


FORM OF ORDER SHEET

Court of _____

Appeal No. 2050/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	12/10/2023	<p>The appeal of Mst. Nusrat Muhammad resubmitted today by Mr. Sardar Muhammad Arif Advocate. It is fixed for preliminary hearing before touring Single Bench at Swat on _____</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

The appeal of Mst. Nusrat Muhammad d/o Muhammad-Naeem at GGMS Malakand Bala Tehsil Balambat Dir Lower received today i.e on 05.10.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal is not signed by the appellant.
- 2- Annexures of the appeal are not in sequence be annexed serial wise as mentioned in the memo of appeal
- 3- Page no. 23 of the appeal is illegible which may be replaced by legible/better one.
- 4- One more copy/set of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3355 /S.T.

Dt. 6/10 /2023.

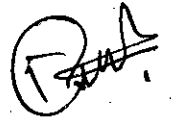


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Sardar Muhammad Arif Adv.
High Court Dir Lower.

8:7

Re submitted.


18-10-23

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL AT PESHAWAR

Service appeal No: 2056/2023

Nusrat MuhammadPetitioner

Versus

DEO Female & others.....Respondents

INDEX OF DOCUMENTS

S.NO	DESCRIPTION OF DOCUMENT	ANNEXURE	PAGE(S)
1	Appeal		1-3
2	Certificate		4
3	Affidavit		5
4	Memo of addresses		6
5	Copy of Domicile & CNIC	"A"	7-8
6	Copy of appointment order	"B"	9-10
7	Copy of transfer order	"B1"	11-12
8	Copy of application, transfer order and charge report	C, D & E	13-15
9	Copy of withdrawal order	"F"	16
10	Copy of appeal, restoration order and withdrawal order	"G, H & I"	17-19
11	Copy of application & letters	"I & J"	20-25
12	Power of attorney		26
13	Wakalatnama		27

(Signature)
Petitioner

(Signature)
Through Counsel,
Sardar Muhammad
Advocate High Court, District Bar
Association Dir lower at Timergara
Cell: 0344-9697644

office address: C/O District Bar Association Timergara Dir lower

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL AT PESHAWAR

Service appeal No:

2050/23

Nusrat Muhammad D/O Muhammad Naccm at
GGMS Malakand Bala Tehsil Balambat Dir lower
.....APPELLANT

Versus

1. District Education Officer (Female) Dir lower at Balambat.
2. Director Elementary & Secondary Education KP at Peshawar
3. Secretary Education KP at Peshawar
4. Zainab bibi GGHS Shatai Tehsil Balambat Dir lower(Respondents)

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT 1974 AGAINST THE ILLEGAL, UNLAWFUL ACTION AND OMISSION WHEREIN THE OFFICIAL RESPONDENT NO.2 HAS WITHDRAW THE OFFICE ORDER BEARING ENDORCEMENT NO 1696-99 DATED: 04-04-2023 IN RESPECT OF POSTING/TRANSFER/ADJUSTMENT OF THE APPELLANT AND APPEAL AGAINST THEREOF BEFORE THE COMPETENT AUTHORITY HAS NOT BEEN DECIDED TILL THE STIPULATED PERIOD.

PRAYER:

ON ACCEPTANCE OF THE APPEAL THE UNLAWFUL AND ILLEGAL WITHDRAWL OFFICE ORDER BEARING ENDORSEMENT NO: 1696-99 DATED: 04-04-2023 BE DECLARED AS NULL AND VOID AB INITIO, WITHOUT ANY EFFECT, THUS BE SET ASIDE, ANY OTHER RELIEF, THOUGH NOT SPECIFICALLY PRAYED FOR, BE GRATIOUSLY GRANTED IN FAVOUR OF THE APPELLANT.

Respectfully sheweth:- The minutiae facts are as following.

1. That the appellant is a permanent & bonafide resident of village, Shatai Tehsil Balambat. (Copy of Domicile & CNIC are attached and marked as Annexure A).
2. That the appellant was appointed as Arabic teacher (AT) in Education department vide office order No: 1005-8 dated: 14-03-2015 at GGHS Dag Gosam

(Copy of appointment order is annexed as Annexure B).

3. That in the year 2019 the appellant applied for transfer cum adjustment from the above station to the GGHS Shatai via E-transfer policy which was accepted/honored however due to the non availability of vacant seat rather the position code from BPS-15 to BPS-16 was altered by high handed and political influential people; the appellant couldn't adjust.
4. That the appellant was again applied for her transfer through E-transfer policy in the year 2021, wherein she was transferred to GGHS Malakand and thus still serving there.
5. That the appellant was transferred from GGHS Dag Gosam to GGHS Malakand Payeen vide order 5982-6033 dated: 09-04-2020. (Copy of transfer order is attached as Annexure B1).
6. That the appellant filed an application for her transfer from GGHS Malakand to GGHS Shatai which was turned down by the respondent No.1 however an appeal was filed by the appellant to the respondent No.2 which was accepted and thus the appellant took her charge at GGHS Shatai Tehsil Balambat Dir lower. (Copy of appeal, transfer order and charge report are annexed as Annexure C, D & E).
7. That the respondent No.2, the reason they knows better withdraw the aforesaid order on dated: 04-05-2023. (Copy of withdrawal order is annexed as Annexure F).
8. That the (appellant and respondent No.4 jointly) once again approached to the respondent No.2, however refused and advised to file an appeal to the worthy secretary Education Khyber Pakhtunkhwa whereof, the office concerned sent the matter back to the respondent No.2 vide letter No.SO(P/F)/F&SED/2-1/transfer/Zainab bibi/2023 dated: 07-06-2023. (Copy of appeal and letter above said are annexed as Annexure G & H).
9. That the appellant filed an application to the Deputy Commissioner to provide the office file/record of the transfer of the appellant along with the respondent No.4 Zainab Bibi which was interested to the respondent No.1 for necessary action however the official concerned as many as provided only two copies of the office order No.427 dated: 18-04-2023 & office order No.7486/F.NO/331/volume I/F/appeal/Dir lower dated: 17-07-2023. (Copy of application & letters are annexed as Annexure I & J).
10. Being aggrieved from the unlawful/illegal and mala fide acts/omission rather political motivated withdrawal office order and not deciding the appeal of the appellant in the stipulated period, the appellant thus files the instant appeal, on the ground below amongst the other inter alia

