
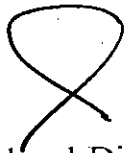


12.10.2023

Junior of learned counsel for the petitioner present.
Mr. Muhammad Nazir, ADEO alongwith Mr. Asif Masood
Ali Shah, Deputy District Attorney for the respondents
present.

Junior of learned counsel for the appellatant requested for
adjournment on the ground that learned counsel for the
appellatant is not available. Adjourned. To come up for
arguments on 01.11.2023 before the D.B. Parcha Peshi given
to the parties.


(Fareeha Paul)
Member (E)


(Salah-ud-Din)
Member (J)

26.09.2023

1. Junior to counsel for the appellant present. Mr. Muhammad Jan learned District Attorney alongwith Mr. Muhammad Nazir, ADEO on behalf of respondents present.

2. Representative of the respondents produce copy of Letter dated 22.03.2023 addressed to District Education Officer (M) Lakki Marwat wherein he has requested to provide advertisement, Merit List, DSC Minutes and process of recruitment for the year 2010 & 2011. Representative of the respondents as well as learned counsel for the appellant are strictly directed to produce the relevant record on the next date positively. To come up for arguments on 12.10.2023 before

D.B. P.P given to parties.

(Muhammad Akbar Khan)
Member (E)

(Rashida Bano)
Member (J)


*KaleemUllah


SCANNED
KP ST
Peshawar

24th Aug. 2023 1. Learned counsel for the appellant present. Mr. Muhammad Jan,
District Attorney for the respondents present.

2. Former made a request for adjournment in order to prepare the
brief. Adjourned. To come up for arguments on 20.09.2023 before
D.B. P.P given to the parties.

SCANNED
KPST
Peshawar


(Salah-Ud-Din)
Member (J)


(Kalim Arshad Khan)
Chairman


Mutazem Shah

Q-1111111111
Peshawar

20th Sep. 2023 1. Learned counsel for the appellant present. Mr. Fazal Shah
Mohmand, Additional Advocate General alongwith Mr. Muhammad
Nazir, ADO for the respondents present.

2. During the course of arguments, the Tribunal felt necessity for
production of certain documents on both sides. The appellant is
directed to produce original educational testimonials while the
respondents are directed to produce the record of recruitment process
including everything within three days. Being an old case of 2014, let it
be fixed on 26.09.2023 before the D.B. P.P given to the parties.

SCANNED
KPST
Peshawar


(Muhammad Akbar Khan)
Member (E)


(Kalim Arshad Khan)
Chairman

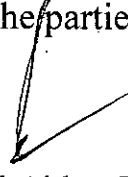
Kamranullah

19.05.2023

Learned counsel for the appellant present. Mr. Muhammad Nazir, ADEO alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant requested for adjournment on the ground that he was not feeling well, therefore, he has not gone through the record. Adjourned. The appeal in hand pertains to the year 2014, therefore, learned counsel for the appellant shall positively argue the appeal on 02.06.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
K. S. T
Peshawar



(Muhammad Akbar Khan)
Member (E)



(Salah-ud-Din)
Member (J)

Naeem Amin

02.06.2023

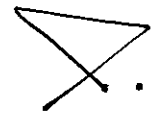
Learned counsel for the appellant present. Mr. Muhammad Nazir, ADEO alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant seeks time for preparation of arguments. Adjourned. To come up for arguments on 24.08.2023 before the D.B. Parcha Peshi given to the parties.

SCANNED
K. S. T
Peshawar



(Fareeha Paul)
Member (E)



(Salah-ud-Din)
Member (J)


Naeem Amin


06.04.2023

Nemo for parties.

Asif Masood Ali Shah learned Deputy District Attorney for respondents present.

File to come up alongwith connected Service Appeal No.773/2014 titled "Jamshed Bibi Vs. Government of Khyber Pakhtunkhwa on 28.04.2023 before D.B.


(Muhammad Akbar Khan)
Member (E)



(Rozina Rehman)
Member (J)

28.04.2023

Appellant present through counsel.

Muhammad Jan, learned District Attorney for respondents present.


Learned Member Executive (Mr. Muhammad Akbar Khan) is on leave, therefore, case is adjourned. To come up for arguments on 19.05.2023 before D.B. Parcha Peshi given to the parties.


(Rozina Rehman)
Member (J)

4th Nov. 2022

Lawyers are on strike today.

To come up for arguments on 14.12.2022 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.



(Fareeha Paul)
Member(E)


(Kalim Arshad Khan)
Chairman

14th Dec. 2022


Due to strike of the Bar and Mrs. Rozina Rehman, learned Member (J) being on leave, this matter is adjourned to 21.02.2023 before the D.B. Office is directed to notify the next date on the notice board as well as the website of the Tribunal.

SCANNED
KPST
Peshawar


(Fareeha Paul)
Member(E)

21.02.2023

Bench is incomplete, therefore, case is adjourned to 06.04.2023 for the same as before.


Reader

20.05.2022

Counsel for the appellant present.

Mr. Kabir Ullah Khattak learned Additional Advocate General for respondents present.

Due to paucity of time, arguments could not be heard. Therefore, case is adjourned. To come up for arguments on 19.07.2022 before the D.B.


(Rozina Rehman)
Member (J)


(Salah-Ud-Din)
Member (J)

19.07.2022

Appellant present through counsel.

Muhammad Riaz Khan Paindakheil, learned Assistant Advocate General for respondents present.

File to come up alongwith connected Service Appeal Nno773/2014 titled Jamshid Bibi Vs. Government of Khyber Pakhtunkhwa on 19.09.2022 before D.B.

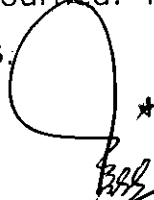

(Fareeha Paul)
Member(E)


(Rozina Rehman)
Member (J)

19.09.2022

Learned counsel for the appellant present. Mr. Muhammad Nazir, ADEO (Litigation) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.

Learned Member (Judicial) Mr. Salah-ud-Din is on leave, therefore, arguments could not be heard. Adjourned. To come up for arguments on 04.11.2022 before the D.B.


(Mian Muhammad)
Member (Executive)


18.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 09.06.2022 for the same as before.


Reader.

15.04.2022

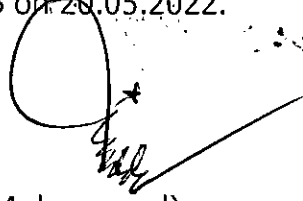
As per directions of the worthy Chairman the instant case be refixed on 09.05.2022 instead of 09.06.2022. Notices of prosecution of appeal be issued to the parties for the date fixed.

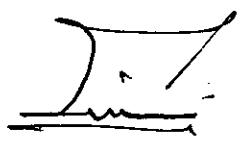

Reader

09.05.2022

Learned counsel for the appellant present. Mr. Muhammad Riaz Khan Paindakhel, Assistant Advocate General for respondents present.

Learned counsel for the appellant again requested for adjournment on the ground that he has not made preparation for arguments. The appeal in hand pertaining to the year 2014, therefore, last opportunity granted. To come up for arguments before the D.B on 20.05.2022.


(Mian Muhammad)
Member(E)


(Salah Ud Din)
Member(J)

27.05.2021

Appellant present through counsel.

Muhammad Adeel Butt Additional Advocate General
alongwith Muhammad Nazeer ADO for respondents
present.

Relevant record in respect of adjustment of the
appellant in the light of inquiry report is not available,
therefore, representative of the respondents is directed
to make sure the production of relevant record before
date.

Adjourned to 13.09.2021 for arguments before D.B



(Atiq ur Rehman Wazir)
Member (E)



(Rozina Rehman)
Member (J)

13.09.2021

Appellant present through counsel.

Asif Masood Ali Shah learned D.D.A alongwith Nazeer
Ahmad ADEO for respondents present.

Request for adjournment was made on behalf of appellant;
granted. To come up for arguments on 29.12.2021 before D.B.



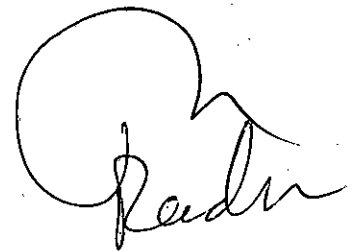
(Rozina Rehman)
Member (J)



Chairman

29/12/2021


Due to winter vacations the case
is adjourned to 18/3/2022 for the
same as before.



13.01.2021

Counsel for the appellant and Addl. AG for the respondents present.

Former requests for adjournment as he is engaged before the Hon'ble High Court in various cases today. Adjourned to 19.02.2021 for hearing before the D.B.

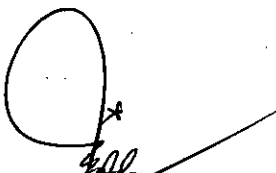

(Atiq-ur-Rehman Wazir)
Member(E)


Chairman

19.02.2021

Counsel for the appellant and Addl. AG along with Muhammad Nazir, AD and Muhammad Sagged, Litigation Officer for the respondents present.

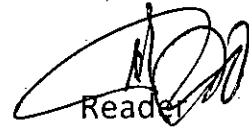
Former requests for adjournment as the appellant could not turned up before the Tribunal today and submit the documents relevant to the appeal in hand. Adjourned to 23.04.2021 before the D.B.


(Mian Muhammad)
Member(E)


Chairman

28-4 .2020

Due to COVID19, the case is adjourned to
8/7 /2020 for the same as before.



Reader

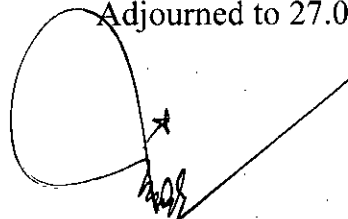
10.07.2020

Junior to counsel for the appellant present.

Addl: AG for respondents present.

Junior to counsel for the appellant seeks adjournment
as senior counsel is not available today.

Adjourned to 27.08.2020 for arguments before D.B.



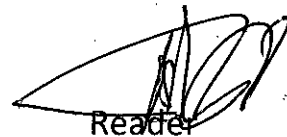
(Mian Muhammad)
Member(E)



(Rozina Rehman)
Member(J)

27.08.2020

Due to summer vacation, the case is adjourned to
03.11.2020 for the same as before.

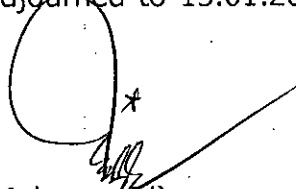


Reader

03.11.2020

Junior to counsel for the appellant and Addl. AG for
the respondents present.

The Bar is observing general strike, therefore, the
matter is adjourned to 13.01.2021 for hearing before the
D.B.



(Mian Muhammad)
Member



Chairman

24.01.2020

Due to general strike on the call of Khyber Pakhtunkhwa Bar Council learned counsel for the appellant is not available today. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Adjourned to 13.03.2020 for further proceedings/arguments before D.B.



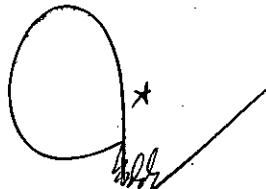
(M. Amin Khan Kundi)
Member



(Hussain Shah)
Member

13.03.2020

Counsel for the appellant present. Mr. Muhammad Jan, DDA for respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 28.04.2020 before D.B.



Member



Member

26.04.2019


Due to general strike of the bar, the case is adjourned. To come up for arguments on 08.07.2019 before D.B.



Member


Member

08.07.2019

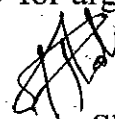
Counsel for the appellant and Addl: AG for respondents present. Learned counsel for the appellant seeks adjournment as he has not prepared the case. The case pertains to the year 2014, therefore, last opportunity granted for arguments. Case to come up for arguments on 24.09.2019 before D.B.



Member


Member

24.09.2019


Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Mr. Muhammad Nazir, ADO for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned to 28.11.2019 for arguments before D.B.

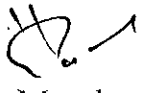

(Hussain Shah)
Member


(M. Amin Khan Kundi)
Member

28.11.2019

Due to general strike of the Pakistan Bar Council, the case is adjourned. To come up on 24.01.2020 before D.B. Muhammad Nazeer ADEO representative of the respondent department present.


Member


Member

03.12.2018

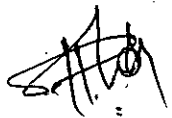
Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 23.01.2019 before D.B.


