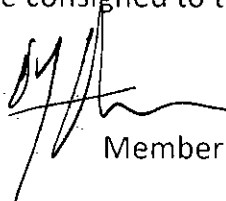
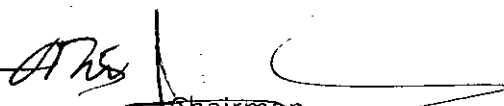


17.01.2017

None present for the appellant. Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique Sr.GP for respondents present. Representative of the respondents informed the Tribunal that the appellant has been adjusted against the desired vacancy and as such not interest in prosecution of the appeal.

Since none is in attendance on behalf of the appellant as such the appeal is dismissed for want of prosecution. File be consigned to the record room.


Member


Chairman
Camp court, A/Abad,
17.01.17.

ANNOUNCED
17.01.2017

22.11.2016

Agent of counsel for the appellant and Mr. Muhammad Usman Senior Clerk alongwith Mst. Bushra Bibi, Government Pleader for official respondents present. Representative of the respondents submitted copy of order dated 9.11.2016 according to which the appellant has been transferred as PSHT at GGPS Ganda District Mansehra. To come up for further proceedings/final hearing on 21.12.2016 before D.B at camp court, Abbottabad. The restraint order shall continue.



Chairman
Camp court, A/Abad

21.12.2016

Appellant in person and Muhammad Siddique, Sr.GP for the official respondents present. Due to incomplete bench, case is adjourned to 17.01.2017 for further proceedings/final hearing before D.B at camp court, Abbottabad. The restraint order shall continue.



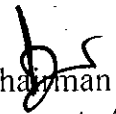
Chairman
Camp court, A/Abad

200/15

17.08.2016

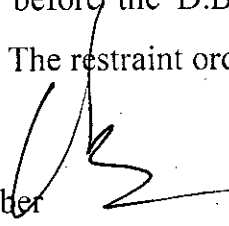
Appellant with counsel and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique, Sr.GP for the official respondents present. Representative of the respondents requested for one more opportunity for adjustment of the appellant. Adjourned for further proceedings/final hearing before the D.B on 20.09.2016 at camp court, Abbottabad. Status quo be maintained.



Member


Chairman
Camp court, A/Abad.

20.09.2016

None is present for the appellant. Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique Sr.GP for the official respondents present. Representative of the respondents informed the Tribunal that adjustment of the appellant is in progress and requested for further adjournment. To come up for further proceedings before the D.B on 17/10/2016 at camp court, Abbottabad. The restraint order shall continue.


Member


Chairman
Camp court, A/Abad

17.10.2016

Counsel for the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique Sr.GP for the respondents present. Requested for adjournment as the grievances of the appellant are being considered departmentally. Adjourned for final hearing before the D.B on 22.11.2016 at camp court, Abbottabad. The restraint order shall continued.


Member


Chairman
Camp Court, A/Abad


14.03.2016

Appellant in person and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique, Sr.G.P for respondents present. Arguments could not be heard due to non-availability of D.B. Adjourned for final hearing before D.B to 19.4.2016 at Camp Court A/Abad. Status-quo be maintained.


Chairman
Camp Court A/Abad

19.04.2016

Appellant in person and Mr Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Due to non-availability of D.B arguments could not be heard. To come up for final hearing on 16.05.2016 before D.B at camp court, Abbottabad. Status quo be maintained.


Chairman
Camp court, A/Abad

16.05.2016


Appellant with counsel and Mr. Muhammad Pervez, Senior Clerk alongwith Mr. Muhammad Siddique Sr.GP for the official respondents present. Counsel for the appellant submitted copy of office order dated 27.07.2015 vide which private respondent No. 5 (Mst. Naeed Begum PSHT) GGPS Ghazi Kote Phulra has been adjusted at GGPS Jabri against a vacant post and, therefore, a new development has taken-place as the post has become vacant for facilitating the appellant. Parties seek adjournment so as to consider the case of the appellant departmentally. Adjourned for further proceedings/final hearing to 17.08.2016 before D.B at camp court, Abbottabad. Status quo be maintained.


Member


Chairman
Camp court, A/Abad

21.10.2015

Appellant with counsel and Mr. Muhammad Fayaz, Supdt. alongwith Mr. Muhammad Tahir Aurangzeb, G.P for respondents present. Rejoinder submitted. Due to non-availability of D.B, arguments could not be heard. To come up for final hearing before D.B on 17.12.2015 at Camp Court A/Abad. Status-quo be maintained.


Chairman
Camp Court A/Abad.

17.12.2015

Appellant in person and Mr. Muhammad Fayaz, Supdt. alongwith Mr. Muhammad Siddique, Sr.GP for respondents and present. Application for adjournment submitted by appellant. Due to non-availability of D.B, appeal to come up for final hearing before D.B on 15.2.2016 at Camp Court A/Abad. Status-quo be maintained.


Chairman
Camp Court A/Abad

15.02.2016


Mr. Muhammad Arif on behalf of the appellant and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Saddique, Sr.G.P for respondents present. Counsel for the appellant is stated indisposed. Application for adjournment submitted. To come up for final hearing before D.B on 14.03.2016 at Camp Court A/Abad. Status-quo be maintained.


Chairman
Camp Court A/Abad


Member


5- 18.5.2015

Appellant with counsel, Mr. Muhammad Tahir Aurangzeb, G. P for official respondents No.1 to 4 and private respondent No.5 in person present. Written reply not submitted. To come up for written reply/comments as well as reply to stay application on 15.6.2015 at Camp Court A/Abad. Till then status-quo be maintained.


Chairman
Camp Court A/Abad

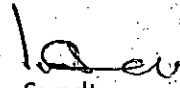
6- 15.6.2015

Appellant with counsel and Mr. Muhammad Bilal, G.P. for official respondents No.1 to 4. Private respondent No.5 absent. Proceeded ex-parte. Learned G.P requested for adjournment. Last opportunity granted. To come up for written reply on behalf of official respondents No.1 to 4 on 20.7.2015 before S.B at camp court A/Abad. Status-quo be maintained.


Chairman
Camp Court A/Abad

20.07.2015

Since the 20th July 2015 has been declared as a public holiday on account of Eid-ul-Fiter. Therefore case is adjourned to 14.09.2015 at Camp Court Abbottabad.


Supdt.

14.9.2015

Appellant with counsel and Mr. Muhammad Usman, Senior Clerk alongwith Mr. Muhammad Tahir Aurangzeb, G.P for respondents present. Written reply submitted. To come up for rejoinder and final hearing before D.B on 21.10.2015 at Camp Court A/Abad. Status-quo be maintained.


Chairman
Camp Court A/Abad

10.03.2015

Mr. Gharib Nawaz Khan, Advocate for the appellant present. Argued that the appellant was serving as PHST (BPS-15) in GGPS Hariar Panjool when transferred vide order dated 30.08.2014 to GGPS Ganda Mansehra where the appellant resumed the duty on 07.11.2014 but vide impugned order dated 08.11.2014, the said order was recalled at the instance of Sardar Zahoor Ahmad, Chairman DDAC/MPA Mansehra-1 vide his letter dated 05.11.2014 (annexure-E P.14). That the impugned order is malafide and the result of political interference and therefore liable to be cancelled. That the appellant preferred departmental appeal against the impugned order on 15.11.2014 which was not responded within the statutory period and hence the present service appeal on 10.03.2015.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 20.04.2015.


Since the appeal pertains to the territorial limits of Hazara Division and as such to be heard at Abbottabad. To come up written reply/comments on the date fixed i.e 20.04.2015 before S.B at camp court Abbottabad. Notice of stay application be also issued for the date fixed. Till then status-quo be maintained.


Chairman

20.4.2015

Appellant with counsel, Mr.Fazal Dad, Supdt: alongwith Mr.Muhammad Tahir Aurangzeb, G.P for official respondents No.1 to 4 and counsel for private respondent No.5 present. Requested for adjournment. To come up for written reply/comments as well as reply to stay application at camp court A/Abad on 18.5.2015. Till then status-quo be maintained.


Chairman
Camp Court A/Abad

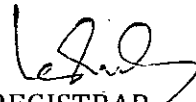

3-
Appellant Appointed Process fee
of Security. 

