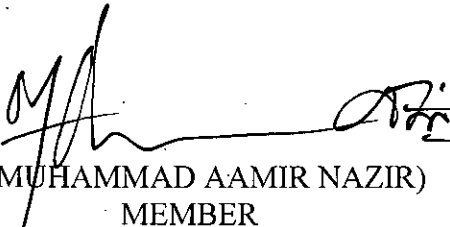


S.No	Date of order proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
	05.10.2016	<p style="text-align: center;"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,</u> <u>PESHAWAR.</u></p> <p style="text-align: center;">APPEAL NO. 602/2014 (Aisha Bibi-vs- Govt: of KPK through Secretary Elementary & Secondary Education, Peshawar and others).</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>PIR BAKHSH SHAH , MEMBER:</u></p> <p>Counsel for the appellant (Mr. Nasir Mehmood, Advocate) and Mr. Hameed-Ur-Rehman, AD(Lit) alongwith Mr. Kabirullah Khattak, Assistant Advocate General for respondents present.</p> <p>2. It is not disputed that the appellant is a Female Theology Teacher in GGMS Nara Banda Tehsil Takhti Nasrati, District Karak, nor that the post has been up-graded to BPS-16. According to appellant, she was unlawfully deprived from promotion to BPS-16 on the false ground as taken in the written reply by the respondents, which is that appellant failed to produce relevant qualification credential to the concerned Committee hence not promoted/up-graded. Counsel for the appellant has also urged that appellant filed departmental appeal dated 22.12.20143 but the same was not responded. On the other hand it was contended for the respondents that such departmental appeal was never moved by the appellant. This appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 is for the disputed up-gradation/promotion of the appellant to BPS-16.</p>

3. Arguments heard and record perused.

4. After a careful perusal of the record and hearing pro & contra arguments it was observed that the issue pertains to promotion/up-gradation and thus monetary loss which is a continuous cause of action and the point of limitation as urged by learned Asstt: AG cannot be accepted. The appellant has taken the plea that she filed departmental appeal which was not responded. On the other hand the respondents have contended that as the appellant failed to produce relevant qualification documents to the Departmental Promotion Committee, therefore she was not up-graded/promoted. In the stated position of the case, the Tribunal is of the considered view to refer the case to the Departmental Authority with the direction to decide departmental appeal of the appellant within a period of one month after receipt of this order. Departmental appeal of the appellant be decided purely on merits in accordance with rules and regulation. Appeal is disposed of accordingly. Parties are left to bear their own cost. File be consigned to the record room.


(MUHAMMAD AAMIR NAZIR)
MEMBER

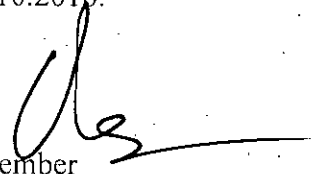

(PIR BAKHSH SHAH)
MEMBER

ANNOUNCED
05.10.2016

17.06.2016

Junior to counsel for the appellant and Mr. Ziaullah, GP for respondents present. Junior to counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 5.10.2016.


Member


Member

03.04.2015

Counsel for the appellant, M/S Khurshid Khan, SO for respondent No.1, Javid Ahmad, Supdt for respondent No. 2 and Muhammad Awais, S.S for respondent No.3, alongwith Addl: AG present. Written reply submitted. The appeal is assigned to D.B. for rejoinder and final hearing for 15.10.2015.


Chairman

16.10.2015

Since 15.10.2015 has been declared as public holiday by on account of Ist Muharramul Haram, therefore, case is adjourned to 11.3.2016 for the same.


READER

11.03.2016

Counsel for the appellant and Mr. Muhammad Awais, S.S alongwith Addl: AG for respondents present. Rejoinder on behalf of the appellant submitted copy of which is placed on file. To come up for arguments on 17.06.2016 before D.B.

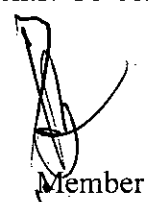

Member

Appeal No. 602/2014
Met. Bibi Aisha

3. 26.06.2014

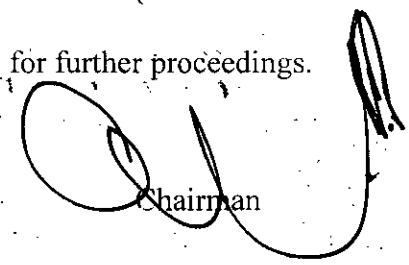
Counsel for the appellant present. Preliminary arguments heard and case file perused. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. Against the impugned order dated 07.03.2013, he filed departmental appeal on 22.12.2013, which has not been responded within the statutory period of 90 days, hence the present appeal on 29.04.2014. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notices be issued to the respondents. To come up for written reply/comments on 19.09.2014.

Appellant Deposited
Security & Process Fee
Rs. 300 Bank
Receipt is Attached with File.


Member

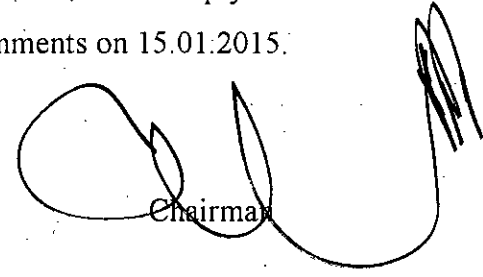
4. 26.06.2014

This case be put before the Final Bench  for further proceedings.


Chairman

5. 19.09.2014

Counsel for the appellant, M/S Khurshid Khan, SO for respondent No. 1 and Noor Zaman, Principal on behalf of respondent No. 3 with Mr. Usman Ghani, Sr. GP for respondents present. Written reply has not been received. To come up for written reply/comments on 15.01.2015.


Chairman

06 15.01.2015

Agent of counsel for the appellant and Addl: A.G for respondents present. Written reply not submitted. Directed to submit the same without fail on 03.04.2015.




Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 602 /2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	29/04/2014	<p>The appeal of Mst. Aisha Bibi presented today by Mr. Nasir Mehmood Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	8-5-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>26-6-2014</u></p> <p style="text-align: right;"> CHAIRMAN</p>

Appellant & Security Register

KPK
BEFORE THE NWFP SERVICE TRIBUNAL ~~NWFP~~, PESHAWAR

Appeal No. 608/2014

Aisha Bibi.....Appellant

Versus


1. Govt. of KPK & others.....Respondents

INDEX

S.no.	Description of documents	Annexure	Pages
1.	Grounds of Appeal with affidavit		1-2
2.	Condonation Application with affidavit		3
3.	Appointment Order	A	4
4.	Service Book	B	5-9
5.	Promotion Order	C	10-11
6.	Seniority List	D	12-14
7.	Departmental Appeal	E	15
8.	Receipts	F	16
9.	Educational Testimonials	G	17-22

Appellant *Aisha Bibi*

Through


Nasir Mehmood Advocate,
13-D Haroon Mansion
Khyber Bazar, Peshawar
Mob; 0333-9176275

29/4/14

①

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO.....602.....\2014

634
99/4/2014

Aisha Bibi D\O Bahadur Zaman Theology Teacher (TT) GGMS Nara Banda Tehsil Takhti Nasrati District Karak.....Appellant

Versus

- 1.Govt. of KPK through Secretary Elementary Secondary Education KPK Peshawar.
- 2.Director Elementary & Secondary Education Govt. of KPK Peshawar.
- 3.District Education Officer Female Karak.....Respondents.

Service Appeal U\Section 4 of the KPK Service Tribunal Act, 1974 against the non action on the departmental appeal dated 22.12 2013 which was sent to respondent no.2 through Registry\TCS for giving promotion to the appellant from BPS-15 to BPS-16 and after expiry of statutory period of 90 days instant appeal is being filed before this honorable tribunal.

Prayer in Appeal;

On acceptance of this appeal appellant may be promoted from BPS-15 to BPS-16 from the date i.e. 07.03.2013 when her junior were promoted with all back benefits.

