camp Court D.I.Khan.

Appellant Deposited
Security & Process Fee


ASHFAQUE TAJ
MEMBER
Camp Court D.I.Khan


29.03.2017

Since tour is hereby cancelled, therefore, the case is adjourned for the same on 23.08.2017.


Reader

23.08.2017

Counsel for the appellant present. Mr. Saadullah, Budget and Accounts Officer for respondents No. 1 to 4 alongwith Mr. Farhaj Sikandar, District Attorney for the respondents also present. Representative of respondent No. 5 is not in attendance therefore, notice be issued to respondent No. 5 with the direction to direct the representative to attend the court and submit written reply on the next date positively. Adjourned. To come up for written reply/comments on 29.12.2017 before S.B at Camp Court D.I.Khan.


(Muhammad Amin Khan Kundi)
Member
Camp Court D.I. Khan

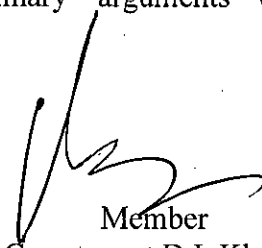
25.07.2016

Tour programme of D.I. Khan scheduled for 25.07.2016 and 26.7.2016 is hereby cancelled, therefore the case is adjourned to 29-8-16 for preliminary hearing. Parties be informed accordingly.


Member

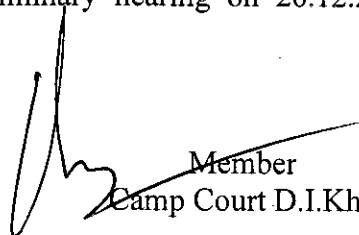
29.08.2016

Counsel for the appellant present and requested for adjournment. To come up for preliminary arguments on 26.09.2016 at camp court D.I. Khan.


Member
Camp court D.I. Khan

26.09.2016



Counsel for the appellant present and requested for adjournment. Request accepted. To come up for preliminary hearing on 26.12.2016 before S.B at Camp Court D.I.Khan.


Member
Camp Court D.I.Khan

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 728/2016

S.No.	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	18/07/2016	<p>The appeal of Mst. Noor Jehan received today by post through Mr. Muhammad Mohsin Ali Advocate may be entered in the Institution Register and put up to Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to Touring S. Bench at D.I.Khan for preliminary hearing to be put up there on <u>26-7-16</u></p> <p style="text-align: right;"> CHAIRMAN</p>

2-

20-7-16



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR.

Appeal No. 728 /2016

Mst. Noor Jahan

.....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa and others


.....RESPONDENTS

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3	Copy of Promotion order	B	8-9
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5	Copy of Educational Certificates	D	12-18
6	Copy of Departmental Appeal	E	19-20
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Dated: 14-07-2016

Humble Appellant



Mst. Noor Jahan
Through Counsel



Muhammad Mohsin Ali
Advocate High Court,
District Courts, D.I.Khan.

(1)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR.

Appeal No. 728 /2016

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 719

Dated 18-7-2016

Mst. Noor Jahan daughter of Sher Muhammad, Senior T.T GGHS
Long Khair Shah, Dera Ismail Khan.

.....APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Education,
Khyber Pakhtunkhwa, Peshawar.
2. Secretary Education, Khyber Pakhtunkhwa, Peshawar.
3. Director, Education Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Female), District Dera Ismail
Khan.
5. Deputy Commissioner, Dera Ismail Khan.

.....RESPONDENTS

APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA

SERVICE TRIBUNAL ACT, 1974

Filed to-day

Registrar

18/7/16

PRAYER; On acceptance of this appeal this august court may be considered the promotion of appellant as Senior TT (BPS-16) from 30-05-2013 in accordance with the rules and awarded all the back benefits on the grounds appearing hereinafter;

OR

GRANT any other relief considered just and appropriate under the given circumstances of the case.

Respectfully sheweth;

1. That the appellant was initially appointed as T.T in GGMS Kirri Khaisoor on 27-12-2003 vide appointment order Ends: No. 19030-33 dated 27-12-2003. Copy of appointment order is enclosed as **Mark-A**.
2. That appellant was promoted as Senior TT (BPS-16) on 02-12-2014. Copy of promotion order is enclosed as **Mark-B**.
3. That in-fact, the appellant was entitled for promotion as Senior TT (BPS-16) alongwith other officials who were promoted as Senior TT (BPS-16) vide notification dated 30-05-2013. Copy of notification is enclosed as **Mark-C**.
4. That the appellant also possessed the required qualification and required grade in respect of qualification, therefore, the appellant was entitled for promotion alongwith other officials promoted on 30-05-2013. Thereafter, the appellant filed the application / departmental appeal on 16-03-2016 to respondent No. 4, but till date no decision is made. Copy of educational certificates and departmental appeal are enclosed as **Mark-D & E** respectively.