GROUNDS:-

- i. That the act of respondents as repeatedly refused and avoided the grievances of the appellant mentioned in her application but the respondents just deprived her from legal rights hence such act is illegal, unlawful against the spirit of the law, hence liable to be struck down.
- ii. That transfer/adjustment of respondent No.4 has not a matter of public interest furthermore.
- iii. That the transfer of respondent No.4 was politically motivated and on the recommendation of cabinet member of the time so such act is void and unlawful being violative of the relevant provision of law.
- iv. That transfer/adjustment of respondent No.4 clearly reflects mala fide on part of respondent No.2 in favour of the respondent No.4 just to provide benefit the private respondent and violated the transfer policy so, on this ground too the transfer of respondent No.4 be declare against the mandate of law and policy.
- v. That the appellant has also submitted so many application but no response was paid so, such act of the respondents No.1 to 3, is highly discriminatory lack backing of law and not maintainable.
- vi. That other ground will be agitated at the time of hearing with the permission of this honorable court.

IT IS HUMBL Y PRAYED THAT ON ACCEPTANCE OF THE INSTANT APPEL, THE UNLAWFUL AND ILLEGAL WITHDRAWL OFFICE ORDER BEARING ENDORSEMENT NO: 1696-99 DATED: 04-04-2023 BE DECLARED AS NULL AND VOID AB INITIO, WITHOUT ANY EFFECT, THUS BE SET ASIDE, ANY OTHER RELIEF, THOUGH NOT SPECIFICALLY PRAYED FOR, BE GRATIOUSLY GRANTED IN FAVOUR OF THE APPELLANT.

Amid Islam
 APPELLANT

Through Counsel
 Sardar Muhammad Arif
 Advocate High Court, District Bar
 Association Dir lower at Timergara
 Cell: 0344-9697644

Address: District Bar Association Dir lower at Timergara Balambat

List of Books: -

- 1. Constitution of Islamic Republic Of Pakistan.
- 2. Services laws
- 3. Any other case law relevant to the facts of the case.

Amid Islam
 APPELLANT

Through Counsel
 Sardar Muhammad Arif
 Advocate High Court, District Bar
 Association Dir lower at Timergara

(4)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL AT PESHAWAR

Service appeal No: _____

Nusrat MuhammadPetitioner

Versus

DFO Female & others.....Respondents

CERTIFICATE

This is to certify that as per information furnished by my client the contents of this service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed and no other such like petition has earlier been filed before this august Court.

Dated: 02-10-2023

Nusrat Muhammad
Petitioner

Sardar Muhammad Arif
Through Counsel,
Sardar Muhammad Arif
Advocate High Court, District Bar
Association Dir lower at Timergara
Cell: 0344-9697644

Address: District Bar Association Dir lower at Timergara Balanbut

(5)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL AT PESHAWAR

Service appeal No: _____

Nusrat MuhammadPetitioner

Versus

DEO Female & others.....Respondents

AFFIDAVIT

I, Nusrat Muhammad S/O Muhammad Naeem at
GGMS Malukand Bala Tehsil Balambat Dir lower, do
hereby solemnly affirm and declare on oath that the contents of the
accompanying service appeal are true and correct to the best of my
knowledge and belief and that nothing has been concealed from this
Honorable Court.

Amjad Islam
Deponent,

CNIC: 15302-8615446

Cell# 0326-1690779

Dated:

(6)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL AT PESHAWAR

Service appeal No: _____

Nusrat MuhammadPetitioner

Versus

DEO Female & others.....Respondents

MEMO OF ADDRESSES

Address of Petitioner:

Nusrat Muhammad S/O Muhammad Naccm at
GGMS Malakand Bala Tehsil Balambat Dir lower.
CNIC:
Cell No:

Addresses of Respondents:

1. District Education Officer (Female) Dir lower at Balambat.
2. Director Elementary & Secondary Education KP at Peshawar.
3. Secondary Education KP at Peshawar.
4. Zainab bibi GGHS Shatai Tehsil Balambat Dir lower

Petitioner

Through Counsel
Sardar Muhammad Arif
Advocate High Court District Bar
Association Dir lower at Timergara
Cell: 0344-9697644

Address: District Bar Association Dir lower at Timergara Balambat



DOMICILE CERTIFICATE

KHYBER PAKHTUNKHWA

DISTRICT DIR LOWER

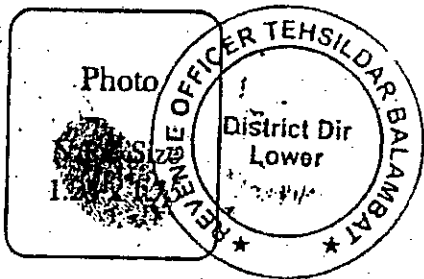
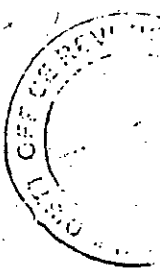
Declaration

No. 447 Date 28/1/2012

I NUSRAT Muhammad declare that I was born of parents who are permanently Domiciled in Khyber Pakhtunkhwa by birth, having settled in it. I belong to village/Mohallah Shatei Matla Tehsil Balambat District Dir Lower having been born in it.