Respectfully Sheweth;

- 1.That the appellant was appointed as TT GHSS Tarki khel Karak vide order dated 26.10.2007. Copy of the appointment order is attached as annexure-A.
- 2.That later on appellant was transferred from the said school to GGMS Nara Banda Tehsil Takhti District Karak. Copy of his service book is attached as annexure-B.
- 3.That since then the appellant is performing her duties to the entire satisfaction of her superior and has never given a chance of complaint to her superior.
- 4.That in the year 2013 the post of TT PBS-15 was upgraded to BPS-16 as Senior TT and on 07.03.2013 District Education Officer Karak respondent no.3 has given promotion to the junior of the appellant. Copy of the promotion order and seniority list is attached as annexure-C&D.

5.That appellant aggrieved wherefrom addressed departmental appeal dated 22.12.2013 to respondent no.2 which was unresponded (copy of departmental appeal & Registry & TCS receipts are attached as annexure-E&F) hence the present appeal inter alia on the following grounds;

29/4/14

Grounds

A. That the respondents have not treated the appellant in accordance with law and rules on the subject and acted in violation of article-4 and 25 of the constitution of Islamic republic of Pakistan, 1973 and unlawfully promoted the junior of the appellant which is unjust, unfair hence not sustainable in the eye of law. It may be noted here that the appellant is at serial no.1 of the appointment order.

B. That the fundamental rights of the appellant has been violated and by not promoting the appellant, she has been discriminated by the respondents.

C. That the appellant is having prescribed qualification of Shahadat ul Alamia and on the basis of the said qualification she was appointed as Theology Teacher (TT) but the respondent no.3 has illegally not promoted the appellant thus vested rights have been accrued in favor of the appellant. Copies of the educational testimonials are attached annexure-G.

D. That the appellant may be allowed to raise additional grounds at the time of arguments.

It is, therefore, respectfully prayed that on acceptance this appeal, this honorable tribunal may be pleased to accept appeal of the appellant by giving her promotion from the date when her junior were promoted with all back benefits.

Any other remedy not specifically asked for but appropriate in the circumstances of the case may also be awarded to the appellant.

Aisha Bibi

Appellant

Through

Nasir Mahmood Advocate,
13-D Haroon Mansion Peshawar.

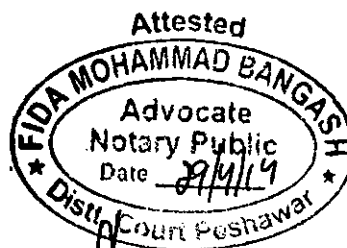
29/9/14

Affidavit

I do hereby declare, and affirm on oath that the contents of accompanying appeal are true and correct to the best my knowledge and belief and nothing has been concealed from this hon'ble tribunal.

Deponent

Aisha Bibi



[Handwritten signature]

(3)

BEFORE THE NWFP SERVICE TRIBUNAL ^{KPK} ~~NWFP~~, PESHAWAR

Aisha Bibi.....Appellant

Versus

1.Govt. of KPK & others.....Respondents

APPLICATION FOR CONDONATION OF DELAY

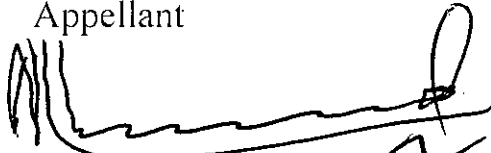
Respectfully Sheweth:

- 1.That the appellant is filing the accompanied appeal before this honorable court which is barred by four days.
- 2.That the appellant is pardanashin lady and was told by the respondent No. 3 that her departmental appeal will be accepted and she will be promoted but unfortunately she was not promoted and being female belonging to far flung area of District Karak she could not contact her counsel in time.
- 3.That due to the above reasons appellant was unable to approach this honourable tribunal. However the order of promotion passed by the respondent no.2 is void order therefore no limitation runs against him.

It is, therefore, respectfully prayed that on acceptance of this application that delay if any occurred may kindly be condoned.

Through

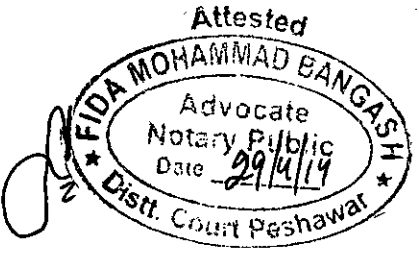
Appellant



Nasir Mehmood Advocate
13-D Haroon Mansion Peshawar. 29/4/14

AFFIDAVIT

I, do hereby solemnly affirm and declare on oath that contents of the above application are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this honourable tribunal



Deponent

Aisha Bibi

Annex - A 4

OFFICE OF THE DISTRICT CO-ORDINATION OFFICER SCHOOLS & LITERACY KARAK

APPOINTMENT:

Consequent upon the recommendation of the District Recruitment/Selection Committee constituted by the Government of NWFP Establishment & Administration Department No. SOR-V (E & AD)/2-7/03, dated Peshawar the 01/11/2006 the following candidates are hereby appointed as TT (Female) on contract basis in BPS-14 @ Rs. (4100-315-13550) Per month plus usual allowances as admissible under the rules from the date of their taking over charge on the terms and conditions as mentioned below:-

S. No.	Name	Father's Name	Post Working	Address	Posted as	School where Posted	G. Month
1	Aisna Bibi	Bhadar Zaman	Fresh	T Nasrati	TT	GGHS Tarki Khel	49.11
2	Nadia Yasmeen	Shad Gel	PST	B. Khel	TT	GGHS Bhadar Khel	47.06
3	Basreen Nareen	Shadaraz Khan	Fresh	Karak	TT	GGMS Dagar Nari	45.66
4	Shakira Bibi	Taj ud Din	Fresh	T Nasrati	TT	GGHSS Teri	44.34
5	Haseena Khatoon	Mosam Bad Shah	Fresh	Chokara	TT	GGMS Totaki	43.04
6	Sadal Nasreen	Muhammad Zada	Fresh	Bogara	TT	GGMS Charpara	41.91
7	Nadra Khatoon	Noor Sakhi Jan	Fresh	Ahmad Abad	TT	GGMS Paloski	40.27

TERMS & CONDITIONS:

- No F.A.D.A is allowed.
- Charge Report should be submitted to all concerned.
- Appointment is purely temporary and contract basis subject to the verification of their documents within three months.
- Appointment are being made purely on documents provided by the individual concerned. Hence all the DDO are not empowered to draw their salaries until the proper verification of their competency.
- They should not be handed over charge if they exceed 35 years or below 18 Years of age.
- Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the District Officer (F) Local office. If found bogus candidate will be reported to the law enforcing agencies for further action.
- Their Pay will not be drawn until and unless certificates to the effect by D.O(F) Local Office that the certificate degrees has been verified from the concerned board university.
- If they failed to take over charge within 15 days, the appointment order will be deemed as cancelled.
- Health & Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
- All the above persons and the persons appointed on regular basis to a service or post in the prescribed manner after the commencement of said act shall, for all contents & purposes be civil servant except for the purpose of pension and gratuity, such a civil servant shall in lieu of pension and gratuity be entitled to receive such amount contributed by him towards the contributory provident fund, along with the contribution made by the Govt to his account in the said fund in the prescribed manner. The were selected for the contribution made by the Govt to his account in the said fund in the prescribed manner.
- They are entitled to get the benefit the regular employees except pension. They were selected for appointment in the prescribed manner to a service or post on or after the 1st of July, 2001 till the commencement of said act but appointed on contract basis on regular post.

(JAVED AHMAD)
DISTRICT CO-ORDINATION OFFICER
KARAK

Dated Karak the 26 / 10 / 2007

- Endst: N 10912-17 / AE-II / Appointment.
- Co of the above is forwarded to:-
- Director Schools & Literacy NWFP Peshawar.
 - District Co-Ordination Officer Karak.
 - District Officer (Male) Schools & Literacy Karak.
 - District Accounts Officer Karak.
 - Headmasters concerned.
 - Candidates concerned.