Thus, being aggrieved, the present appellant filling the instant appeal, inter alia, on the following grounds;

GROUND:

1. That the appellant possessed the required qualification and required grade, therefore, the appellant was entitled for promotion alongwith other officials promoted on 30-05-2013. Moreover, the whole service of the appellant is spotless and un-blameable and there is no red entry in the service book.
2. That the appellant has been deprived from her legal right while not promoted the appellant on 30-05-2013.
3. That the appellant is the victim of unlawful and illegal act of the respondents and such a malafide act on the part of respondents is against the law and natural justice, it has caused an immense mental torture and agony to the appellant.
4. That the appellant is not treated in accordance with law. She is virtually deprived of her right as guaranteed under the law.
5. That the appeal is being filed within the statutory period prescribed in section 4 of The KPK Service Tribunals Act, 1974.
6. Any other legal ground that may be raised at the time of hearing of this appeal.

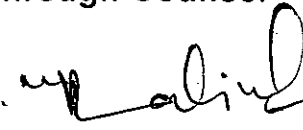
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It is therefore, humbly prayed that the instant appeal may kindly be accepted and be considered the promotion of appellant as Senior TT (BPS-16) from 30-05-2013 in accordance with the rules and awarded all the back benefits.

Dated: 14-07-2016

Humble Appellant


Mst. Noor Jahan
Through Counsel


Muhammad Mohsin Ali
Advocate High Court,
District Courts, D.I.Khan.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. _____/2016

Mst. Noor JahanAPPELLANT

VERSUS

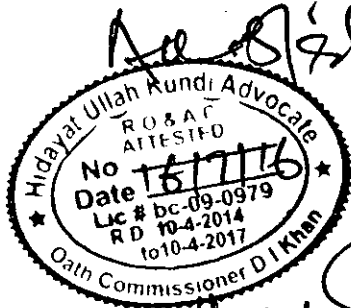
Govt. of Khyber Pakhtunkhwa and othersRESPONDENTS

AFFIDAVIT

I, the Appellant, do hereby solemnly affirm and declare on Oath that all the para-wise contents of this appeal are true and correct to the best of my knowledge and belief; and that nothing has been deliberately concealed or kept secret from this Honourable Court.


Identified by Counsel


Deponent





6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR.

Appeal No. _____/2016

Mst. Noor JahanAPPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa and othersRESPONDENTS

ADDRESSES OF THE PARTIES

Mst. Noor Jahan daughter of Sher Muhammad, Senior T.T GGHS Long
Khair Shah, Dera Ismail Khan.

.....APPELLANT

-
1. Govt. of Khyber Pakhtunkhwa through Secretary Education,
Khyber Pakhtunkhwa, Peshawar.
 2. Secretary Education, Khyber Pakhtunkhwa, Peshawar.
 3. Director, Education Khyber Pakhtunkhwa, Peshawar.
 4. District Education Officer (Female), District Dera Ismail Khan.
 5. Deputy Commissioner, Dera Ismail Khan.

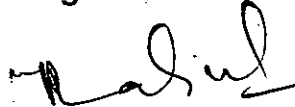
.....RESPONDENTS

Dated: 14-06-2016

Humble Appellant


Mst. Noor Jahan

Through Counsel



Muhammad Mohsin Ali
Advocate High Court,
District Courts, D.I.Khan.

*Attended
in
D.I.Khan
odc*

*Annex - A
P 7*

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY)
D.I.KHAN.**

APPOINTMENT ORDER:-

Consequent upon the approval of selection committee and approved by the District Coordination Officer D.I.Khan. The following TT Female candidates open merit are here by appointed on vacant posts in the schools noted against their names in BPS-7 being a qualified, fresh candidates on contract basis as per existing policy in the interest of public service w.e.f. date of taking over charge on the following terms and conditions.

S.No	Name	Father's Name	Posted At	Remarks
1	Noor Jahari	Sher Muhammad	GGMS Kiri Khaisoor	Vacant Post

Note:-

1. Charge report should be submitted to all concerned.
2. The service of the above named candidate is made purely on temporary basis and liable to terminate at any time without assigning any reason/notice.
3. The initial period of appointment shall be 3-years after which the contract may be renewed by the competent authority keeping in a view the performance of the teacher concerned.
4. They will produce health and age certificate from the MS concerned.
5. The original documents may be checked/verified by the concerned Board/University through DDO before handing over charge.
6. The contract candidate will be bound to sign an agreement on stamp paper as per recruitment policy.
7. No TA/DA is allowed.

Sd/-

ABDUL RAHIM KHAN
EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY D.I.KHAN

Ends No. *19030-33*
Copy submitted to the:

1. Director Schools & Literacy NWFP Peshawar.
2. District Coordination Officer D.I.Khan
3. District Accounts Officer D.I.Khan.
4. Principal/Headmaster concerned.

Amir S
DISTRICT OFFICER (FEMALE)
SCHOOLS & LITERACY D.I.KHAN



TTs (F) D I Khan IV
Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar
PH No. 091-9210389, 9210938,
9210437, 9210957, 9210468
Fax 091-9210936, 0800-33857
E-mail rafiq_kk851@yahoo.com

Annex-B
P(8)

Notification

Consequent upon the recommendations of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification NoSO(B&A)/1-18/E&SE/2012 dated 11.07.2012 and Finance Department Endorsement No SO(FR)/FD/10-22(E)/2010 dated 16.07.2012, the following Female TTs B-15 are hereby promoted to the post of Senior TT BPS-16 (Rs.10000-800-34000) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, on the terms and condition given below with immediate effect and further they will be posted in the Government Higher Secondary /High Schools by the District Education Officers concerned against the newly upgraded Senior TT BPS-16 posts, they will be posted by the District Education Officer concerned on "School based".

