


FORM OF ORDER SHEET

Court of _____

Appeal No. _____

2054/2023

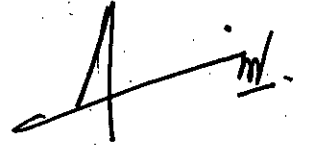
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/10/2023	<p>The appeal of Mst. Nazish resubmitted today by Syed Noman Ali Shah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on Parcha Peshai is given to the counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

The appeal of Mst. Nazish Ex-PST GGPS Speen Qamar Nowshera received today i.e on 02.10.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Index of the appeal is not attached with the appeal.
- 2- Page nos. 14, 15, 16 and 17 of the appeal are illegible which may be replaced by legible better one.
- 3- Departmental appeal having no date be dated.

No. 3343 /S.T,

Dt. 3/10 /2023.




REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

M. Asif Yousafzai Adv.
High Court Peshawar.

R/Sir.

all objection (1 to 3) were removed & resubmitted


Syed Noman

12-10-2023

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 2054 /2023

Nazish

V/S

Edu Deptt:

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Nazish
Appellant
Nazish

Through:

Muhammad Asif Yousafzai
(MUHAMMAD ASIF YOUSAFZAI)

Advocate Supreme Court

Syed Noman Ali Bukhari
(SYED NOMAN ALI BUKHARI)

ADVOCATE, HIGH COURT

Date: / /2023.

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

①

APPEAL NO. 2054 /2023

Miss Nazish. Ex-PST
GGPS Speen Qamar, Nowshera.

(Appellant)

VERSUS

1. The Director Education, Elementary & Secondary Education Peshawar.
2. The District Education Officer (Female) Nowshera.

(Respondents)

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACTS, 1974, AGAINST THE ORDER DATED 12.05.2022, WHEREBY THE APPOINTMENT ORDER OF THE APPELLANT WAS WITHDRAWN AND AGAINST NOT DECIDING THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD OF 90 DAYS.

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 12.05.2022 MAY PLEASE BE SET-ASIDE AND THE APPELLANT MAY BE REINSTATED INTO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

RESPECTFULLY SUBMITTED:

FACTS:

1. That the appellant is Resident of Nowshera and the appellant filed application for appointment under fresh quota being highly qualified.

9

Thereafter, the DSC meeting was held on 19/02/2022 and the appellant was recommended as PST. On the basis of recommendation of DSC the appellant was appointed as PST on regular basis vide order dated 09/05/2022. Copy of the application, DSC meeting and appointment order is attached as annexure-A, B, & C.

2. That the appellant submitted joining report and performed her duties assigned to her with zeal and devotion and there was no complaint, what so ever regarding her performance. (Copy of joining report is attached as Annexure-D).
3. That the appellant regularly performed her duties and the clearance certificate was issued in respect of the appellant and salaries of the appellant was release. (Copy of clearance is attached as Annexure-E).
4. That thereafter directly the appointment order of the appellant was withdrawn vide order dated 12.05.2022 without any prior notice which is mandatory in law, against which appellant filed departmental appeal which was not responded within statutory period of 90 days. (Copy of impugned order and departmental appeal is attached as Annexure-F& G)
5. Hence the appellant constrained to file the instant service appeal on the following grounds amongst others.

GROUND:

- A. That the impugned order are against the law, facts, norms of justice, and material on record, therefore not tenable and liable to be set aside.
- B. That the appellant simply filed application for appointment under fresh quota without mentioning any court judgment, so there is no ground for mentioning that *in compliance of the court judgment*. Moreover, the DSC meeting was properly held which was also silent about court judgment and the appellant was recommended as PST. On the basis of recommendation of DSC the appellant was appointed as PST on regular basis vide order dated 09/05/2022. So the words *in incomppliance of court judgment* was typographical mistake. So there is no ground remained to withdrawn the appointment order of the appellant on ground that the verified degree was not produced. So

(B)


whole episode was made on malafide intention. Hence liable to be set-aside.