[Signature]
EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY KARAK

CTC
R

Note: -- The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

1. Name: Aisha Bibi

2. Race _____

3. Residence Moh: Malayan, village Takhti Nazratki
Tehsil Takhti Nazratki District Karakoram

4. Father's name and residence
Bahadur Zaman - As above -

5. Date of birth by Christian areas, nearly as can be ascertained
15-03-1983 (15th March N.H of Eighty Three)

6. Exact height by measurement.
5-1

7. Personal marks for Identification
NIL

8. Left hand thumb and Finger Impression of (non-Gazetted) Officer.

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

9. Signature of Government Servant Aisha Bibi

10. Signature and Designation of the Head of the Office, or other Attesting Officer.
[Signature]
High School, Karakoram

ETC
[Signature]

8

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service courts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for Officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
TT G.G.M.S, Tanki Khel			BPS NO. 4100-315-13550				
			Rs:- 4100/-	P.M.		26/10/2007	Aisha B
do			Rs. 4100/-	P.M.		01/12/2007	Aisha B
do	(B/Pay Revised with effect from, 1-7-2008) (BPS NO-14 (4920-378-18260))		Rs. 4920/-			1/7/2008	Aisha B
do			Rs:- 4920/-	P.M.		31/8/2008	Aisha Bib
G.G.M.S odini shah			Rs. 4920/-	P.M.		01/9/2008	
do			Rs. 5300/-	P.M.		07/12/2008	
G.G.M.S Dokri Shah			Rs 5680/-			12/09	
			Rs 6060/-			12/10	
			Rs 9830/-			7/11	

CTC

G.G.M.S High School

G.G.M.S High School

G.G.M.S High School

G.G.M.S High School

G.G.M.S High School

G.G.M.S High School

DISTRICT PROSECUTOR

DISTRICT PROSECUTOR

DISTRICT PROSECUTOR

DISTRICT PROSECUTOR

DISTRICT PROSECUTOR

DISTRICT PROSECUTOR

7

5

8	9 Signature and designation of the head of office or other attesting officer in Government Columns 1 to 8	10 Date of termination of appointment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Service	
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government			
						Period			Government to which debitable
7		2/11/2007						Appointment as TT Post was from 26.10.2007 vide Executive Distt. officer (ES) Karak office order: NO. 10912-17 dated 26.10.2007.	
7		30/8/2007	no increment						
7		31/8/2008	Transfer to					passed 9. Matriculation Exam. 1999 under Roll No. 5111004 obtained Marks 576 out of 850 from the B.D.S.E, pushover and result was declared on 30/8/1999.	
		30/11/2008	Annual						
		30/11/09						passed Intermediate Setup: Below 2001 under Roll No 89357 from the B.D.S.E, pushover about 477 out of 1100 and result was declared on 24/11/2008.	
		30/11/10							
		30/11/11	Revision					passed Matriculation under Roll No. 481 marks obtained 371 out of 481 on 18/10/05.	
		30/11/11							

CTE

8

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether, service courts for pension under Art. 371 C.S.R.	Pay in substantive post	Additional Pay for Officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government
TT AGMS Adnan Shah			Rs 16	Rs 10000/-	10/11/12	12/11	
TT AGMS Nara B...				Rs 10000/-		3/11/12	
- etc -				Rs 11050/-		12/12	
<p>Revised details in AGMS in the light of Cont. Notification No 50/B-A/1-15/ESSE/2012 Dt 11/12</p>							
- etc -				Rs 10600/-		17/12	
- etc -				Rs 11300/-		12/12	
	CTC						
	A						

9

9 Signature and Name of the head of the office or other attesting officer in Government Station of Classes 1 to 8	10 Date of termination of appoint- ment	11 Reason of termination (such as promotion, transfer, dismissal, etc.)	12 Signature of the head of the office or other attesting officer	13 Leave		14 Signature of the head of the office or other attesting officer	15 Reference to any recorded punishment or censure, or reward or praise of the Government Servant	
				Nature and dura- tion of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debtible to another Government			
					Period			Government to which debtible
<i>[Signature]</i>			<i>[Signature]</i>			<i>[Signature]</i>	Service verified w/ef 26-10-2007 to 31-8-2008 from Ag/Recd & other office records.	
<i>[Signature]</i> District Officer, Karak Elementary & Secondary Edu Deptt.		11 A/mc 30/12	<i>[Signature]</i>			<i>[Signature]</i>	Service verified w/ef 26/10-2008 To 30-11-2008 from Acquittance Roll and other office records.	
<i>[Signature]</i> District Officer, Karak						<i>[Signature]</i>		
<i>[Signature]</i>						<i>[Signature]</i>	Service verified w/ef 1-12-08 30/11/09 From Ag/Recd Record of This Office	
<i>[Signature]</i>		11 A/mc 30/12				<i>[Signature]</i>	District Officer (Female) Elementary & Secondary Edu Deptt. Karak	
<i>[Signature]</i>						<i>[Signature]</i>	Service verified w/ef 30/11/10 Record of This Office	
<i>[Signature]</i>						<i>[Signature]</i>	District Officer (Female) Elementary & Secondary Edu Deptt. Karak	
<i>[Signature]</i>						<i>[Signature]</i>	Service verified w/ef 30/11/10 Record of This Office	
<i>[Signature]</i>						<i>[Signature]</i>	District Officer (Female) Elementary & Secondary Edu Deptt. Karak	
<i>[Signature]</i>						<i>[Signature]</i>	Service verified w/ef 30/11/10 Record of This Office	
<i>[Signature]</i>						<i>[Signature]</i>	District Officer (Female) Elementary & Secondary Edu Deptt. Karak	

Drown Rs = 1800/- on a/c
 of Less drawn of Pmg
 FB - 15 w/ef 1-7-2012 to
 31-12-2012 with No. 185.
 From the Perusal
 of S/Book it was noted
 that Shanadati Alam
 was not recorded in
 the S/Book till 19-12-2013
 and also the S/Book
 upto 19-12-2013
 was not recorded in
 the S/Book till 19-12-2013

ETC

Distt: Education Officer (F)
 Karak
 19/12/13

Annex - C

10

BETTER COPY

OFFICE OF DISTRICT EDUCATION OFFICER (FEMALE)
KARAK.

NOTIFICATION

consequent upon the recommendation of departmental promotion committee and in pursuance of government of K.P.K. elementary and secondary education (E&L) notification No. SO(B&A) sic dated 11-07-2012 and finance department endorsement No. sic dated 16-07-2012 and further notification issued by the director of elementary & secondary education, K.P.K. endorsement No. sic dated 21-02-2013 the following female T.Ts are hereby promoted to the post of female senior T.Ts. sick plus usual allowances admissible under the rules on regular basis under the existing policy of the provincial government on the terms and conditions given below with immediate effect and further hereby posted on the government higher secondary/high school in district Karak against newly upgraded senior T.Ts. (BPS-16) posts :-

<u>S/No.</u>	<u>Name of teachers</u>	<u>present school</u>	<u>school where posted in BPS-16 newly upgraded posts.</u>
1. to 17.	not relevant		
18.	Mst. Shakira Bibi	GGHS Gunderi Khattak	GGHS Gunderi Khattak
19.	Mst. Sadaf Nasreen	GGMS Chapara	GGHS Rahmat Abad

CTC
R

Handwritten scribbles or initials at the top of the page.