Nusrat
Signature of applicant

Pursuance to the declaration filed above by NUSRAT Muhammad Son/Daughter/Wife of Muhammad NAEM Khan it is hereby certified that the said Mr/Mrs/Miss NUSRAT Muhammad is born of parents who are permanent residents of Khyber Pakhtunkhwa District Dir Lower belonging to it birth /settled in it. I have satisfied myself from ~~my personal knowledge~~/verification overleaf that the above declaration is true this 19th day of Jan 2012



Seal

[Signature]
Deputy District Officer
Revenue & Estates

Countersigned

[Signature]
Deputy District Officer
Revenue & Estates
District Dir Lower

تصدیق تصدیق کی جاتی ہے۔ کہ سہی اسماءہ لہور سے نکلا۔ ولدہ بنت ازوج محمد نسیم خان

کونسلٹنگ پرائیویٹ سکول جسٹس مشعلیہ میں زیر تعلیم رہ چکا ہے۔ جگا جسکی داخلہ نمبر 112

اور تاریخ پیدائش ہے 05-05-1991

دستخط پرنسپل ایڈماتر

(1) یہ کہ سہی اسماءہ لہور سے محمد ولدہ بنت ازوج محمد نسیم خان

ساکن جسٹس مشعلیہ قوم رہتا ہے۔ ذیلی شاخ پرائیویٹ سکول جسکی اصل پیدائش ہے۔

جو کہ میرے حلقہ نیابت میں واقع ہے۔

(2) یہ کہ سہی اسماءہ مذکورہ نے قبل ازین کوئی ڈومیسائل سرٹیفکیٹ حاصل نہیں کیا۔

(3) یہ کہ فارم لڈا پر چپاں تصویر درخواست کنندہ کی ہے جو کہ میری تصدیق کردہ ہے۔

(4) یہ کہ سہی اسماءہ ڈومیسائل سرٹیفکیٹ کا حقدار ہے جس کو میری ذاتی ذمہ داری پر ڈومیسائل سرٹیفکیٹ دیا جائے۔

تصدیق کنندہ نمبر: 1- نام ڈاکٹر حفیظ علی ولدیت محمد رفیع علی سکونت اولیہ سرائے

شناختی کارڈ نمبر: 6- (1944951-15301) دستخط

DR. HAZRAT ALI
M.B.B.S Medical Officer
Sharif Khan
M.Sc. M.Ed. S.E.T (S) SPS
G.H.S Malakand Div (L)

تصدیق کنندہ نمبر: 2- نام شریف خان ولدیت حفیظ خان

شناختی کارڈ نمبر: 7- (0977542-15302) دستخط



دستخط
نام
عہدہ

تصدیق متعلقہ تحصیلدار

نمبر 55 تاریخ 19-01-2012

نوٹ: 1- ڈومیسائل فارم پر تصویر کو بند سے چپاں کیجئے۔

2- فارم میں انگریزی معنی کے کوائف انگریزی میں ٹائپ کئے جائیں۔

3- فولڈ شدہ اور پٹے ہوئے فارم قابل قبول نہیں ہوئے۔

4- مذکورہ فارم جو کہ تمام تحصیل دفاتر میں دستیاب ہیں کے علاوہ کوئی اور یا فونٹی کا پی فارم قابل قبول نہیں ہوگا۔ [دفتر تحصیلدار]

Rs: 5.00

(8)



PAKISTAN National Identity Card

Name: Nusrat M Khanum

Husband Name: Amjad Khan

Gender: F

Identity Number: 15302-3871410-H

Date of Issue: 13.03.2032

Date of Birth: 05.05.1961

Date of Expiry: 13.03.2032



Holder's Signature

CPC
[Signature]
[Signature]

15302-3871410-H

10108124346

Minister General of Pakistan

گشده کارڈ ملنے پر قریبی ایئر بکس میں ڈال دیں

18

15302-3071416

10103124346

Registrar General of Pakistan

گشده کارڈ ملنے پر قریبی لینڈ بکس میں ڈال دیں

(9) B

District Education Officer (F) Dir Lower



PH No. 0945-9250083,

E-mail emisdeoofdirlower@yahoo.com

(F) 1-1

OFFICE ORDER:

Consequent upon the recommendation / approval of the District Selection Committee Dir Lower in its meeting held on 14/03/2015, the following AT (Female) (School based) are hereby appointed in BPS-15 (Rs.8500-700-29500) @ Rs. 8500/- fixed plus usual allowances as admissible to them under the rules on adhoc and contract basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below:

Sl#	RollNo	Name	Father's Name	Name of School	Score
1	771300020	ABGINA.BIBI	ABDUL SHAKOOR	GGHS Osakai	113.27
2	891300115	RABIA BIBI	NAQEEB AHMAD	GGMS Beroo	104.29
3	891300136	HURMAT UN NISA	HABIB AHMAD	GGHS Zimdara	102.78
4	891300104	FAZEELAT BIBI	MUHAMMAD WALI	GGMS MusaAbad	102.69
5	891300049	SUNBAL SAMI	SAMI UR REHMAN	GGMS Darmal Payeen	101.62
6	891300149	ASMA GUL	KACHKOL KHAN	GGMS Daroo	100.56
7	891300046	LUBNA BEGUM	ANWAR ZADA	GGMS Babagam	98.99
8	891300161	SHAHEEN HABIB	HABIB ULLAH	GGMS Mator	97.92
9	891300170	RABIA SHAMS	SHAMSUL ISLAM	GGMS Dehrai	95.46
10	891300069	SAIMA SALMA	QAZI FAZL ULLAH	GGHSS Mayar	94.16
11	891300092	NUSRAT MUHAMMAD	MOHAMMAD NAEEM KHAN	GGHS Dag Gosarn	93.16
12	891300112	ZABUN NASHA BAGUM	BADSHAH JEHAN	GGHS Beshigram	91.98
13	891300203	ABIDA BEGUM	MOHAMMAD KHAN	GGMS Sangwalai	91.89
14	771300043	WAKALAT BIBI	MUHAMMAD YOUSAF BACHA	GGMS Gadder	91.87
15	891300176	ZAINAB ZADA	SAHIB ZADA	GGMS Darmal Bafa	91.6
16	891300007	BIBI NAZIA	INAYAT ULLAH	GGMS Markhani	91.34
17	891300100	SAMIHA NAZ	MOHAMMAD MEHTAR KHAN	GGMS Banda Talash	90.66
18	891300080	MEHREEN BEGUM	SABER SAID PACHA	GGMS NariTangai	76.08

TERMS AND CONDITIONS:

1. This order will commence from 16/03/2015 and shall continue till 15/03/2016 and will, however, not construe in any form, either express or implied, any assurance for future employment with the Elementary and Secondary Education Department.
2. They will be entitled to emoluments of Rs. Rs. 8500/- per month fixed plus usual allowances as admissible under the rules on adhoc and contract basis for one year and will be eligible for tax deduction (if any) as per prevailing government rules.
3. Their Pay will not be drawn until and unless a certificate to the effect by DDO (concerned) is issued that their certificates are verified.
4. They will produce Health and Age Certificate from the Medical Superintendent concerned before taking over charge.
5. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
6. Their services shall be terminated at any time, in case their performance is found unsatisfactory.