4-

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 200/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	10.03.2015	<p>The appeal of Mst. Yasmeen Begum presented today by Mr. Gharib Nawaz Khan Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	10-3-15	<p>This case is entrusted to Bench <u>I</u> for preliminary hearing to be put up thereon <u>11-03-2015</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

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

Appeal no 200/15

Mst. Yasmin Begum.....Appellant

Versus

Government of Khyber Pakhtunkhwa
through Secretary Education for School,
K.P.K. Peshawar etc.....Respondents

SERVICE APPEAL

INDEX

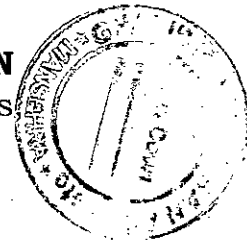
S#	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE#
1.	Memo of appeal	-	1 to 5
2.	Application for suspension of operation of impugned order No. 40-50 dated 08.11.2014	-	6 to 7
3.	Correct addresses of the parties.	-	-8-
4.	Affidavit	-	-9-
5.	Copy of appointment order	"A"	-10-
6.	Copy of order dated 1169-72 dated 30.08.2014	"B"	-11-
7.	Photo copy of the charge report	"C"	-12-
8.	Photo copy of order and letter of MPA/Chairman DDAC Committee.	"D" & "E"	13 to 14
9.	Photo copy of appeal.	"F"	15 to 16
10.	Wakalat nama	-	-17-

Dated 09.03.2015

Y. Begum
Yasmin Begum
(Appellant)

Through: -

GHARIB NAWAZ KHAN
GHARIB NAWAZ KHAN
Advocate District Courts
Mansehra



1

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

Appeal no-200/2015

Mst. Yasmin Begum (PSHT) wife of Sheikh Muhammad Din, Government Girls Primary School Ganda, Tehsil and District Mansehra.....**Appellant**

**K.W.P. Province
Service Tribunal**
Diary No. 2126
dated 10-3-2015

Versus

- 1) Government of Khyber Pakhtunkhwa through Secretary Education for School, K.P.K. Peshawar.
- 2) Director of Elementary Education, Government of Khyber Pakhtunkhwa, Peshawar.
- 3) Executive District Officer (Elementary & Secondary Education), Mansehra.
- 4) District Education Officer (Female) Education, Tehsil and District Mansehra.
- 5) Naeed Begum, PST, Government Girls Primary School Ganda, Tehsil and District Mansehra.....**Respondents**

*Respondent No. 5
etc - pmta vide
order sheet No. 6
dt: 15-6-15*

415-4 of KP Service Tribunal Act
APPEAL / AGAINST THE ORDER
ENDORSEMENT NO. 40-50 DATED
08.11.2014 PASSED BY THE
RESPONDENT NO. 4.

PRAYER: -

On acceptance of the appeal the order Endst. No. 40-50 dated 08.11.2014 to the extent of respondent No. 5 may kindly be set-aside and order Endst. No. 1169-72 dated 30.08.2014 may kindly be restored and appellant may kindly be allowed to serve on her original school i.e. Government Girls Primary School Ganda, Tehsil and District Mansehra and appellant may kindly be restored on her original school i.e. Government Girls Primary School Ganda, Tehsil and District Mansehra.

Filed to-day
[Signature]
10/3/15

Respectfully sheweth;

- 1) That, the appellant is a (PSHT) Teacher in Education Department since 1982.

(Copy of first appointment order is annexed as Annexure "A").

- 2) That, the appellant was transferred after a long period of 33 years to her parent Union Council Ganda from Govt. Primary School Harian Panjool to Govt. Girls Primary School Ganda vide order Endst. No. 1169-72 dated 30.08.2014 by the respondents Nos. 4 & 5, after the approval of competent authority against vacant post after the promotion of Mst. Kalsoom Jan, PST Teacher.

(Copy of the order is annexed as Annexure "B").

- 3) That, appellant spent more than 33 years in difficult area very away from her home station.

- 4) That, later-on with the compliance of order dated 30.08.2014 the appellant took over the charge in Govt. Girls Primary School Ganda on 07.11.2014 (Before Noon).

(Photo copy of the charge report is annexed as Annexure "C").

- 5) That, respondent No. 4 again issued cancellation order Endst. No. 40-50 dated 08.11.2014 vide which respondent No. 5 was transferred from

By

Govt. Girls Primary School Trapi Khail to Govt. Girls Primary School Ganda on the place of appellant and appellant was transferred from Ganda Govt. Girls Primary School to Govt. Girls Primary School Harian Panjool on the basis of political influence.

(Photo copy of letter is annexed as Annexure "D" and the letter of MPA/Chairman DDAC is annexed as Annexure "E").

- 6) That, appellant filed a departmental appeal against said order No. 40-50 dated 08.11.2014 before respondent No. 2 the said respondent did not decide the departmental appeal within 90 days.

(Photo copy of appeal is annexed as Annexure "F").

That feeling aggrieved from the impugned order of respondent No. 4 appellant seek the indulgence of this Honourable Court *inter-alia*, on the following grounds: -

GROUND: -

- A) That, the impugned order dated 08.11.2014 is wrong, illegal, unconstitutional, against the natural justice and based on malafide. Hence, not tenable in the eye of law.
- B) That, appellant is poor and no political base, therefore, made a rolling stone by the respondent.

(4)

- C) That, the impugned order is passed on political pressure and no sufficient reasons were given in the said order by the respondent No. 4.
- D) That, on the compliance of the transfer order dated 30.08.2014 appellant joined the duty in Govt. Girls Primary School Ganda. The valuable rights created in favour of appellant by the transfer order dated 30.08.2014. Hence, the impugned order passed by respondent No. 4 is against the principle of locus potentia.
- E) That, the appellant was adjusted against the vacant post.

PRAYER: -

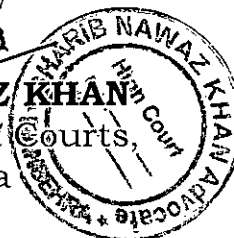
acceptance of the appeal the order Endst. No. 40-50 dated 08.11.2014 to the extent of respondent No. 6 may kindly be set-aside and order Endst. No. 1169-72 dated 30.08.2014 may kindly be restored and appellant may kindly be allowed to serve on her original school i.e. Government Girls Primary School Ganda, Tehsil and District Mansehra and appellant may kindly be restored on her original school i.e. Government Girls Primary School Ganda, Tehsil and District Mansehra.

Dated 09.03.2015

Y. Begum
Yasmin Begum
(Appellant)

Through: -

Gharib Nawaz Khan
GHARIB NAWAZ KHAN
Advocate District Courts,
Mansehra



(5)

VERIFICATION

I, MST. YASMIN BEGUM (PSHT) WIFE OF SHEIKH MUHAMMAD DIN, GOVERNMENT GIRLS PRIMARY SCHOOL GANDA, TEHSIL AND DISTRICT MANSEHRA DO HEREBY VERIFY THAT THE CONTENTS OF FORE-GOING APPEAL ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

Y. Begum
**MST. YASMIN BEGUM
(DEPONENT)**



(6)

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

Mst. Yasmin Begum.....Appellant

Versus

Government of Khyber Pakhtunkhwa
through Secretary Education for School,
K.P.K. Peshawar etc.....Respondents

SERVICE APPEAL

**APPLICATION FOR SUSPENSION OF
OPERATION OF IMPUGNED ORDER NO.
40-50 DATED 08.11.2014 TILL THE
FINAL DISPOSAL OF ABOVE TITLED
APPEAL.**

Respectfully sheweth!

- 1) That, this application may kindly be considered as integral part and parcel of above titled appeal.
- 2) That, appellant is sanguine to every success of the above titled appeal.
- 3) That, balance of convenience tilts in favour of appellant.
- 4) That, if the operation of impugned order is not suspended the very purpose of appeal will be fruitless.

It is, therefore, most humbly prayed that on acceptance of instant application the operation of impugned order No. 40-50 dated 08.11.2014 may kindly be suspended till the final disposal of above titled appeal.

Dated 09.03.2015

Y. Begum
Yasmin Begum
(Appellant)



Through: -

Gharib Nawaz Khan
GHARIB NAWAZ KHAN
Advocate District Courts,
Mansehra

to the extent of R/No-5

(7)

AFFIDAVIT

I, MST. YASMIN BEGUM (PSHT) WIFE OF SHEIKH MUHAMMAD DIN, GOVERNMENT GIRLS PRIMARY SCHOOL GANDA, TEHSIL AND DISTRICT MANSEHRA DO HEREBY SOLEMNYL AFFIRM AND DECLARE ON OATH THAT THE CONTENTS OF FORE-GOING APPLICATION ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.