10. Ημερ. Εφαρ. Ημετερον

ΟΕΠΕ Οργανωσις

ΟΕΠΕ Ημετερον Υποδ

18. Ημερ. Εφαρ. Ημετερον

ΟΕΠΕ Οργανωσις Υποδ

Υποδ ΟΕΠΕ Οργανωσις

11. Ημερ. Εφαρ. Ημετερον

Ε.Ημερ. ΟΕΠΕ Οργανωσις

Ημετερον Υποδ

Υποδ ΟΕΠΕ Οργανωσις
και ΟΕΠΕ-18 Ημετερον
Υποδ ΟΕΠΕ Οργανωσις

Εκπαιδευτικη Διευθυνση Α.Ε. (ΟΕΠΕ-18) Ημετερον :-
Οργανωσις Ημετερον ΟΕΠΕ Οργανωσις Ημετερον Υποδ ΟΕΠΕ Οργανωσις
Εκπαιδευτικη Διευθυνση Α.Ε. Ημετερον Υποδ ΟΕΠΕ Οργανωσις
Εκπαιδευτικη Διευθυνση Α.Ε. Ημετερον Υποδ ΟΕΠΕ Οργανωσις
Εκπαιδευτικη Διευθυνση Α.Ε. Ημετερον Υποδ ΟΕΠΕ Οργανωσις
Εκπαιδευτικη Διευθυνση Α.Ε. Ημετερον Υποδ ΟΕΠΕ Οργανωσις
Εκπαιδευτικη Διευθυνση Α.Ε. Ημετερον Υποδ ΟΕΠΕ Οργανωσις
Εκπαιδευτικη Διευθυνση Α.Ε. Ημετερον Υποδ ΟΕΠΕ Οργανωσις
Εκπαιδευτικη Διευθυνση Α.Ε. Ημετερον Υποδ ΟΕΠΕ Οργανωσις
Εκπαιδευτικη Διευθυνση Α.Ε. Ημετερον Υποδ ΟΕΠΕ Οργανωσις
Εκπαιδευτικη Διευθυνση Α.Ε. Ημετερον Υποδ ΟΕΠΕ Οργανωσις

ΚΟΜΜΙΣΙΟΝ

ΕΥΡΩΠ.
ΟΕΠΕ ΟΡΓΑΝΩΣΙΣ ΕΚΠΑΙΔΕΥΣΙΣ (ΟΕΠΕ)
ΒΑΛΛΕΣ ΟΥΔΑ

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OFFICE OF THE DISTRICT EDUCATION OFFICER (GENERAL), KARAVAN

Annex-c
10

Government upon the recommendation of the Departmental promotion committee and in pursuance of the Government of Khyber Pakhtunkhwa (Promotion and Secondary Education) Act (XVI) of 1973 (1973) dated 11-07-2012 and Finance Department Notification No. 50 (P.S.A)/15/1524/2012 dated 11-07-2012 and further North-West Frontier Province (Promotion) Act (XVI) of 1973 (1973) dated 21-07-2012, the following posts shall be promoted to the post of headmaster (T.T) in (K-1000) rate, junior plus usual allowances on the terms and condition given below with immediate effect, and further hereby posted in the government Higher Secondary/High Schools in District Karak against newly upgraded posts in P.S. to posts.

S.No	Name of Teacher	Present School	School where posted in P.S. to
1	Abdul Zehra	GCHS Lamber	GCHS Lamber
2	Shahzad Sultana	GCHS Lamber	GCHS Lamber
3	Nabi Sultana	GCHS Lamber	GCHS Lamber
4	Lal Padi	GCHS Chundak Killa	GCHS Chundak Killa
5	Nadia Yasreen	GCHS No.1 Karak	GCHS Chundak Killa
6	Fahima Khatun	GCHS No.1 Karak	GCHS Chundak Killa
7	Zayna Khatun	GCHS Hazid Khat	GCHS Chundak Killa
8	Parbat Shabeh	GCHS Mandar Killa	GCHS Chundak Killa
9	Parbat Begum	GCHS Chokan	GCHS Chundak Killa
10	Lal Begum	GCHS Karak	GCHS Chundak Killa
11	Khatun Begum	GCHS Khatun Killa	GCHS Chundak Killa
12	Khatun Ahsan	GCHS Karak	GCHS Chundak Killa
13	Khatun Ahsan	GCHS Karak	GCHS Chundak Killa
14	Khatun Ahsan	GCHS Karak	GCHS Chundak Killa
15	Khatun Ahsan	GCHS Karak	GCHS Chundak Killa
16	Khatun Ahsan	GCHS Karak	GCHS Chundak Killa
17	Khatun Ahsan	GCHS Karak	GCHS Chundak Killa
18	Khatun Ahsan	GCHS Karak	GCHS Chundak Killa
19	Khatun Ahsan	GCHS Karak	GCHS Chundak Killa

Final Posting/Transfer of T.T. P.S. 15

S.No	Name of Teacher	School from	Final Posting/Transfer
1	Fahima Khatun	GCHS Karak	GCHS Karak
2	Zayna Khatun	GCHS Karak	GCHS Karak
3	Parbat Shabeh	GCHS Karak	GCHS Karak
4	Parbat Begum	GCHS Karak	GCHS Karak
5	Khatun Begum	GCHS Karak	GCHS Karak
6	Khatun Ahsan	GCHS Karak	GCHS Karak
7	Khatun Ahsan	GCHS Karak	GCHS Karak
8	Khatun Ahsan	GCHS Karak	GCHS Karak
9	Khatun Ahsan	GCHS Karak	GCHS Karak

They would be on probation for a period of one year from the date of their appointment. They will be governed by the rules and regulations in force at the time of their appointment. Their services can be terminated at any time in case her performance is found unsatisfactory during probationary period. In case of misconduct, she should be proceeded under the rules framed from time to time. Large report should be submitted to all concerned.

[Handwritten Signature]
17/05/2012

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Annex-D
12

OFFICE OF THE DISTRICT EDUCATION OFFICER ELEMENTARY AND SECONDARY EDUCATION KARAK
FINAL SENIORITY LIST OF (FEMALE) TT TEACHERS AT KARAK DISTRICT

No.	Name	Father's Name	BPS	D/O Birth	Acad: Quar:(BA/B.Sc,MAMSc)with subject Bio/Maths Group)	Acad: Quar: with Div:	Prof:Qual:(PTC,CT,B.Ed; M.Ed:ShahadatulKhana/Aama Allar/Almia,Carl Sanad	Date of result Declaration	Name of Board/University Madrasah	Date of Ist: Applt:	Date of T/over Charge in the present post:	Date of T/over charge in this Distt:	Date of promotion in the present post i.e. trained teacher	Remarks
1	Afaq Zeba	Andaleep Shah	10	03.03.59	Arts=2nd: 19.2.90	Islamiyat 12.9.99	2nd: Sanad B Ed.	27.05.79 21.5.95	Dar: Sar: Ban	29-10-1979	29-10-1979	29-10-1979	29-10-1979	Latamber
3	Afsab Mehal Begum	Faz ur Rahman	10	12.10.62	Arts=2nd: 16.3.91	Nil	Nil	TT Certif: 05.07.79	Takul Isl: Bannu	03-12-1980	08-12-1980	08-12-1980	08-12-1980	No MA Isl: & Sha: Aimia
3	Fa war Sultan	Gul Sahib Khan	10	01.04.62	Arts=2nd 16.3.91	Nil	Nil	Sanad CT 4.2.79 29.11.87	Bannu RDE Pesh:	26-04-1980	16-09-1982	16-09-1982	16-09-1982	No MA Isl: & Sha: Aimia
4	Shahista Zahida	Abdul Khanan	10	01.03.63	Nil	Nil	Nil	Sanad TT.Exa: 25.08.82	Saraj ul Bannu	20-10-1982	20-10-1982	20-10-1982	20-10-1982	No MA Isl: & Sha: Aimia
5	M. Saadia Khatoon	Rab Nawaz	10	15.4.54	Nil	Nil	Nil	Sanad 04.01.79	Bannu	13-11-1984	13-11-1984	15-11-1984	15-11-1984	No MA Isl: & Sha: Aimia
6	Kamal Begum	Abbas Khan	10	02.02.64	Nil	Nil	Nil	Taleem ul Isl: 08.01.82	Sha: Baba Ban	19-05-1986	23-05-1986	23-05-1986	23-05-1986	No MA Isl: & Sha: Aimia
7	Sagar Begum	Robia Khal	10	31.12.63	Nil	Nil	Nil	Haf: Qur: San: Yaf: 1981 27.3.85	Bannu	09-03-1988	09-03-1988	09-03-1988	09-03-1988	No MA Isl: & Sha: Aimia
8	Nishat Begum	Misbah ud Din	10	13.09.68	Nil	Nil	Nil	Sanad 01.5.87	Sha: Baba Ban	10-12-1988	13-12-1988	13-12-1988	13-12-1988	No MA Isl: & Sha: Aimia
9	Nasreen Akhtar	Inayat Shah	10	01.06.68	Arts=2nd: 22.22.11	Nil	Nil	Sanad Fargh: 15.06.85	Sha: Bab: Ban:	07-09-1987	25-01-1990	25-01-1990	25-01-1990	No MA Isl: & Sha: Aimia
2	Tanira Sbi	Habib Ullah	7	16.03.60	Nil	Nil	Nil	Sanad Sha: Aimia 04.03.83 07.4.02	Ban Mardan	24-01-1990	28-01-1990	23-01-1990	28-01-1990	No MA Isl: & Sha: Aimia(W.M.I:ult)
1	Fa Khanda Yasmin	Allah Yar Gul	7	19.06.71	Arts=1st: 20.09	Nil	Nil	Sanad 16.02.90	Sha: Bab: Ban:	26-02-1989	11-11-1990	11-11-1990	11-11-1990	No MA Isl: & Sha: Aimia
2	Nasreen Begum	Muhsid Khan	7	05.04.71	Arts=3rd: 9/10/84	Nil	Nil	Sanad Far: 09.02.92	Sha: Baba Ban	25-04-1992	27-04-1992	27-04-1992	27-04-1992	No MA Isl: & Sha: Aimia
3	Shahar Sultana	Muhammad Ghulam	7	18.03.69	Arts=2nd: 22.11.99	Islamiyat: 22.11.07	2nd:	Sanad CT B'Ed: 25.02.93 12.05.02	Sra Ba: Ban: A.I.O.U A.I.O.U	31-03-1993	31-03-1993	31-03-1993	31-03-1993	Jandari
4	Nasreen Anwar	Muhammad Nazir	7	01.02.65	Arts=2nd: 11.10.03	Nil	Nil	TT Sanad 10.10.92 7.11.95	BISE Pesh:	05-05-1993	01-09-1993	01-09-1993	01-09-1993	No MA Isl: & Sha: Aimia
5	Afa Zafar	Muhammad Yaseen	7	23.03.75	Nil	Nil	Nil	Sanad 01.10.94	Bannu	20-11-1994	21-11-1994	21-11-1994	21-11-1994	No MA Isl: & Sha: Aimia
6	Zarba Fatma	Abdu: Rahman	10	05.11.75	Arts=2nd: 30.3.10	Nil	Nil	Sanad Fargh: 17.10.91	Sha: Baba Bannu	05-10-1995	07-10-1995	07-10-1995	07-10-1995	No MA Isl: & Sha: Aimia