- C. That neither charge sheet, statement of allegation, show cause notice was served upon the appellant nor inquiry was conducted against the appellant, which was necessary and mandatory in law before taking adverse action which is violation of law, rules and norms of justice.
- D. That the appellant has not been treated under proper law despite he was a civil servant of the province, therefore, the impugned order is liable to be set aside on their score alone.
- E. That the appellant has not been treated according to law and rules and has been deprived from the monthly salaries despite proper performance of duty, thus the action of the respondents is totally illegal and without lawful authority.
- F. That the appellant has been condemned unheard in violation of Article 10-A of the Constitution of Islamic republic of Pakistan and in violation of maxim "Audi Alterum Partum" and has not been treated according to law and rules. That according to reported judgment cited as 2019 CLC 1750 stated that Audi Alterum Partum" shall be read as part and parcel of the every statute. The same principle held in the Superior Court judgments cited as 2016 SCMR 943, 2010 SCMR 1554 and 2020 PLC(cs) 67.
- G. That according to Federal Shariyat court Judgment cited as PLD 1989 FSC 39 the show cause notice is must before taking any adverse action, non-issuance of show cause notice is against the injunction of Islam. Hence the impugned order is liable to be set-aside.
- II. That the show cause is the demand of natural justice and also necessary for fair trial and also necessary in light of injunction of Quran and Sunnah but show cause was not given to the appellant. So, fair trial denied to the appellant which is also violation of Article 10-A of the constitution. Further it is added that according to reported judgment cited as 1997 PLD page 617 stated that every action against natural justice treated to be void and unlawful. Hence impugned order is liable to be set-aside. The natural justice should be considered as part and parcel of every statute according to superior court judgment cited as 2017 PLD 173 and 1990 PLC cs 727.


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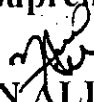
- I. That the appellant have never committed any act or omission with bad or malafide intentions which could be termed as misconduct, albeit the appellant was dismissed from the service. Which is violation of reported judgment cited as 1997 PLC cs 564.
- J. That no proper regular inquiry was conducted to dig out the real facts Rule-10 (b) and Rule 11 (1) of the E&D Rules 2011, which were totally ignored before imposing punishment which is illegal and against the law, rules and natural justice. The same principle held in the Superior Court judgments cited as 2010 SCMR 1554, 2016 SCMR 108, 2009 PLC (cs) 19, 2008 SCMR 1369, 2009 SCMR 412, 2007 PLC cs 247 and 2008 PLC cs 1107.
- K. That the opportunity of personal hearing and personal defense was not provided to the appellant which was violation of Rule 7(d) in case inquiry was not necessary and 14(5) of the E&D rules 2011 in case where inquiry is necessary. The same principle held in the Superior Court judgments cited as 2006 SCMR 1641.
- L. That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore most humbly prayed that the appeal of the appellant may be accepted as prayed for.


APPELLANT
NAZISH

THROUGH:


(MUHAMMAD ASIF YOUSAFZAI)
Advocate Supreme Court


(SYED NOMAN ALI BUKHARI)
Advocate High Court


(UZMA SYED)
Advocate High Court

(S)

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____/2023

Shehnaz

V/S

Edu Deptt:

CERTIFICATE:

It is certified that no other service appeal earlier has been filed between the present parties in their Tribunal, except the present one.


DEPONENT

LIT OF BOOKS:

1. Constitution of the Islamic Republic of Pakistan, 1973.
2. The ESTA CODE.
3. Any other case law as per need.


(SYED NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT

B

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

APPEAL NO. _____ /2023

Shahnaz


V/S

Edu Deptt:

AFFIDAVIT

I, Shahnaz, (Appellant) do hereby affirm that the contents of this service appeal are true and correct, and nothing has been concealed from this honorable Tribunal.

DEPONENT


Shahnaz

(7)

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

SERVICE APPEAL NO. _____/2023

Nazish

V/S

Education Deptt. etc.