(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

23.01.2019

Uzma Said, Junior counsel for the appellant present. Mr. Usman Ghani, District Attorney for the respondents present. Junior counsel for the appellant requested for adjournment on the ground that learned senior counsel for the appellant is busy before the Hon'ble Peshawar High Court, Peshawar and cannot attend the Tribunal today. Adjourned to 01.03.2019 for arguments before D.B.



(HUSSAIN SHAH)
MEMBER



(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

01.03.2019

Appellant in person and Addl. AG for the respondents present.

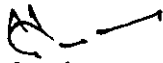
Due to general strike on the call of Bar Association instant matter is adjourned to 26.04.2019 before the D.B.



Member


Chairman

13.08.2018

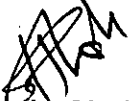
Mr. Amjid Khan, Advocate counsel for the appellant present. Mr. Muhammad Riaz Painsdakhel, Asst. AG for respondents present. Learned counsel for the appellant stated that other connected appeals are fixed on 04.10.2018, as such the appeal in hand is adjourned to the said date i.e 04.10.2018 for arguments before D.B.


Member


Chairman

04.10.2018


Appellant absent. Learned counsel for appellant absent. Mr. Muhammad Jan learned Deputy District Attorney present. Adjourned. To come up for arguments on 18.10.2018 before D.B.



(Hussain Shah)
Member


(Muhammad Hamid Mughal)
Member

18.10.2018

Learned counsel for the appellant Mr. Zia Ullah learned Deputy District Attorney for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for and arguments on 03.12.2018 before D.B.

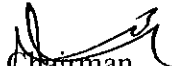

(Hussain Shah)
Member


(Ahmed Hassan)
Member

7.2.2018

Counsel for the appellant and Addl. AG for the respondents present. Due to shortage of time, arguments could not be heard. To come up for arguments on 28.02.2018 before the D.B.




Member


Chairman


28.02.2018

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional AG for the respondents present. Learned counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 11.04.2018 before D.B.

11.04.2018


 Member (Executive)  Member (Judicial)
Learned counsel for the appellant and Mr. Kabir Ullah Khattak, learned Additional Advocate General alongwith Dil Jan Superintendent for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 22.06.2018 before D.B



(Ahmad Hassan)
Member


(Muhammad Hamid Mughal)
Member

22.06.2018

Counsel for the appellant present. Mr. Ziaullah, Deputy District Attorney for the respondents also present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 13.08.2018 before D.B.


(Ahmad Hassan)
Member


(Muhammad Amin Khan Kundi)
Member

21.12.2017

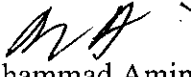
Due to Judicial Officer's Conference today, case is
adjourned to 07.02.2018 for the same before the D.B.



Reader

20.06.2017


Counsel for the appellant and Mr. Ziaullah, Deputy District Attorney for the respondents present. Counsel for the appellant requested for adjournment. Adjourned. To come up for arguments on 10.08.2017 before D.B.



(Muhammad Amin Khan Kundi)
Member

(Gul Zeb Khan)
Member

10.08.2017


Counsel for the appellant present. Mr. Kabirullah Khattak, Assistant AG for the respondents present. Learned counsel for the appellant seeks adjournment. Adjourned. To come up for arguments on 21.09.2017 before D.B.



(Muhammad Amin Khan Kundi)
Member (J)


(Muhammad Hamid Mughal)
Member (J)

21.09.2017


Junior to counsel for the appellant present. Kabir Ullah Khattak, Learned Assistant Advocate General for the respondents present. Junior to counsel for the appellant seeks adjournment. Adjourn. To come up for arguments on 16.10.2017 before D.B.

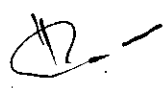

Member
(Executive)


Member
(Judicial)

16.10.2017

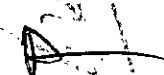
Counsel for the appellant present. Mr. Muhammad Jan Deputy District Attorney for the respondents present. To come up alongwith connected appeals for 21.12.2017 before D.B.


(Ahmad Hassan)
Member (E)


(Muhammad Hamid Mughal)
Member (J)

02.11.2016

Counsel for the appellant and Asst:AG alongwith Mr. Hameed Ur Rehman, AD(Lit) and Dil Jan, Supdt for the respondents present. Learned Asst: AG requested for adjournment. To come up for arguments on 24.01.2017.


(ABDUL LATIF)
MEMBER


(PIR BAKHSH SHAH)
MEMBER

24.01.2017

Agent to counsel for the appellant and Mr. Abdul Shakoor, Assistant Account Officer alongwith Addl: AG for respondents present. Agent to counsel for the appellant requested for adjournment as counsel for the appellant was busy before the Peshawar High Court, Peshawar. To come up for arguments on 20.06.2017 before D.B.


Member


Chairman

12.05.2016

Junior to counsel for the appellant and Assistant AG for respondents present. Junior to counsel for the appellant requested for adjournment. Adjourned for arguments on 22.7.2016.

Member

Member

22.07.2016

Counsel for the appellant and Mr. Pir Iqbal, Supdt. alongwith Assistant AG for respondents present. Assistant AG argued that the similar nature cases have already been fixed on 19.8.2016 therefore, the instant appeals may be clubbed ^{with} _{on} other connected cases. To come for arguments on 19.8.2016.

Member

Member

19.08.2016

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for arguments on 2-11-16.

Member

Member

28.07.2015

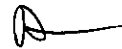
Counsel for the appellant, M/S Amanullah, Supdt. and Khurshid Khan, SO alongwith Addl: A.G for respondents present. Written reply on behalf of respondents No. 1 to 3 submitted. The learned Addl: A.G rely on the same on behalf of respondent No. 4. The appeal is assigned to D.B for rejoinder and final hearing for 25.11.2015.


Chairman

25.11.2015

Counsel for the appellant and Mr. Muhammad Jan, GP for respondents present. Rejoinder submitted on behalf of the appellant which is placed on file. To come up for arguments on

31/3/16



Member

31.03.2016

Counsel for the appellant and Mr. Pir Iqbal, Supdt alongwith Asstt: AG for respondents present. Counsel for the appellant requested for adjournment. To come up for arguments on 12.05.2016.


MEMBER
MEMBER

8.

15.04.2015

Ms. Uzma Sayed, Advocate on behalf of counsel for the appellant, M/S Amanullah Khan, Supdt for respondent No.1 and Akram Marwat, Supdt for respondents No.3 and 4 alongwith Asstt: AG present. Counsel for the appellant is not in attendance due to strike of the Bar. Adjourned for preliminary hearing to 29.04.2015 before S.B.


Chairman

9. 29.04.2015

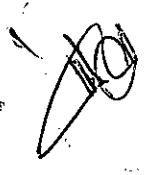
Counsel for the appellant, M/S Amanullah, Supdt: for respondent No.1 and Akram, Supdt: for respondents No.3 and 4 alongwith Asstt: A.G for respondents present. Learned counsel for the appellant argued that the appellant was appointed as D.M (BPS-9) on 24.01.2011 and since then he has not paid the salary despite performing her duties. That the appellant preferred departmental appeal on 20.2.2014 which was not responded and hence the instant service appeal on 30.5.2014. That the appellant is entitled to draw the pay.

Learned Asstt: A.G argued that the services of the appellant were terminated as a result of fake appointment vide notification dated 25.8.2014.

Since the factual controversy is involved as such the appeal is admitted to regular hearing. Security and process fee be deposited within 10 days, where-after notices be issued to the respondents for written reply/comments for 28.7.2015 before S.B.


Chairman

Appellant Deposited
Security & Process Fee



57.
17.10.2014

Counsel for the appellant and M/S Amanullah Khan, Supdt for respondent No.1 and Akram Marwat, Supdt for respondent No. 3 and 4 with Muhammad Jan, GP for the respondents present. Preliminary arguments partly heard. Representatives of the respondents are directed to submit complete record of the appellant. To come up for further preliminary hearing on 19.12.2014.


Member

6.
Reader Note:

19.12.2014

No one is present on behalf of the appellant and Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Since the Tribunal is incomplete, therefore, case is adjourned to 03.03.2015 for the same.


Reader

7.
03.03.2015

Counsel for the appellant and Asst: AG for the respondents present. Learned Asst: AG requested for adjournment. Adjourned to 15.04.2015 for preliminary hearing before S.B.


Member


3.
11.08.2014

Counsel for the appellant present. Preliminary arguments partly heard. Since the impugned order is not available on file and as per contention of learned counsel for the appellant, salary of the appellant has been withheld without any justification, therefore, pre-admission notice be issued to the learned GP and to respondents to appear before the Court and clarify the position. To come up for preliminary hearing on 24.09.2014.


Member

4.
24.09.2014



Counsel for the appellant and Mr. Ziaullah, GP for the respondents present. The learned counsel for the appellant stated that similar nature of appeal No.540/2014 titled Mst. Shehnaz Bibi and appeal No. 541/2014, Mst. Sohila Zafar have already been admitted and pending before learned Bench-I on 24.12.2014, therefore, the same may also be admitted for regular hearing. The above mentioned service appeals may be requisition as well as the learned GP is also directed to produce complete record of the appellant. To come up for further preliminary hearing on 17.10.2014.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 771/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	02/06/2014	The appeal of Mst. Neelum Nayab resubmitted today by Mr. Saadullah Khan Marwat Advocate, may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.  REGISTRAR
2	3-6-2014	This case is entrusted to primary Bench for preliminary hearing to be put up there on <u>11-8-2014</u> .  CHAIRMAN


SCANNED
KPST
Peshawar

The appeal of Mst. Neelum Nayab D.M GGMS, Khwaja Khel Lakkai Marwat received today i.e. on 30.05.2014 is incomplete on the following score which is returned to the counsel for the appellatant for completion and resubmission within 15 days.

- 1- Appeal may be paged marked according to the Index.
- 2- Annexures of the appeal may be attested.
- 3- Copy of charge report mentioned in para-3 of the memo of appeal (Annexure-C) is not attached with the appeal which may be placed on it.

No. 847 /S.T,

Dt. 30/5 /2014.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Saadullah Khan Adv; Pesh.

Sir

Resubmitted after completion

by

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

S.A No. 771 / 2014

Neelum Nayab

Versus

D.E.O & others

I N D E X

S.#	Description of Documents	Annex	Page
1.	Memo of Appeal		1-3
2.	Educational Qualifications,	"A"	4-7
3.	Appointment Order, 24.01.2011	"B"	8
4.	Charge Report, 26.01.2011	"C"	9
5.	Attendance,	"D"	10-19
6.	Civil Suit/Written Statement, 10.11.2012	"E"	20-23
7.	Order of Civil Judge, 13.06.2013	"F"	24-25
8.	Representation, 20.02.2014	"G"	26-27

Neelum Nayab
Appellant

Through

Saadullah Khan Marwat

Dated: 30.03.2014

(Saadullah Khan Marwat)
Advocate
21-A Nasir Mension,
Shoba Bazar, Peshawar.
Ph: 0300-5872676

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR

S.A No. 771/2014

Neelum Nayab D/o Nageeb Ullah,
Drawing Mistress, GGMS, Khwaja Khel,
Lakki Marwat Appellant

Versus

1. District Education Officer (Female),
Elementary & Secondary Education, Lakki
Marwat.
2. Director of Education, Directorate of
Elementary & Secondary Education, KP,
Peshawar.
3. Secretary, Government of KP, Elementary &
Secondary Education Department,
Peshawar.
4. District Accounts Officer, Lakki Marwat Respondents

⇔<=>⇔<=>⇔<=>⇔<=>⇔

**APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT,
1974 WHEREBY MONTHLY SALARIES OF
APPELLANT WERE WITHHELD SINCE 24.01.2011
TILL DATE FOR NO LEGAL REASON.**

⇔<=>⇔<=>⇔<=>⇔<=>⇔

Respectfully Sheweth:

1. That appellant has educational qualification of Drawing Mistress of PTC, BED and MA Education. (Copies as annex "A")
2. That numerous posts of Drawing Masters, B-09 alongwith other disciplines were advertised by R. No. 1 for appointment as such. Appellant applied to the same in prescribed manner.