CTC
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18	Lal Pari	Gul Shah Jan	9	06.03.73	Arts=2nd: 11.10.03	Islamayāt 22.1.07	Ist:	Sanad B Ed M.Ed:	21.2.97 18.7.12 6.11.04 3.12.05	Mardan, W.M.Multan Akhtar Un:	25-05-1997	26-05-1997	26-06-1997	26-06-1997	Ghunda Killa
19	Nadra Yaseen	Youseen Bad Shah	9	20.03.74	Arts=2nd:	Isl 27.0.07	Znd:	Al sanwi B Ed:	04.1.95 25.1.07	W.M.Multan Kohat Univ	14-03-1998	14-03-1998	14-03-1998	14-03-1998	GGMS, Lakki Ghunda
20	Nisar Waheda	Nusahib Gul	7	01.01.75	Nil	Nil	NI	Sha. Sanwi	4.1.95	W.M.Multan	14-03-1998	14-03-1998	14-03-1998	14-03-1998	GGMS, Kamali Banca
21	Kousar Nabeed	Awal Zaman	9	12.02.78	Arts=2nd: 15.6.05	Nil	NI	Sanad Fargh	15.2.97	Sha Baba Bannu	14-03-1998	14-03-1998	14-03-1998	14-03-1998	No MA Isl: & Sha Almia
22	Gul Shad Begum	Abdul Ghani	9	12.12.78	Nil	NI	NI	Sanad Yaf: CT	22.4.97 31.7.01	Bannu A.I.O.U	19-03-1998	19-03-1998	19-03-1998	19-03-1998	No MA Isl: & Sha Almia
23	Fatima Khatak	Hakim Janan	7	01.04.81	Arts=2nd: 19.4.05	Islamayāt 17.2.11	Ist: Dvt:	Sanad Far: CT B Ed:	15.12.97 20.3.07 15.12.97	Sha Baba Bannu	15-12-1999	15-12-1999	15-12-1999	15-12-1999	Bazid Khel
24	Zeenat Rehara	Azizi ur Rahman	9	8.6.70	Arts=2nd: 17.2.92	Islamayāt 27.9.94	Znd:	Sanad Yafia	19.99	Bannu	15-12-1999	16-12-1999	16-12-1999	16-12-1999	GGMS, Mandar Killa
25	Farhat shahen	Khan Sardar	14	01.01.75	Arts=3rd: 30.5.01	Nil	NI	Sanad B Ed: Sha: alia Sha Almia	1997 17.02.04 21.06.05 18.7.12	Sha Bba Bnu W.M.Multan Pesh: W.M.Multan	15-12-1999	15-12-1999	15-12-1999	15-12-1999	Chokera
26	Farhad Niaz	Sher Ali Khan	9	09.12.77	Arts=2nd: 17.4.2010	Nil	NI	Sanad: Yafia CT	25.8.99 02.03.03	Mardan A.I.O.U	15-12-1999	16-12-1999	16-12-1999	15-12-1999	No MA Isl: & Sha: Almia
27	Zakia Begum	Sher Dawal Khan	9	15.04.78	Arts	NI	NI	Sanad Yafia	1997	Bannu	15-12-1999	16-12-1999	16-12-1999	16-12-1999	No MA Isl: & Sha: Almia
28	Farah Naz	Noor Qadat Khan	9	08.10.79	Arts=3rd:	Isl:	Znd:	Sanad Yafia	1998	Bannu	15-12-1999	16-12-1999	16-12-1999	16-12-1999	No MA Isl: & Sha: Almia
29	Saeeda Akhtar	Muhammad Naseer	9	02.10.75	Nil	NI	NI	Sanad	15.2.02	Bannu	03-02-2005	03-02-2005	03-02-2005	03-02-2005	GGMS Tappi Alcad:
30	Gul Nasreen	Ali Shah	15	01.05.78	Arts=2nd: 11.10.03	Nil	NI	Sanad ul Far B.Ed:	15.12.95 05.11.04	Sha:Ba:Bun: Akhtar Univ:	03-02-2005	03-02-2005	03-02-2005	03-02-2005	No MA Isl: & Sha: Almia
31	Talet Kousar	Islam Zada		01.09.78	Arts=2nd:	Islamayāt	Znd:	Sanad CT B.Ed:	20-01- 2000	A.I.O.U A.I.O.U	03-02-2005	03-02-2005	03-02-2005	03-02-2005	No MA Isl: & Sha: Almia
32	Khilar Begum	Lizat Khan	9	02.02.79	Arts=2nd:	Islamayāt 23.2.07	Znd:	Sanad Far:	30.4.00	Bannu	03-02-2005	03-02-2005	03-02-2005	03-02-2005	Khojaki Killa
33	Khaloon Bibi	Said Nawaz	9	10.01.79	Arts=2nd:	Islamayāt 15.1.2009	Ist:	Sanad Fargh B.Ed:	1998 25.6.07	Bannu Akhtar Un:	03-02-2005	03-02-2005	03-02-2005	03-02-2005	Mitha Khel
34	Rohana Ahmed	Ahmed Khan	9	10.03.79	Arts=3rd: 11.10.03	Islamayāt 15.1.09	Ist:	Sanad B Ed:	01.7.93 06.2.07	Sush Bannu A.I.O.U	03-02-2005	03-02-2005	03-02-2005	03-02-2005	Zar Khan Killa
35	Faqir	Rahmat Jan	9	01.05.81	Arts=2nd: 2002	NI	NI	Sanad Farah	01.03.03	Sha: Baba Bannu	03-02-2005	03-02-2005	03-02-2005	03-02-2005	Soran Killa
36	Yazreen Akhtar	Wiyal Khan	9	20.03.81	Arts=2nd:	Islamayāt	Znd:	Sanad	2001	Bannu	03-02-2005	03-02-2005	03-02-2005	03-02-2005	No MA Isl: & Sha: Almia
37	Gul Naz Begum	Abdul Rehman	14	11.12.83	Isl:Arts=2nd:	Islamayāt	Znd:	Sanad Hassa	13.2.00 12.3.10	Bannu W.M.Multan	03-02-2005	03-02-2005	03-02-2005	03-02-2005	Terkat Koi
38	Janish da Yaseen	Gulistan Khan	9	15.04.78	Arts=2nd: 28.4.2001	Islamayāt 31.3.2004	Znd:	Khasse Sanad Far:	01.2.02	Bannu	03-02-2005	04-02-2005	04-02-2005	04-02-2005	Sarat Khel
39	Farhad Begum	Ali Mat Khan	9	23.06.76	Arts=2nd:	NI	NI	Sanad	2001	Bannu	03-02-2005	04-02-2005	04-02-2005	04-02-2005	Warkh Saraj Khel