Y. Begum
MST. YASMIN BEGUM
(DEPONENT)



ATTESTED *S. M. Suleman*
S.M. Suleman Advocate *9/3/15*
NOTARY PUBLIC MANSEHRA

(8)

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

Mst. Yasmin Begum.....Appellant

Versus

Government of Khyber Pakhtunkhwa
through Secretary Education for School,
K.P.K. Peshawar etc.....Respondents

SERVICE APPEAL

CORRECT ADDRESSES OF THE PARTIES

Respectfully sheweth!

Correct addresses of the parties are as
under: -

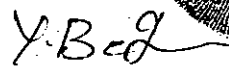
APPELLANT

Mst. Yasmin Begum (PSHT) wife of Sheikh
Muhammad Din, Government Girls Primary
School Ganda, Tehsil and District Mansehra

RESPONDENTS

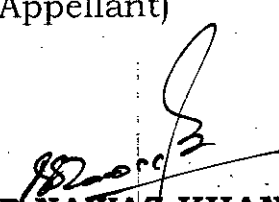
- 6) Government of Khyber Pakhtunkhwa
through Secretary Education for School,
K.P.K. Peshawar.
- 7) Director of Elementary Education,
Government of Khyber Pakhtunkhwa,
Peshawar.
- 8) Executive District Officer (Elementary &
Secondary Education), Mansehra.
- 9) District Education Officer (Female)
Education, Tehsil and District Mansehra.
- 10) Naeed Begum, PSHT, Government Girls
Primary School Ganda, Tehsil and
District Mansehra

Dated 09.03.2015


Yasmin Begum
(Appellant)



Through: -


GHARIB NAWAZ KHAN
Advocate District Courts,
Mansehra

(9)

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

Mst. Yasmin Begum.....Appellant

Versus

Government of Khyber Pakhtunkhwa
through Secretary Education for School,
K.P.K. Peshawar etc.....Respondents

SERVICE APPEAL

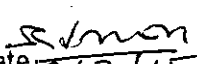
AFFIDAVIT

I, MST. YASMIN BEGUM (PSHT) WIFE OF SHEIKH MUHAMMAD DIN, GOVERNMENT GIRLS PRIMARY SCHOOL GANDA, TEHSIL AND DISTRICT MANSEHRA DO HEREBY SOLEMNYL AFFIRM AND DECLARE ON OATH THAT THE NO SUCH SUBJECT MATTER APPEAL HAS EVER BEEN FILED BEFORE THIS HONOURABLE TRIBUNAL NOR PENDING NOR DECIDED. THAT THE CONTENTS OF FORE-GOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF AND NOTHING HAS BEEN CONCEALED OR SUPPRESSED FROM THIS HONOURABLE TRIBUNAL.


MST. YASMIN BEGUM
(DEPONENT)

IDENTIFIED BY:


GHARIB NAWAZ KHAN
ADVOCATE/COUNSEL FOR APPELLANT

ATTESTED 
S.M. Suleman Advocate
NOTARY PUBLIC MANSEHRA 9/3/15

BETTER COPY OF PAGE NO. 11

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (F) MANSEHRA

ADJUSTMENT:-

As approved by the competent authority Mst. Yasmeen Begum PSIIT-GGPS. Harian Panjool is hereby adjusted at GGPS Ganda on her own pay and grade vice Mst. Kalsoom Jan PSIII in their interest of public service.

Note:-

1. The order should take effect as and when Mst. Kalsoom Jan PSIIT promoted to the post of SST.
2. No TA /DA is allowed.

-sd-

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

Endst No. 1169-72/Approval/Transfer Dated Mansehra the 30/05/2014

COPY TO:

1. The District Account Officer, Mansehra.
2. The ASDEO Circle Concerned.
3. The Head Teacher Concerned.
4. Teacher Concerned.

SUB DIVISIONAL EDUCATION OFFICER
(FEMALE) MANSEHRA

(11)

"B"

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (F) MANSEHRA

ADJUSTMENT

As approved by the competent authority Mst. Yasmeen Begum, PSITT, GGPS, Harijoo Panjool is hereby adjusted at GGPS, Ganda on her own pay and grade of Mst. Kalsoom Jan, PSITT in the interest of public service.

Note:-

1. The order should take effect as and when Mst. Kalsoom Jan, PSITT promoted to the post of SST.
2. No TADA is allowed.

Sd/-
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

Encls.No 169-72/Approval/Transfer Dated Manshra the 30/8/2014

*Copy to:-

1. The District Account Officer, Manshra.
2. The ASDEO Circle concerned.
3. The Head Teacher concerned.
4. Teacher concerned.

*attached 4 se
one copy*



[Signature]
SUB DIVISIONAL EDUCATION OFFICER
(FEMALE) MANSEHRA.

حاضری رپورٹ

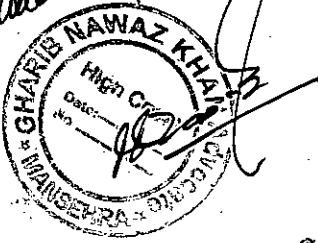
عین سماء یاسمین بیگم P.H.S.T سکیول 15 نے آرڈر نمبر 1169-1
(G.G.P.S. Hadrian Panjool)

کے تحت میں مکتوم جان فولہ S.S.T پوسٹ پریپرٹوٹ ہوئی ہیں

ارد P.H.S.T کی خالی پوسٹ پریپرٹوٹ مورفہ 7.11.2014 کو قبل از روپہر

حاضری کر لی ہے اور حاضری رپورٹ حاضر قدرت ہے

Attested to be true copy.



Kule
Head Mistres
G.G.p school
Ganda Manshra

P.H.S.T یاسمین بیگم

اور گنت لرنر پریپرٹوٹ سکیول

گندا

Yasmeen Begum

7/11/2014

BETTER COPY OF PAGE NO. 13

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA.

CANCELLATION:-

As approved by the competent authority the Conditional Adjustment orders issued vide Office Endst No. 822-25/dated 04/07/2014 No. 830-33/dated 04/07/2014 No. 1061-64 dated 12/08/2014, No. 1169-72 dated 30/08/2014 and No. 1201-04 dated 30/08/2014 are hereby cancelled in the interest of public service with immediate effect.

-sd-

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

Endst No. 40-50/ENDST Branch Dated Mansehra the 08/11/2014

FORWARDED FOR INFORMATION AND NECESSARY ACTION
TO:-

1. The District Accounts Officer, Mansehra.
2. The Sub Divisional Education Officer (Female) Mansehra.
3. The ASDEO Circle Concerned.
4. The Head Teacher, GGPS, Ganda Kotly Payeen, Gandian No. 1, Bangain and Mansehra No. 1.
5. The original concerned.
6. Office file.

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

(13)

“ D U ”



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

CANCELLATION

As approved by the competent authority, the Conditional Adjustment Orders issued vide Office Endst. No. 822-25/Dated 4/7/2014, No. 830-33/Dated 4/7/2014, No. 1061-64/Dated 13/8/2014, No. 1169-72/Dated 30/8/2014 and No. 1201-04/Dated 30/8/2014 are hereby cancelled in the interest of public service with immediate effect.

Sd/-
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.

Endst. No. 40-50 /Est. Branch, Dated Mansehra the 8/11 /2014.

Forwarded for information and necessary action to:-

1. The District Accounts Office, Mansehra.
2. The Sub Divisional Education Officer (Female) Mansehra.
3. The ASDEO Circle Concerned.
- 4-8. The Head Teachers, GGPS, Ganda, Kotly Payeen, Gandian No.1, Bangian and Mansehra No.1.
9. The Official Concerned.
10. Office File.

*attached to be
true copy*



DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA.



(14) E
OFFICE OF THE CHAIRMAN
DDAC MANSEHRA/MPA PK-53

No. DDAC (M)/MPA PK 53/III

Dated: 5 / 11 / 2014.

To

The District Education Female,
Manshra.

Subject: - TRANSFER/POSTING

attested to be true copy.

Kindly refer to the subject noted above and to request that following School Teachers may be Transfer/Posting, in the best public interest, with immediate effect:-

S.No	Name of Teacher	From	To
1.	Riffat Shaheen (PST BS-15)	GGPS Battal	GGPS Hatthi Mera
2.	Mahida Rehman (PST BS-15)	GGPS Kagal Talhta	GGPS Manshra#I
3.	Naeeda Bagum (PST BS-15)	GGPS Khayl	GGPS Ganda
4.	Saeeda Bagum (PST BS-15) in place of at Serial # 2	GGPS Nori (Balakot)	GGPS Kagal
5.	Saeeda Fakhir-e-Batool (PST BS-15)	GGPS Gali Mughalan	GGPS Bakrial

attested to be true copy

(Sardar Zafoor Ahmed)
Chairman DDAC/
MPA Manshra-I.