Total No. of TT (F) Posts duly verified by the DAO	137
1/3 share of Senior TT Posts	46
Share of promotion 100 %	43
✓ Already promoted to the post of STT B-16	43
Posts available for promotion	03
Vacant posts due to promotion of STT to SST	02
Total Posts available for promotion	05
Proposed for promotion	05

S No	SL No	Name of Mistress	Place of Posting	Date of Birth	D/O Applt: as TT	Remarks
1	4	Gulnaz Begum	GGHSS Kulachi	22-03-1963	08-10-1983	Services placed at the disposal of DEO (F) D I Khan for further posting on "School based".
2	14	Shamira Akhtar	GGMS Panila	01-02-1968	19-09-1987	---Do---
3	39	Kishwar Sultana	GGMS Rahmani Khel	04-12-1976	23-04-1999	---Do---
4	46	Noor Jahan	GGMS Basti Dhappanwali	12-11-1974	29-01-2004	---Do---
5	57	Tahira Yasmin	GGHS Kotla Kaim Shah	04-01-1975	08-04-2005	---Do---

Terms and conditions:-

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se- seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.

Checked
W. J.

SELTs (F) D I Khan IV

9

7 They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if he is wrongly promoted he will be reversed.

(Muhammad Rafiq Khattak)
Director
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Endst: No. *63-29* / File No.1/Promotion Senior TT B-16: Dated Peshawar the *2/12/2014*.

Copy forwarded for information and necessary action to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. District Education Officers (M) D I Khan
3. District Accounts Officer D I Khan
4. Official Concerned.
5. PS to the Secretary to Govt: Khyber Pakhtunkhwa E&SE Department.
6. PA to the Director E&SE Khyber Pakhtunkhwa, Peshawar.
7. M/File

[Signature]
Dy: Director Estab (Female)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar

7.
8.
9.
10.
11.

DISTRICT EDUCATION OFFICER (FEMALE)
DERA ISMAIL KHAN

Annex-C
P 10

NOTIFICATION

DTL/2013
Shah

Consequent upon the recommendations of Departmental Promotion Committee, and in pursuance of Khyber Pakhtunkhwa E&SE Notification No.50 (B&A) 1-18/E&SE/2012 dated 16/07/2012 and Finance Department Endst. No.50 (FR) 1 D/10-22(E)/2012 dated 16/07/2012 and Director E&SE KPK Peshawar Endst. No.4410-10 File No.1/Promotion Senior TT B-16 dated 28.5.2013 the following TTs (F) B-15 are hereby promoted to the post of Senior TTs BPS-16 (Rs. 10000-8000-4000) plus usual allowance as admissible under the rules on regular basis under the existing policy of the Provincial Govt. in Teaching cadre on the terms and conditions given below with effect from 28.5.2013 and they are further posted in the school noted against each.

Sl. No.	NAME OF TEACHER	NAME OF SCHOOLS	POSTED AT	REMARKS
1717	Hina Yasmeen	GGMS Awan Now working at GGMS, Bisam	GGHS, Ratta Kulachi	Against vacant post
1718	Fahar Shafiq	GGMS Nad Ali Shah	GGHS No.9 Dimpur	-do-
1721	Sahra Qureshi	GGCMS No1 Dikhan	GGHS No.1 Dikhan	Already occupied
1724	Shahid Patel	GGMS Chah Bar wala	GGHS, No.1 Dikhan	Against vacant post
1726	Farah Bibi	GGCMS, No.1	GGHS No.1 Dikhan	Already occupied
1729	Syeda Asia Firdus	GGHSS Mitha Pur	GGHSS Mitha Pur	-do-
1731	Zahra Shafiq	GGMS Lakhra Dikhan	GGHS, Fatah	Against vacant post
1735	Razwana Akter	GGMS Kulachi Wala	GGHS, Daraban Khurd	Against vacant post
1736	Nasrin Naseer	GGMS Sari Fager	GGHSS No.5 Dikhan	Against vacant post
1737	Ghulam Zarif	GGHS Musazai	GGHS Musazai Sharif	Already occupied
1738	Shiraha Umber	GGHS No.4 Dikhan	GGHS No.4 Dikhan	-do-
1739	Syed. Zainab Amin	GGMS Roda	GGHS, Kiji Sahamozai	Against vacant post
1743	Sahara Qasim	GGHS RATA KULACHI now working at GGMS, Basti Dhapu	GGHSS, No.2 Dikhan	Against vacant post
1744	EBI FATIMA	GGMS WANDA MADAT	GGHS, Yajik	Against vacant post
1745	Hadeema Sadia	GGHS Hassa	GGHS, Hessa	Already occupied
1747	Rozina Bibi	GGMS Zarnikhel	GGHSS, Kulachi	Against vacant post
1748	Shazia Anjira	GGHS Haji Mola	GGHS, Haji Mola	Already occupied
1750	Aisha Tabsum	GGMC, Chah Bar Wala	GGHS Bahar Pakka	Against vacant post
1752	Kubinaarum	GGHSS No.5 Dikhan	GGHSS No. Dikhan	Already occupied
1753	Shakila Bibi	GGMS, Zarni Lal now working at GGMS, Fatah	GGHS Hahala	Against vacant post