**APPLICATION FOR CONDONATION
OF DELAY IN THE INSTANT APPEAL IF ANY.**

RESPECTFULLY SHEWETH:

1. That the instant appeal is pending before this Honourable Tribunal in which no date has been fixed.
2. That the similar appeal is already pending and admit for regular hearing wherein the same order is in question titled as Sumbal Riaz Vs Education, so in the light of the Superior Court Judgment reported as 2018 SCMR380, 2021 SCMR 1313, 2022 PLC cs 94 and 2022 PLC cs 288, Limitation losses force in matter where similar relief granted to similar placed person. So limitation no run in the instant appeal.
3. That the same principal followed in the appeal no: 2013/2017 decided on 06.08.2019 and delay was condoned and the appeal was accepted and the same was also upheld by the Supreme Court of Pakistan.
4. That the august Supreme Court of Pakistan has held that decision on merit should be encouraged rather than knocking-out the litigants on technicalities including limitation. Therefore, appeal needs to be decided on merit (2003, PLD (SC) 724:

⑧

It is therefore most humbly prayed that the instant appeal may be decided on merit by condoning the delay to meet the ends of justice.

APPELLANT

Nazish
Nazish

Through

Muhammad Asif
(MUHAMMAD ASIF YOUSAFZAI)

Advocate Supreme Court

Syed Noman Ali
(SYED NOMAN ALI BUKHARI)

Advocate High Court

Uzma Syed
(UZMA SYED)

Advocate High Court

To

A (9) (9)

The District
Education Officer
Naasheer.

Subject: Application For the Post of PST

Respected Mam,

With due respect it is stated that I
belong to poor family and highly qualified with
C.T. & P.T.C. I heard from some sources that the
some post of PST daily vacant in your
office I am being eligible & highly qualified
may be considered for the post of PST

I shall be very thankful to you.

Your sincerely-

Nazish

01-1-2022

REC'D NAASHEER

1/17

01-01-22



012 B (19)
**OFFICE OF THE
DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA**



☎ 0923-9220105 ☎ 0923-9220105
✉ deofnowshera@yahoo.com

**MINUTES OF THE MEETING OF DEPARTMENTAL SELECTION COMMITTEE HELD
ON 19-02-2022 AT 10:00 AM IN OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA.**

A meeting of the Departmental Selection Committee was held on 19-02-2022 at 10:00 AM under the Chairmanship of District Education Officer (Female) Nowshera to discuss the Appointment cases of Deceased/retired/fresh Candidate to suitable posts i.e. PST, J/Clerk, in the Elementary & Secondary Education Department Female Nowshera. The following attended the meeting:

1. **Mst. Dure Shawar** in Chair
District Education Officer
Female Nowshera
2. **Mst. Faheem Afshan** Member
Principal GGHSS, Dheri Kati Khel
3. **Mst. Sumbal Iftikhar** Member
ADEO (Estab) Secondary
4. **Mst. Shabnum Bibi** Member
ADEO (Estab) Primary
5. **Mr. Shamshad Muhammad** Member
Superintendent Local Office
6. **Mr. Arsalan Ahmiad** Member
J/Clerk Local Office

2. The meeting started with recitation from the Holy Quran. The Chair welcomed the participants and apprises that application received from Children of Deceased/retired on Medical Board Govt. employees of Elementary and Secondary Education Female Nowshera. and fresh candidate working Papers, Provisional selection lists were prepared as per the following selection criteria.

Selection Criteria

1. PST Post = Bachelor degree from recognized University and nine months in service mandatory professional training at RITE or PITE. Age limit; 19 to 35 years
2. J/Clerk = At least SSC or equivalent qualification from a recognized Board and a speed of twenty five words per minute in typing. Age limit; 18 to 30 years.

The following items were considered by the Departmental Selection Committee and the decisions recorded below:

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S#	Name of Candidate	Father/Mother/Spouse Name	Name of Post with Station	Date of Death/Invalidation	Qualification of Candidate	Eligible for Post	Reason of not recommendation	Remarks
1	Javaria Faiz	Faiz Ullah Khan Ex-SPST	GPS Islamabad Nowshera	22/02/2019	FA/BA	PST	ok	Recommended
2	Ramla Munir	Akhtar Munir Ex-SDM	GSHAHS Sardar Garhi Peshawar	31/12/2018	F.Sc/BS Incomplete	PST	FRC from NADRA. Certificate from DEO (M) Peshawar for not availing Quota. Not eligible for PST BS incomplete	Deferred
3	Nayab Azmat	Aurangzeb Ex-PST	GGPS Azakhel	27/09/2020	MA	PST	ok	Recommended
4	Laila Gul	Mian Shaheen Ullah Ex-Naib Qasid	Office of DEO (M) NSR	29/09/2021	F.Sc/B.Sc	PST	ok	Recommended
5	Maria	Anwar Zeb Ex-PST	GGPS No.1 Amankot	29/03/2001	BA	PST	ok	Recommended
6	Gul Rukh	Shagufta Ex-PSHT	GGPS No.2 Chowki Drab NSR	14/09/2021	F.Sc/B.Sc	PST	ok	Recommended
7	Sumbal Riaz	Riaz Ul Haq Ex-PST	GGPS Khan Sher Garhi	06/10/2021	M.Sc	PST	ok	Recommended
8	Navced Ali Durrani	Shakeela Ex-Sweeper	GGMS Pashtoon Garhi NSR	01/11/2021	SSC	J/Clerk	ok	Recommended
9	Muhammad Abbas	Javed Khan Ex-Chowkidar	GGPS Islamabad Koroon NSR	04/08/2021	HSSC/DIT	J/Clerk	ok	Recommended
10	Muhammad Baqir Malik	Samreen Shaheen Ex-PST	GGPS Khal Killi NSR	01/12/2021	SSC/DAE	J/Clerk	ok	Recommended
11	Kamran Khan	Raees Khan Ex-Chowkidar	Office of DEO (Female) NSR	31/12/2021	SSC	J/Clerk	ok	Recommended
12	Bushra Munaf	Abdul Munaf Ex-PSHT	GPS No.1 Akbar Pura	24/04/2021	FA	J/Clerk	ok	Recommended
13	Muhammad Haris Siddiqui	Khurshid Jehan Ex-PST	GGPS Baghban Pura	31/01/2022	HSSC	J/Clerk	ok	Recommended
14	Nazish	Irfan Khan	GGPS Spin Qamar NSR	01/02/2022	BA	PST	ok	Recommended
15	Said Jameel Khan	Munjamil Khan Ex-Junior Clerk	GGHSS Noudeh NSR	01/02/2022	SSC	J/Clerk	ok	Recommended



DISTRICT EDUCATION OFFICER

(FEMALE) NOWSHERA

Phone/Fax No. 0923-9220105

Email: deofnowshera@gmail.com

C (19)

To be Substituted Vide Same Number And Date

Corrigendum

Pursuant to the litigation policy Government of Khyber Pakhtunkhwa 2016 and pending adjudication vide civil suit No. 915-/2022 MST: Nazish W/o Irfan Vs DEO (F) Nowshera. The component authority is pleased to appoint Mst: Nazish W/o Irfan against vacant post at GGPS Speen Qamar as PST BPS-12 (13320-960-42120) plus usual allowance as admissible on regular basis under the existing policy on the following term and condition.

TERMS & CONDITIONS

1. No TA/DA etc. is allowed is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (Female) Nowshera, any one found producing bogus certificate/degree will be reported to law enforcing agencies for further action.
4. The pay of any appointee shall not be drawn/released by the DAO/DDO concerned until a certificate to the effect by DEO (F) Nowshera is issued that her certificates/degrees have been verified.
5. Health and age certificate should be produced from the Medical Superintendent concerned before taking over charge.
6. The appointee should join her post within 30 days of the issuance of this order positively otherwise the appointment shall stand cancelled.
7. She shall be governed by such rules and regulations as may be issued from time to time by the Government.
8. Her services are liable to termination on one month's notice from either side. In case of resignation without notice her one month pay and allowance shall be forfeited to the Government.

(DURE SHAWAR)
DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA

Endst: No. 5255-61 Dated Nowshera the 09/05/2022

Copy of the above is forwarded for information & necessary action to the:-

1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawa.
2. Senior District Accounts Office Nowshera.
3. Sub Divisional Education Officer (Female) Concerned.
4. Medical Superintendent District Head Quarter Hospital Nowshera
5. ADEO (Female) Prg: Establishment Branch Local Officer.
6. Superintendent Establishment Section Local Office.
7. Candidate Concerned.
8. Master File.