etc
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1	Shaboom Akhter	Shahista Jehan	14	01-05-77	Arts=2nd: 1999	Urdu 2002	2nd: Nil	Alia Alamia	2000 2011	AIOU W/M Multan	01-04-2004	03-12-2005	03-12-2005	03-12-2005	Palosa Kamari
2	Aisha Bibi	Sahada Zaman	14	15-03-83	Nil	Nil	Nil	Hassa	18.10.03	W/M Multan	26-10-2007	26-10-2007	26-10-2007	26-10-2007	No MA Ist. & Sha: Almia
3	Shakira Bibi	Tajud Din	14	12-01-83	Arts=1st: Nil	Nil	Nil	Alamia	08-02-93	W/M Multan	26-10-2007	27-10-2007	27-10-2007	27-10-2007	Gandari Khattak
4	Sadaf Nasreen	Muhammad Zafar	14	22-01-87	Nil	Nil	Nil	Alamia	22.9.05	W/M Multan	26-10-2007	27-10-2007	27-10-2007	27-10-2007	Charpara
5	Nadia Khatoon	Noor Sabih Jan	14	28-08-83	Nil	Nil	Nil	Alia Alamia	2005 2005	W/M Multan W/M Multan	26-10-2007	27-10-2007	27-10-2007	27-10-2007	Pa'oski
6	Nadia Yasmin	Shad Gul	14	15-10-79	Arts=2nd: 2005	Ist: Nil	2nd: Nil	Alamia B Ed:	10.2.07	W/M Multan AIOU	24-07-2008	31-10-2007	31-10-2007	31-10-2007	Bahadar Khel
7	Beanna Nooreen	Shah Daraz Khan	14	21-02-83	Arts=2nd: 04-10-07	Ist: 07.2.11	Ist: Nil	Shah: Alami B Ed:	02.11.04 20.02.10	W/M Multan AIOU	14-09-2005	01-11-2007	01-11-2007	01-11-2007	Dabb
8	Hassina Khatoon	Misam Bad Shah	14	01-07-85	Nil	Nil	Nil	Alia Alamia	2004 2005	W/M Multan W/M Multan	26-10-2007	01-11-2007	01-11-2007	01-11-2007	Shaidan
9	Farnat Yasmin	Aziz Khan	14	13-04-83	Arts=2nd: Nil	Ist: Nil	Ist: Nil	B Ed: (Hassa)		W/M Multan	23-04-2012	24-04-2012	24-04-2012	24-04-2012	Jarasi
10	Khalida Zia	Masood ur Rehman	14	15-08-83	Arts=1st: Nil	Islamayat	Ist: Nil	Shanoutun Alyia		W/M Multan	23-04-2012	23-04-2012	23-04-2012	23-04-2012	Totaki
11	Saman Hayat	Muhammad Hayat	14	08-04-83	Arts=2nd: Nil	Nil	Nil	B Ed:		Pesr Univ	23-04-2012	23-04-2012	23-04-2012	23-04-2012	J I Khel
12	Munira Begum	Gul Sahib Shah	14	11-02-82	Arts=2nd: Nil	Nil	Nil	CT Shah: Al:		W/M Multan	23-04-2012	23-04-2012	23-04-2012	23-04-2012	Deli Mela
13	Alia Asad	Gul Nawab Khan	14	21-04-83	Arts=2nd: Nil	Nil	Nil	Hassa	08.12.08	W/M Multan	23-04-2012	25-04-2012	23-04-2012	23-04-2012	Ten
14	Zahid Aman	Aman Ullah	14	15-04-83	Arts=1st: Nil	Nil	Nil	Hassa		W/M Multan	23-04-2012	24-04-2012	24-04-2012	24-04-2012	Terki Khel
15	Latifa Qadar	Bashir Ahmad	14	11-10-82	Arts=2nd: Nil	Islamayat	2nd: Nil	Shahat: Alia	25.01.12	W/M Multan	23-04-2012	24-04-2012	24-04-2012	24-04-2012	Esak Chuntra
16	Shor Bang	Khan Sardar	14								23-04-2012	24-04-2012	24-04-2012	24-04-2012	Odin Shah
17	Haira Bibi	Musal Khan	14	23-03-84	Nil	Nil	Nil	Haf: Alamia			23-04-2012	23-04-2012	23-04-2012	23-04-2012	Dagar Nari

Assistant District Officer (Female)
Elementary & Secondary Education
Karak

DISTRICT EDUCATION OFFICER(F)
ELEMENTARY AND SECONDARY EDUCATION
KARAK

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CTC
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Alshabab
2013/2014

22/11/2013

Alshabab

- 18 -
- 17 -
- 16 - Appointment Order: Seniority List
- 15 - Appointment Order
- 14 - Professional Qualification: Seniority List
- 13 - Appointment Order

D E O F
 Alshabab
 Alshabab & Reports
 Alshabab

15/11/2013

15/11/2013

Alshabab

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Alshabab

Annex-F

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No.870

For Insurance Notices see reverse. Stamps affixed except in case of insured letters of not more than the initial weight prescribed in the Post Office Guide or on which no acknowledgment is due.

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Date Stamp

Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for (in figures) (in words)

Insurance fee (in words) Weight (in words) Kilo Grams

Name and address of sender



CS Centre

SALE TAX INVOICE

24/12/03

From Aisha bibi D/o Bahadar zaman vill, P/O, Teh Takht Mastani distt Karak

PHONE 0546.5355699

To Director of Elementary and Sec education M. Rafiq Ktk dabgori poshaur K.P.K

Org.	Dest.
Insured	Wt. (kgs)
<input type="checkbox"/> Yes <input type="checkbox"/> No.	Pcs.
Value	
Service Type	
<input type="checkbox"/> Overnight <input type="checkbox"/> Hailday	
<input type="checkbox"/> Extra Sp. <input type="checkbox"/> Same Day	
<input type="checkbox"/> Second Day	
Service Charges	
Weight	
Handling	
Other	
GST	
Insurance Premium	
TOTAL	

PICKUP INFORMATION		
Counter Code	Date	Time

AS PER P.O. ACT 1988, THIS WILL NOT CARRY LETTER/POSTCARDS. Any suggestion/complaint about service may be mailed to PO Box # 8042, Karachi, 75400.

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CTC
Handwritten signature

S.No. 99849

Roll No. 8935

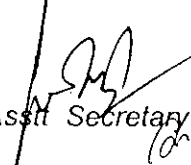
Group. Humanities



Annex-G
17

Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION
SESSION 2001-SUPPLEMENTARY

This is to Certify that Aisha Bibi *Daughter of* Bahadar Zaman
and a resident of Karak District *Registered No.* 9090-B/P-2000
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in Oct/Nov: 2001 *as a* Private *Candidate. She obtained* 477 *Marks out of 1100*
and has been placed in Grade D *Representing* Fair *. She has been awarded Grade* - *on the*
basis of internal assessment by the institution concerned. The Examination was taken in parts.


Asst Secretary




Secretary

This certificate is issued without alteration or erasure.

S.No. 57217

Roll No. 111004



(B)

Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination
SESSION 1999 – ANNUAL
(Humanities Group)

This is to Certify that Aisha Bibi Son / Daughter of Bahadar Zaman
and a student of Govt. Girls High School Takhti Nasratti, Karak has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in May/June 1999 as a Regular
candidate. He / She obtained 574 Marks out of 850 and has been placed in Grade B Representing Very Good

The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|--------------------|-------------------------------|
| 1. English | 3. Islamiyat | 5. Mathematics | 7. Islamic Study |
| 2. Urdu | 4. Pakistan Studies | 6. General Science | 8. Elements of Home Economics |

He / She has been awarded Grade A on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form March 15, 1983


Asstt. Secretary


C.T.C.