P (11)

21/70	Saifur Iqbal	GGMS Mian Tawal	GGHS NO.7 Dikhan	Against vacant post
22/71	Nucleofar	GGMS Ijaz Abad	GGHS No.2 Dikhan	Against vacant post
23/72	Begum	GGMS PANIALA	GGHS Kaich	Against vacant post
24/81	Rugia Shaheen	GGHS, Kacha Mali Khel GGHS Bigwa aiShumali now	GGHS Kacha Mall KHel	Already occupied
25/83	Ghazala Parveen	GGMS, Ara	GGHS, Wanda Hisam	Against vacant post
26/84	Hameeda Yasmin	GGHS No9 Dikhan	GGHSS No.9 Dinpur	Already occupied

TERMS AND CONDITIONS:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their services can be terminated at any time, in case her performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time.
4. Charge report should be submitted to all concerned.
5. Their Inter-Seniority on lower post will be in intact.
6. No TADA is allowed for joining her duty.
7. They will give an under taking to be recorded in their services book to the effect that if any overpayment is made to her in the light of this letter will be recovered and if she is wrongly promoted she will be reversed.
8. The DDC Concerned is directed to check her original documents duly verified from the concerned board / University / Madarasa before submission their bills to DAO Dikhan.

(SYEDA ANJUM)
District Education Officer
(Female) Dera Ismail Khan

Dated: 30/05/2013

Enclst No. 2199-92
Trans. Adjs/AT/

Copy forwarded for information and necessary action to the

1. Director E&SE Khyber Pakhtunkhwa Peshawar
2. District Account's Officer Dikhan
3. Principals/ headmistress GGHSR/GHS
4. All official Concerned
5. Accountant/ Superintendent, Dikhan

(Signature)
District Education Officer
(Female) Dera Ismail Khan

Original
Board of Intermediate & Secondary Education
PESHAWAR

54838

Annex-D

DETAILED MARKS CERTIFICATE
Secondary School Certificate Examination
(GENERAL GROUP)

P(12)

Session 19 FP (Annual/Supplementary)

Name Noor Jehan Bibi

Father's Name Shah Mahid Roll No. 9892

SUBJECT	Total Number of marks allotted	MARKS OBTAINED	
		In figures	In words
1. English	150	57	
2. Urdu	150	78	
3. Islamiyat	75	45	
4. Pakistan Studies	75	29	
5. Gen Mathematics Mathematics/E.H.E. H.H.A. & R.P.	100	33	
6. General Science	100	48	
7. <i>EHE</i>	100	28	
8. <i>Arabic</i>	100	68	
Total	850	386	<i>Three Hundred & Eighty Six</i>

SECRET OFFICER,
Board of Inter. & Secondary Education
PESHAWAR
24/12/13

Note: Errors/ommissions excepted

F: Failed in the paper(s)

Date _____ 19____

Controller of Examination
Board of Intermediate & Secondary Education
PESHAWAR

sN: 634689

Approved
والله اعلم
بالحق

Roll No. 2892

13

BOARD OF INTERMEDIATE AND SECONDARY EDUCATION



Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination

SESSION SUPPLEMENTARY 1988

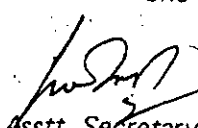
THIS IS TO CERTIFY THAT Neer Jehan Bibi
Son/Daughter of Sher Muhammad
and a resident of D. I. Khan District

has passed the *Secondary School Certificate Examination*
of the Board of Intermediate & Secondary Education, Peshawar held in October 1988 as
a *Private Candidate*. He/She obtained 386 Marks out of 850
and has been placed in Grade D Representing Fair


The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|-----------------|-------------|
| 1. English | 3. Islamiyat | 5. Gen: Maths | 7. Arabic |
| 2. Urdu | 4. Pakistan Studies | 6. Gen: Science | 8. E: H: EE |

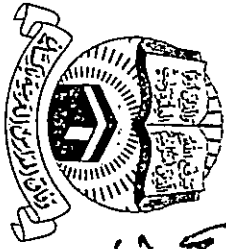
Date of birth according to admission form is Nineteenth May,
one thousand nine hundred and Seventy Only (19-5-1970)


Asstt. Secretary
28th January 1989

This certificate is issued without alteration or erasure


Secretary

28050011712

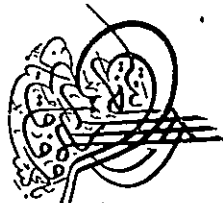


جامعة المدينة المنورة
المدنية

المجلة العلمية

المجلة العلمية

١١٩



الحمد لله رب العالمين. والصلاة والسلام على خاتم الأنبياء والمرسلين، وعلى آله وصحبه أجمعين. افتاحه، فإن رسالة
 وفاء للإسلام في المعركة، بياكستان، كشهد بأن الظالمية فور حبان في بي بي شير محمد من شيرة اسماعيل خا
 الموردة في عام ١٣٩٠ م قد أتممت دراسة الثانوية العامة في جامعة خديجة الكبرى للسياحة الأنتحان النهائي المنعقد
 تحت إشراف وفاق المدارس العربية باكستان في ١٣٩٠ هـ بتقدير (جيد) وبسبب على ذلك استحققت الشهادة
 ورئيس الوفاق إذ يفئسها هذه الشهادة بوصفها بتقوى الله تعالى ويسأل الله عز وجل أن يسلك بها سبيل العاتات العالمة