3. That after going through the prescribed procedure of selection, appellant was appointed as Drawing Mistress, B-09 on the recommendation of Department Selection Committee vide order dated 24.01.2011 on regular basis and then the charge was assumed on 26.01.2011. (Copies as annex "B" & "C")
4. That on one hand, appellant was performing her official duties in the school while on the other hand, she was not paying her monthly salaries, so filed civil suit before the court of Civil Judge, Lakki Marwat on 10.11.2012 for payment of salaries. (Copies as annex "D" & "E")
5. That on 13.06.2013, the learned Civil Judge, Lakki Marwat returned the suit to appellant to seek remedy before the proper forum. (Copy as annex "F")
6. That on 20.02.2014, appellant filed departmental appeal before R. No. 2 which made dead response till date. (Copy as annex "G")

Hence this appeal, inter alia, on the following grounds:-

GROUND S:

- a. That having the requisite educational qualification and by going through the prescribed procedure of appointment, appellant was selected as Drawing Mistress in B-09 on the recommendation of the DSC.
- b. That till date, appellant is performing her official duties at the said school by marking herself present.
- c. That similarly placed other colleagues of appellant numbering dozens were paid monthly salaries by the department and those who were refused, approached this Hon'ble Tribunal for release of their monthly salaries and then the Hon'ble Tribunal was pleased to accept the appeal, directing the authority to pay them salaries and then the same were paid from the date of their appointments.

- d. That as per law, rules and judgments of the Superior Courts, similarly and equally placed persons be treated similarly and equally to avoid discrimination.
- e. That the act of the respondents by not paying monthly salaries to appellant is based on ulterior motive.

It is, therefore, most humbly prayed that on acceptance of the appeal, respondents be directed to release monthly salaries of appellant since 24.01.2011, and onward too, with such other relief as may be deemed proper and just in circumstances of the case.

Neelam Nazki
Appellant

Through

Saadullah Khan Marwat

Saadullah Khan Marwat

Dated: 30.05.2014

Arbab Saif-ul-Kamal

Arbab Saif-ul-Kamal

&

Miss Robina Naz

Miss Robina Naz,
Advocates,

Registration No. SUIT-06-01-68212

Serial No. 100096



Sarhad University of Science & Information Technology

This is to certify that Neelum Nayab daughter of Nageeb Ullah

having passed the requisite examination, is hereby awarded the **CHECKED AND VERIFIED**

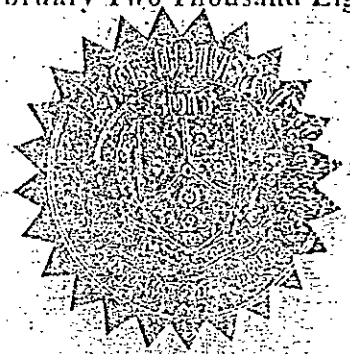
Diploma in Drawing Master

[Signature]
CONTROLLER OF EXAMINATION
SARHAD UNIVERSITY PESHAWAR

Given at Peshawar (PAKISTAN) on the Sixteenth Day of February Two Thousand Eight.

[Signature]
Dean

[Signature]
Registrar



[Signature]
Vice-Chancellor

[Handwritten signature]
Neelum Nayab

5

Allama Iqbal Open University Islamabad



Serial No. 195590

Certified that *Mr/Ms* NEELAM NAYAB
 Son/Daughter of NAQEEB ULLAH
 Registration No. 04-NLM-0568 Roll No. P692987
 Semester SPRING 2005 having met all the requirements under
 the semester system is this day awarded the

Primary Teaching Certificate

He/She has secured 61 % marks
 and has been placed in B grade



Result declared on: January 09, 2006

Date of Issue: July 03, 2010

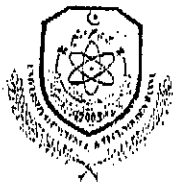
[Signature]
Controller of Examinations

Note: This certificate is issued without alteration/revision.
The detail of course is overleaf.

S.E.T/BPS-16

S.H.S. Titor Khel

Distt. Larkki Marwat



UNIVERSITY OF SCIENCE & TECHNOLOGY BANNU

Khyber Pakhtunkhwa PAKISTAN

S.No:113689

DETAILED MARKS CERTIFICATE

Master of Arts in Islamiyat

Session: 2009-2011

Final Year Annual Examination Held in September, 2011



Name: Neelam Nayab Roll No: 16599
 Father's Name: Naqeeb Ullah Reg No: 2009-UB-LP-26394
 Institute Name: Private Candidate

The Candidate has secured the following Marks and is placed in 2nd Division.

No.	Subjects	Max Marks	MARKS OBTAINED				Remarks
			Theory	Practical	Total	In Words	
1	Previous	500		---	286	TWO HUNDRED EIGHTY-SIX	
2	Taqabul e Adyan	100	58	---	58	FIFTY-EIGHT	
3	Viva Voce	100	58	---	58	FIFTY-EIGHT	
4	Al-Fiqh	100	52	---	52	FIFTY-TWO	
5	Ilm ul Kalam	100	37	---	37	THIRTY-SEVEN	
6	Islami Akhlaq aur unka Tasawar	100	37	---	37	THIRTY-SEVEN	
7	Islam aur Jadeed Maghashee Nazaryat	100	34	---	34	THIRTY-FOUR	
Total		1100			562	FIVE HUNDRED SIXTY-TWO	

Note: Required Pass Percentage in each Subject (Written & Practical Separately) 33, Aggregate Pass Percentage 36

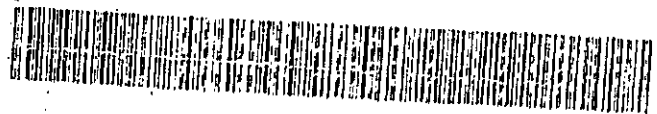
The Examination was taken as a Whole

Prepared by: [Signature]

Checked by: [Signature]

Controller of Examinations
University of Science & Technology, Bannu

Result Declaration Date	10-01-2012
Issue Date	13-01-2012



Errors & omissions excepted, if any, are subject to subsequent rectification by the competent authority.

7



Sarhad University

OF SCIENCE & INFORMATION TECHNOLOGY, PESHAWAR

Serial Number SUIT-09-PRO-3605 issued: June 13, 2009

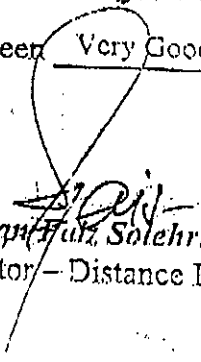
Provisional Certificate

This is to certify that Mr./ Ms. Neelam Nayab
son/ daughter of Mr. Naqeeb Ullah
registration number SUIT-07-01-25241

is a regular student of the Sarhad University of Science and Information Technology,
Peshawar Since Fall 2007 till date.

Mr./ Ms Neelam Nayab has completed all the requirements for the
award of Bachelors of Education degree with a CGPA
of 2.08 on a scale of 4.00. He/she has already been issued a transcript
and degree will be awarded her in due course of time on the request of student

Mr./ Ms Neelam Nayab bears good moral character and his/ her
conduct during his/ her stay at the University from January 2008 to March 2009
has been Very Good


Salman Huzi Soheeria
Director - Distance Education

B

86

24-1-11

**OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & SECONDARY
EDUCATION LAKKI**

APPOINTMENT ORDER:

Consequent upon the approval of the competent authority, the undersigned is pleased to issue appointment order in respect of following DM candidates against vacant posts of DM in BPS-9 plus usual allowances as the same pay scale in the best interest of public services with immediate effect or from the date of taking over charge, subject to the terms and condition Given below:-

S.No	Name of Candidate	Father Name	Name of School	Name of Post	Remarks
1	Neelam Nayab	Naqib Ullah	GGMS Khuja Khel Lakki Marwat	DM	Vacant Post

TERMS AND CONDITIONS:

1. His/ Her service will be considered regular but without pension and gratuity in term of section -19 of NWFP. Civil servant Act, 1973. as amended vide NWFP, Civil servant (Amendment) Act, 2005. He will however be entitled to contributory Provident Fund in such a manner and at such rates as may be prescribing by the government.
2. His/ Her services will be liable to termination an one month's notice from either side, in case of resignation without notice his two month's pay / allowance will be forfeited to Government.
3. The appointee should submit his charge report to all concerned.
4. His / Her services can be terminated at any time, in case his performance is found unsatisfactory during probationary period, incase of misconduct they will be proceeded against under the NWFP removal from service Special Power Ordinance 2000 and the rules framed from time to time.
5. The candidate should join his post within 15 days within the issuance of this order. The head of institute concerned should furnished a certificate to the effect that the appointee has joined the post or otherwise, after 15 days of issuances of this order, failing which his order will be treated as cancelled.
6. Charge should not be handed over if age of the candidate is below 18 years or above 35 years.
7. The appointee is directed to perform his duties in his respective schools noted against his names for a minimum period of three years and he will not apply for transfer from school where appointed.
8. In case fake Certificate and Degree detected later on the undersigned reserve the right of termination from Service and disciplinary action will instead against the teacher concerned.
9. He/ She is required to produce health & Fitness Certificate from the medical Superintendent concerned before taking over charge.
10. His/ Her original certificate/ Degree should be verified from the concerned Board/ University Institute on his own expenses before the release of his pay.
11. The appointment of the candidate concerned will withdrawn with out prior notice with immediate effect if appointment is found at any stage is not under the prevailing rules/ policy.

(NOOR HASSAN)
EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION
LAKKI MARWAT

Endst: No 117-20/DO (F/S)

Dated: 24-1-11

Copy for information & Necessary action to the:-

1. District Coordination Officer, Lakki Marwat
2. Director of Elementary & Secondary Education KPK Peshawar
3. District Officer, (Female) E/S Education Lakki Marwat with remarks that their pay may not drawn until and her testimonials are not verified from concerned Board /University
4. District Account Officer, , Lakki Marwat
5. Candidate Concerned.

EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION
LAKKI MARWAT

Neelam Nayab

26-1-11

چارج رپورٹ

آج مورچہ 2011-2012 کو حوالہ آدگی نمبر 117-20

24-1-2011

کو گورنمنٹ ٹریننگ سٹریٹ سکول قواپہ ضلع میں د. م. س.

پوسٹ پر اپنے عہدے کا چارج سنبھال لیا ہے۔

لینڈنگ اطلاعاً رپورٹ عرض ہے۔

دستخط نائب مہتر

Nedam Nayab.
26-1-11

لینڈنگ

Nedam Nayab

دستخط سربراہ

Bhushidra
HEAD MISTRESS
G.G.M.S Kharwaja Khel
Lakki Marwar

رجسٹر حاضری مدرسین گورنمنٹ گریجویٹ کالج

بابت ماہ جنوری		فہرستی 2020ء	
نام	نیم نام	نیم نام	نیم نام
M.A.BED-D.M	M.A.BED-D.M	M.A.BED-D.M	M.A.BED-D.M
تاریخ	آمد	رواگی	دستخط
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تعمیر خدمت حال سابقہ میزان حال سابقہ میزان حال سابقہ میزان

رجسٹر حاضری مدرسین سکول قزاق محل

بابت ماہ مارچ		اپریل 2020ء	
نام	نیم نام	نیم نام	نیم نام
M.A.BED-D.M	M.A.BED-D.M	M.A.BED-D.M	M.A.BED-D.M
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رسالة حواصن خمار رجسٹر حاضری مدرسین

2011

مدرسین

مدرسین

M.A. B.Ed. DM

M.A. B.Ed. DM

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رجسٹر حاضری مدرسین

2011

مدرسین

مدرسین

M.A. B.Ed. DM

M.A. B.Ed. DM

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سکول ذوالفقار راجسٹر حاضری مدرسین

ماہنامہ جنوری 2017ء

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MA. Bed. D.M		MA. Bed. D.M		MA. Bed. D.M		MA. Bed. D.M	
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18	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
19	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
20	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
21	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
22	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
23	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
24	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
25	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
26	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
27	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
28	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
29	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
30	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	
31	N.N 2:00	N.N 9:00			N.N 2:00	N.N 9:00	

تشریح	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
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رجسٹر حاضری مدرسین گورنمنٹ گریڈ سکول

ماہنامہ نومبر 2011ء

نم		نیم نامیات		نیم نامیات		نیم نامیات	
MA. Bed. D.M		MA. Bed. D.M		MA. Bed. D.M		MA. Bed. D.M	
تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی
1	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
2	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
3	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
4	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
5	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
6	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
7	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
8	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
9	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
10	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
11	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
12	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
13	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
14	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
15	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
16	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
17	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
18	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
19	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
20	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
21	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
22	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
23	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
24	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
25	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
26	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
27	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
28	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
29	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
30	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	
31	N.N 1:30	N.N 8:30			N.N 1:30	N.N 8:30	

تشریح	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
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الاول