بخدمت جناب ڈائریکٹر صاحب ایلیمنٹری ایجوکیشن پشاور

بوساطت جناب (F) (DEO) مانسہرہ

محکمہ انہ اپیل اجمالی آرڈر 1169-72 محررہ 30/08/2014 منسوخی آرڈر

08/11/2014 مورخہ 40-50

جناب عالی!

موجبات اپیل ذیل ہے

- ۱- یہ کہ ایپلانٹ سال 1982 میں بطور PTC ٹیچر بھرتی ہوئی۔ (نقل لف ہے)۔
- ۲- یہ کہ ایپلانٹ مانسہرہ سٹی کی رہائشی و سکونت ہے۔
- ۳- یہ کہ ایپلانٹ نے اپنی ساری سروس گھر سے انتہائی دور دشوار گزار اور مشکل ترین علاقہ میں بخوبی سرانجام دی جس سے محکمہ ہذا کو کوئی شکایت کا موقع نہیں دیا گیا ہے۔
- ۴- یہ کہ ایپلانٹ اب بوڑھی اور کمزور ہو چکی ہے اور ایک بڑے کنے کا سہارا بھی ہے اور ایپلانٹ کے بچے چھوٹے اور کچھ بڑے ہیں جس کو ایپلانٹ خاطر خواہ توجہ نہیں دے رہی ہے جس سے بچوں کی تعلیم، تربیت بھی بری طرح متاثر ہو رہی ہے۔
- ۵- یہ کہ حیثیت انسان اور انسانیت کے میرا بھی حق بنتا ہے کہ مجھے بھی گھر کے قریب تعینات کیا جائے۔
- ۶- یہ کہ ایپلانٹ کی درخواست پر ایپلانٹ کی ایک خالی جگہ GGPS گھنڈا، ہاڑیاں پنچول GGPS سے تبادلہ کیا گیا۔ (نقل لف ہے)۔
- ۷- یہ کہ ایپلانٹ نے GGPS گھنڈہ میں 07/11/2014 کو حاضری کی اور اپنی خدمات جاری رکھنے کا آغاز کیا۔
- ۸- یہ کہ ایپلانٹ ایک غریب معزز اور شریف گھرانے سے تعلق رکھتی ہے لیکن ایپلانٹ کی شرافت سیاست کے آگے نہ ٹھہر سکی اور ایپلانٹ کو دوسری ہی دن بغیر کوئی وجہ بتائے 08/11/2014 کو دوبارہ GGPS گھنڈہ سے GGPS ہاڑیاں پنچول واپس تبدیل کیا۔

بخدمت جناب ڈائریکٹر صاحب ایجوکیشن پشاور
بوساطت جناب DEO(F) مانسہرہ

حکمانہ اپیل/ بحالی آڈر 72-1169 محرمہ 30.08.2014، منسوخ آڈر 40-50

Dated 08.10.2014



جناب عالی! منوجبات اپیل ذیل ہے۔

(۱) یہ کہ ایپلانٹ سال 1982ء میں بطور PTC ٹیچر بھرتی ہوئی (نقل لف ہے)۔

(۲) یہ کہ ایپلانٹ مانسہرہ سٹی کی رہائش و سکونت ہے۔

(۳) یہ کہ ایپلانٹ نے اپنی ساری سروس گھر سے انتہائی دور دشوار گزار اور مشکل سفر پر مشتمل علاقہ میں بخوبی سرانجام دی جس سے محکمہ ہذا کو کوئی شکایت کا موقع نہیں آیا۔

(۴) یہ کہ ایپلانٹ اب بورڈنگ اور کمزور ہو چکی ہے اور ایک بڑے کنبے کا لالہ بھی ہے۔

(۵) یہ کہ ایپلانٹ کے بچے چھوٹے اور کنبے بڑے ہیں جن کا تعلیم و تربیت بھی متاثر ہو رہی ہے۔

(۶) یہ کہ بنییت انسان اور انسانیت کے میرا بھی حق بنتا ہے کہ مجھے بھی لھر کے قریب تعینات کیا جائے۔

(۷) یہ کہ ایپلانٹ کی درخواست پر ایپلانٹ کی ایک خالی جگہ GGPS گھنڈہ، ہاڑیاں پنول GGPS سے تبادلہ کیا گیا۔ (نقل لف ہے)۔

(۸) یہ کہ ایپلانٹ نے GGPS گھنڈہ میں 07.11.2014 کو حاضری کی اور اپنی خدمات جاری رکھنے کا آغاز کیا۔

(۹) یہ کہ ایپلانٹ ایک غریب معزز اور شریف گھرانے سے تعلق رکھتی ہے۔ لیکن ایپلانٹ کی شرافت سیاست کے آگے نہ ٹھرسکی اور ایپلانٹ کو دوسرے ہی دن بغیر کوئی وجہ بتائے 08.11.2014 کو دوبارہ GGPS گھنڈہ سے

G G P S ہاڑیاں پنول واپس تبدیل کیا۔

Director
P. G. P. T. S.
Manshera

Special Secretary
Elementary and Secondary Education
Govt. of Punjab
26/11/14

DEO(F)
Manshera
Please
send your
as per
rules on
the
Director
Elementary
Khyber Pakhtunkhwa

وکالت نامہ

بعدالت جناب سروس ریٹائرمنٹ گورنمنٹ پاکستان
 نام حکومت پاکستان کراچی
 دعویٰ یا جرم سروس ریٹائرمنٹ پاکستان

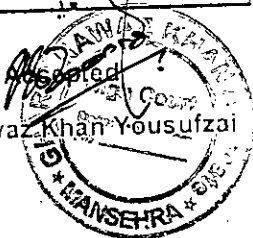
باعث تحریر آنکہ سروس ریٹائرمنٹ گورنمنٹ پاکستان
 اندریں مقدمہ عنوان میں اپنی طرف سے برائے بیرونی وجوہات ہی مقام

غریب نواز خان یوسفزئی ایڈووکیٹ

کو بدیں شرط وکیل مقرر کیا ہے میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے پروکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا اگر کسی پیشی پر منظر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ کچہری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیرونی کرنے کے مجاز نہ ہوں گے۔ اگر مقدمہ مقام کچہری کے کسی اور جگہ سماعت ہونے پر بروز کچہری کے اوقات کے آگے یا پیچھے ہونے پر منظر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے کہ مجھے کل ساختہ پرداخت صاحب مثل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد تاشی وراثی نامہ فیصلہ برخلاف کرنے و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا ڈگری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادا تین علیحدہ بیرونی مختار نامہ کرنے کا مجاز ہوگا اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا بیرٹر کو بجائے اپنے ہمراہ مقررہ کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے کہ یہ سندرت۔ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

تاریخ 10-03/15 2014ء

Attested & Accepted
 Gharib Nawaz Khan Yousufzai
 Advocate.



غریب نواز خان یوسفزئی ایڈووکیٹ
 ڈسٹریکٹ جج گورنمنٹ کورٹ منسہرہ
 منسہرہ

Y. Begg



وکالت نامہ

بعدالت جناب سروس ٹریڈنگ کمپنی ناہیدہ بیگم PSI گنڈا

صداقت ماسخین لابی ناہیدہ بیگم دعویٰ یا رقم
سروس ٹریڈنگ کمپنی تعمیر یا رقم

مندرجہ بالا عنوان میں اپنی طرف سے بیرونی وجوہات دہی بنام سروس ٹریڈنگ کمپنی جوہان احمدی
 بدیں شرط وکیل مقرر کیا ہے میں ہر پیشی پر خود یا بذریعہ مختار خاص روبرو عدالت حاضر ہوتا ہوں
 گا اور بوقت پکارے جانے پر وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا اگر کسی پیشی پر مظہر حاضر نہ ہو اور غیر حاضری
 کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب
 موصوف صدر مقام کچہری کے علاوہ کسی اور جگہ کچہری کے تقررہ اوقات سے پہلے یا بروز تعطیل بیرونی کرنے کے مجاز نہ ہوں
 گے۔ اگر مقدمہ مقام کچہری کے کسی اور جگہ سماعت ہونے پر بروز کچہری کے اوقات کے آگے یا پیچھے ہونے پر مظہر کو کوئی
 نقصان پہنچے تو ذمہ دار یا اس کے واسطے کسی معاوضہ ادا کرنے، مختار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ
 ہونگے کہ مجھے کل ساختہ پرداختہ صاحب مثل کردہ ذات خود منظور قبول ہوگا اور صاحب موصوف کو عرضی دعویٰ اور درخواست
 اجراء ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز روپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا ہر قسم کا بیان دینے اور سپرد
 ثالثی و راضی نامہ فیصلہ برخلاف کرنے و اقبال دعویٰ کا اختیار ہوگا اور بصورت انیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ
 درخواست حکم امتناعی یا ڈگری قبل از فیصلہ اجراء ڈگری بھی صاحب موصوف کو بشرط ادا ایگی علیحدہ بیرونی مختار نامہ کرنے کا
 مجاز ہوگا اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا ایئر سٹر کو بجائے اپنے ہمراہ مقررہ کریں اور ایسے مشیر
 قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں
 گا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے
 برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا ہے کہ یہ سند ہے۔ مضمون مختار نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

صداقت ماسخین لابی
Naheedh Begum
 PSI گنڈا

موزنہ 20 جون 2015ء

Accepted
 Attached
 (A)

BEFORE THE HONOURABLE SERVICE TRIBUNAL

KHYBER PAKHTUNKHWA, PESHAWAR.