DISTRICT EDUCATION OFFICER
(FEMALE) NOWSHERA



13

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D.H.Q. Hospital, Nowshera

Medical Certificate



NIC No: 17201-5079007-6

Name of Official Nazish
 Casto of race Muslim
 Father's Name Awazzeb
 Residence Amn Kot Tehsil Pabbi District
Nowshera
 Date of Birth 15/12/1991
 Exact height by measurement 5.5 inches
 Personal mark of identification Nil
 Signature of Official Nazish
 Signature of head of Officer _____

Head of Office

I do hereby certify that I have examined Mr Nazish a candidate for
 employment in the Office of the District Education Officer (Female)
Nowshera
 and can not discover that he had any disease communicable or other constitutional affection or
 bodily infirmity except Bit

I do so consider this as disqualification for employment in the office of the
as above His age according to his own statement 30 year
 and by appearance about 30 year.

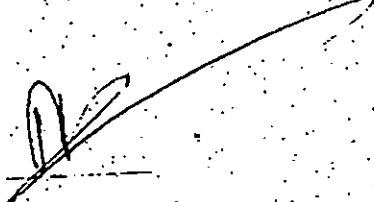
LEFT HAND THUMB AND FINGER IMPRESSIONS

Medical Superintendent.
 D H Q Hospital Nowshera
 10/5/20

D-14


It is certified that we have on the dated charge 9/4/22 after Noon of this day
over and receive charge of this Office of the PSI-12 GGPS, Guh-Sheer D. J.
Vide DE-O (JEM) (F) NOWSHERA APPOINTMENT No: 5235-41 9/4/22

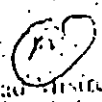
Particulars of cash and important secret and confidential documents handed
the reverse.

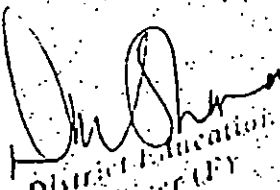
Signature of relieving 

Name of Government servant Nazish

Station: GGPS Spin Qamar Nowshera Designation PSI BPS-12


ASDEO(F) PABBI
CIRCLE JALLOZAI
NOWSHERA.


Headmistress
GGPS Guh-Sheer Nowshera


District Education
Officer (F)
Nowshera

(Better Copy of Page NO 14)

1. Certified that we have on the dated charge 09/04/2022 after noon of this day over and receive charge of this Office of the PSH-12 GGPS Ouch Neher D vide DI-O(FEMALE) Nowshera Appointment End. No. 3255-61.

Particular of each and important secret and confidential documents handed the reverse.

Signature of relieving _____ Sd/--

Name of Government Servant: Nazish

Station: GGPS Spin Qamar Nowshera, Designation PST BPS-12

Head Mistress

GGPS Spin Qamar Nowshera

E. 15

CLEARANCE CERTIFICATE / PAY RELEASE

The following teachers has been appointed against PST position in the District Education Officer (female) Nowshera in the school under the name

Her educational and professional Certificates Degree DMG have been checked from the concerned boards Universities and found correct.

Therefore the undersigned is pleased to issue clearance certificate of the following PST teachers.

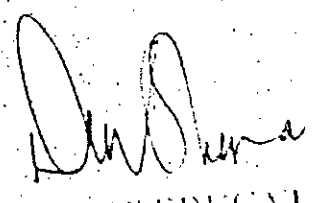
S. No	Name of Teacher & Designation	Father / Husband Name	School Name
1	Mst. Nayab Azmat (PST)	Azmat Ali	GGPS Spira Qanbr
2	Mst. Maria (PST)	Anwar Zeb	GGPS Oach Ncher
3	Mst. Sumbal Riaz (PST)	Riaz Ullah	GPS Wapra Colony
4	Mst. Kainat (PST)	Pervez Khan	GGPS Hasheed Shabana Nowshera
5	Mst. Rukhsar Nazar Ali (PST)	Nazar Ali	GGPS Hasheed Shabana Nowshera
6	Mst. Nazish (PST)	Irfan Khan	GGPS Spira Qanbr

(DURE SHAWAR)
 DISTRICT EDUCATION OFFICER
 (FEMALE) NOWSHERA

No. 5262-68 DEO (F) NSR Estab. Clearance Date 09/05/2022

Copy of the above is forwarded for information & Necessary action.

- Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar
- Senior District Accounts Officer Nowshera
- Senior District Education Officer (female) Nowshera
- Superintendent Local Office
- ADP (F) Primary / Estab. Local Office
- EMIS Local Office
- Head of the Concerned
- Principal


 DISTRICT EDUCATION OFFICER
 (FEMALE) NOWSHERA

(Better Copy of Page NO 15)

(FEMALE) Nowshera

(Office Phone # 0923-9220105, Fax #: 0923-9220105)

CLEARANCE CERTIFICATE / PAY RELEASE

The following teachers has been appointed against PST post under, on regular basis vide District Education Officer (Female) Nowshera in the school mentioned noted against her name.

Her educational and professional certificates / degree / DMCs have been verified from the concerned boards / university and found correct.

Therefore, the undersigned is pleased to issue clearance certificate / pay release of the following PST teachers.

S.No	Name of Teacher & Designation	Father / Husband Name	School Name
1.	Mst. Nayab Azmat (PST)	Azmat Ali	GGPS Spin Qamar
2.	Mst. Maria (PST)	Anwar Zeb	GGPS Ouch Neher
3.	Mst. Sumbal Riaz (PST)	Riaz Ul Haq	GPS Wapda Colony
4.	Mst. Kainat (PST)	Pervez Khan	GGPS Rasheed Abad Shabara Nowshera
5.	Mst. Rukhsar Nazar Ali (PST)	Nazar Ali	GGPS Rasheed Abad Shabara Nowshera
6.	Mst. Nazish (PST)	Irfan Khan	GGPS Spin Qamar

Dur E Shawar
District Education Officer
(Female) Nowshera

Endst: No. 5262-68/DEO(F) NSR Estab: Clearnace File / Dated NSR 09/05/2022

Copy of the above is forwarded for information & Necessary action.

1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Senior District Accounts Officer, Nowshera.
3. Sub Divisional Education Officer (Female) Nowshera.
4. Superintendent Local Office.
5. ADEO (1) Primary Estab Local Office.
6. EMIS Local Office
7. Head Mistress Concerned.
8. Official Concerned.
9. Office Copy

District Education Officer
(Female) Nowshera

**OFFICE OF THE
DISTRICT EDUCATION OFFICER
FEMALE NOWSHERA
Phone/Fax No. 0921-9220105**

OFFICE ORDER

As the following candidates have been appointed as PATENT 12 rule this office Endat. No noted against such notice in the light of canal assignment. But verified with judgment and other relevant documents have not been provided to undersigned by candidates. As well as, all other relevant documents, physical letters, etc. are not provided. The candidates are: **Pat. No. 5289 Dated: 07/04/2022** and **Pat. No. 5290 Dated: 07/04/2022**

Therefore, the undersigned is hereby through this resolution of the office, the above mentioned candidates are hereby

No.	Name of Teacher	Name of School	No. & Date of Appointment	Remarks
01	Ms. Rashid	GOPS Saba Qamar	No. 46177 Dated: 07/04/2022	
02	Ms. Rashid	GOPS Saba Qamar	No. 46177 Dated: 07/04/2022	
03	Ms. Rashid	GOPS Rashid Abed	No. 445774 Dated: 07/04/2022	
04	Ms. Rashid	GOPS Rashid Abed	No. 5180-57 Dated: 07/04/2022	
05	Ms. Rashid	GOPS Saba Qamar	No. 5289 Dated: 07/04/2022	

(DURE BHAWAR)
DISTRICT EDUCATION OFFICER
FEMALE NOWSHERA

Copy of the above is forwarded for information to the:-
 1. Director, F/S Education, Khyber Pakhtunkhwa Peshawar
 2. Deputy Commissioner Nowshera
 3. Senior District Accounts Officer Nowshera to stop the salary
 4. District Monitoring Officer Nowshera
 5. Senior Divisional Education Officer (Female) Pabbi to stop the salaries.
 6. Superintendent/ J/EO/Exp./ Dealing Assistant Local Office
 7. Local Office with the directions to explain your position as to why action will not be taken against you under E&D Rules 2011.