رئيس الجامعة / د. محمد بن عبد الوهاب
رئيس اللجنة / د. محمد بن عبد الوهاب

رئيس اللجنة / د. محمد بن عبد الوهاب

رئيس اللجنة / د. محمد بن عبد الوهاب

رقم التسجيل 1423-05-022661
 رقم الهاتف 19271
 الأبحاث 321
 محل الإصدار الرياض
 رقم الإصدار 13-09-2007
 الطابع ١٣٩٠



Handwritten signature and text in Urdu: "دائرة اعلیٰ تعلیم، حکومت پنجاب، پاکستان"

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

شہادت نامہ

الثانویۃ الخاصۃ

Handwritten number: 15

010002



بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِیْمِ

الحمد لله رب العالمين. والصلوة والسلام على خاتم الانبياء والمرسلين، وعلى اله وصحبه اجمعين. اما بعد، فإن رئاسة
وفاق المدارس العربیہ پاکستان، تشهد بأن الطالبة نور جهان بی بی بنت شیر محمد من ذیرہ اسماعیل خان
المولودۃ فی عام 19-05-1970 ء قد اتمت دراسة الثانوية الخاصة فی جامعہ مخدیحہ الکبری للبنات فی لاہور، پاکستان، بتقدير (جید) وبسبب علی ذلك استحققت الشهادة
تحت إشراف وفاق المدارس العربیة پاکستان فی شبان ۲۱۲۲۹ / ۲۱۱۰۸ ء بتقدير (جید) وبسبب علی ذلك استحققت الشهادة
ورئيس الوفاق اذینحها هذه الشهادة یوصیها بتقوی الله تعالی ویسأل الله عزوجل ان یسلك بها سبیل العالیات العالیات.

مخرج الوثيقة

رئيس اللجنة

رئيس اللجنة

رئيس اللجنة

رقم التسجيل 1428-05-022661
12826
رقم الجلوس 311
الذريعات 1-
محل الإصدار: (المنطقة التعليمية) لاہور
التاريخ 01-09-2008 ء

012433

(16)

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

صلى الله عليه وسلم



شهادة الماجستير
في اللغة العربية وآدابها
والإسلاميات
والفقه الإسلامية

بسم الله الرحمن الرحيم

الحمد لله رب العالمين، والصلوة والسلام على خاتم الأنبياء والمرسلين، وعلى الله وصحبه أجمعين. أقاميد، فإن رسالة
وفاء لرسول الله صلى الله عليه وسلم، كتهدية من الطالبة: نورحمان بي بي بنت شير محمد من ذرية اسماعيل خان

المولودة في عام 1970-05-19. قد أتت الدراسة العالمية في جامعة خديجة الكبرى للبنات، ونجحت في الامتحان النهائي المنعقد
تحت إشراف وفاق المدارس العربية بباكستان في رجب 1431هـ بتقدير (جيد) وبكامل على ذلك استحققت الشهادة العالمية
ورئيس الوفاق إذ يمنحها هذه الشهادة بوصفها بتقوى الله تعالى ويسأل الله عز وجل أن يسلك بها سبيل الصالحات العاملات،

رقم التسجيل... 1428-05-022661
رقم الجلس... 3443
الدرجات... 300
محل الإصدار: جامعة الإمام محمد بن سعود الإسلامية
التاريخ... 12-08-2010

بسم الله الرحمن الرحيم

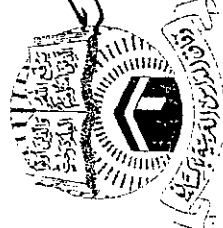
بسم الله الرحمن الرحيم



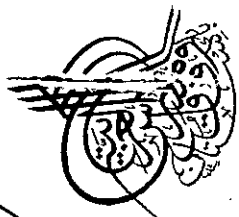
١٦
١٤٣٦٦٧

بسم الله الرحمن الرحيم

محمد بن عبد الله



شهادة الماجستير في اللغة العربية وآدابها
من جامعة الإمام محمد بن سعود الإسلامية



الحمد لله رب العالمين، والصلاة والسلام على خاتم الانبياء والمرسلين، وعلى الله وصحبه أجمعين. أقام بعد، فإن رسالة
وفاء للدراس العربية بباكستان، تشهد بأن الطالبة نور جيان بي بي بنت شير محمد من ذرية اسماعيل خان

المولودة في عام 19-05-1970م قد أتمت الدراسة النهائية في جامعه خديجه الكبرى للبنات وبمجتاز في الامتحان النهائي المنعقد
بالمقابل كؤنسين ديره اسماعيل خان
وتسكا، على ذلك استحققت الشهادة،