Government of Punjab
Near National Bank Colony,
Batala
Ph: 0193-222994, 0193-222997

C-T-c
2/3/2015

(10)

during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.

7. Their appointments have been made on School based, they will have to serve at the place of posting, and their service is not transferable to any other station.
8. The appointment of the candidates mentioned above is subject to the condition that they are domiciled in District Dir Lower.
9. NO TA/DA will be paid to them on joining the post.
10. Their age may not exceed 35 years or below 18 years.
11. Charge reports should be submitted to all concerned.
12. Drawing & Disbursing Officers concerned are directed to collect photo copies of their testimonials along with verification fees and submit the same to the office of the undersigned for further verification from the institutions concerned.
13. This order is issued, errors and omissions accepted, as a notice only.
14. 100 % candidates have been initially recruited from amongst those candidates who have qualified NTS test for the purpose purely on merit.

C.T.C
[Handwritten signature]

(Zaibun Nisa)
District Education Officer (F)
District Dir Lower

Endst. No. 1005-8

Dated Timergara the 14/03/2015.

Copy of the above is forwarded to:

1. The Director (E&SE) Khuber Pakhtun Khwa Peshawar.
2. The District Accounts Officer Dir Lower.
3. The Principals / Headmastrèss of the institute concernd.
4. The Officials concernd.

Director (E&SE) Khuber Pakhtun Khwa Peshawar
Near National Bank Colony,
Balambat Chowk, Timergara,
Ph: 0945-022994, Mob: 9996-9306707

[Handwritten signature]
District Education Officer (F)
District Dir Lower



(11) B2

OFFICE OF THE DISTRICT EDUCATION OFFICER (Female) DIR PAYAN

eTransfer ID: 09042020123940

OFFICE ORDER

Consequent upon the approval of the competent authority the following teachers are hereby transferred/adjusted against the vacant Posts mentioned against their names in the interest of public service with immediate effect.

S.No	Name	Designation	From	Transferred To
1	ASMA GUL	A.T.	GGMS DAROD MAIDAN	GGMS MAYAR KHADAGZAI
2	NUSRAT MUHAMMAD	A.T.	GGHS DAG GOSAM	GGHS MALAKAND (P)
3	SABIHA BIBI	A.T.	GGMS DALGRAM	GGHS BIYARAI
4	NAJMUUNESA	A.T.	GGMS KANDO MACHLA	GGHS NARI TANGI
5	NAIJA BIBI	CT	GGMS BAMBOLAI	GGMS ADAM DHIRAI
6	JAMORIA BEGUM	CT	GGHS BIYARAI	GGHS MORANAI
7	NAYAB SHUAIB	CT	GGMS SHALPALAM	GGHS KHALL COLONY
8	UZLEEFAT	CT	GGMS MATOOR	GGMS TEKNI PAYEEN
9	PARVEEN BEGUM	CT	GGMS DARMAL BALA	GGHS JANOO
10	NABILA	CT	GGMS SAFARY MAIDAN	GGHS KOHERAY
11	SIDRA	CT	GGMS TEKNI BALA	GGHS DARA RAMORA
12	SANA GUL	CT	GGHS NARI TANGI	GGMS ASSIGI
13	KALSOOM	CT	GGMS GUMBAT BANDA	GGMS MARKHANAI
14	SHAJINEELA	CT	GGMS TERONA KHADAGZAI	GGHSS KHADAGZAI
15	UZMA LASANI	CT	GGHS KHAN ABAD (DUKRAI)	GGHS BAGHI KANDAI
16	SAINA HUSSAIN	D.M.	GGHS INZARO	GGHSS KHADAGZAI
17	MUFIDA	P.E.T.	GGHS BAGHI KANDAI	GGMS MAYAR KHADAGZAI
18	SALMA ALI	P.E.T.	GGMS DARMAL BALA	GGHS SHATAI
19	SABINA BIBI	P.E.T.	GGMS DARMAL PAYEEN	GGHS KOHERAY
20	KASHRA BEGUM	P.E.T.	GGMS SANGOLAI PAYEEN	GGHS TAWDA CHINA
21	GULFAM	P.E.T.	GGMS SAFARY MAIDAN	GGHS TIMERGARA
22	FUZIA TABASSUM	PSHT	GGPS MANDEZO	GGPS GOSAM GHANAM SHAH
23	ZAMAROOD BEGUM	PSHT	GGPS PASHATAI	GGPS MUNDA NO 1



Scanned with CamScanner

Attest

*Assist: Distt: Edu: officer
(M) Distt: Dir Lower*

C.T.C
[Signature]

(12)

1	MUSHAQAT BEGUM ✓	PST	GGPS BANDAGAI MUNJAI	GGPS JAHAGAI BALAMBAT ✓
2	NAEEMA BIBI	PST	GGPS RAIDGAI	GGPS GALL GOOL
26	SHADNAM BEGUM	PST	GGPS SHADAS	GGPS GALL GOOL
27	NAHEEDA	PST	GGPS CHEKHO	GGPS MATTA ASLAM ABAD
28	ULFAT JABEEN	PST	GGPS SHEKHAN MAYAR	GGPS DANDO SIAH
29	HUMIRA NAZ	PST	GGPS MANZ BANDA	GGPS MIRZA ABAD
30	HANIFA BIBI	PST	GGPS NAGRI BALA	GGPS NASIFA TALASH
31	SHARAFAT SULTAN	PST	GGPS SAFROONA	GGPS OUCH BANR
32	NAILA BIBI	PST	GGPS ASIGI NO.2	GGPS RABAT NO.2
33	SHABNAM	PST	GGPS OSAKAI	GGPS SARAI BALA
34	HALEEMA GUL	PST	GGPS HARAM KAY	GGPS SIERA MRD ✓
35	FARYAL JABEEN	PST	GGPS BOCHAKAY	GGPS TALAI SIA
36	ULFAT HINA	PST	GGPS GERO TANGAI	GGPS ZIRAT TALASH
37	SEEMA GUL	PST	GGPS SHAL KANDAL	GGPS KHADI KHELA
38	SAPNA SETARA	PST	GGPS LALO	GGPS LACHA MAIDAN
39	NIZAKAT BEGAM	PST	GGPS GORO TALASH	GGPS GUMBAT TALASH
40	MEHNAZ AZAM	Senior C.T.	GGHS OSAKAI	GGHSS OUCH
41	NAEEN UN-NISA	SST (General)	GGHS NAMAZ KOT	GGHSS OUCH
42	WALAYAT	SST (General)	GGHS INZARO	GGHS KHADAGZAI BALA
43	MARYAM BIBI	SST (General)	GGMS MASKINI	GGMS KHAIJI
44	MARIA NABI	SST (IT)	GGHSS MUNJAI	GGHS THRAI
45	ABIDA FARVEEN	T.T.	GGHS MORANAI	GGHS MALAKAND (P)