(Better Copy of Page NO 16)

**OFFICE OF THE
DISTRICT EDUCATION OFFICER
(FEMALE) Nowshera
(Office Phone # 0923-9220105)**

OFFICE ORDER:

As the following candidate have been appointed as PST BPS-12 vide the court judgment and other relevant documents have not been provided to the undersigned by candidates as well as legal advisor. Several letters or reminders issued of eh legal advisor to provide the same vide this office memo No: 5239-42 dated 28/04/2022 and reminder memo No: 5310 dated 09/05/2022.

Therefore, the undersigned is pleased to withdraw / cancelled the appointment of the following candidates ab – initio.

S.No	Name of Teacher	Name of School	No. & Date of Appointment	Remarks
1.	Nayab Azmat	GGPS, Spin Qamar	No. 4617-24 dated 09/04/2022	Appointed under Court Judgement.
2.	Maira	GGPS Och Neher	No. 4449-56 dated 07/04/2022	--do--
3.	Sumbal Riaz	GGPS Wapda Colony	No. 4441-45 dated 07/04/2022	--do--
4.	Kainat	GGPS Rashid Abad	No. 4457-64 dated 07/04/2022	--do--
5.	Rukhsar Nazar Ali	GGPS Rashid Abad	No. 5180-87 dated 07/04/2022	--do--
6.	Nazish	GGPS Spin Qamar	No. 5255- dated 09/05/2022	--do--

Dur E Shawar
District Education Officer
(Female) Nowshera

Endst: No. 5521-26, Dated 12/05/2022

Copy of the above is forwarded for information.

1. Director, Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner, Nowshera.
3. Senior District Accounts Officer, Nowshera to stop the salaries.
4. District Monitoring Officer, Nowshera.
5. Sub Divisional Education Officer (Female) Pabbi to stop the salaries.
6. Superintendent / ADEO Estab / Dealing Assistant Local Office.
7. Legal Advisor Local Office with the directions to explain your position as to why action will not be taken against you under E&D Rules – 2011.

District Education Officer
(Female) Nowshera

مالی

گزشتہ سال کی صورتوں اور ایک سالہ سائیکل ایم ایس اسلامیات اور T.C. سندھیا سے
مفت شریف گورنمنٹ سے لیکر رکھنے والی انجمن صحت منڈل فرمیا 20 سالہ عورت ہے۔

سائیکل کے مختلف ضابطہ کارروائی کے مطابق اپنی تعلیمی اور T.C. سندھیا
سینس آرٹس ڈسٹرکٹ ایجوکیشن ٹرینل بوشہرہ سے سولہ 9/5/2022 کو

گورنمنٹ گزٹریز ایجوکیشن (سینس فمر) کمیٹی P.S.T. پھر لے
اور 10/5/2022 تک لکھن سنس بھی حاصل کی۔

اور جاری الزورٹ دیگر ڈیوٹی بھی شروع کی جسکے معاملہ کی بحالہ
ڈکومنٹ جاری سنس بھی کی۔ اور سولہ 31/5/2022 تک ڈیوٹی

بھی ای کام میں جاری ہوئی۔ 2022 سے ترمیموں کے تعطیلات شروع ہوئے۔
اس سائیکل گورنمنٹ ڈیوٹی سے معلوم ہوا ہے کہ سنس کوئی نوٹس یا انکار

کے بغیر کھینچ (Backdate) تاریخ سولہ 12/5/2022 سے جاری تھا وہ

نہد گئے ہماری تعلیمی احکامات کنسل ٹیٹے ہیں جسکی تابیاں ڈاکٹر

ابوبکر ایجوکیشن / 50/2022 / انٹرنل / انارٹس / انٹرنل / انارٹس / انٹرنل

ماہ سولہ / انارٹس / انٹرنل / انارٹس / انٹرنل / انارٹس / انٹرنل

ماہ 15 / انارٹس / انٹرنل / انارٹس / انٹرنل / انارٹس / انٹرنل

سے عوارب / انارٹس / انٹرنل / انارٹس / انٹرنل / انارٹس / انٹرنل

اصناف / انارٹس / انٹرنل / انارٹس / انٹرنل / انارٹس / انٹرنل

17201-5079007-6

ماہ 15 / انارٹس / انٹرنل / انارٹس / انٹرنل / انارٹس / انٹرنل
انارٹس / انٹرنل / انارٹس / انٹرنل / انارٹس / انٹرنل
انارٹس / انٹرنل / انارٹس / انٹرنل / انارٹس / انٹرنل