APPEAL NO.200/2015

Yasmeen Begum (PSHT) W/O Sheikh Muhammad Din, Government Girls Primary School
Ganda, Tehsil and District Mansehra.

.....APPELLANT

VERSUS

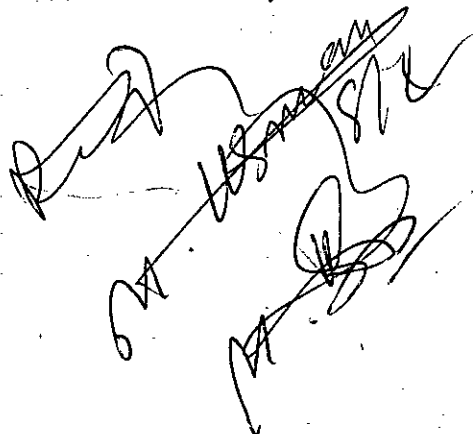
1. Govt. of Khyber Pakhtunkhwa through Secretary Education, for school K.P.K Peshawar.
2. Director of Elementary Education, Government of Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Female) Mansehra.
4. Headmistress Govt:Girls Middle School, Ganda Mansehra.

.....RESPONDENTS.

Written reply on behalf of the Respondent No. 1, 2, and 4.

PRELIMINARY OBJECTIONS.

1. That this Honorable Service tribunal has got no jurisdiction to entertain the present appeal.
2. That the appellant has got no cause of action/locus standi to file the present appeal.
3. That the appeal is not maintainable in its present form.
4. That the appellant has not come to the Tribunal with cleans hands.
5. That the appellant is estopped by his own conduct to being the instant appeal.
6. That the transfer of the appellant was in interest of public Service and is further bound by section 10 of Khyber PakhtunKhwa Civil servant act 1973 to obey the orders.
7. That the appeal is groundless based on malafide.
8. That the appeal is based on false and malafide hence deserves dismissed.
9. That the appeal is barred by law and limitation.



RESPECTFULLY SHEWTH.

1. Para No.1 is correct up to the extent that the appellant is serving in Education Department.
2. Para No.2 is correct up to the extent that the appellant was conditionally transferred from GGPS Harijan Panjool to GGPS Ganda (Mansehra) against the post of Mst. Kalsoom Jan PST, who was likely to be promoted against the post of SST.
3. Para No.3 is related to the service record of the appellant. The Government Servant is bound to perform her service at any station asked by the Department.
4. Para No.4 needs no comments.
5. Para No.5 is incorrect. The appellant was transferred from GGPS Ganda to GGPS Harijan Panjool on the basis of internal adjustment of the teachers to fill the gap of vacant posts in the best interest of Public Service.
6. Para No.6 is correct up to the extent that the appellant filed an appeal, but the competent authority has not given any kind of approval, being non-maintainable.

GROUND:

- A:- Para is incorrect. The transfer order dated 08-11-2014 is legal, constitutional and is accordance with rules.
- B:- Incorrect. The appellant has served more than 33 years in the Department Without any complaint on the part of the Department.
- C:- Incorrect as stated above in para-5, the transfer order was made, due to the internal arrangement / adjustment of teachers by the Department and not on political grounds.

D:- Incorrect, the appellant was conditionally transferred from GGPS Harijan Panjool to GGPS Ganda and not on the basis of favoritism to either side of the appellant or provide respondent.

E:- Incorrect. At the time of transfer of the appellant, the post was occupied by Mst: Kalsoom Jan PST.

Prayer:-

It is therefore humbly prayed that the instant appeal may kindly be dismissed.

RESPONDENT NO 1.....

1. SECRETARY ELEMENTARY & SECONDARY
EDUCATION DEPARTMENT, KPK, PESHAWAR.

RESPONDENT NO 2.....

2. DIRECTOR OF ELEMENTARY & SECONDARY
EDUCATION GOVERNMENT OF KPK PESHAWAR.

RESPONDENT NO 3.....

3. DISTRICT EDUCATION OFFICER
FEMALE MANSEHRA

AFFIDAVIT

I, Raja Fazal dad, Superintendent SDEO (Female) Mansehra, do, hereby solemnly affirm and declare that the contents of reply in the instant Appeal No. 200/2015, titled case Yasmeen Bagum PSHT Versus Education are correct and true to the best of my knowledge and belief and I have concealed nothing as material facts before this Honorable Tribunal.


DEPONENT.

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

Appeal No.200/2015

Yasmeen BegumAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary
Education and othersRespondents.

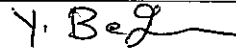
SERVICE APPEAL

REJOINDER ON BEHALF OF APPELLANT

INDEX

S#	particulars of documents	Annexure	Pages
1	Memo of rejoinder on behalf of appellant.	1-to-4
2	Copy of the promotion order.	"A"	6-to 9
3	Copy of the relieving order of Mst. Kalsoom Jan.	"B"	10
4	Wakalat Nama.	

Dated 16.10.2015


Yasmeen Begum
...Appellant

Through


GHAREEB NAWAZ,
Advocate High Court,
Mansehra.

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

Appeal No.200/2015

Yasmeen BegumAppellant

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary
Education and othersRespondents.

SERVICE APPEAL

REJOINDER ON BEHALF OF APPELLANT

Respectfully Sheweth!

PRELIMINARY OBJECTION.

1. Para No.1 of preliminary objection is incorrect. This Honourable tribunal was got jurisdiction to entertain the present appeal.
2. Para No.2 of the preliminary objection is incorrect. Appellant has got cause of action/locus Standi to file the present appeal.
3. Para No.3 of preliminary objection is incorrect.
4. Para No.4 of preliminary objection is incorrect.

- 2
5. Para No.5 of preliminary objection is incorrect.
 6. Para No.6 of preliminary objection is quite incorrect. The transfer of appellant was not in the interest of public service purely on the basis of political pressure and based on malafide.
 7. Para No.7 of preliminary objection is incorrect.
 8. Para No.8 of preliminary objection is incorrect.
 9. Para No.9 of preliminary objection is incorrect. The appeal is well within time.

FACTS.

1. Para No.1 is correct.
2. Para No.2 is correct. Promotion and relieving order of Mst. Kalsoom Jan *is attached as annexure "A" & "B"*).
3. Para No.3 is incorrect. Respondents are bound to act as per law and rules. Impugned order has been passed merely on political interference. Appellant was made rolling stone by the respondents.
4. Para No.4 needs no comments.

5. Para No.5 is incorrect and para No.5 of the appeal is correct.
6. Para No.6 to the extent of non-maintainability of appeal is incorrect. Para No.6 of the appeal is correct.

GROUNDS


- a. Para No.(a) of the appeal grounds is correct. Impugned order dated 08.11.2014 is quite illegal, unconstitutional, against the natural justice and based on malafide and political pressure to adjust their favourite teacher, therefore, para No.(a) of the reply is incorrect.
- b. Para No.(b) of the grounds is incorrect. The reply has not been given in accordance with the para mentioned in the grounds of the appeal. Para No.(b) of the grounds of appeal is correct.
- c. Para No.(c) of the grounds is incorrect.
- d. Para No.(d) of the grounds is incorrect and para No.(d) of the appeal is correct.
- e. Para No.(e) of the grounds is incorrect and para No.(e) of the grounds of appeal is correct.