Secretary

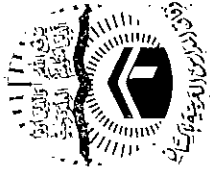
This certificate is issued without alteration or erasure.

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

شهادة التحصيل

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

19

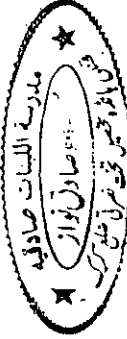


الحمد لله رب العالمين، والصلوة والسلام على خاتمة الأنبياء والمرسلين، وعلى آله وصحبه أجمعين. أما بعد، فإن رئاسة
وفاق المدارس العربية بباكستان، تشهد بأن الطالبة عائشة بنت بهادر زمان من كوك

المولودة في عام ١٩٨٣ م، قد أتمت الدراسة الشهائية في مدرسة البنات صادق، ونجحت في الامتحان النهائي المنعقد

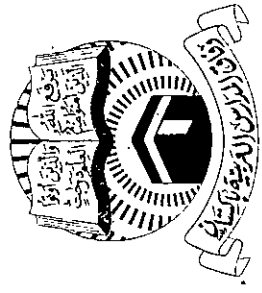
تحت إشراف وفاق المدارس العربية بباكستان في شعبان ١٤٢٦ هـ. بتقدير جيد جداً. وكذا على ذلك استختمت الشهادة،
ورئيس الوفاق إذ يصفها هذه الشهادة، بوصفها بتقوى الله تعالى ويسأل الله عز وجل أن يسلك بها سبيل العائلات العاملات؛

رقم التسجيل 1423-05-009414
رقم الترخيص 4817
الذخيرات 371
محل الإصدار: وزارة التعليم
التاريخ: 18-10-2005
رقم الترخيص: 1423-05-009414
رقم الترخيص: 4817
الذخيرات: 371
محل الإصدار: وزارة التعليم
التاريخ: 18-10-2005



١٥٥

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ



مَشْرِفَةُ الْحَمَلِيِّ

وَمَجْلَدُ الْإِسْلَامِيَّةِ وَالْحَمَلِيِّ



الحمد لله رب العالمين، والصلاة والسلام على خاتمة الأنبياء والمرسلين، وعلى آله وصحبه أجمعين. أتابع، فإن رئاسة
وفاء لدارنا العزيزة بباكستان، تشهد بأن الطالبة عائشة بنت بهادر زمان من كركي

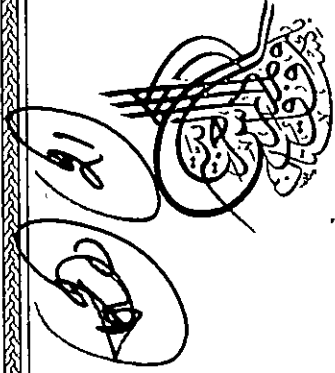
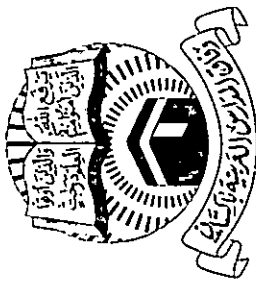
المولودة في عام ١٤٠٣هـ. قد أتت الدراسة العالية في معهد البنات صادق شكري بالله (كوكي) ونجحت في الامتحان النهائي المنعقد
٢٠١٣م تحت إشراف وفاق المدارس العربية باكستان في شعبنا ١٤٢٥هـ بتقدير جيد جداً. وبكآ على ذلك استحققت الشهادة العالمية
ورئيس الوفاق إذ يصفها هذه الشهادة بوصفها بتقوى الله تعالى ويسأل الله عز وجل أن يسلك بها سبيل الصالحات العاملات،

رقم التسجيل	٢٥٠٤٣٣	بسم الله الرحمن الرحيم	بسم الله الرحمن الرحيم	بسم الله الرحمن الرحيم
رقم الترخيص	٤٩١٢	بسم الله الرحمن الرحيم	بسم الله الرحمن الرحيم	بسم الله الرحمن الرحيم
الدرجات	٤٤١	بسم الله الرحمن الرحيم	بسم الله الرحمن الرحيم	بسم الله الرحمن الرحيم
محل الإصدار	الجامعة الإسلامية العالمية	بسم الله الرحمن الرحيم	بسم الله الرحمن الرحيم	بسم الله الرحمن الرحيم
التاريخ	١٤٢٥/١٠/٢٥	بسم الله الرحمن الرحيم	بسم الله الرحمن الرحيم	بسم الله الرحمن الرحيم

بسم الله الرحمن الرحيم

الشافعية الخاصة

الدراسة العلمية



الحمد لله رب العالمين والصلوة والسلام على خاتمة الانبياء والمرسلين، وعلى آله وصحبه أجمعين. أتابع، فإن رئاسة
وفاء الدرر للبريم بباكستان، تشهد بأن الطالبة... عائشة بي بي... بنت... بهادر زمان... من... كرك...

المولودة في عام... ١٩٨٣م... قد أتت دراسة الثانوية الخاصة في مدرسة البنات مادية تشيكية باندكروك (وتخرجت في الامتحان النهائي المنعقد
تحت إشراف وفاق المدارس العربية باكستان في شعبان... ١٤١٢هـ... بتقدير... جيد جداً... وبسبب ذلك استحققت الشهادة
ورئيس الوفاق إذ يصفها هذه الشهادة بوصفها بتقوى الله تعالى ويسأل الله عز وجل أن يسلك بها سبيل العالقات العاملات؛

رقم التسجيل	٢٠٢٣٥٨	رقم الترخيص	٦٢٢٩	رقم التسجيل	٢٠٢٣٥٨
رقم الترخيص	٦٢٢٩	رقم الترخيص	٦٢٢٩	رقم الترخيص	٦٢٢٩
الدرجات	٢٥٥	الدرجات	٢٥٥	الدرجات	٢٥٥
محل الإصدار	الكويت	محل الإصدار	الكويت	محل الإصدار	الكويت
التاريخ	٢٠١١/١١/٢٠	التاريخ	٢٠١١/١١/٢٠	التاريخ	٢٠١١/١١/٢٠

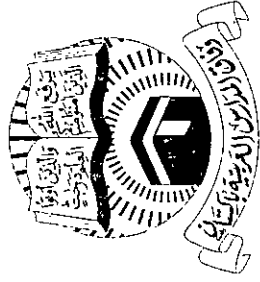


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بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

الشهادة العامة

من جامعة الإمام محمد بن سعود الإسلامية



٤٩

الحمد لله رب العالمين. والصلوة والسلام على خاتم الانبياء والمرسلين؛ وعلى آله وصحبه أجمعين. أقام بعد. فإن رسالة
وفاء المرسلين للعرين بباكستان، تشهد بأن الظالبة عائشة بي بنت بهادر زمان من كرك
المولودة في عام ١٤١٣ هـ. قد أتممت دراسة الثانوية العامة في مدرسة البنات صادقة تحت نعتي ركرك) ونجحت في الامتحان النهائي المنعقد
تحت إشراف وفاق المدارس العربية بباكستان في شعبان ١٤١٣ هـ بتقدير ممتاز. وبكذلك على ذلك استحققت الشهادة
ورئيس الوفاق إذ يمنحها هذه الشهادة يوصيها بتقوى الله تعالى ويسأل الله عز وجل أن يسلك بها سبيل العالقات العاملات.