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گزارش بحضور انور ایہ کہ سائلہ ایم اے اسلامیات اور C.T سند یافتہ اور معزز شریف گھرانے سے تعلق رکھنے والی اچھی صحت مند تقریباً 32 سالہ عورت ہے۔ سائلہ نے حسب ضابطہ کاروائی کے مطابق اپنی تعلیمی اور C.T سندت پیش کر کے ڈسٹرکٹ گرلز پرائمری سکول جاوزئی (سپین قمر) بحیثیت PST بھرتی آرڈر نمبر 61-5255 حاصل کر کے 10/5/2022 میڈیکل فٹنس بھی حاصل کی۔ اور حاضری رپورٹ دے کر ڈیوٹی بھی شروع کی۔ جبکہ سائلہ کی تمام ڈاکومنٹ کی ویری فیکیشن بھی کی۔ اور مورخہ 31/05/2022 تک ڈیوٹی بھی انجام دی۔ جبکہ یکم جون 2022 سے گرمیوں کی تعطیلات شروع ہو گئے۔ اب سائلہ کو باوثوق ذرائع سے معلوم ہوا ہے کہ ہمیں کوئی نوٹس یا انفارم کئے بغیر پچھلے (Back Date) تاریخ مورخہ 12/05/2022 سے ہماری تنخواہ بند کر کے ہماری تعیناتی احکامات کینسل کئے گئے ہیں۔ جس کی کاپیاں ڈائریکٹر ایجوکیشن / DC نوشہرہ / سینئر ڈسٹرکٹ اکاؤنٹس آفیسر نوشہرہ / ڈسٹرکٹ مانیٹرنگ آفس نوشہرہ / سب ڈویژنل ایجوکیشن آفیسر فیمل پی ارسال کئے گئے ہیں۔

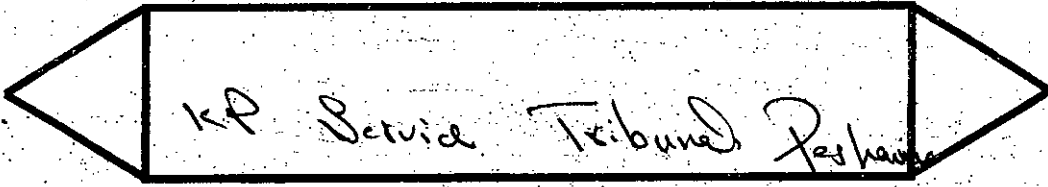
عالیجاہ! آپ جناب سے استدعا ہے کہ اس ظلم ناروا کے بارے میں مجاز اتھارٹی سے جواب طلب کر کے اور سائلہ کی دادرسی کر کے اپنی پوسٹ پر بحال کے احکامات جاری کروائیں۔ سائلہ جناب کی دعا گور ہوں گی۔

17201-5079007-6

العبد: _____

نازش زوجہ عرفان خان، PST گورنمنٹ گرلز پرائمری سکول، سپین قمر
ساکن پی ایم کوٹ، ضلع نوشہرہ۔

بعدالت



2023 منجانب

Shehnaz

مورخہ

بنام

vs

مقدمہ

Edu Deptt

دعویٰ

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ

آن مقام Peshawar کیلئے سید نصیر علی محمد دعا پور کی طرف سے

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز

وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

ذرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی بلا بندی

اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت

مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے جج صاحب

تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکور با اختیارات حاصل ہوں گے

اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے

سب سے وہوگا۔ 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 سندر ہے۔

2023ء

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ماہ

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المرقوم

Shehnaz

العبد گ العبد