Alula
Hussaini

رجسٹر حاضری مدرسین

ماہیت ماہ صبیحہ 2012

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	N.N.12:00	N.N.7:00							
2	N.N.12:00	N.N.7:00							
3	N.N.12:00	N.N.7:00							
4	N.N.12:00	N.N.7:00							
5	N.N.12:00	N.N.7:00							
6	N.N.12:00	N.N.7:00							
7	N.N.12:00	N.N.7:00							
8	N.N.12:00	N.N.7:00							
9	N.N.12:00	N.N.7:00							
10	N.N.12:00	N.N.7:00							
11	N.N.12:00	N.N.7:00							
12	N.N.12:00	N.N.7:00							
13	N.N.12:00	N.N.7:00							
14	N.N.12:00	N.N.7:00							
15	N.N.12:00	N.N.7:00							
16	N.N.12:00	N.N.7:00							
17	N.N.12:00	N.N.7:00							
18	N.N.12:00	N.N.7:00							
19	N.N.12:00	N.N.7:00							
20	N.N.12:00	N.N.7:00							
21	N.N.12:00	N.N.7:00							
22	N.N.12:00	N.N.7:00							
23	N.N.12:00	N.N.7:00							
24	N.N.12:00	N.N.7:00							
25	N.N.12:00	N.N.7:00							
26	N.N.12:00	N.N.7:00							
27	N.N.12:00	N.N.7:00							
28	N.N.12:00	N.N.7:00							
29	N.N.12:00	N.N.7:00							
30	N.N.12:00	N.N.7:00							
31	N.N.12:00	N.N.7:00							

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انقرض									

رجسٹر حاضری مدرسین

ماہیت ماہ البریل 2012

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	N.N.1:30	N.N.8:30							
2	N.N.1:30	N.N.8:30							
3	N.N.1:30	N.N.8:30							
4	N.N.1:30	N.N.8:30							
5	N.N.1:30	N.N.8:30							
6	N.N.1:30	N.N.8:30							
7	N.N.1:30	N.N.8:30							
8	N.N.1:30	N.N.8:30							
9	N.N.1:30	N.N.8:30							
10	N.N.1:30	N.N.8:30							
11	N.N.1:30	N.N.8:30							
12	N.N.1:30	N.N.8:30							
13	N.N.1:30	N.N.8:30							
14	N.N.1:30	N.N.8:30							
15	N.N.1:30	N.N.8:30							
16	N.N.1:30	N.N.8:30							
17	N.N.1:30	N.N.8:30							
18	N.N.1:30	N.N.8:30							
19	N.N.1:30	N.N.8:30							
20	N.N.1:30	N.N.8:30							
21	N.N.1:30	N.N.8:30							
22	N.N.1:30	N.N.8:30							
23	N.N.1:30	N.N.8:30							
24	N.N.1:30	N.N.8:30							
25	N.N.1:30	N.N.8:30							
26	N.N.1:30	N.N.8:30							
27	N.N.1:30	N.N.8:30							
28	N.N.1:30	N.N.8:30							
29	N.N.1:30	N.N.8:30							
30	N.N.1:30	N.N.8:30							
31	N.N.1:30	N.N.8:30							

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
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مدیران نکل فرہنگی رجسٹر حاضری مدرسین

بابت ماہ 20

بابت ماہ

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1															
2															
3															
4															
5															
6															
7															
8															
9															
10															
11															
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26															
27															
28															
29															
30															
31															

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انسانی												

رجسٹر حاضری مدرسین کو رٹائرڈ کر کے

بابت ماہ 20

بابت ماہ ستمبر

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1												
2												
3												
4												
5												
6												
7												
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27												
28												
29												
30												
31												

نام
نسیم نواب
MA - B.ed. D.M.P.

Handwritten signature and name: *Handwritten signature*
Handwritten name: *Handwritten name*

قسم رخصت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انسانی									

۱۶

رجسٹر حاضری مدرسہ													
بابت ماہ													
Reg. No. 11111													
عبد													
Date													
Time													
Date													
Time													
1	K.B	12:30	K.B	7:30	S.B	12:00	S.B	7:30	K.B	12:00	K.B	7:30	1
2													2
3	K.B	12:30	K.B	7:30	S.B	12:00	S.B	7:30	K.B	12:00	K.B	7:30	3
4	K.B	12:30	K.B	7:30	S.B	12:00	S.B	7:30	K.B	12:30	K.B	7:30	4
5	N.N	12:00	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:00	S.P.	7:30	5
6	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	6
7	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:00	S.B	7:30	7
8	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	8
9													9
10	N.N	12:30	N.N	7:30	C. Leave				S.B	12:30	S.B	7:30	10
11	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	11
12	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	12
13	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	13
14	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	14
15	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	15
16													16
17	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	17
18	N.N	12:30	N.N	7:30	C. Leave				S.B	12:30	S.B	7:30	18
19	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	19
20	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	20
21	C. Leave												21
22	C. Leave												22
23													23
24	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	24
25	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	25
26	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	26
27	N.N	12:30	N.N	7:30	C. Leave				S.B	12:30	S.B	7:30	27
28	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	28
29	N.N	12:30	N.N	7:30	K.B	12:30	K.B	7:30	S.B	12:30	S.B	7:30	29
30													30
31													31

اقدمت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
	1			3								9
اتفاق												
امتحان												
بیماری												
میزان												

Neelam Sufab

رجسٹر حاضرین مدرسین گورنمنٹ کالج سوات

بابت ماہ اکتوبر
 نام: **Khurshida Begum**
 خورشیدا بیگم
 پتہ: **AT**
 خورشیدا بیگم
 تعلیم: **C.T**
 ڈی. ایم

N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	1
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	2
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	3
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	4
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	C. Leave				5
N.N	12:30	N.N	7:45	C. Leave				K.B	12:30	K.B	7:45	6
Sundays												7
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	8
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	9
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	10
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	11
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	12
N.N	12:30	N.N	7:45	C. Leave				K.B	12:30	K.B	7:45	13
Sundays												14
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	15
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	16
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	17
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	18
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	19
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	20
Sundays												21
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	22
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	23
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	24
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	25
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	26
Sundays												27
Sundays												28
Sundays												29
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	30
N.N	12:30	N.N	7:45	K.B	12:30	K.B	7:45	K.B	12:30	K.B	7:45	31

میزان	سابقہ	مکان	میزان	سابقہ	مکان	میزان	سابقہ	مکان	میزان	سابقہ	مکان	میزان
2	2	-	3	3	-	1	1	-	1	1	-	1
Signature: <i>Khurshida Begum</i> Date: <i>10/10/20</i>												

رجسٹر حاضری نڈر سین گورنمنٹ کالج سکول حویلیا

بابت ماہ اکتوبر 2012
 قاسم رجسٹر Khushida Resg عیدہ
 شادمانہ شادمانہ
 خورشید بیگم خورشید بیگم
 بیگم خانیاد DM T.T AT C.T

روز	وقت	ن.ن	ن.ن	ک.ب	ک.ب	س.ب	س.ب	ک.ب	ک.ب	نمبر	
	11:00	8:30	1:00	8:30				1:00	8:30	1	
	11:00	8:30	1:00	8:30				1:00	8:30	2	
	11:00	8:30	1:00	8:30				1:00	8:30	3	
Sunday											
	11:00	8:30	1:00	8:30				1:00	8:30	5	
	11:00	8:30	1:00	8:30				1:00	8:30	6	
	11:00	8:30	1:00	8:30				1:00	8:30	7	
	11:00	8:30	1:00	8:30				1:00	8:30	8	
علاصہ اقبالی											
	11:00	8:30	1:00	8:30				1:00	8:30	10	
Sunday											
	11:00	8:30	1:00	8:30				1:00	8:30	12	
	11:00	8:30	C. Leave				1:00	8:30	1:00	8:30	13
	11:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	14
	11:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	15
	11:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	16
	11:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	C. Leave		17
Sunday											
	11:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	19
	11:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	20
	11:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	21
	11:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	22
	11:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	11:30	8:30	23
فصلہ کھائی											
	11:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	25
	C. Leave		1:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	26
			1:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	27
	11:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	1:00	8:30	28
	11:00	8:30	C. Leave				1:00	8:30	C. Leave		29
	11:00	8:30	C. Leave				1:00	8:30	C. Leave		30

روز	سابقہ	مال	سابقہ	مال	سابقہ	مال	سابقہ	مال	سابقہ	مال
4	2	4	2	2	3	1	2			
Attestation										
Signature										

رجسٹر حاضرین تدارکین لورمنڈ ط (سرگودھا) سکول (خوار فیلا)

بابت ماہ جنوری

نمبر آباد	حور شہزادہ	شمالی (ک)	Khushida Reg
(DM)	(T.T)	(A.T)	(C.T)

روز	دستخط	زمانہ	دستخط	زمانہ	دستخط	زمانہ	دستخط	زمانہ	دستخط	زمانہ	دستخط	زمانہ	دستخط	زمانہ	دستخط	زمانہ	دستخط	زمانہ
۱	N.N	2:00	N.N	9:00	K.B	2:00	K.B	9:00	S.B	2:00	S.B	9:00	K.B	2:00	K.B	9:00		
۲	N.N	2:00	N.N	9:00	K.B	2:00	K.B	9:00	S.B	2:00	S.B	9:00	K.B	2:00	K.B	9:00		
۳	N.N	2:00	N.N	9:00	K.B	2:00	K.B	9:00	S.B	2:00	S.B	9:00	K.B	2:00	K.B	9:00		
۴	N.N	2:00	N.N	9:00	K.B	2:00	K.B	9:00	C Leave				K.B	2:00	K.B	9:00		
۵	N.N	2:00	N.N	9:00	K.B	2:00	K.B	9:00	S.B	2:00	S.B	9:00	K.B	2:00	K.B	9:00		
۶	Sundays																	
۷	N.N	2:00	N.N	9:00	K.B	2:00	K.B	9:00	S.B	2:00	S.B	9:00	K.B	2:00	K.B	9:00		
۸	N.N	2:00	N.N	9:00														
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۳۱																		

Nayan Nayab

حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان	حالت	سابقہ	میزان

دستخط ہیڈ ماسٹر

معدلات ضاب منیر سرگرم کی صورت

- 1- نیٹم نایاب دفت لقیب الہیہ مرحوم سید شریف علی جان صلح ٹیرٹ
- 2- ایئر لائنز گروپ آف پاکستان (PAG) ایئر لائنز آف پاکستان
- 3- ڈی۔ ای او فنانس ایئر لائنز (PAG) فیملی ٹیرٹ
- 4- ٹی وی سٹیٹس ایئر لائنز کی صورت
- 5- سیڈ سے سب کو دفعتاً ملل کر سٹیٹس کی رقم میں صلح کی صورت
- 6- قلمی دفتر جب سے قلمی دفتر کے ذریعہ صلح کی صورت

ذرا ملاحظہ فرمائیے کہ اس معاملہ میں جو رقمیں لکھی گئی ہیں ان میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔ ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔ ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔

ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔ ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔ ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔

ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔ ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔ ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔

ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔ ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔ ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔

ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔ ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔ ان رقموں میں سے کئی رقمیں ایئر لائنز گروپ آف پاکستان کے ذریعہ ملنے والی ہیں۔

جوابی درجہ کا مندرجہ ذیل ہے۔
1- ایم بی درجہ تعلیمات DM پیر کوئٹہ کے اسکول فورم جیل ملنگ پورہ
میں طالبہ میرٹ باہمی جوالم ص 117-224 جمعی پورہ لہہ حصول میں تھیں

تھیں۔ یہ اسکول اسکول میں پیر کوئٹہ کے اسکول فورم رپورٹ حاصل
کہ اس کی بناء پر ڈیڑھ سے اجماع رسالہ ہی کی ذریعہ اور بنامہ ایگزیکٹو آفیسر پی ایس
فیلڈ پورہ کے سرکار میں لیا گیا جا رہا ہے۔ اس کے ساتھ ساتھ اس کے ساتھ
ایگزیکٹو آفیسر پورہ میں بھی موجود ہیں۔

2- تحصیل مندرجہ ذیل ہائے خواہ درجہ تعلیم خصوصاً درجہ تعلیم کے لئے ایگزیکٹو
غلو رکنیت کا فوٹا روک رکھی اور ایگزیکٹو آفیسر کے عذر مقررہ فی ایگزیکٹو
کی ادائیگی میں لی گئی۔ اس کے ساتھ ساتھ ہر ماہ مقررہ کو خواہ اس کے
مہ پانڈ ہیں۔ جبکہ ڈیڑھ سے اس کے ساتھ ساتھ ہر ماہ مقررہ کو خواہ اس کے
چینا مندرجہ ہر ماہ مقررہ ایگزیکٹو اسکول پورہ میں۔ اور ایگزیکٹو آفیسر
امکمال کے درجہ میں درجہ ذیل خواہ جاری اس کے ساتھ ساتھ ایگزیکٹو سے ایگزیکٹو
کیا اس کے لئے بھی مامول ہے۔

3- ایم بی درجہ کے لئے خواہ درجہ تعلیم سے مطالبہ کیا۔ وہ مندرجہ ذیل خواہ میں
ادائیگی سے باہر ہے۔ اور اس کے ساتھ ساتھ ایگزیکٹو میں۔ تک بے مال اسکول کے
میں سے ایگزیکٹو سے مامول ہے۔

4- ایم بی درجہ کی بناء پر خواہ درجہ تعلیم میں مقررہ ہونے سے ایگزیکٹو میں
خواہ اس کے ساتھ ساتھ ایگزیکٹو میں مامول ہے۔ اس کے ساتھ ساتھ
کی ایگزیکٹو میں مامول ہے۔ اس کے ساتھ ساتھ ایگزیکٹو میں مامول ہے۔
میں اس کے ساتھ ساتھ ایگزیکٹو میں مامول ہے۔ اس کے ساتھ ساتھ ایگزیکٹو میں مامول ہے۔
رہا جاوے۔

درجہ تعلیم نایاب
Neelam Nayab.