وتختم إشراف وفاق المدارس العربية بآكمتان في 2012م بتقدير الاحبار الفرعي ١٣٢٣هـ مقبول
ورئيس الوفاق اذ يصفها بهذه الشهادة، يوصيها بتقوى الله تعالى ويسأل الله عز وجل ان يسلك بها سبيل العالقات العاملات،

رقم التسجيل 1428-05-022661
رقم الجلبوس 1948
الدرجات 280 / 100
محل الإصدار: مكة المكرمة
التاريخ: 16-10-2012م

بسم الله الرحمن الرحيم
محمد بن عبد الله
بسم الله الرحمن الرحيم
محمد بن عبد الله
بسم الله الرحمن الرحيم
محمد بن عبد الله



~~Attested~~
Attested
DOMICILE CERTIFICATE

P 18

I Noor Jehan Bibi Son/Daughter of Sher Mahammad
hereby declare that I was born of parents who are permanently domiciled in
North West Frontier Province having been born/settled in this Province.

I was born at Village/Mchallah Mozam
Tehsil D.I. Khan District Dera Ismail Khan.

Noor Jehan Bibi
Signature of the applicant
Dated _____

Pursuance to the declaration dated _____ filed by
Mr./Miss Noor Jehan Bibi Son/Daughter of Sher Mahammad
domiciled in North West Frontier Province, it is hereby certified that the said
Noor Jehan Bibi is born of parents who are permanent
residents of the North West Frontier Province having been born/settled within it.

I have satisfied myself from ~~personal~~ by field visit knowledge/verification that the above
declaration is true certly accordingly.

This 7th day of Sept 1995



CS. Anwar Ali Shah
AC/MAGISTRATE 1st CLASS
AW

COUNTERSIGNED
Khan Sami
DISTRICT MAGISTRATE
Dera Ismail Khan.



Two Copies of
Photographs

Strike out which over is not applicable.

No. 4031 HC Dated 13/9/95

فائل نمبر 149-58-242897

فدیہ کی

نور پور ضلع کی پی ڈی ڈی دفتر نئی سرحد کو مدد مل

VARIFIED

سے نفع و فائدہ حاصل کیے جانے اور

RURAL AREA

URBAN AREA

1. Batwari Halqa

1. Municipal Councilor

نیا کمرے ملنے اور اس کے ساتھ

آبنائے اور کھیتوں کے

2. Chairman,
Municipal Committee
Town Committee.

2. Girdawar Circle

3. Tehsildar

3. Tehsildar

Handwritten signatures and dates: 18/8, 26/8, 1955, 27/8, 1955

Handwritten signature and date: 27/8, 1955

Handwritten signature and date: 27/8, 1955

Annex-E
P 19

To

The Director
Education, Khyber Pakhtunkhwa,
Peshawar.

Subject: **Departmental Appeal**
(Through Proper Channel)

Respected Sir:

1. That the applicant was initially appointed as T.T in GGMS Kirri Khaisoor on 27-12-2003 vide appointment order Ends: No. 19030-33 dated 27-12-2003. Copy of appointment order is enclosed herewith.
2. That applicant was promoted as Senior TT (BPS-16) on 02-12-2014. Copy of promotion order is enclosed herewith.
3. That in-fact, the applicant was entitled for promotion as Senior TT (BPS-16) alongwith other officials who were promoted as Senior TT (BPS-16) vide notification dated 30-05-2013. Copy of notification is enclosed herewith.

4. That the applicant also possessed the required qualification and required grade in respect of qualification, therefore, the applicant was entitled for promotion alongwith other officials promoted on 30-05-2013. Moreover, the whole service of the applicant is spotless and un-blameable and there is no red entry in the service book.
5. That the applicant has been deprived from his legal right while not promoted the applicant on 30-05-2013.

It is therefore, humbly prayed that the instant appeal may kindly be accepted and be considered the promotion of applicant as Senior TT (BPS-16) from 30-05-2013 in accordance with the rules and awarded all the back benefits.

Dated: 16/03/2016

Your's Sincerely,



Noor Jahan

Senior T.T GGHS
Long Khair Shah;
Dera Ismail Khan.