PRAYER: -

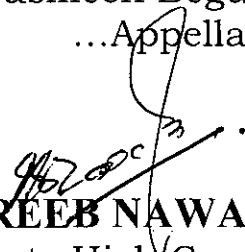
Para regarding prayer of the respondents made in the reply/ comments is incorrect.

It is, therefore, most humbly prayed that the order Endst. No.40-50 dated 08.11.2014 to the extent of respondent No.5 may kindly be set aside and order Endst. No.1169-72 dated 30.08.2014 may kindly be restored and appellant may kindly be allowed to serve on her original school i.e. government Girls Primary School Ganda, Tehsil and District Mansehra and appellant may kindly be restored on her original school i.e. Government Girls Primary School Ganda, Tehsil and District Mansehra.

Dated 16.10.2015


Yasmeen Begum
...Appellant

Through


GHAREEB NAWAZ,
Advocate High Court,
Mansehra.

AFFIDAVIT.

I, Mst. Yasmeen Begum, appellant, do hereby solemnly affirm and declare on oath that the contents of the foregoing rejoinder are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable court.

Dated 16.10.2015


Mst. Yasmeen Begum
(DEPONENT)

Better copy

(A) (6)

Better Copy

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA

NOTIFICATION

In compliance with the Notification issued by the Director of Elementary and Secondary Education Khyber Pakhtunkhwa vide Endst. No. 3619-25/File No. 2/Promotion SST B-16 dated Peshawar the 28.10.2014, the following 39 (female) SCTCL, SDAEDAL, SAHAT, STEZLE, PSHT, SPST PST and S Qaria are hereby adjusted against the post of SST (General/SSF (Bio-Ch.) noted against each BPS No. 16 & 10000-800-34000 plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government on the terms and condition given below with immediate effect and further they are being adjusted on school based.

S#	S.L. #	Name of officials	Present place of posting	Promoted to	Date of birth	School where adjusted
1	137	Nargis Khatoun SCT	GGHS G Ullah	SST (Bio-Ch)	3/4/69	GGHS SN Khan
2	1444	Bibi Zainab PSHT	SSPS Mari Muqarab Shah	SST (Bio-Ch)	5/5/85	GGHS Baidra
3	1463	Rizwana Rafique PSHT	GGPS Chajar Bala	SST (Bio-Ch)	14/8/88	GGHS Shinkhari
4	43	Iffat Sadia	GGHSS Murad Pur	SST (Bio-Ch)	25/9/73	GGHS Bherkund
5	1	Sabeha Begum SCT	GGHS No. 1 Mansehra	SST (Gen.)	1/4/60	Refused
6	3	Hafiza Begum SCT	GGHS Phaglia	SST (Gen.)	1/1/56	GGHS Dhauda Kholian
7	4	Mehmooda Khanam SCT	GGHS Phaglia	SST (Gen.)	1/4/60	Refused
8	5	Yasmeen Begum SCT	GGHS Mangloor	SST (Gen.)	18/7/62	Refused
9	6	Gulshan Begum SCT	GGHS Dhodial	SST (Gen.)	4/4/62	GGHS Talhatta
10	7	Rahat Ara SCT	GGHS Afzal Abad	SST (Gen.)	6/1/63	Refused
11	11	Saeeda Bibi SCT	GGHS Shinkhari	SST (Gen.)	10/3/66	GGHS Bali Mang
12	12	Kishwar Naz SCT	GGHS Khawari	SST (Gen.)	10/3/66	GGHS Jared
13	14	Fozia Sultana SCT	GGHS Behali	SST (Gen.)	15/3/66	GGHS Ghanool
14	16	Farhat Jabeen SCT	GGHS Dharyal	SST (Gen.)	20/2/68	GGHS Zafar Abad
15	18	Farhat Jabeen SCT	GGHS No. 1 Mansehra	SST (Gen.)	12/12/68	GGHS Kawai
16	19	Jamila Begum SCT	GGHS Sangar	SST (Gen.)	31/3/67	Refused
17	20	Bibi Merana SCT	GGHS No. 1 Mansehra	SST (Gen.)	1/5/68	GGHS Kaghan
18	21	Saman Gul SCT	GGHS Shehlia	SST (Gen.)	15/8/69	GGMS Davel
19	21	Yasmin Akhtar SCT	GGHS Shehlia	SST (Gen.)	22/12/65	GGMS Karori
20	25	Munaza Naheed SCT	GGHS Behali	SST (Gen.)	6/1/65	GGMS Ghannul
21	27	Asia Parveen SCT	GGHS Shinkhari	SST (Gen.)	15/2/70	GGMS Paris
22	28	Naheed Bano SCT	GGHS Bhatto Bandi	SST (Gen.)	5/9/68	GGMS Chansair
23	20	Nasreen Bibi PSHT	GGPS Ghandian No. 1	SST (Gen.)	3/2/55	GGHS Ghanool
24	41	Azra Shaheen -do-	GGPS Labarkot	SST (Gen.)	1/6/58	GGHS Phagal
25	180	Kalsoor Jan -do-	GGPS Ganda	SST (Gen.)	14/3/66	GGMS Bararkot
26	201	Farzana Shaheen -do-	GGPS Mansehra No. 1	SST (Gen.)	28/3/66	GGMS Karkala
27	240	Bibi Sughra -do-	GGPS Mansehra No. 1	SST (Gen.)	2/6/66	GGHS Bai Bohal
28	279	Bibi Ghazala -do-	GGPS Hathi Mera	SST (Gen.)	25/1/68	GGMS Bai Bala
29	280	Yasmeen Usman -do-	GGPS Bakrial	SST (Gen.)	23/3/71	GGHS Dhanda Kholian
30	281	Bibi Shaheen -do-	GGPS Bhangian	SST (Gen.)	2/2/71	GGMS Joscha
31	283	Gul Bibi -do-	GGPS Kotli Payeen	SST (Gen.)	8/1/70	GGMS Kotiari
32	286	Gul Naz -do-	GGPS Khaki	SST (Gen.)	3/2/72	GGMS Bai Bajna
33	3	Robina Lateef SDM	GGHS Bhatto Bandi	SST (Gen.)	12/1/69	GGMS Karnol.
34	4	Gulnaz SDM	GGHS Jabbori	SST (Gen.)	27/7/67	GGMS Sinjee
35	3	Shaheena Kosar SAT	GGHS Sangar	SST (Gen.)	13/2/60	GGHS Hassa
36	5	Irum Bibi SAT	GGHS No. 1 Mansehra	SST (Gen.)	3/10/69	GGHS Mong
37	1	Bibi Nusrat STT	GGHS Tarawara	SST (Gen.)	6/7/59	GGMS, Tarawara
38	2	Shaheen Jalil STT	GGHS Dhodial	SST (Gen.)	4/5/62	GGMS BEla Scha
39	3	Abida Sultana S Qaria	GGHS Dandian	SST (Gen.)	1/4/66	

Terms and Conditions

- 1) They would be on probation for a period of one year extendable for another one year.
- 2) They will be governed by such rules and regulation as may be issued from time to time by the Government.
- 3) Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
- 4) Charge reports should be submitted to all concerned.
- 5) Their Inter Se-seniority on lower post will remain intact.
- 6) No TA/DA is allowed for joining his duty.
- 7) They will give an undertaking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if she is wrongly promoted she will be reversed.

Better copy - (17)

- 8) They will be governed by such rules and regulations as may be issued from time to time by the Government.
- 9) Their posting will be made on school based, they will have to serve all the place of posting and their service is not transferable to any other station.
- 10) Before handing over charge once again their documents may be checked if they have not the required relevant Qualifications as per rules, they may not be handed over charge of the post.

Sd/--
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Endst. No. 8988-9029/AE-II/Prom: SSt (Sc. Gen.) Dated 05.11.2014

Copy to the: -

- 1) PA to Director (E&SE) Khyber Pakhtunkhwa Peshawar.
- 2) District Accounts Officer, Mansehra.
- 3) Principals/Headmistress concerned.
- 4) ADO B&AO Local Office.
- 5) Accountant General Local Office.
- 6) Teacher concerned
- 7) DMO Mansehra.
- 8) DC Mansehra

Sd/--
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MANSEHRA**NOTIFICATION.**

In compliance with the Notification issued by the Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar vide Endst: No.3619-25/ File No.2/Promotion SST B-16 dated Peshawar the 28/10/2014, the following 39 (Female) S.T.C.T., S.D.M./D.M., S.A.T., S.T.P.T., P.S.H.T., S.P.S.T. P.S.T. and S.Qaria are hereby adjusted against the post of SST (General/SST(Bio-Ch)) noted against each BPS No.16 @ 10000-800-34000 plus usual allowances as admissible under the rules on regular basis under the existing policy of the provincial Government on the terms and condition given below with immediate effect and further they are being adjusted on school based.

