

Order

20.12.2018

Appellant alongwith counsel present. Mr. Ziaullah, Deputy District Attorney alongwith Mr. Amir Muhammad, ADO for respondents present. Arguments heard and record perused.

This appeal is also accepted as per detailed judgment of today placed on file in connected service appeal No. 378/2016 titled "Mst. Naseem Akhtar -vs- Govt. of Khyber Pakhtunkhwa through Secretary Education, Peshawar and two others" Parties are left to bear their own cost. File be consigned to the record room.

Announced:
20.12.2018



(Ahmad Hassan)
Member
Camp Court Abbottabad



(Hamid Farooq Durrani)
Chairman

28.08.2018

None for the parties present. Due to summer vacations, the case is adjourned .To come up for the same on 17.10.2018 at camp court Abbottabad.


Reader

17.10.2018

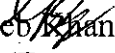
Counsel for the appellant Mr. Amanullah Khan Salik, Advocate present. Mr. Amir Muhammad, ADO alongwith Mr. Usman Ghani, District Attorney for the respondents present. Due to shortage of time, arguments could not be heard. To come up for arguments on 20.12.2018 before the D.B at camp court, Abbottabad.



Member


Chairman
Camp Court, A/Abad

19.12.2017

None present on behalf of the appellant. Mr. Kabirullah Khattak, Additional AG alongwith Mr. Amir Muhammad, ADEO for the respondents present. Notice be issued to appellant and his counsel for attendance and arguments for 22.02.2018 before D.B at Camp Court Abbottabad.

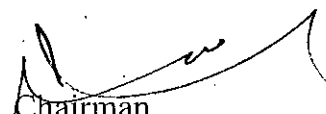

(Gul Zeb Khan)
Member (Executive)
Camp Court Abbottabad


(Muhammad Amin Khan Kundi)
Member (Judicial)
Camp Court Abbottabad

22.02.2018

Appellant in person and Addl. AG alongwith Amir Muhammad, ADO for the respondents present. Appellant seeks adjournment as his counsel is not in attendance. To come up for arguments on 24.05.2018 before the D.B. at camp court, Abbottabad.


Member


Chairman
Camp court, A/Abad.

24.05.2018

Mr. Akhtar Nawaz, relative of the appellant Mst. Naheed Akhtar present. Mr. Amir Muhammad ADO alongwith Mr. Muhammad Jan, Deputy District Attorney for the respondents present. Counsel for the appellant was stated to be busy in the Hon'ble High Court. Requested for adjournment. Granted. To come up for arguments 28.08.2018 before the D.B at camp court, Abbottabad.


Member


Chairman
Camp court, A/Abad.

20.10.2016


Counsel for the appellant and Mr. Amir Muhammad, ADO alongwith Mr. Muhammad Siddique, Sr.P for the respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 19.01.2017 at camp court, Abbottabad.


Chairman

Camp Court, A/Abad

19.1.2017

None present for appellant. Mr. Amir Muhammad ADO alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 19.07.2017 at camp court, Abbottabad.



Chairman

Camp court, A/Abad

19.07.2017

Clerk of counsel for the appellant and Mr. Muhammad Bilal, DDA alongwith Amir Muhammad ADO for the respondents present. Due to general strike of the Bar, counsel for the appellant is not in attendance. Adjourned. To come up for final hearing on 19.12.2017 before the D.B.


Member


Chairman
Camp court, A/Abad


20.04.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as PST Teacher when removed from service vide impugned order dated 19.10.2015 which came into notice of the appellant on 01.12.2015 where-against she preferred departmental appeal on 09.12.2015 which was not responded and hence the instant service appeal on 10.3.2016.

That the appellant was performing her duty and was never absent. That codal formalities were not complied with by the competent authority and as such the impugned order is liable to be set aside.


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 21.07.2016 before S.B at camp court, Abbottabad.

Appellant Deposited
Security & Process Fee


Chairman
Camp court, A/Abad.

21.7.2016



Clerk of counsel for the appellant and Mr. Muhammad Jamil, Supdt. alongwith Mr. Muhammad Siddique Sr. G.P for the respondents present. Seeks adjournment. To come up for written reply/comments on 20.10.2016 before S.B at camp court, Abbottabad.