وکالت نامہ

P 21

کورٹ
فین

Before The Khyber Pakhtunkhwa Service Tribunal

Appellant

Mst. Noor Jahan

منجانب

Respondent

VS

Govt of W.P.K etc

Service Appeal

باعث تحریر آنکہ

D. Ullah
Muhammad Mousin Ali Advocate High Court

مقدمہ مندرجہ بالا عنوان میں اپنی طرف واسطے بیرونی درجہ اور برائے پیش یا تفسیر مقدمہ تمام
 کہ حسب ذیل شرائط پر دیکھ مقرر کیا ہے کہ میں پیشی پر خود یا ہذا بذریعہ رو برد عدالت حاضر ہونا نہیں گا اور ہر وقت پکارے جانے مقدمہ دیکل صاحب
 موصوف کو اطلاع دے کر حاضر عدالت کروں گا اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور میرے خلاف ہو گیا تو صاحب
 موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے نیز دیکل صاحب موصوف صدر مقام پکھری کے علاوہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل
 بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ صدر مقام پکھری کے علاوہ اور جگہ ساعت ہونے یا بروز تعطیل یا پکھری کے اوقات کے آگے یا پیچھے پیش ہونے
 پر مظہر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اسکے واسطے کسی معاوضہ کے ادا کرنے یا سخت نہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے مجھ
 کو کل ساعت پر وادختہ صاحب موصوف مشل کردہ ذات خود منظور قبول ہو گا اور صاحب موصوف کو عرض دعوی یا جواب دعوی یا درخواست اجراء اسمائے ذگری
 نظر ثانی اپیل گمرانی و ہر قسم درخواست ہر قسم کے بیان دینے اور پر غامٹی یا تراشی نامہ و فیصلہ برطرف کرنے اقبال دعوی کا بھی اختیار ہو گا اور بصورت مقرر ہونے
 تاریخ پیشی مقدمہ مقرر بیرون از پکھری صدر بیرونی مقدمہ مقرر نظر ثانی اپیل و گمرانی و برآمدگی مقدمہ یا سنوئی ذگری یک طرفہ یا درخواست حکم انتہائی یا قرق
 یا گرفتاری قبل از فیصلہ اجراء ذگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ مختا بیرونی کا اختیار ہو گا اور تمام ساعت پر وادختہ صاحب موصوف مشل کردہ
 از خود منظور و قبول ہو گا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہو کہ مقدمہ مقررہ یا اس کے کسی جزو کی کارروائی یا بصورت درخواست نظر ثانی
 اپیل گمرانی یا دیگر معاملہ و قدمہ مذکورہ کسی دوسرے دیکل یا بیرونی کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو بھی ہر امر میں دعوی اور ویسے
 اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ میں جو کچھ ہر جانہ التواء پڑے گا وہ صاحب موصوف کا حق ہو گا مگر
 صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہو گا کہ مقدمہ کی پردی نہ کریں اور ایسی صورت
 میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا

لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے
 مورخہ 14 مارچ 2016

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Accepted
 as Attached

Mst. Noor Jahan (Appellant)

نوور جان

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

Service Appeal No. 728/2016

Mst Noor Jahan

VS

Government of KPK

PARA WISE COMMENTS ON BEHALF OF RESPONDENTS

Preliminary objections

- 1 That the appellant has got illegally sanad / Degree Shahadat ul Almia from Wafaq ul Madaris.
- 2 That the appellant remain student of Wafaq Ul Madaris from 2007 to 2012 without prior permission from the respondents department.
- 3 That the appellant has drawn regular salary from the respondents department from 2007 to 2012.
- 4 That the appellant has not taken study leave form the respondent department from **2007 to 2012 (6year period)**, as no study leave entry is found in the service-book of appellant.
- 5 That the sanad of appellant present in her service book is unverified from the Wafaq Ul Madaris which does not confer any rights to the appellant.
- 6 That the appellant has cheated the department in the whole process of her promotion, therefore the promotion of the appellant may kindly be declare as illegal and void ab-initio and respondents department may allow to recover benefits of BPS-16 from the appellant.
- 7 That the appellant is **aggrieved** from the promotion order dated 30.05.2013 whereas the appellant has filed departmental appeal to the respondents department on 31.01.2018 after laps of 4year and 8months (**1700 days**) and appellant has filed the present service appeal in July 2016 before the departmental appeal and after laps of more than 3years. Hence present service appeal is badly time barred and not maintainable in eye of law.
- 8 That the service appeal of the appellant is based on malafide motives.
- 9 That the service appeal is not maintainable due to mis-joinder and non-joinder of necessary parties.
- 10 That the appellant has got no cause of action / locus standi.
- 11 That the appellant has not come to Honourable Tribunal with clean hands.
- 12 That the instant appeal is against the prevailing law and rule.
- 13 That the instant appeal is illegal and against the facts and on grounds circumstances.
- 14 That the Honourable Court has no jurisdiction to entertain such like appeal.

Respectfully Sheweth

- 1) Para pertains to the appointment of appellant as Theology Teacher (TT) at GGMS Kirri Khaisor on 27.12.2003, hence no comments.
- 2) That the appellant has cheated the respondent department and has got illegal promotion to the post of Senior TT BPS-16. The appellant has got admission in the **Wafaq Ul Madaris** for **Sanad e Shahadatul Almia in the year 2007**. The appellant has passed her first year examination in the September 2007, second year examination in the September 2008, third year examination in the August 2010 and fourth year examination in the October 2012 (**photo copies are annexed with service appeal**). In the meanwhile appellant was also regular employee of the Education Department got salaries from respondents department. The appellant did not take permission (**NOC**) for the taking admission in the Wafaqul Madaris. Therefore appellant did not annex any **Departmental Permission / NOC** with present service appeal.
- 3) Incorrect / not admitted. Appellant was not entitled for promotion to the post Sr. TT BPS-16 on the basis of **illegal sanad of Shahadat ul Almia from Wafaq ul Madaris**. The appellant remained regular employee of the respondents department from year 2007 to 2012 and appellant has drawn her regular salary from the government exchequer which is against the law.
- 4) Incorrect / not admitted. ^{↑ ssc D grade ??} The appellant has cheated the respondent department and has got illegally admission in the Wafaq Ul Madaris. On the basis of **illegal admission** the appellant has got sanad / degree, therefore appellant was not entitled for promotion to the post of Sr. TT BPS-16. The appellant has **cheated the department** and illegally got promotion of Sr. TT BPS-16 in the year 2014. Hence it is requested to this Honourable Tribunal to allow this department to revert the appellant to the post of TT BPS-15 and recover all the benefits which she has taken illegally forms the respondents department. The service appeal of the appellant is an exercise in futility. Further proceeding in this regard would bear no fruit. Therefore it is requested to this Honourable Tribunal to dismiss the appeal of the appellant with heavy cost.