S.No.	S.L.#	Name of Officials.	Present Place of posting.	Promoted To	Date of Birth.	School Where Adjusted.
1	137	Nurgis Khatun SCT	GGHS G.H. Ullah	SST(Bio.Ch)	3/1/69	GGHS, SN Khan
2	144	Bibi Zainab PSHT	GGPS Mari Muzarab Shah	SST(Bio.Ch)	5/5/85	GGHS, Baidra.
3	1463	Eizwana Rafiq PSHT	GGPS Chagar Bala	SST(Bio.Ch)	14/8/88	GGHS, Shinkari
4	43	Hafat SDM	GGHSS Murad Pur	SST(Bio.Ch)	25/9/73	GGHS, Bherkund
5	1	Sabaha Begum SCT	GGHS No.1 Mansehra.	SST(Gen.)	1/1/56	Refused.
6	3	Hafiza Begum SCT	GGHS Pliagla	SST(Gen.)	1/4/60	GGHS Dhandu Kholian.
7	4	Mehmooda Khasim SCT	GGHS No.1 Mansehra.	SST(Gen.)	18/7/62	Refused.
8	5	Yasmeen Begum SCT	GGHS Mangloor.	SST(Gen.)	4/4/62	GGHS, Talhatta.
9	6	Gulshan Begum SCT	GGHS Dhodial	SST(Gen.)	13/1/63	Refused.
10	7	Rahat Ara SCT I	GGHS Akal Abad	SST(Gen.)	6/2/61	GCMS, Kamler.
11	11	Saeeda Bibi SCT I	GGHS Shinkari	SST(Gen.)	6/1/63	GCMS Bali Mong.
12	12	Kishwar Naz SCT	GGHS Khwari	SST(Gen.)	16/3/66	GGHS, Jareed.
13	14	Fozia Sultana SCT	GGHSS Behali.	SST(Gen.)	15/3/66	GGHS, Chanoool.
14	16	Farhat Jabeen SCT	GGHS Dharyal	SST(Gen.)	20/2/68	GCMS, Zaffer Abad.
15	18	Farhat Jabeen SCT	GGHS No.1 Mansehra.	SST(Gen.)	12/12/68	GGHS, Kawai.
16	19	Jamila Begum SCT	GGHS Sanger	SST(Gen.)	31/3/67	Refused.
17	20	Bibi Muneera SCT	GGHS No.1 Mansehra.	SST(Gen.)	15/6/68	GGHS, Kaghlan.
18	21	Saman Gul SCT I	GGHS Shahela	SST(Gen.)	15/8/69	GCMS, Dayel
19	24	Yasmin Akhter SCT	GGHS Shahdara	SST(Gen.)	22/12/65	GCMS, Karori
20	25	Munaza Nahood SCT	GGHSS Behali.	SST(Gen.)	6/1/65	GCMS, Channal
21	27	Asia Parveen SCT	GGHS Shinkari	SST(Gen.)	15/2/70	GCMS, Paris.
22	28	Nahood Bano SCT	GGHS Bhatta Bandi.	SST(Gen.)	5/9/68	GCMS, Chansair.
23	20	Nasreen Bibi PSHT.	GGPS Chaudhri No.1	SST(Gen.)	3/2/55	GGHS Chanoool.
24	44	Azra Shaheen -do-	GGPS Labor Kot	SST(Gen.)	1/6/58	GGHS, Phagal.
25	180	Kal-soon Jan -do-	GGPS Ganda	SST(Gen.)	14/3/66	GCMS, Bararkot.
26	201	Farzana Shaheen -do-	GGPS Mansehra No.1	SST(Gen.)	29/3/66	GCMS, Karkala.
27	240	Bibi Sughra -do-	GGPS Mansehra No.1.	SST(Gen.)	2/6/66	GGHS, Bai Bohal.
28	279	Bibi Ghazala -do-	GGPS Hathi Mora	SST(Gen.)	25/1/68	GCMS, Bai Bala
29	280	Yasmeen Usman -do-	GGPS Baqrial	SST(Gen.)	23/3/71	GGHS Dhandu Kholian.
30	281	Bibi Shaheen -do-	GGPS Bhangian	SST(Gen.)	2/2/71	GCMS, Josacha.
31	283	Gul Bibi -do-	GGPS Kotli Payeen	SST(Gen.)	8/1/70	GCMS, Koturi.
32	286	Gul Nar -do-	GGPS Khaki	SST(Gen.)	3/2/72	GCMS, Bai Bajna.
33	3	Robina Latief SDM	GGHS Bhatta Bandi	SST(Gen.)	12/1/69	GCMS, Karnool
34	4	Gulnaz SDM	GGHS Jabhori	SST(Gen.)	27/7/67	GCMS, Singles.
35	5	Shaheena Kosar SAT	GGHS Sanger	SST(Gen.)	13/2/60	GGHS, Hassa.
36	5	Irum Bibi SAT	GGHS No.1 Mansehra.	SST(Gen.)	3/10/69	GGHS, Mong.
37	1	Bibi Nusrat STP	GGHS Tarwara	SST(Gen.)	6/7/59	GCMS, Tarwara.
38	2	Shaheen Jabil STP	GGHS Dhodial	SST(Gen.)	4/5/62	GCMS, Bela Sacha
39	3	Abida Sultana S Qaria	GGHS Gaudian.	SST(Gen.)	1/1/66	GCMS, Shaugrata

Terms and Conditions:-

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulation as may be issued from time to time by the Govt.

(Signature)
District Education Officer
Mansehra.

Photo Copy - (9)

3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their Inter Se-seniority on lower post will remain intact.
6. NO.FA/DA is allowed for joining his duty.
7. They will give an under taking to be recorded in their service book to the effect that if any over payment is made to him in light this order will be recovered and if she is wrongly promoted she will be reversed.
8. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
9. Their posting will be made on school based, they will have to serve at the place of posting, and their service is not transferable to any other station.
10. Before handing over charge once again their documents may be checked if they have not the required relevant Qualifications as per rules, they may not be handed over charge of the post.

Sd/-
DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Endst: No. 8988-9029 - AE-II/Prom: SST (Sr: Gen:) Dated 05/11/2014

Copy to the:-

1. PA to Director (E&SE) Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Manshra.
3. Principals/Headmistress Concerned.
4. ADO B&AO Local Office.
5. Accountant Concerned Local Office.
6. Teacher Concerned.
7. DMO Manshra.
8. DC Manshra.

(Signature)

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Relieving Certificate (13) (40)

In compliance with the District
education officer (Female) Manshera
office under Endst:- NO 8988-9029

Ms. Kulsarn Jan PSHT in G.G.P.S Ganda
Promoted to S.E.T Post has been
transferred to G.G.M.S Boaskot is
hereby relieved of her duties.

today on 5/11/14

She is directed to report
the concerned Head Mistress
G.G.M.S Boaskot positively.

Yasmin Beg
Head Mistress
G.G.
Ganda Manshera

5/11/14

29/11/2014

Before The Honourable service
Tribunal, Khyber Pakhtunkhwa
Peshawar

Yasmeen Begum..... Appellant

VS

Govt. of KPK...etc..... Respondents

Service X Appeal

Application for adjournment

Respectfully sheweth!

1. That the council for appellant suffering from spinal cord injury. Therefore, unable to attend this honourable service tribunal (medical is annexed)
2. Kindly adjourn the appeal till next date.
3. That the appeal ^{is} pending adjudicate before this honourable service tribunal.

Date: 17.12
-2015

Yasmeen Begum..... Appellant
17/12/2015

2102
Date: 11.15

Respected Sirs...

- 1. I am writing to you regarding the services provided by the hospital.
- 2. The quality of the services is not up to the mark.
- 3. I am sure that you will take the necessary steps to improve the services.
- 4. I am sure that you will take the necessary steps to improve the services.
- 5. I am sure that you will take the necessary steps to improve the services.

Application for admission

Respected Sirs

I am writing to you regarding the services provided by the hospital.

12

Respected Sirs...

Respected Sirs

I am writing to you regarding the services provided by the hospital.