رقم التسجيل ٥٥٦٢٩
رقم الجلبوس ٩٢١٢
الدرجات ١٠٠ / ١٠٠
محل الإصدار: الرياض - الرياض
التاريخ: ٢٢/٢٣/١٤١٣ هـ

رئيس الجامعة
رئيس الجامعة
رئيس الجامعة

رئيس الجامعة

رئيس الجامعة

رئيس الجامعة

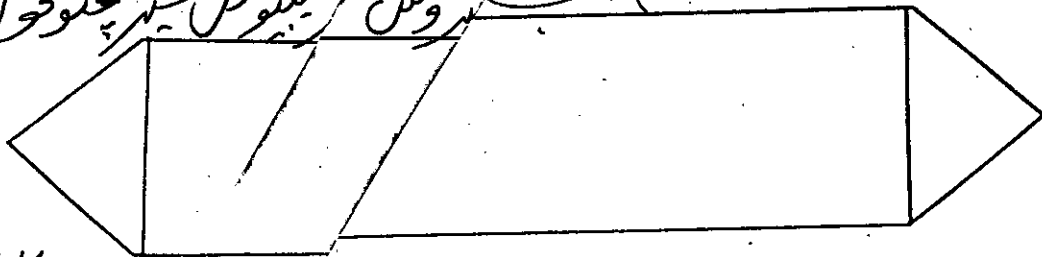
رئيس الجامعة

رئيس الجامعة

رئيس الجامعة

صادق وطار
صادق وطار
صادق وطار

بعدالت حجاب روس بینوزل خیر پختونخوا ایشیا

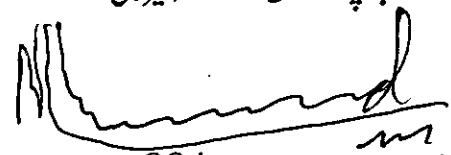


2014ء پنجاب ایبلانٹ
عائشہ بی بی بنام حکومت

مورخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام ایشیا اور کیلئے ناہم محمود اینڈ مسید عبدالحی صیفا ریڈ ویلیج
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 و تقرر ثالثتہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اہل کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جاندا التوائے مقدمہ کے سبب Academy
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 سند ہے۔


ماہ اپریل 2014

المرقوم 29

Aisha Bilal

گواہ
کے لئے منظور ہے۔
بمقام لیکچرار

34

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No 602/2014

AISHA BIBI D/O Bahadar Zaman, TT, GGMS Nara Banda, Tehsil Takhti Nasrati District Karak

.....Appellant

VERSUS

Govt: of KPK through Secretary E&SE KPK Peshawar and others

.....Respondents

Joint Reply / Para wise comments for and on behalf of Respondents No 1 to 3

Respectfully Sheweth:-

The Respondents submit as under:-

Preliminary Objections

1. That the appellant has got no cause of action / locus standi.
2. That the appellant has not come to this Honourable Tribunal with clean hands.
3. That appellant has concealed material facts from this Honourable Tribunal.
4. That the instant service appeal is bad for non-joinder and mis-joinder of the necessary parties.
5. That the instant service appeal is not maintainable in its present form.
6. That the appellant is estopped by her own conduct to file the instant appeal before this Honourable Tribunal.
7. That the appellant is not entitled to the relief as she has claimed.
8. That the instant service appeal has been filed with malafide intentions.
9. That the instant service appeal is against the relevant provisions of law.
10. That the instant appeal is badly time barred.
11. That this Honourable Tribunal has got no jurisdictions to entertain the instant appeal.

ON FACTS

1. That para-1 needs no comments as it pertains to the service record of the appellant.
2. That para-2 pertains to record hence needs no comments.
3. That para-3 needs no comments being irrelevant in the present circumstances and actual issue of the case.

0-7
03.04.17

- 33
4. That para-4 is incorrect and misleading one. The Respondent no 3 has acted as per set criteria and up gradation policy in the instant case as the appellant has miserably failed to provide and submit the relevant service record to the Respondent no 3 at the DSC for up gradation of TT from BPS-15 to BPS-16, hence she was not upgraded to BPS-16 against the post due to lack of required documents with the quarters concerned.
5. That para-5 is incorrect and misleading. No departmental appeal has been filed by appellant nor is any such record available in the office of the Respondents.

ON GROUNDS

- A. That Ground-A is incorrect and denied. The appellant has been treated as per set criteria and relevant policy of up gradation by Respondent no 3, being no violation of article 4 and 25 of the Constitution of Pakistan 1973.
- B. That Ground-B is also incorrect and denied. The appellant has rightly been treated by the Respondent no 3 in accordance with the facts and circumstances of the present case, the burden of which lies upon the appellant for not submitting the relevant documents to Respondent no 3 prior to the meeting of DSC for the grant of up gradation in BPS-16 against TT post.
- C. That ground-C is incorrect and denied. Detailed reply of this para has already been given in the above mentioned paras, hence no further comments.
- D. That Ground-D is legal. However the Respondents seek the leave of this Honourable Tribunal to advance additional grounds at time of arguments before this Honourable Bench.

It is therefore mostly humbly prayed that on acceptance of this reply, the appeal in hand may very kindly be dismissed in favour of the Respondents with special cost.

SERECTARY

Elementary & Secondary Education

KPK, Peshawar KPK, Peshawar

DIRECTOR

Elementary & Secondary Education

DISTRICT EDUCATION OFFICER (Female)

District KARAK

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No 602/2014

AISHA BIBI D/O Bahadar Zaman, TT, GGMS Nara Banda, Tehsil Takhti Nasrati District Karak

.....Appellant

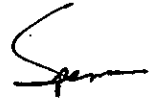
VERSUS

Govt: of KPK through Secretary E&SE KPK Peshawar and others

.....Respondents

AFFIDAVIT

I, Sabira Parveen, District Education Officer (Female) Karak, do hereby solemnly affirm and declare that the contents of this joint para wise comments/ reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.



DEPONENT

ATTESTED

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

IN RE; Service Appeal NO.602\2014

Aisha Bibi.....Appellant

Versus

Govt. of KPK and others.....Respondents

Rejoinder on behalf of appellant to the reply of respondent No.1 to 3.

Preliminary Objections:

All the preliminary objections have been taken in routine. Appellant has got cause of action and the appeal is competent in its present form. It is further submitted that the appellant has presented true picture before this honorable tribunal and nothing has been concealed by the appellant. The appellant has not done anything which would estopped her from asserting her rights. The appellant has come to this honorable tribunal with clean hands. All the necessary parties have arrayed as respondents. The appeal is correct and has bonafidely been filed by the appellant in order to assert her rights. Proper application for condonation of delay has been filed. The appeal is in accordance with law and this honorable tribunal has got the jurisdiction to entertain it.

ON FACTS:

1. Para-1 to 3 of the reply needs no rejoinder.
2. Para-4 of the reply is misleading. The appellant was never asked to submit the require documents however it is further submitted that all the required documents of the appellant are available with the respondents.
3. Para-5 is wrong and incorrect. Proper departmental was forwarded to the respondents.

GROUND:

- A. Reply of the Ground-A of the reply is wrong and incorrect. Ground-A of the appeal reiterated.

B. Reply of the Ground-B of the reply is wrong and incorrect. The appellant was never asked to submit the require documents however it is further submitted that all the required documents of the appellant are available with the respondents. Ground-B of the appeal reiterated.

C. Reply of the Ground-C of the reply is wrong and incorrect.

D. Reply of the Ground-D of the reply is wrong and incorrect.

In the light of the above rejoinder the petition may kindly be accepted.

Aisha Bibi

Appellant

Through

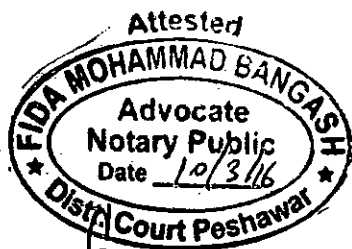
Nasir Mahmood Advocate
Supreme Court of Pakistan
13-D Haroon Mansion Peshawar.

Affidavit

I do hereby declare, and affirm on oath that the contents of accompanying rejoinder as per instructions of my client are true and correct to the best my knowledge and belief and nothing has been concealed from this hon'ble tribunal.

Aisha Bibi

Deponent



KHYBER PAKHTUNKWA SERVICE TRIBUNAL, PESHAWAR

No. 1694 /ST

Dated 13 / 10 / 2016

To The Director E&SE,
Peshawar.

Subject: - **JUDGMENT**

I am directed to forward herewith a certified copy of Judgement dated 5.10.2016 passed by this Tribunal on the above subject for strict compliance.

Encl: As above

REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.