Objection on Grounds

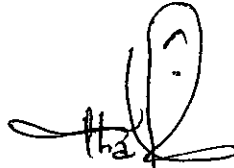
1. Incorrect / not admitted. The appellant was not eligible for the promotion to the post of Sr. TT on the basis of illegal sanad / degree.
2. Incorrect / not admitted. The appellant was not deprived from promotion in the year 2013. In the year 2013 appellant did not have any right of promotion to the post of **Sr. TT BPS-16**. The appellant has got promotion to BPS-16 illegally, because the sanad of Shahadat ul Almia was based on malafide intension. It is further added that the entry in her service book is against the law, because the sanad affixed in her service book is unverified. The appellant has cheated the department in the whole process of her promotion. An unverified sanad / degree do not confer any useful right to the appellant.
3. Incorrect / not admitted. The respondents department is victim of illegal act of her taking promotion to the post of Sr. TT BPS-16. The promotion of the appellant is against the law, rule and principle of natural justice. The appellant has mentally torture all the employee of the respondent department and has got promotion to the BPS-16.
4. Strongly denied. The appellant may kindly be directed to produce her NOC for the admission in **Wafaq Ul Madaras**. It is further added that the appellant may kindly be directed to produce the study leave record of six year (**from 2007 to 2012**) according

to law. If appellant failed to produce so before this Honourable Tribunal then her promotion to the post of Sr. TT BPS-16 will be illegal in eye of law.

5. Incorrect / not admitted. Strongly denied. The appellant was aggrieved from promotion order dated 30.05.2013 whereas the appellant has filed her departmental representation vide **DEO(F)DIKhan office dairy Nò. 276 dated 31.01.2018**. Hence departmental appeal is badly time barred. The appellant has filed the departmental appeal after **laps of 4yr 8M and 01day (1700days)**. Hence the present service appeal is not maintainable in the eye of law.
6. That the counsel for the respondents may kindly be allowed to raise additional grounds at the time of argument.

Pray

Therefore it is requested to this Honourable Tribunal to dismiss the service appeal of the appellant with heavy cost, being devoid of merit and respondent department may kindly be allowed to initiate proceeding against the petitioner and recover all benefits which she has illegally taken from the respondent department on the basis of illegal sanad. It is further requested to this Honourable Tribunal to cancel the sanad of petitioner as she has got illegally.



Litigation Officer
Secretariat & Directorate of E&SE
DIKhan Bench



گڈنٹ چناب سرورس کمرپوٹیل بیج قیمت کوٹنوار سے کر کے

نورجیان بنی کوٹنوار خیر کوٹنوار

رسپل

دندو سٹیمبراد with Draw زلمہ صفی

رسپل عزرا باہ

بناب مال: جدید رسپل عزرا باہ زلمہ فرسٹ

1- بیک رسپل عزرا باہ زلمہ سمانت عدالت ضو انفور

تاج بیسی اللوز فور

2- بیک رسپل عزرا باہ بیس من رسپلٹک رفق اسکا برفی

سائبر آب ذمہ بھرون رسپل عزرا باہ بیس آرتا فاسی رسپل بیس

کیسی دفتر دفتر فوری

دندو سٹیمبراد رسپل عزرا باہ

دندو سٹیمبراد رسپل عزرا باہ

رسپل

نورجیان NoorJahan

To

The District Education Officer
(Female), D.I.Khan

Subject: Withdrawal of Service Appeal No. 728/2016 Titles Noor Jehan vs Govt. of
KPK in the Honorable Khyber Pakhtunkhwa Service Tribunal.

Respected Madam!

With due respect, I solemnly declare on oath that I hereby withdraw the
Serviced Appeal No.728/2016 filed by me at The Honorable Khyber Pakhtunkhwa Service
Tribunal in view of restoration of seniority from February 2013, in respect of Noor Jehan, Senior
TT, GGHS Wanda Mozam. Moreover, I have no claims of seniority as stated/ prayed in the said
Service Appeal before The Honorable Khyber Pakhtunkhwa Service Tribunal and/ or any other
service matter as duly granted unto me by the competent authority till now.

I further, declare on oath that I will not file any Case, Suit, Writ, Petition
or Service Appeal or litigate in any court or Tribunal for the matter already discussed in Serviced
Appeal No.728/2016 filed by me at The Honorable Khyber Pakhtunkhwa Service Tribunal.

Dated: 17.04.2019

Yours Faithfully,

Noor Jehan

Noor Jehan

Senior Theology Teacher (BS-16)
GGHS Wanda Mozam
Dera Ismail Khan

12103-4891575-0

Received

*Legation
17-4-19*

District Education Officer
(Female) D.I.Khan
Diary No. 2595
Date 17/4/19