C.T.G
[Signature]
[Signature]

[Signature]
 District Education Officer (F),
 DIR PAYAN

Endst. No: 5982-6033

Dated: 23/04/2020

- Copy of the above is forwarded to:
1. District Accounts Officer Concerned
 2. Principal/Head Master/Mistress Concerned
 3. Official Concerned
 4. B & AO local office
 5. Cashier/Accountant Local Office
 6. Master File

Attended
[Signature]
 Assis. Distt. Educ. officer
 (E) Distt. Dir Lower

[Signature]
 Deputy District Education Officer (F)

(13)

Muhammad C

To,

The District Education officer (F)
District Dir (L).

17/10/2011

Subject: Application for transfer from GGMS Malakand Bala to GGHSS Shatal.

Respected Madam,

With great veneration it is stated that I am serving as AT (BPS-15) at GGMS Malakand Bala which is far away from my home. As AT (BPS-15) post laying vacant at arm's length in GGHSS Shatal. So I offer my services to be transferred to GGHSS Shatal Dir Lower.

Therefore, you are requested to kindly issue my transfer order from GGMS Malakand Bala to GGHSS Shatal at AT (BPS -15) vacant post.

I shall be highly grateful to you for this act of kindness.

C.T.C
[Signature]

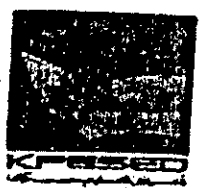
shahzida
HEAD MISTRESS
GGMS
Malakand Bala

Yours Obedient,
Nusrat Muhammad
AT (BPS-15)
GGMS Malakand Bala

(14)



OFFICE OF THE
DISTRICT EDUCATION OFFICER (F)
DIR. LOWER AT TIMERGARA



0945-9250083 DEO FEMALE DIR LOWER M emustredemaledir.lower@gmail.com
NEAR POLICE LINE, EDUCATION COMPLEX BALAMBAT TEHSIL TIMERGARA DISTRICT DIR LOWER.

OFFICE ORDER

The transfer of the following mistress is hereby ordered at the school noted
each in the interest of public service.

No	Name Of Teacher with Designation	From	To	Remarks
1	Nusrat Muhammad AT B-15 ✓	GGMS Malakand (B)	GGHSS Shatai ✓	A.V.P
	Zalnab Bibi AT B-15	GGMS Ghwargai	GGMS Malakand (B)	A.V.P

- 1.No TA/DA is allowed.
- 2.Charge Report should be submitted to all concerned.
3. She is directed to take over charge at the present schools as and when the post vacated by Seema Gul (AT) GGHSS Shatai in case of Appointment as Lecturer.

C.T. 6
[Handwritten signature]

(SHAIHEEN BEGUM)
DISTRICT EDUCATION OFFICER,
(F) DIR LOWER AT TIMERGARA

Endst: No; 1696-99

Dated Timergara the 04/04/2023.

- Copy of the above is forwarded to;
- 1.The District Account Officer Dir Lower.
 - 2.The Principal/Head Mistress concerned.
 - 3.The Teacher concerned.
 - 4.Office Record.

[Handwritten signature]
DISTRICT EDUCATION OFFICER
(F) DIR LOWER AT TIMERGARA



(15)

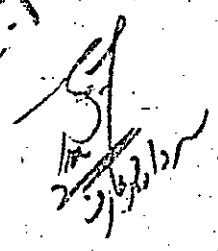
OFFICE OF THE PRICIPAL GGHSS SHATAI DIR LOWER.

CHARGE REPORT

In compliance with the Office notification issued vide District Education Officer Female Dir Lower under Endst: No.1696-99 dated 05.04.2023.

I Mst; NUSRAT MUHAMMAD AT B-15 took over my duties charge at GGHSS SHATAI Dir (L) Today on 03/05/2023(FN).


Signature

C.T.C


Mst; Nusrat Muhammad

No: 394-96 dated 03-05-2023

Copy of the above is forwarded to the;

1. District Education Office (F) Dir(L).
2. DISTRICT ACCOUNT OFFICE Dir Lower.
3. Official concerned.


PRINCIPAL
GGHSS SHATAI DIR(L)
Principal
GGHSS Shatai
Dist: Dir(L)

116



OFFICE OF THE
DISTRICT EDUCATION OFFICER (F)
DIR LOWER AT TIMERGARA



0945-9250083 DEO FEMALE DIR LOWER M mesahubemaledirlower@gmail.com
NEAR POLICE LINE, EDUCATION COMPLEX BALAMBAT TENHIL TIMERGARA DISTRICT DIR LOWER.

OFFICE ORDER.

Transfer order issued under Endst: No. 1696-99 dated 04/04/2023, is hereby with drawn in the interest of public service.

- Note:
- 1.No TA/DA is allowed.
 - 2.Charge Report should be submitted to all concerned.

(MEHRUN NISA)
DISTRICT EDUCATION OFFICER
(F) DIR LOWER AT TIMERGARA

Endst: No; 2177-81

Dated Timergara the. 04/11/2023.

Copy of the above is forwarded to;

- 1. The District Accounts Officer Dir Lower.
- 2. The Principal /Head Mistress Concerned.
- 3. The District Monitoring EMA Officer Dir Lower.
- 4. The Teacher concerned.
- 5. Office Record.