FREE

DR. AHSAN AURANGZEB

(M.B.B.S (M-S) (FELLOWSHIP NEUROSURGERY JAPAN)
ASSOCIATE PROFESSOR NEUROSURGERY
AYUB TEACHING HOSPITAL COMPLEX
ABBOTTABAD.

Ghoreeb Nawaz (M) (504)

14/12/15

Adv/

c/sp c (4) Br

1. Tab. Wimpex 50

3 = 1, 1

2. Tab. Antiflam 75

1 + 1

3. Tab. Myolax

1 + 1

4. Cap. Esofil 40

2 (1) 1 + 1

10
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↓ PP C7

5. Tab. Denzen

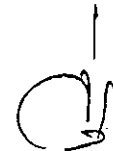
1 + 1 + 1 x 7

(-)

Adv/

→ MRI c/spine

PIND C6-7



برین اینڈ سپائن کلینک ایبٹ آباد

الحیدر پلازہ بالمقابل آئی نور ہسپتال

ایوب میڈیکل کمپلیکس منڈیان، مانسہرہ روڈ، ایبٹ آباد

فون نمبر: 0300-9118513 / 0992-384939

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Before The Honourable Service Tribunal,
Ikyser Pukhtunkwa Peshawar.

Yasmeen Begum appellant

-vs-

Govt. of Pukhtunkwa etc - Respondent

Service appeal

application for adjournment of
hearing appeal

Respectfully sheweth!

- (1) That the above title appeal is pending adjudication before this Honourable Tribunal.
- (2) That today's date is fixed for arguments.
- (3) That Council for appellant had been suffering from Special Cord (Medical prescription & report is attached).
- (4) That Council for appellant is unable to attend this Honourable Service Tribunal today.
- (5) That no adjournment has been

taken before this application.

Therefore you are requested to

Please adjourn the above title
appeal till further date -

Thanking you in anticipation.

15/2
2016

Yasmeen Begum - appellant

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) MANSEHRA.

ADJUSTMENT.

As approved by the competent authority/proposed by ASDEO (F) Circle concerned on need base adjustment in respect of MST ~~Abdullah~~ PSHT GGP5 Ghazikote, Peshwa. hereby adjusted at GGP5 Jabri against vacant post in the best interest of public service with immediate effect.

Note: -

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.

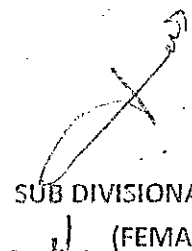
Sd/-

DISTRICT EDUCATION OFFICER
(FEMALE) MANSEHRA

Endst: No. 2128-34 /AE-II Establishment Branch SDEO (F) Mansehra Dated 27/7 /2015

Copy to: -

1. District Education Officer (F) Mansehra.
2. PS to Director (E&SE) KPK Peshawar.
3. District Account Officer Mansehra.
4. District Monitoring Officer Mansehra.
5. ASDEO (F) Circle Concerned.
6. Teacher Concerned.
7. Office order file.


SUB DIVISIONAL EDUCATION OFFICER
(FEMALE) MANSEHRA

جاری روایت

میں سماہ ناہیدہ سیم (P.S.T) نے گورنمنٹ لائبریری
سکول غار کلوٹ پورہ سے آڈر نمبر 34-2128
کے تحت گورنمنٹ لائبریری سکول حلیہ سالانہ میں
آج مورخہ 15.08 کو قریب از روپہ حافی کرنی
جسکی روایت حافضت ہے

جاری روایت

جاری روایت

Roohi Begum

Mohd. Saif
Mohd. Saif
Mohd. Saif

ASSISTANT DISTRICT OFFICER (F)
Circle
Mansehra

N
RA



DR. AHSAN AURANGZEB

(M.B.B.S) (M-S) (FELLOWSHIP NEUROSURGERY JAPAN)

ASSOCIATE PROFESSOR NEUROSURGERY

AYUB TEACHING HOSPITAL COMPLEX,
ABBOTTABAD.

FREE

Ghazeeb Nawaz (M) 504

22/01/16

ATV/

C/SP e (4) Bx

20 FO PIND Co-7

1. Tab. Matey

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2. Tab. Epefon

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3. Tab Wimpex 50

~~3~~ 1

4. Cap. Rabixion 20

2 1 (+)

5. Tab. Voltal 50

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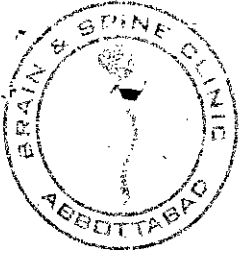
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برین اینڈ سپائن کلینک مانسہرہ

رحیم پلازہ بلمقابل نیواو پی۔ ڈی گیٹ کنگ عبداللہ ٹیچنگ ہسپتال

مانسہرہ: فون نمبر: 0333-5053236

FREE



DR. AHSAN AURANGZEB
(M.B.B.S (M-S) (FELLOWSHIP NEUROSURGERY JAPAN)
ASSOCIATE PROFESSOR NEUROSURGERY
AYUB TEACHING HOSPITAL COMPLEX
ABBOTTABAD.

14/12/15

Ghoreeb Nawaz (M) (50y)

c/sp c (4) Br.

Adv/

1. Tab. Wimpex 50

3 = 1, 1

2. Tab. Antiflam 75

1 + 1

3. Tab. Myolax

1 + 1

4. Cap. Esofil 40

2 (1) 1 + 1

10
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↓ PP C7

Adv/

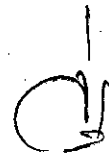
→ MRI c/spine

PIND C6-7

5. Tab. Denzen

1 + 1 + 1 x 7

(-)
2



برین اینڈ سپائن کلینک ایبٹ آباد

الحیدر پلازہ بالمقابل آئی نور ہسپتال

ایوب میڈیکل کمپلیکس منڈیان، مانسہرہ روڈ، ایبٹ آباد

فون نمبر: 0300-9118513 / 0992-384939

Handwritten signature or mark.

Professor Dr. Khaleeq uz Zaman
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شیریں لوز

24.12.2015

%
 Backache
 left - shoulder

✓
 C6/7 P.D
 trigger R

- R
- ① soft cervical collar
 - ② small
 - ③ Spondyl
 - ④ Diagnostic
 - ⑤ Moxibustion
 - ⑥ Neco 400
- 1 1 1 + 1

تعطیل :- ہفتہ ، اتوار



PREMIER OPEN MRI & Diagnostic Center

Ref No: _____

Date: _____

Patient's Name : Ghareeb Nawaz
Age: 50 Yrs Sex : M
Date of Reg : 15 Dec, 2015
Referred By : Dr. Ahsan Aurangzeb

MRI CERVICAL SPINE

Clinical Information: Neck pain radiating to left upper limb.

Technique: T1W and T2W sequences were performed in sagittal and axial planes through cervical spine.

Findings:

- Ridging along vertebral bodies and associated diffuse posterior bulge of the intervertebral disc is seen at C.V.6-7 level. The osteophytes-disc complex is effacing CSF column. (L > R)
- No fracture or dislocation is seen.
- No marrow abnormality is seen.
- No intradural or extradural mass lesion is seen.
- No evidence of tonsillar herniation or basilar invagination is seen.
- Cervical spinal cord shows normal diameter and signal intensity.

CONCLUSION:

Degenerative changes with the osteophytes-disc complex effacing CSF column at C.V.6-7 level (L > R)

Professor of Radiology
Maj Gen(R) M. Hamid Akram
M.B.B.S.(Pb), M.C.P.S.(Pak)
D.M.R.D.(Pb) (Gold Medalist)
F.C.P.S. (Pak)
OJT in MRI—U.S.A. & Germany

NOTE: This image-based, computer-generated report is in no way the final diagnosis and is not to be used as medico-legal document.

OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE MANSEHRA

IMPLEMENTATION

The undersigned is pleased to adjust Mst. Yasmeen Begum, PSHT against the vacant post at GGPS Ganda, already under appeal before the Honorable Service Tribunal Peshawar's No. 200/2015 on the basis of compromise and in the interest of Public Service with immediate effect. The appellant/Mst. Yasmeen Begum has already been enjoying the post since 2014 due to status quo.

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.

sd
DISTRICT EDUCATION OFFICER
FEMALE MANMSEHRA

No. 15373-27 / Litigation/Implementation/

Dated the 9/11 /2016

Copy to the:-

1. Registrar Service Tribunal Peshawar.
2. District Accounts Officer Mansehra
3. SDEO (F) Mansehra.
4. ASDEO Circle Mansehra
5. Teacher concerned.

[Signature]
DISTRICT EDUCATION OFFICER
FEMALE MANMSEHRA