درجہ تعلیم نایاب
Neelam Nayab.

مددات ضابطہ سینیٹر سول جج صاحبان کی طرف

اور دیگر ملکی و غیر ملکی اداروں کے افسروں کے

تعمیر

تعمیرات

اور دعویٰ

ضابطہ عالی اور جوڑ دعویٰ منجانب وریا علیہم ذیل ہے۔

مددات طلبی

- 1- یہ کہ دعویہ کو کوئی نیا نیا دعویٰ حاصل نہ ہے۔
- 2- یہ کہ دعویہ درجہ اول اور درجہ دوم ہے۔ اور نہ ہی قابل سماعت ہے۔
- 3- یہ کہ دعویہ درجہ اول اور درجہ دوم ہے اور درجہ اولیٰ ہے۔ اس کے تحت دفعہ 35-A
- 4- ضابطہ دیوانی اسٹیبل مندرجہ کے تحت ہے۔
- یہ کہ درجہ اول اور درجہ دوم کے مابین کوئی فرق نہیں آتا ہے۔
- بیکہ ضابطہ ضابطہ کے تحت ہے۔
- 5- یہ کہ دعویہ نے خود سے اس میں کوئی قدم نہیں بنایا ہے۔

مددات واقعی

- 1- یہ کہ فقہہ نیا معلق ہے۔ درجہ اول اور درجہ دوم میں
- اور درجہ اول اور درجہ دوم میں ہے۔ جس کی وجہ سے اس کی کوئی وغیرہ سے بولیں ہیں
- 2- یہ کہ فقہہ نیا ہی معلق ہے۔ درجہ اول اور درجہ دوم میں ہے۔ اس میں تمام امور
- اور باقی کو درجہ اول اور درجہ دوم میں ہے۔ تا جاتر افسار استمال کرنے کا موقع بھی
- دیں سکتے۔ درجہ اول اور درجہ دوم میں ہے۔ اس کی کوئی بولیں ہے۔
- دعا کے تحت اس کے لئے کی ضرورت نہ ہے۔

3 - یہ کہ فقہرہ نمبر 3 منقطع ہے۔ درعہ نے دعویٰ علیہم سے کوئی نفاذ نہ
 اس بابت نہیں کیا ہے۔ نیز دعویٰ علیہم کی اس بابت نفاذ نہ کرنے کا کوئی
 حق حاصل ہے

4 - یہ کہ درعہ کو کوئی نفاذ دعویٰ حاصل نہ ہے نیز دعویٰ درعہ انڈر دعویٰ
 نہ ہے نیز دعویٰ درعہ قابل سماعت عدالت انتخاب ہے

5 - یہ کہ فقہرہ نمبر 3 قانونی ذمہ داری ہے

مذکورہ دعویٰ ہے کہ یو جی ٹ یا لاؤڈنگ دعویٰ درعہ کوئی ذمہ داری
 بلکہ اس کی ذمہ داری فارانہ فرمایا ہے

10/06/06
 2006

علی

علی

vetted by
 (علی)

A. Rahman
 ADEO (M)

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13-6-13

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2013

لیدر با - سونج صبا کورت

13/6
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233
EDU. کورت

Order
13/06/2013

Plaintiff along with counsel present:

This order shall dispose off an application, filed by the petitioner/defendant for return or rejection of plaint under Order 7 rule-10 or Order 7 rule 11 CPC respectively.

Counsel for the petitioner argued that plaintiff has come to the Civil Court as Civil Servant and her lis relates to service matter, therefore, this court lacks jurisdiction to entertain the same.

Respondent/plaintiff resisted the instant application.

Arguments heard and case file perused.

Record reflects that the plaintiff instituted the suit in hand for declaration to the effect that she has been appointed as DM vide order No. 117-20 dated 24/01/2011 issued by the defendant No. 1. After taking charge, she has been serving on the said post without fail but she has been deprived from her salary by the defendant No. 3 collusively and prayed for release of the same.

As evident, release of salary is clearly a service matter and falls into the definition of terms and condition of service Section 17 Chapter II of Civil Servants Act.

6/13
District & Sessions Judge
Lakki Marwat

25

Section 23 (B) Jurisdiction Barred.--- Save as provided under the this Act and the Service Tribunal Act, 1974 (N.W.F.P. Act No. I of 1974), or the rules made thereunder, no order made or proceedings taken under this Act, or the rules made thereunder by the Governor or any officer authorized by him shall be called in question in any Court and no injunction shall be granted by any Court in respect of any decision made, or proceedings taken in pursuance of any power conferred by or under this Act or the rules made thereunder.]

For what has been discussed above, the petition in hand is allowed. Suit of the plaintiff is hereby returned to be instituted at the relevant/proper form.

File be consigned to record room after its necessary completion and compilation.

Announced.
13/06/2013.

(Muhammad Rehan Samad)
Civil Judge-VI, Lakki Marwat.

Application No. 2799
 Application received on. 12/6/13
 Copying fee Deposited on. 12/6/13
 Next Date for Delivery of Copies. 28/6/13
 File received for copying. 28/6/13
 No of sheet. 78
 Copying fee. 78
 Search fee. 1
 Urgent fee. 1
 Name of complainant. Javed
 Copy completed on. 28/6/13
 Copy delivered on. 28/6/13
 Signature of examining officer.

28/6/13

28/6/13

Neelum Nazki

حَدِيثُ نَبِيِّ دَاوُدَ عَلَيْهِ السَّلَامُ اِنْ دَسْتُ رِي يُوْنِسَ اِبْنِ اِيْلِيَا

مَعْنَى: در صورت بیدار آمدن باغی بنوار نخواه جات از تاریخ 24 به 25

ضامی - گذارش شد که حکم نه بهت می آسایوں جو رسول دوا بند ماست احیادات
 میں برائے بھرتی مشیت سے۔ ساتھ میں نے ایم۔ ای۔ بی ایڈ۔ کو پلم دوا بند ماست،
 گی۔ ٹی سی پالی جی۔ کو بھرتی سے استعمار قدرہ کے درویش دے دلی۔
 2- مردم قانون تیل کے بعد ساتھ کو حرم ای ہا کو حین دوا بند ماست
 سیں 9 میں ضامی آسای بر بھرتی نے حکم جاز آتھارٹان جارک بنا
 جو حیا بندگی سے تھیست سرور تیل کے علاوہ ساتھ سے حصے 26 و آسای
 مذکورہ کو وقت گزرتا کہ رسول دل خورم میں میں اپنے عہدہ، اوجرم تھا گیا۔
 ہا حکم ساتھ ایجا کوئی وقت آگویی سے سرانجام دے رہی تھی۔ تیلہ دوسری طرف
 ساتھ کو بنوار نخوا جات ادائیں کی جا رہی تھی۔
 12
 ہا بنوار نخوا جات مقدم دائر گیا۔ کیا لوگ قلم کو دیکھ جواب دیو بھی داخل
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ادریگی شروع کی۔ اور جن مدرسین کو نخواستہ میں دیا گیا۔ انہوں نے
 عدالت حضور میں آپس میں دائری۔ جن پر عدالت حضور نے حکم صادر کیا کہ
 عدالت نخواستہ میں دینے کا فرمان جاری کیا۔
 ؟ یہ ایک طرف ساتھ ایجا ڈیوٹی انجام دے رہی ہے۔ جبکہ دوسری طرف
 اسے ماہوار نخواستہ میں ہے جس پر ڈیپارٹمنٹ کے افسر نے حکم جاری کیا
 لفظ کی جارہی ہے۔

یہ سب لکھ کر نخواستہ میں دینا اور کسی کو نہ دینا جو کہ ایک ہی حالت کے سوا رہتا
 ہے۔ اس کا حکم / فعل سب پر امتیاز دینا ہے۔

اس کے ساتھ ساتھ وزارت میں 24 تا حال اور اس کے لئے ماہوار نخواستہ
 ادارے کے لئے یہ واقعہ فراہم کرے۔
 20-2
 2014

عس

نیلیم نایب ذمہ لقیب اللہ دروم حال مکتبہ گردنیا در بریل سکول
 فورم بریل صلح و فیصلہ بہت -

Neelam Nayab.

بعدالت جناب سروس ٹریڈنگ سے پی ایس ڈور

مورثہ

محمد نعیم

بنام

نیلیم نایاب

دعویٰ اپیل

باعث شکریہ اینکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطہ پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام کے لئے سعد اللہ خان مروت ایڈووکیٹ ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق اور اس پر دستخط کرانے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطہ اور وکیل یا نمٹار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور و قبول ہوگا و دوران مقدمہ میں جو خرچہ و ہرجانہ التواء مقدمہ کی سبب سے ہوگا اس کے مستحق وکیل صاحب موصوف ہوں گے نیز بقایا و خرچہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔

لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم 30/6/19

العبد

العبد

العبد

نیلیم نایاب

Neelam Nayab

ارباب سفیر السلام
ایڈووکیٹ

سعد اللہ خان مروت
ایڈووکیٹ

Pushina Nazki
سروس ٹریڈنگ
ایڈووکیٹ

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR
S.A.No.771/2012

Neelam Nayab D/O Naqib Ullah DM GGMS Khawaja Khel Lakki Marwat.

.....Appellant.

Versus

1. District Education Officer (Female) Lakki Marwat. Ex-EDO Lakki Marwat.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa Peshawar.
3. Secretary Govt: of Khyer Pakhtunkhwa (E&SE) Deptt: Peshawar.
4. District Accounts Officer Lakki Marwat.

..... Respondents.

Subject:- REPLY/COMMENTS ON BEHALF OF RESPONDENT NO.1,2&3

PRELIMINARY OBJECTION:-

1. The appellant has no locus standi.
2. The appellant has not come to the Tribunal with clean hands.
3. The appeal in hand is not maintainable in the present form.
4. The appellant has concealed the real facts from this Honourable Court.
5. The appeal in hand is badly time barred.
6. The appeal is liable to be dismissed due to mis-joinder and non-joinder of necessary parties.
7. The appellant is estopped by her own conduct to file the instant appeal.

COMMENTS OF FACTS:-

1. As per record.
2. Incorrect. Though there was no post of DM in the advertisement against which the applicant applied, yet she applied for the post of DM. how did she apply then?
"Annex-A".
3. Incorrect, the appointment is made against the rules and policy of the Department. The appointment order was issued prior to the conduct of DSC under the bogus signature of competent authority. The appointment was issued on 24-01-2011 while DSC conducted on 24-02-2011. So her services were terminated from the date of taking over charge.
4. Incorrect. The Department always followed the rules & Policy of the Govt: .the issuing authority has himself re-affirmend that the appointment of the appellant is fake and bogus and not under my signature. Hence, monthly salary was not paid to her. It is astonishing to note that being a DM, she appears in NTS test after two year. It leads to the fact that the appointment order is fake. The letter by the Ex-EDO to DEO (Male) is Annexed herewith "Annex-B&C", but the same Dairy No. 117-20 dated: 24-01-2011 was issued in favor of Mr. Noor Majeed S/O Mir Sada Khan PST and Mr. Mumtaz Khan S/O Akbar Khan PST was claimed by same Dairy No. by Neelam Nayab D/O Naqib Ullah DM which was fake and bogus as Annex-"D". Moreover, in GGMS Khawaja Khel, Musarat Jabeen has been appointed as DM on merit **is Annexed herewith , Annex: "E"**. And she is working at this school and only one seat of DM is exist in GGMS Khawaja Khel. So, how the appellant is working at GGMS Khwaja Khel. There is no proof of her attendance.