C.T.C
[Handwritten signature]
2/11/2023

[Handwritten signature]
M

DISTRICT EDUCATION OFFICER
(F) DIR LOWER AT TIMERGARA

(17)

محترم جناب ڈائریکٹر ایگزیکیوٹو اینڈ سیکنڈری ایجوکیشن غیر چھوٹا
عنوان! اپیل نام ڈائریکٹر ایجوکیشن غیر چھوٹا مابت دارسی انعام آرڈر
۹۹-۱۶۹۶ مورخہ ۰۴/۰۳/۲۰۲۳

جناب عالی!

موردانہ گزارش ہے کہ فدوی لہرت محمد ولد محمد نجم خان

سے ۲۱-۷۱ پر لہجیات ہے اور جب سے لہرتی ہوئی ہے تو اپنی قریبی سہیلیشن
سے دور دراز علاقوں میں لہجیات رہی ہے۔

یہ کہ ان آٹھ سالوں کے دوران پہلی بھی فدوی کانسٹریبل غیر چھوٹا
سے کینسل کیا گیا ہے اور ان کی بار سیاسی محلہ کے بنیاد پر ڈی ای او دیر
کی طرف سے کانسٹریبل کیا گیا ہے قبیلہ فدوی موجودہ سکول میں مورخہ ۰۳/۰۳/۲۰۲۳
کو دوسری استانی سے پہلے چارج بھی لے چکی ہے۔

یہ کہ صرف دو مہینوں کے اندر آرڈر نمبر ۹۹-۱۶۹۶ مورخہ ۰۴/۰۳/۲۰۲۳
کو غیر چھوٹا طریقے سے کینسل کیا گیا۔

یہ کہ فدوی زینب بی بی جسکی مندرجہ بالا آرڈر کے ذریعے MS ملاکنڈ مارا بنا
ہو چکا ہے لیکن اسی سیاسی اثر و رسوخ کی وجہ سے غیر چھوٹا طریقے سے یہ کانسٹریبل کیا
چکا ہے۔

اسی لئے لہرت محمد اپیل اب سے درخواست کی جاتی ہے کہ لہرت محمد اور زینب بی بی کی اس آرڈر
۹۹-۱۶۹۶ مورخہ ۰۴/۰۳/۲۰۲۳ کو موجود سہیلیشن پر لہرتی کی جائے تاکہ اس آرڈر میں موجود استانیوں کو انصاف

دینے سکے کہ ہم تاقیبات دعا گو رہینگے۔
فقط

سر داد محمد

✓ لہرت محمد ۲۱-۷۱
MS ملاکنڈ شاہ ڈاؤن دیر پابلیک
زینب بی بی ۲۱-۷۱
MS ملاکنڈ بازار دیر پابلیک

تاریخ ۱۲/۰۳/۲۰۲۳

(18)



TO BE SUBSTITUTED WITH SAME NO & DATE
DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

OFFICE ORDER

The posting/transfer order issued by DEO(F) Dir Lower vide Endst NO:1696-99 dated 4.4.2023 is hereby restored with immediate effect in the interest of public service.

Note:

1. The DEO Female Dir Lower has issued transfer order vide Notification No 2182-86 dated 4.5.2023 is hereby withdrawn.

Director
Elementary & Secondary
Education Khyber Pakhtunkhwa

Endst: No.5133-35/A-17/appeal Dir Upper /F/G, Peshawar the 16.5.2023

Copy for information to the:-

1. District Education Officer (Female) Dir Lower for further necessary action.
2. District Accounts Officer Dir Lower.
3. Teacher concerned.
4. PA to Director (E&SE) Khyber Pakhtunkhwa.
5. M/File.

Assistant Director (Female)
Elementary & Secondary Education
Khyber Pakhtunkhwa,

19/5/2023

(19)



**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR**

OFFICE ORDER

Consequent upon approval of the competent authority, this office order regarding endst. NO:5133-35/A-17/appeal Dir Lower dated 16.5.2023 is hereby withdrawn with immediate effect in the interest of public service.

**Director
Elementary & Secondary
Education Khyber Pakhtunkhwa**

7149-52

Endst: No. _____ /F.No.26-1/F/G.Transfer dated Peshawar the 25/5/2023

Copy for information to the:-

1. District Education Officer (Female) Dir Lower
2. District Account Officer Dir Lower.
3. Teacher concerned.
4. PA to Director (E&SE) Khyber Pakhtunkhwa.
5. M/File.

[Handwritten signature]

[Handwritten signature]
25/5/23
**Assistant Director (Female)
Elementary & Secondary Education
Khyber Pakhtunkhwa,**

To

(20)

Secretary
E/S Secondary Education
Khyber Pakhtunkhwa
Peshawar.

Subject: Restoration of transfer order
issued by DEO (Female) Dir Lower
Ends No 1696-99 dated 04/04/2023

Respected Sir,

It is stated that DEO Female Dir Lower
issued our transfer order end: 1696-99 (4-04-2023)
The said order was withdrawn DEO(F) through
endst 2177-21 dated 04/05/2023. Upon our appeal
to Director E/S KPK, the said order was

ASE restored by Director/Assistant Director (Female)
through endst 5133 35/A. But once again our
transfer order was cancelled, which has
put us in mental stress

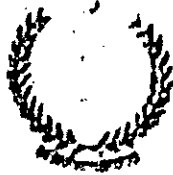
2/6

It is requested that transfer order
ends: 1696-99 (04/04/2023) may kindly be
restored so that we may take some
relief. Thank you

Your truly
Zunab Bibi
AT G.G.M.S Malakand
Nusrat Muhammad
AT G.G.H.S.S Shetari

So (P/F)
Received as
Director's order
2367
dated 1.8.23
2/6

SECRETARY DIR.



(21)

**GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT
CIVIL SECRETARITE, PESHAWAR
(PHONE NO. 091-9223587)**

No. RC (P/P/E.&SE)/2-1/Transfer/Zainab Bibi/2023
Dated Peshawar the, 7th June, 2023

To,

The Director,
E&SE, Khyber Pakhtunkhwa,
Peshawar.

[Handwritten signature]
8/6

[Handwritten initials]
C.T.C.
2/6/23

Subject: - RESTORATION OF TRANSFER ORDER ISSUED BY DEO (FEMALE) DIR LOWER ENDST NO. 1696-99 DATED 04.04.2023.