5. As per record.
6. This office in response to Director (E&SE) KPK Peshawar as produced facts to the case vide this office No. 1288 dated: 08-05-2014. As a result the show cause notice was issued to the appellant. The reply by the appellant was nothing but just evasive denial by beating about the bushes only and it was also lacking his signature.

PARAWISE COMMENTS OF GROUNDS:-

- A. Incorrect. Though there was no post of DM in the advertisement against which the applicant applied, yet she applied for the post of DM. How did she apply then? The appointment is made against the rules and policy of the Department. The appointment order was issued prior to the conduct of DSC under the bogus signature of competent authority. The appointment was issued on 24-01-2011 while DSC conducted on 24-02-2011. So her services were terminated from the date of taking over charge.
- B. Incorrect. The appellant has not performed her duties and the attendance register produced by her is spurious.
- C. Incorrect. The remunerations/salaries are enjoyed only by those whose services are required to the respondent No. 1/office and accordingly they perform but her in the case, neither appellant services were required nor she performed her duties. So she is not deserved for salary at any cost.
- D. Incorrect. As replied above.
- E. Incorrect. The respondent have acted bonafidely.

Therefore, It is, prayed that the appeal may kindly be dismissed.

Dated: ___/___/___.

Secretary to Government
Of Khyber Pakhtunkhwa Elementary &
Secondary Edu; Deptt; Peshawar
Respondent No. 3

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar.
Respondent No. 2

District Education Officer
(Female) Lakki Marwat
Respondent No. 1

COUNTER AFFIDAVIT

I Mst: Bibi Razia District Education Officer (Female) Lakki Marwat solemnly affirm and declare oath that contents of instant reply/comments are true to the best of my knowledge and belief. Nothing has been concealed from this Honourable Court.

Dated. _____/2015.

District Education Officer
(Female) Lakki Marwat

1533060

2	3576000	35900	روشن کوثر گارڈن پتھار کے پتھروں میں 13/11/09 کو کم قیمت کے پتھروں میں ہونے والے نقصانات اور بار بار جانے کو کم
3	2630000	59250	سلاطین و سہیلیں مرمت آؤٹی شیٹ پتھار سب ہیڈنگ (i) سول روڈ (ii) پتھری کا کام 1/2 سیکس کا کام
4	2650000	59250	خیبر روڈ پتھری پتھار میں سلاطین و سہیلیں مرمت سب ہیڈنگ (i) سول روڈ (ii) پتھری کا کام 1/2 سیکس کا کام
5	510000	12050	خیبر روڈ پتھروں پتھار میں 13/6/09 اور 21/1/09 کو کم قیمت کے پتھروں میں ہونے والے نقصانات کی بحالی کا کام
6	3156800	69386	سول پتھری کوہاٹ روڈ پتھری میں سلاطین پتھروں مرمت سب ہیڈنگ (i) سول روڈ (ii) پتھری کا کام 1/2 سیکس کا کام (iii) پتھری پتھروں (iv) پتھری کا کام 1/2 سیکس کا کام (v) 8VA200 اسٹارٹر کی مرمت
7	708200	16014	سول پتھری کوہاٹ روڈ میں سلاطین پتھروں مرمت سب ہیڈنگ سول روڈ
8	3223000	123210	مگدوڑ پتھری پتھار میں سلاطین و سہیلیں مرمت آؤٹی شیٹ پتھار
9	1254000	11330	کوہاٹ پتھری کوہاٹ پتھری میں سلاطین و سہیلیں مرمت

ضروریات و تصدیقات: (1) ٹینڈر فارم گیلے درخواست دہندگان کے لئے ایک دن قبل
موصول ہونے چاہئے۔ (2) درخواست کے تمام دستاویزوں کو پتھری پتھری میں
پتھری پتھری میں (3) درخواست کے ہر ایک ٹینڈر لائٹ کے 2 فیصد ضمانت اور سب سے زیادہ ضمانت
پتھری پتھری میں (4) درخواست کے ہر ایک ٹینڈر لائٹ کے 2 فیصد ضمانت اور سب سے زیادہ ضمانت
پتھری پتھری میں (5) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں
پتھری پتھری میں (6) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں
پتھری پتھری میں (7) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں
پتھری پتھری میں (8) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں
پتھری پتھری میں (9) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں
پتھری پتھری میں (10) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں
پتھری پتھری میں (11) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں
پتھری پتھری میں (12) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں

پتھری پتھری میں (1) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں
پتھری پتھری میں (2) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں
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پتھری پتھری میں (12) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں

Sl. No.	Particulars	Estimate	Actual	Variance	Remarks
1	FA 156	11	11	0	
2	FA 157	11	11	0	
3	FA 158	11	11	0	
4	FA 159	11	11	0	
5	FA 160	11	11	0	
6	FA 161	11	11	0	
7	FA 162	11	11	0	
8	FA 163	11	11	0	
9	FA 164	11	11	0	
10	FA 165	11	11	0	
11	FA 166	11	11	0	
12	FA 167	11	11	0	
13	FA 168	11	11	0	
14	FA 169	11	11	0	
15	FA 170	11	11	0	

پتھری پتھری میں (1) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں
پتھری پتھری میں (2) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں
پتھری پتھری میں (3) ٹینڈر فارم کے تمام دستاویزوں کو پتھری پتھری میں
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From

Navar Hassan Khan

Bz - Bz (Bz SE)

Contract Proposal

To

The District Officer (D.O.)

(Enrol) Enrol Contract Proposal

Sub: Verification of PCT (MRF) Appointment Subscriptions

Reference your No 1138 dated 29/12/2012 on the above subject

Sent No

- x (1) Burhanuddin Bz Khan order No 95-100 dated 29/12/2012
- x (2) Navar Majid Khan Bz Khan order No 117-20 dated 29/12/2012
- x (3) Muzaffar Ullah Bz Khan order No 274-75 dated 29/12/2012
- x (4) Rasheedullah Khan Bz Khan order No 155-57 dated 29/12/2012
- x (5) Huseinullah Bz Khan order No 155-57 dated 29/12/2012
- x (6) Saifullah Khan Bz Khan order No 155-57 dated 29/12/2012

- 586(8) Farhad Khan Bz Khan order No 714-15 dated 29/12/2012
- 592(9) Rukhsana Bi Bi Bz Khan order No 155-57 dated 29/12/2012
- (10) + Somraiz Bi Bi Bz Khan order No 155-57 dated 29/12/2012
- (11) + Farzida Saibin Bz Khan order No 155-57 dated 29/12/2012
- 529(12) Shahida Begum Bz Khan order No 155-57 dated 29/12/2012
- (13) Aema Gul Bz Khan order No 155-57 dated 29/12/2012
- (14) Mehroz Bz Khan order No 155-57 dated 29/12/2012
- (15) Farzilat Bi Bi Bz Khan order No 155-57 dated 29/12/2012

Moreover specimen signatures are also enclosed herewith for completion of orders with these signatures to avoid further correspondence.

Navar Hassan Khan
 (Signature)
 Bz - Bz (Bz SE)
 Contract Proposal

2/22/2014

GGMS KHAWAJA KHEL
Drawing Master (BPS-15)

Sr	RollNo	Name	Govt	NIC	SSC			HSSC			Bachelor			Master			M. Phil		Diploma				Academi	NTS	Total	
					Obt	Total	20% (rel)	Obt	Total	20% (rel)	Obt	Total	20% (rel)	Obt	Total	15% (rel)	Obt	Total	5% (rel)	Obt	Total	5% (F)				5% (C)
1	2330074	ZUBAIDA KHANUM	Fer	12101-1597887-5	613	850	14.42	555	1100	12.09	343	550	12.47	1471	2300	9.59	0	0	0	0	741	1000	11.11	59.55	45	100.00
2	2330156	ULFAT BIBI	Fer	11201-3103529-2	374	850	8.6	583	1100	10.9	255	550	9.64	0	0	0	0	0	0	741	1000	11.11	59.55	45	100.00	
3	2330157	MUSSARAT JABEEN	Fer	11201-7791516-2	420	850	10.82	542	1100	9.93	318	550	11.56	539	1100	7.35	0	0	0	0	741	1000	11.11	59.55	45	100.00
4	2330164	MADIHA REHMAN	Fer	11201-7494814-8	575	1050	10.95	681	1100	12.38	278	550	10.71	579	1100	9.26	0	0	0	0	741	1000	11.11	59.55	45	100.00
5	2330146	SAFILA	Fer	00000-0000000-0	559	900	12.42	672	1100	12.22	389	550	13.42	0	0	0	0	0	0	0	741	1000	11.11	59.55	45	100.00
6	2330138	NAZIA HUSSAIN	Fer	11201-0793975-8	509	850	11.98	634	1100	11.36	255	550	9.31	0	0	0	0	0	0	0	741	1000	11.11	59.55	45	100.00
7	2330170	NEELAM NAYAB	Fer	11201-2903911-4	417	850	9.81	573	1100	12.33	430	800	12.0	0	0	0	0	0	0	0	741	1000	11.11	59.55	45	100.00
8	2330058	NARILA YOUNAS	Fer	11201-8570043-2	439	850	9.85	578	1100	10.53	267	550	9.71	522	1100	9.5	0	0	0	0	741	1000	11.11	59.55	45	100.00
9	2330107	PARAH DEEBA	Fer	11201-9012371-6	503	850	12.31	554	1100	11.89	281	550	10.22	0	0	0	0	0	0	0	741	1000	11.11	59.55	45	100.00
10	2330182	SAIMA RUSTAM	Fer	11201-1801925-4	303	850	5.54	507	1100	9.22	210	550	9.52	0	0	0	0	0	0	0	741	1000	11.11	59.55	45	100.00
11	2330135	KALSOOM BIBI	Fer	11201-2270125-4	583	1050	11.1	640	1100	11.52	271	550	9.55	0	0	0	0	0	0	0	741	1000	11.11	59.55	45	100.00
12	2330102	RIFFAT JAHAN	Fer	11201-5931998-4	577	800	12.82	673	1100	12.24	301	550	10.93	0	0	0	0	0	0	0	741	1000	11.11	59.55	45	100.00
13	2330151	KALSOOM BIBI	Fer	11201-8521359-6	410	850	9.55	585	1100	10.27	273	550	9.93	0	0	0	0	0	0	0	741	1000	11.11	59.55	45	100.00
14	2330055	MISSSES NUSRAT SHAH	Fer	11201-0335442-6	307	850	7.22	635	1100	11.55	226	550	8.22	0	0	0	0	0	0	0	741	1000	11.11	59.55	45	100.00
15	2330128	ZAMIDA PARVEEN	Fer	11201-3744854-4	351	850	8.28	471	1100	8.62	269	550	10.91	575	1100	7.84	0	0	0	0	741	1000	11.11	59.55	45	100.00
16	2330117	TASLEEM BIBI	Fer	11201-6672773-4	387	800	9.11	550	1100	10.0	290	550	10.55	0	0	0	0	0	0	0	741	1000	11.11	59.55	45	100.00
17	2330111	MUSARAT SHAHEEN	Fer	11201-1547637-0	352	850	9.68	488	1100	9.29	239	550	8.88	502	1100	6.95	0	0	0	0	741	1000	11.11	59.55	45	100.00

Sub Divisional Officer
(Female) Lalwal, Rawalpindi

Shauqulfa Amin
S.A.O. (BPS) Education
Lalwal, Rawalpindi

herewith for completion of...

Handwritten notes and signatures at the bottom right corner.

CGMS MABU KHEL
Drawing Master (RAS-16)

Sl. No.	Folio/Name	Gen	NIC	SSC				USF				Hatchler	V-Plotter			Emplyer	M. Ed.	M. S. E. G.			
				Total	Civ	M	E	Total	Civ	M	E		Civ	M	E				Civ	M	E
1	2310143		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
2	2310144		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
3	2310145		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
4	2310146		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
5	2310147		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
6	2310148		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
7	2310149		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
8	2310150		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
9	2310151		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
10	2310152		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
11	2310153		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
12	2310154		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
13	2310155		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
14	2310156		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
15	2310157		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
16	2310158		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
17	2310159		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
18	2310160		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
19	2310161		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		
20	2310162		11201-5410591-2	774	500	100	174	500	100	174	500	100	174	500	100	174	500	100	174		

600 Division (Female)

Shaquilia Amin
A.S.O (SSC) Incharge
Lakki Mawatha

Principal
Lakki Mawatha

GGMS BAKHMAL AHMAD ZAI
Drawing Master (BPS-15)

Sl. No	Name	Gen	NIC	SSC			HSSC			Bachelor			Master			M. Phil			Diploma			M. Ed/ (MFA+B+C)	Academi (D)	NTS	Total
				Obt	Total	20% (A)	Obt	Total	20% (B)	Obt	Total	20% (C)	Obt	Total	15% (D)	Obt	Total	5% (E)	Obt	Total	15% (F)				
2330084	SAIDA AKBAR	Fem	11201-9332810-6	840	1050	16.0	630	1100	15.09	362	550	13.16	1724	2400	10.77	0	0		793	1000	11.97		63.23	52	115.80
2330150	SADAF NAWAZ	Fem	11201-5654492-4	618	850	14.54	746	1100	13.56	312	550	11.35	2288	3300	10.4	0	0		710	1000	10.65	3.6	64.1	47	111.1
2330171	SAMAR UN NISA	Fem	11201-7901744-4	470	850	11.06	697	1100	12.67	294	550	10.69	587	1100	8.0	0	0		701	1000	10.51		62.93	37	99.63
2330172	ZEE JAHANA	Fem	11201-0360178-8	351	850	8.26	491	1100	8.93	528	900	11.73	570	1100	7.77	0	0		633	1000	12.49		49.16	38	87.10
2330291	HAFSA BANO	Fem	11201-7909885-2	390	850	9.18	471	1100	8.53	259	550	10.51	552	1100	7.53	0	0		910	1200	11.37		47.10	40	87.10
2330180	MARGIS SHAHEEN	Fem	11201-5518314-2	723	1050	13.77	606	1100	11.05	607	550	10.88	27	0	10.13	0	0		709	1000	10.63		53.3	39	86.60
2330285	SHAZIA NOREEN	Fem	11201-3574519-6	555	850	13.13	662	1100	12.4	275	550	10.0	0	0		0	0		910	1200	11.37		40.5	38	86.5
2330170	NEELAKI NAYAB	Fem	11201-6570013-2	419	850	9.86	579	1100	10.53	267	550	9.71	562	1100	7.66	0	0		803	1200	10.66		45.42	32	81.2
2330107	PARAN DEEBA	Fem	11201-4911925-4	363	850	6.54	507	1100	9.22	270	550	9.62	0	0		0	0		816	1000	12.27		39.23	28	77.5
2330134	SUMERA GUL	Fem	11201-4911653-3	584	1050	11.12	592	1100	10.89	293	550	10.65	0	0		0	0		832	1000	12.57		46.23	31	78.22
2330104	RIFAT JAHAN	Fem	11201-8021389-0	410	850	9.65	525	1100	10.27	273	550	9.03	0	0		0	0		713	1000	10.09		40.54	32	72.71
2330123	ZAHIDA PARVEEN	Fem	11201-3744664-4	367	850	9.11	550	1100	10.0	290	550	10.55	0	0		0	0		718	1100	9.73		39.48	27	66.21
2330186	ZANAB SIBI	Fem	11201-2156618-0	614	1050	11.7	555	1100	10.09	351	550	9.13	0	0		0	0		0	0			30.92	28	58.67

[Signature]
Shagufta Amin
A.D. (MS&E) Education

[Signature]
Sub Division Edu. Officer
(Female) Lakki Marwat

[Signature]
District Education Officer
(Female) Lakki Marwat

[Signature]
Principal
Lakki Marwat

GGMS KHERU KHEL PACCA
Drawing Master (BPS-15)

Roll No	Name	Gen	NIC	SSC			HSSC			Bachelor			Master			M. Phil			Diploma			M. Ed/ (H.A.+D.C. in-Eds.)	Academi (G)	NTS (G)	Total (H+I)
				Obt	Total	20% (A)	Obt	Total	20% (A)	Obt	Total	20% (A)	Obt	Total	15% (F)	Obt	Total	5% (F)	Obt	Total	15% (F)				
1	2330384 SAIDA AKBAR	Fen	11201-8338610-6	840	1050	16.0	830	1100	15.09	362	550	13.16	1724	2400	10.77	0	0		798	1000	11.97		68.99	52	118.99
2	2330086 BALQEES YOUNIS	Fen	11201-9470359-6	458	850	10.78	559	1100	10.71	239	550	8.69	0	0		0	0		696	1000	10.29		49.47	67	107.47
3	2330122 ASMA NOREEN	Fen	11201-6013215-6	711	1050	13.54	605	1100	11.0	303	550	11.02	0	0		0	0		716	1000	10.74		45.3	43	88.3
4	2330102 RAHAT FARID	Fen	11201-4934840-0	547	850	12.87	578	1100	10.47	281	550	10.22	551	1100	7.51	0	0		627	1000	12.4		53.47	35	88.47
5	2330114 ARJAMAND SHAHEEN	Fen	11201-7224040-4	614	1050	11.7	681	1100	12.35	334	550	12.15	673	1100	9.18	0	0		694	1000	10.41		55.83	29	84.82
6	2330115 BIBI FAUZIA	Fen	11201-2433437-0	560	850	13.18	579	1100	10.53	257	550	9.35	609	1100	8.3	0	0		742	1000	11.63		52.49	31	83.49
7	2330080 SHAKILA NAZ	Fen	11201-7254461-0	470	850	11.06	627	1100	11.29	270	550	9.82	567	1100	7.73	0	0		734	1000	11.01		50.91	32	82.91
8	2330170 NEELAM NAYAB	Fen	11201-6570043-2	419	850	9.86	579	1100	10.53	287	550	9.71	562	1100	7.66	0	0		653	1200	10.66		48.42	33	81.42
9	2330107 FARAH DEEBA	Fen	11201-1901925-4	363	850	8.54	507	1100	9.22	270	550	9.22	0	0		0	0		518	1000	12.27		36.85	38	77.85
10	2330109 RAHAT UN NISA	Fen	11201-3184738-6	597	1050	11.37	534	1100	9.71	298	550	10.47	0	0		0	0		693	1000	12.0		43.54	33	76.54
11	2330154 RIFAT ZAHQOR	Fen	11201-1988881-4	637	900	14.19	552	1100	10.01	221	550	9.4	0	0		0	0		789	1000	11.54		41.16	32	73.16
12	2330125 ZAHRA MINHAS	Fen	11201-5322141-0	368	850	8.66	548	1100	9.98	223	550	8.11	562	1100	7.68	0	0		705	1000	10.67		44.83	30	74.83
13	2330188 ZAINAB BIBI	Fen	11201-2158018-0	614	1050	11.7	585	1100	10.09	281	550	9.13	0	0		0	0		0	0			30.92	28	58.92
14	2330177 NAHEED AKHTAR	Fen	12101-0919858-4	446	850	10.49	548	1100	9.93	0	0		0	0		0	0		551	500	9.15		29.6	24	53.6

[Signature]

Shagufta Amin
A.D.O (S&E) Education
Lakki Marwat

[Signature]
Sub Divisional Edu. Officer
(Female) Lakki Marwat

[Signature]
District Education Officer
(Female) Lakki Marwat

[Handwritten notes]
S.A.
P.V.M
A.R.H
C.H.
2.8

GGMS BEGU KHEL
Drawing Master (SFS-15)

Sl. No.	Name	Gen	NIC	SSC			HSSC			Bachelor			Master			M. Phil			Diploma			M. Ed	Academi	M.T.S	Total			
				Obt	Total	20% (P)	Obt	Total	20% (P)	Obt	Total	20% (P)	Obt	Total	15% (P)	Obt	Total	5% (P)	Obt	Total	15% (P)					Obt	Total	15% (P)
1	ZIYARA BISI	Fem	11201-6406081-0	691	900	15.56	515	1100	14.62	445	550	16.18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
2	SALMANOUREEN	Fem	11201-4367489-6	527	650	12.4	562	1100	12.04	311	550	11.31	0	0	1100	8.2	0	0	0	0	0	0	0	0	0	0	0	
3	IBRAHIM SHAZIA	Fem	11201-1051709-0	637	900	14.16	663	1100	12.51	356	550	12.95	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
4	INDOFEEN AKHTAR	Fem	11201-2683610-4	446	550	10.45	633	1100	11.51	553	900	12.29	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
5	ADIA DILAWAR	Fem	11201-1467276-4	591	900	13.13	642	1100	11.67	292	550	10.62	0	0	1100	9.05	0	0	0	0	0	0	0	0	0	0	0	0
6	LIYFAT BISI	Fem	11201-3103529-2	374	550	8.8	563	1100	10.6	265	550	9.64	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
7	MEHAR GUL	Fem	11201-7416363-8	637	900	14.16	671	1100	12.2	304	550	11.05	0	0	1100	9.33	0	0	0	0	0	0	0	0	0	0	0	0
8	ANJUM	Fem	11201-1591445-0	401	550	9.44	662	1100	12.4	300	550	10.91	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
9	MAHREEN	Fem	11201-7278470-5	594	900	13.2	675	1100	12.29	310	550	11.27	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
10	MAHREEN	Fem	11201-6192446-2	564	900	13.17	738	1100	13.36	317	550	11.03	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
11	SHAMLA ASMAT	Fem	11201-4800385-2	546	900	12.59	642	1100	11.67	292	550	10.47	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
12	SHAKILA NAZ	Fem	11201-6049548-6	674	900	12.82	617	1100	11.22	285	550	9.72	0	0	670	9.82	0	0	0	0	0	0	0	0	0	0	0	0
13	SHAZIA NORGEEN	Fem	11201-5574519-6	559	650	13.38	652	1100	12.4	275	550	10.3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
14	IRANJANDALEEB	Fem	11201-2177792-6	322	550	7.58	569	1100	10.71	365	600	12.17	575	1100	7.93	0	0	0	0	0	0	0	0	0	0	0	0	
15	MAHREEN NAZ	Fem	11201-8215052-6	436	550	9.24	567	1100	10.66	247	550	8.98	0	0	1100	6.67	0	0	0	0	0	0	0	0	0	0	0	
16	SHABUFTA MAJAN	Fem	11201-1590169-4	477	550	11.22	569	1100	10.71	270	550	9.53	544	1100	7.42	0	0	0	0	0	0	0	0	0	0	0	0	
17	NEELAM NAYAB	Fem	11201-6570013-2	560	650	9.85	579	1100	10.53	267	550	9.71	562	1100	7.05	0	0	0	0	0	0	0	0	0	0	0	0	
18	MAHREEN NAZ	Fem	11201-0336735-4	401	550	9.44	566	1100	9.2	274	550	9.98	556	1100	7.57	0	0	0	0	0	0	0	0	0	0	0	0	
19	SAMIYA GUL	Fem	11201-5660053-4	569	650	13.38	676	1100	12.29	240	550	8.73	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
20	SHANIDA FARVEEN	Fem	11201-0690536-5	405	550	9.55	592	1100	10.76	222	550	8.07	558	1100	7.61	0	0	0	0	0	0	0	0	0	0	0	0	

Shagufta Amin
A.D. (SFS) Education
Lakki Marwat

Sub Divisional Edu. Officer
(Female) Lakki Marwat

[Signature]
District Education Officer
(Female) Lakki Marwat

[Handwritten Signature]
2-9/16/2016

Anner DS

OFFICE OF THE EXECUTIVE DISTRICT OFFICER SCHOOLS & LITERACY LAKKI MARWAT

APPOINTMENT ORDER

Consequent upon the recommendation and approved by the Departmental Requirement committee, undersigned is pleased to appoint the below mention males, PST candidates out of merit list in BPS mention against their plus usual allowances as admissible under the existing rules/policy in the schools noted with effect from the date of taking over charge in the best interest of public services subject to the terms/conditions given below.