I am directed to refer to the subject noted above and to enclose herewith a copy of appeal alongwith its enclosures submitted by Zainab Bibi AT CGMS Malakand and others for necessary action, please.

Encl. As above.

[Handwritten initials]

[Handwritten signature]
SECTION OFFICER (PRIMARY/F)

Copy forwarded to:-

- 1. PS to Secretary, E&SE Department Khyber Pakhtunkhwa.

[Handwritten initials]

[Handwritten signature]
SECTION OFFICER (PRIMARY/F)

(22)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

Kiazul

No. 7486 /F.No 331/Vol-1/F/appeal/Dir Lower

Dated Peshawar the 17/07/2023

To

The District Education Officer,
(Female) Dir Lower

27/7/23

Subject:

RESTORATION OF TRANSFER ORDER ISSUED BY DEO FEMALE
DIR LOWER ENST NO. 1696-99 DATED 4.4.2023.

Meme:

I am directed to refer to the subject cited above and to enclose herewith a copy of application alongwith its enclosures in r/o Mst. Zainab Bibi, AT GGMS Malakand, received from Section Officer (PE) Govt of Khyber Pakhtunkhwa E&SE Department vide letter No. SO(PE)E&SE-D/2-1/Zainab Bibi/2023 dated 7.6.2023 and to ask you to resolve the issue as per rules/policy.

[Signature]

Assistant Director (Female)
E&SE Khyber Pakhtunkhwa,
13/7/23

Enst No.

Copy of the above is forwarded to the:

1. Section Officer (Primary/F) Govt of Khyber Pakhtunkhwa E&SE Department w/r to his letter No. & dated cited above
2. PA to Director E&SE KPK-Peshawar.

[Signature]
Assistant Director (Female)
E&SE Khyber Pakhtunkhwa.

Dy No 1448
27/7/2023

(23)



DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

NO. 42-7

10-7/vel-2 appeal for transfer

Dated Peshawar the 18/04/2021

To
The District Education Officer
(Female) Dir Lower

SUBJECT:- REQUEST FOR TRANSFER.

Memo:-

I am directed to refer to the subject cited above and to enclose herewith a copy of an self explanatory application/appeal along with its enclosure in respect of Mst Zamab Bibi, AT, B-11 GGNIS Bindi Mandan District Dir Lower and to ask you to consider the appeal/application accordingly under intimation to this office.

Assistant Director Establishment (F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Copy forwarded for information to the:-

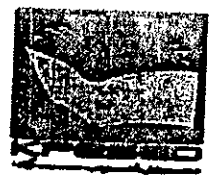
5 - PA to Director E&SE Local office.

Assistant Director Establishment (F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

(24)



OFFICE OF THE
DISTRICT EDUCATION OFFICER (F)
DIR LOWER AT TIMERGARA



0945-9250083 DEO FEMALE DIR LOWER M deofemalechulower@gmail.com
NEAR POLICE LINE, EDUCATION COMPLEX BALABAT TEHSIL TIMERGARA DISTRICT DIR LOWER.

OFFICE ORDER.

Mst: Zainab Bibi AT GGMS Bandal Maidan, Is hereby transferred to GGSS Shatai against vacant post in the interest of public service with immediate effect.

Note:

- 1.No TA/DA Is allowed.
- 2.charge report should be submitted to all concerned.

(MEHRUN NISA)
DISTRICT EDUCATION OFFICER,
(F) DIR LOWER AT TIMERGARA.

Endst No: 2182-86

Dated Timergara the 04/05/2023.

Copy of the above is forwarded for information to the;

- 1. PS to Minister for Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
- 2. District Account Officer Dir Lower.
- 3. Principal/Head Mistress concerned.
- 4. Teacher concerned.
- 5. Accountant local office.

C.T.C
[Handwritten signature]
23/5/23

[Handwritten signature]
DISTRICT EDUCATION OFFICER,
(F) DIR LOWER AT TIMERGARA

ادارات ضلع رشی گڑھی ہری پور ضلع ہری پور

DEO (E)

Provide the requisite information to the appellants under RTI, Act 2013.

درخواست گزار: ...
موضوع: ...
تاریخ: ...

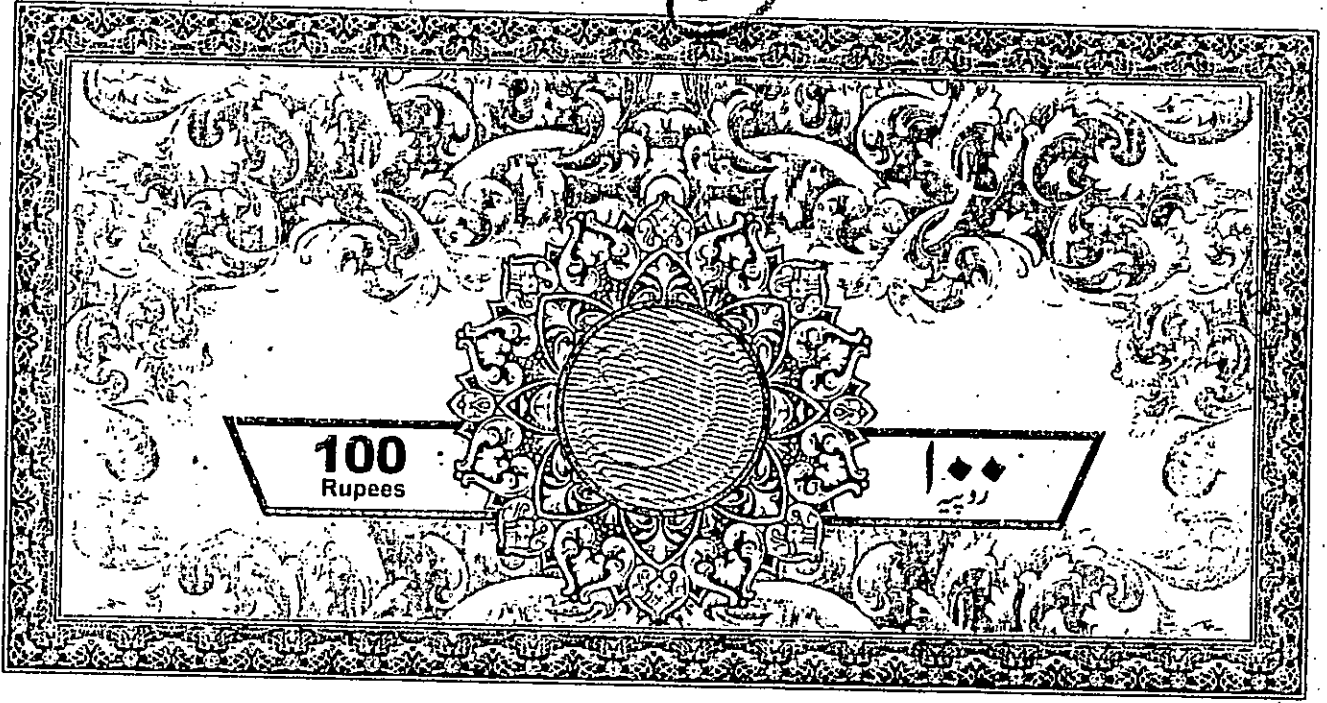
De D/O
20/09/23

یہ کہ من سائید دائرہ شائشی تقسیم بلدیہ رشی گڑھی ہری پور اور
لاقت بدھا خود تعلیم دیر پائش میں شہرت AT تہیات ہیں۔
و۔ یہ کہ من سائید ہری پور ہری پور از گورنمنٹ گرلز میڈیکل سکول لاکنہ
یہ کہ گورنمنٹ گرلز ہائی سکول رشی گڑھی ہری پور ہری پور
دی تھی جس میں گورنمنٹ ہری پور ہری پور ہری پور ہری پور
یہ کہ ہری پور ہری پور ہری پور ہری پور ہری پور ہری پور
یہ کہ ہری پور ہری پور ہری پور ہری پور ہری پور ہری پور
یہ کہ ہری پور ہری پور ہری پور ہری پور ہری پور ہری پور
یہ کہ ہری پور ہری پور ہری پور ہری پور ہری پور ہری پور
یہ کہ ہری پور ہری پور ہری پور ہری پور ہری پور ہری پور
یہ کہ ہری پور ہری پور ہری پور ہری پور ہری پور ہری پور
یہ کہ ہری پور ہری پور ہری پور ہری پور ہری پور ہری پور

cc: DEO/Secretary
ma

سہ ماہی
سہ ماہی

AT-B-15 / 1586 ایس لاکنہ ہری پور ہری پور
0326-1690779 # 100



بعدالت جناب خیبر پختونخواہ سروس ٹریڈیونل پشاور بمقام پشاور

نصرت محمد بنام ڈسٹرکٹ ایجوکیشن افسر (زنانہ) وغیرہ

(مختیار نامہ خاص)

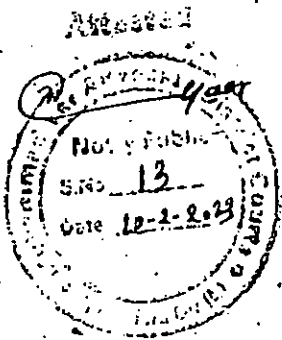
سروس اپیل:

مختیار نامہ خاص بحق امجد اسلام ولد گل دعوت خان ساکن ملی خیلہ شامی درہ تحصیل بلاسٹ ضلع درپہاٹن۔

ازاں مسماة نصرت محمد زوجہ امجد اسلام ساکن ملی خیلہ تحصیل بلاسٹ ضلع درپہاٹن۔

بروئے تحریر ہذا اقرار کر کے لکھ دیتی ہوں کہ من مقررہ بیخہ زنانہ ذات و پردہ نشین خاتون ہونے اساتما بیرونی مقدمت کا سہرہ ہے۔ اس سے من مقررہ اپنے جانب سے امجد اسلام (شوہر ام) کو مختیار خاص مقرر کر کے لگا دیتی ہوں کہ وہ میری خواہش سے درخواست تبادلہ، اپیل، دعویٰ، جواب دعویٰ، درخواست و جواب درخواست کرے، بیان طلبی، عدالت یا جواب عذرات دائر کرے، گواہ طلب کرے، میری طرف سے بیان/شہادت قلمبند کرے، درخواست سرسبزی مقدمہ کرے، درمیان مقدمہ کوئی درخواست کرے، راضی نامہ کرے کوئی وکیل یا ایئر سٹروٹ کرے، اپیل دائر کرے، بیرونی اپیل کرے، نگرانی، رٹ پیشکش بعدالت مجازاً عدالت نظمی دائر کرے نظر ثانی، تجویز ثانی، راضی نامہ، وگناہ، گواہان کیلئے خرچہ خوراک جمع کرے، کارروائی اجراء جمع کرے، پیسے وصول کرے، کارروائی اجراء کی بیرونی کرے العرض جو اختیارات مجھے مقدمہ عنوان بالا سے حاصل ہے وہ مختیار خاص مذکورہ بالا کو تفویض کرتی ہوں۔ مختیار خاص کی جملہ کارروائی مثل کردہ مجھے قبول و منظور ہوگی۔

مورخہ: 2-10-2023



(اختیاررہندہ) العبد نصرت محمد

مسماة نصرت محمد 8-1416-3871-15302

(اختیاررہندہ) العبد Amjad Islam

امجد اسلام 1-15446-8615302

(27)

الحکومت جنرل سروس ٹریڈ یونٹ کے ذریعے منسلک

سائنس / اسٹاٹسٹکس

تاریخ: 23/10/2023

مقام: لاہور

ڈی وی او (F) (P)
بیس

بابت: جنوری

مقررہ مندرجہ ذیل پر مبنیاً پانچ سالہ عرصہ کے لئے اس کے تحت مندرجہ ذیل شرحیں طے کر لی گئی ہیں۔
 آئی ایم اے کے آئی ایم ایف کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ
 ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ
 ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ
 ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ
 ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ
 ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ
 ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ
 ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ
 ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ
 ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ
 ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ ایف آئی ایم کے ساتھ ساتھ

United Islam
 لاہور

ESTABLISHED 1948

Attested & Accepted

0344-9697644

بیس

ڈی وی او (F) (P)