S/NO	Name	Father's Name	Place of Posting	Scale	Remarks
1.	Mr. Noor Majeed Khan	Mir Sada Khan	GPS, Landi Mirsalam, Lakki Marwat.	BPS-07	Against vacant post
2.	Mr. Mumtaz Khan	Akber Khan	GPS, Shaista Khan, Behram Khel, Matora, Lakki Marwat	BPS-07	Against vacant post

TERMS & CONDITIONS

1. Their services will be considered regular but without pension & gratuity in terms of section-19 of NWFCivil Servant Act, 1973 as amended vide NWFP, Civil servant (Amendment) Act, 2005. They will however be entitled to contributory provident Fund such a manner and such rates may be prescribed by the Government.
2. Their services will be liable to terminating on one month's notice from either side, in case of resignation without notice her two month's pay/allowances shall be forfeited to Government.
3. The appointees should submit their charge report to all concerned.
4. Their services can be terminated at any time. In case their performance is found unsatisfactory during probationary period and in case of misconduct, they will be proceeded against under the NWFP removal from service Special Ordinance 2000 and the rules framed from time to time.
5. The candidates should join their posts within 15 days. The head of the institution concerned should furnish a certificate to the effect that the candidates have joined the post otherwise, after 15 days of the issuance of this order, failing which, their orders will be treated as cancelled.
6. Charge should not be handed over if ages of the candidates are below 18 years or above 35 years as per policy issued on 23-02-2003.
7. The appointees are directed to perform their duties in their respective school noted against their names for a minimum period of three years and they will not be transferred from school where appointed.
8. In case of fake certificates/Degree or any other mistake in the said appointment order detected later on the undersigned reserves the right of amendment in the appointment order accordingly.
9. The appointment of candidates mentioned above will be subject to the condition that their domicile belongs to Lakki Marwat
10. They will produce Health & Fitness certificates from Medical Superintendent concerned before taking over charge.
11. No TA/DA etc is allowed.

Mrs. Farhat Hashmi
Civil Judge - V Lakki Marwat

Noor Hassan Khan
Executive District Officer
Elementary & Secy: Edu: Lakki Marwat

Endst. No. 117-20

Dated the 24/01/04

Copy for information and necessary action to:-

1. The District Coordination Officer, Lakki Marwat.
2. Director Elementary and Secondary Education, KPK, Peshawar.
3. Deputy District Officer (F) local office.
4. District Account Officer, Lakki Marwat.
5. Medical Superintendent: DHQ Hospital, Lakki Marwat

Executive District Officer
Elementary & Secy: Edu: Lakki Marwat.

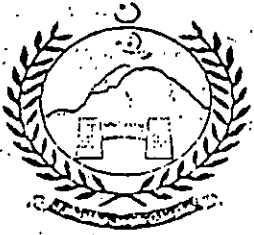
Annex E

APPOINTMENT ORDER OF DM (FEMALE) CONTRACT

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) LAKKI MARWAT

Phone No. 0969-538080

Fax No. 0 969-538080



APPOINTMENT.

Consequent upon recommendation of the Departmental Selection Committee, appointment of the following candidates are hereby ordered against the post of DM School based in BPS-15 (Rs:8500-700-29500) @ Rs: 8500/- fixed plus usual allowances as admissible under the rules on adhoc basis on Contract under the existing policy/Notification issued vide SO (PE)4-5/2014 teaching cadre dated: 30-04-2014 of the Provincial Government, in Teaching Cadre on the terms and condition given below with effect from the date of their taking over charge :-

S.#	Name	Father,s Name	Permanent address.	Place of posting
1	Sara Bibi	Juma Khan	BeguKhelLakki City	GGMS Daulat Khel
2	Balqees younus	Muhammad Younas	ShahbazKhelLakkiMarwat	GGMS Kheru Khel Pacca
3	Saima Noreen	Muhammad Ramzan	Bilal Town Lakki City	GGMS Mandan Manjiwala
4	Zubaida Khanum	Muhammad Javid	ShahbazKhelLakkiMarwat	GGMS Abdul Khel
5	SumairaAkram	Muhammad Akram	Lakki City	GGMS Wanda ShahabKhel
6	Naureen Akhtar	AbaidUllah Khan	Mina KhelLakki City	GGMS IsakKhel
7	Bibi Khadija	Abdul Manan	KhaidabKhelLakki City	GGMS JabuKhel
8	Nadia Dilawar	Dilawar Khan	Saeed KhelLakki City	GGMS Gambila
9	Iram Begum	Yaseen Ahmad	S/NaurangLakkiMarwat	GGMS Kotka Gideer
10	UlfatBibi	MukhtamBadshah	S/Naurang	GGMS Barat Khel Landiwah
11	FarzanaMajeed	Abdul Majeed	GulbazDehqanLakkiMarwat	GGMS Mash Habib Ullah
12	ShahanaGul	Muhammad Nariman Khan	KotkaSikandar S/Naurang	GGMS Jamil Khan TakhiKhel
13	Asma Khan	Abdul Hakim	LandiwahLakkiMarwat	GGMS BahadarLandiwah
14	Musarat Jabeen	Mira Jan Shah	Mama KhelMarwat S/Naurang	GGMS Khawaja Khel
15	Noor Mahal	Muzammil Khan	PaharKhelThalLakkiMarwat	GGMS HaramaTala
16	Musarat Shaheen	Banat Shah	KotlaMansoor Shah S/Naurang	GGMS Mangala
17	Sadaf Mahreen	AsmatUllah	Mina KhelLakki City	GGMS Chowki Jund
18	Ishrat Jabeen	Abdul Ahad Jan	Mina KhelLakki City	GGMS Mela MandaraKhel
19	Anila Anjumi	Muhammad Aslan	Mina KhelLakki City	GGMS Wanda Khara
20	Safila	Syed YounasAlishah	Mama KhelMarwat S/Naurang	GGMS Nasar Khel
21	Suria Jehan	Ghulam Qasim	Nar Sprlay S/Naurang	GGMS Baist Khel
22	Samar un Nisa	Muhammad Ayub Khan	Mama KhelMarwat S/Naurang	GGMS Bakhmal Ahmadzai

23	Rahat Farid	Farid Ullah	Shahbaz Khel Lakki Marwat	GGMS Pahar Khel Pacca
24	Nabila Shaheen	Rustam Khan	S/Naurang	GGMS Kotka Ayaz Khan
25	Shahida Parveen	Muhammad Azim	Dallo Khel Lakki Marwat	GGMS Umar Daraz Tajori
26	Shumila Asmat	Asmat Ulfah Khan	Khoidad Khel Lakki Marwat	GGMS Begu Khel

TERMS & CONDITION

1. NO TA/DA etc is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. Appointment is purely on temporary & contract basis initially for one year.
4. They should not be handed over charge if she exceeds 35 years or below 18 years of age.
5. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by this office. Any one found producing bogus certificates will be reported to the Law enforcing agencies for further action.
6. Their services are liable to termination on one month's notice from either side. In case of resignation without notice his one-month pay/allowances shall be forfeited to the Government.
7. Pay will not be drawn until and unless a certificate to the effect by this office is issued that her certificates are verified.
8. They should join their posts within 10 days of the issuance of this notification. In case of failure to join their posts within 10 days of the issuance of this notification, their appointment will expire automatically and no subsequent appeal etc shall be entertained.
9. Health and Age Certificate should be produced from the Medical Superintendent concerned before taking over charge.
10. Before handing over charge they will sign an agreement with the department, otherwise this order will not be valid.
11. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
12. Their services shall be terminated at any time, in case his performance is found unsatisfactory during their contract period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
13. Their appointment is made on School based, They will have to serve at the place of posting, and their service is not transferable to any other station.
14. Before handing over charge once again their document may be checked if they have not the required qualifications they may not be handed over charge.
15. The undersigned reserve the right of amendment in this appointment order in case of any mistake/error or omission.
16. All Heads of Institutions are directed to hand over charge on the production of original documents.

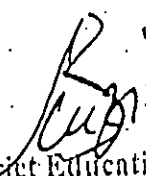
(Mst: Bibi Razia)
District Education Officer
(Female) Lakki Marwat

Endst: No. 1594-99 /AppiUCT/2014

Dated 29/05 2014.

Copy forwarded for information and necessary action to the:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy District Education Officer (Female) Lakki Marwat.
3. District Accounts Officer Lakki Marwat.
4. Principals/Head Mistresses concerned schools.
5. Official concerned.
6. M/File.


District Education Officer
(Female) Lakki Marwat

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR

S.A No. 771/2014

Neelum Nayab

Versus

DEO & Others

REJOINDER

Respectfully Sheweth,

PRELIMINARY OBJECTION.

All the 7 preliminary objections are illegal and incorrect. No reason in support of the same is ever given as to why appellant has no locus standi, unclean hands, not maintainable, concealment of facts, barred by time, mis and non joinder of necessary parties and estopped by her own conduct.

ON FACTS

1. Educational qualification not objected by respondents, so admitted correct by them.
2. Not correct. Appellant was appointed as DM after advertising the same in advertisement of the year, 2008 who contains the posts of DMs.

There was dispute over diploma certificate as to whether diploma of Board would be admissible of the University or otherwise.

The department was recognizing the diploma of Board and not of the University, so the W.P No. 1030/2010 was filed before Peshawar High Court, Peshawar by some of the candidates to treat the diploma of University at par with other Institutions. The W.P was accepted vide judgment dated 01.06.2010 by treating the diploma of all the Institutions (Board & University) at par of the candidates possessing the same are eligible for DM Posts.
(Copy as annex "R")

In pursuance of the aforesaid judgment of the Peshawar High Court Peshawar, upheld by apex Supreme Court of Pakistan, order of Female DMs was issued on 23.08.2010 regarding advertisement of the year, 2008 along with appellant. (Copy as annex R1)

The advertisement as Annexure "A" alongwith Merit List of the year, 2014 with reply of the year, 2010 is of no avail to respondents as appointment of DM was made at the advertisement of the year, 2008.

3. Not correct. Factual and legal positions is explained in the preceding paras, yet the dates given in para by respondents has no concern with the subject matter as order of appointment of appellant was made on advertisement of the year, 2008 and not on the year, 2010.

Moreso, when subject matter is subjudice before any legal forum, no adverse action is legally required to be taken.

4. Not correct. As stated earlier, the Ex-EDO E&SED with connivance of the representatives/staff of the department was minting money from the candidates, so foul was play by them in issuing of orders of appointments and endorsement No and dates i.e in Annex "B" with reply Endost No. 112-20, dated 24.01.2011 of PST while at appointment order of appellant, the Endst No. is 117-20/DO(F/S), dated 24.01.2011 of DM. Order of appointment of such PST candidates did not bear words DO(F/S), meaning thereby that respondents are not presenting clear stance in the case.

As for as stance of respondents regarding appointment of other Female DM at GGMS, Khawaja Khel, is concerned, such appointment order was issued on 29.05.2014 as against appointment order of appellant on 24.01.2011. Respondents in reply tried their best to confuse the matter and the Hon'ble Tribunal.

As fraud is played by the respondents in appointment orders, such fraud is going to be played with Hon'ble Tribunal.

5. Admitted correct by the respondents.

6. Not correct. The para of reply is without proof. Submission of departmental appeal to the authority is not denied.

GROUNDS:

- a. Not correct. As stated earlier, appellant was not appointed as DM on the advertisement for the year, 2010 but of the year, 2008 as other colleagues appointed as DMs were also at the advertisement of the year, 2008, so the para of the reply is incorrect

The signature of the then EDO, if compared with the signature bear on order dated 23.08.2010, is one and the same. Her services were illegal terminated.

- b. Not correct. The attendance in the register of attendance along with three other female teachers is quite correct and genuine.
- c. Not correct. The ground of the appeal is correct. Respondents are advancing lame excuses in the case in hand.
- d-e. Not correct. The grounds of the appeal are correct. Comprehensive explanation has been given in the preceding paras of facts.

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

Through
Dated: .11.2015

Appellant
Saadullah Khan Marwat
Arbab Saif Ul Kamal
Miss Rubina Naz
Advocates,

AFFIDAVIT

I, Neelum Nayab D/o Naqib Ullah, Appellant do hereby solemnly affirm and declare that contents of the **Appeal & rejoinder** are true and correct to the best of my knowledge and belief while that of the reply of respondents are illegal and incorrect.

I reaffirm the same on oath once again to be true and correct as per the available record.

DEPONENT

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