Chairman
Camp Court, A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 347/2016


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	01.04.2016	<p>The appeal of Mst. Naheed Akhtar resubmitted today by Post through Mr. Amanullah Khan Salik Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2	17-4-16	<p>This case is entrusted to Touring S. Bench at A.Abad for preliminary hearing to be put up thereon <u>20-4-2016</u></p> <p> CHAIRMAN</p>

The appeal of Mst. Naheed Akhtar d/o Esafa Nosh Khan Resident of Arghashori Tehsil and Distt. Battagram received to-day i.e. on 10.03.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ✓1- Memorandum of appeal may be got signed by the appellant.
- ✓2- Annexures of the appeal may be flagged.
- ✓3- Annexures of the appeal may be annexed serial wise as mentioned in the memo of appeal.

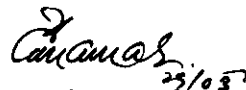
No. 413 /S.T,

Dt. 10/3 /2016


REGISTRAR -
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Amanullah Khan Salik Adv.
Battagram:

Received back on 24/03 at
2016
Battagram and re-submitted
today on 29-03 after attending
2016
and then removing all the above
mentioned OBJECTIONS.


Amanullah Salik
Advocate
BATTAGRAM.

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

Service Appeal No. 347/2016

Mst. Naheed Akhtar daughter of Esafa Nosh Khan, resident of Arghashori,
Tehsil & District, Battagram.

....APPELLANT

VERSUS

Provincial Govt. Khyber Pakhtunkhwa, through Secretary Education
(Primary), Peshawar & others.

....RESPONDENTS

SERVICE APPEAL


INDEX

<i>S.#</i>	<i>Description</i>	<i>Page No.</i>	<i>Annexure</i>
1.	Service appeal along with affidavit	1 to 7	
2.	Copy of order of appointment	8-9	"A"
3.	Copy of Newspaper cutting	10	"B"
4.	Copy of maternity leave	11-13	"C"
5.	Copy of earned leave	14	"D"
6.	Copy show cause notice	15	"E"
7.	Copy of application	16-19	"F"
8.	Copy of removal order	20	"G"
9.	Wakalatnama		

...APPELLANT

Through

Dated: _____/2016


(Amanullah Khan Salik)
 Advocate High Court,
Battagram

1

BEFORE THE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

S.W.F. Province
Service Tribunal
Diary No. 199
Dated 10-3-2016

Service Appeal No. 347 /2016

Mst. Naheed Akhtar daughter of Esafa Nosh Khan, resident of Arghashori,
Tehsil & District, Battagram.

....APPELLANT

VERSUS

1. Provincial Govt., Khyber Pakhtunkhwa, through Secretary Education (Primary), Peshawar.
2. Director General Schools, Khyber Pakhtunkhwa, Peshawar.
3. District Education Primary (Female), Battagram.

....RESPONDENTS

Filed to file
10/3/16

SERVICE APPEAL UNDER SECTION 4 OF
KPK SERVICE TRIBUNAL ACT 1974,
AGAINST THE ORDER BEARING ENDST NO.
1763-67 DATED 19/10/2015 AND WHEREBY
RESPONDENT NO. 3 HAS REMOVED

Re-submitted to file
and filed:
11/4/16

APPELLANT FROM THE SERVICES OF THE
POST OF PST(F).

PRAYER: ON ACCEPTANCE OF THE
INSTANT APPEAL, ORDER DATED
19/10/2015, BE DECLARED VOID OF LEGAL
FORCE AND STRUCK AS ILLEGAL AND THE
SERVICE OF THE RESTORED/ REINSTATED
WITH ALL THE BACK BENEFITS.

Respectfully Sheweth:-

May it please your goodself to submit as under, inter-alia,
on the bellow given factual premises and legal points:-

1. That, appellant, alongwith so many others was
selected on merits and then appointed vide order
dated Nil. Copy of order is annexed as
.....Annexure "A".
2. That, inspite of all hardships in an un-attracted
backward area like District Battagram, where
backward area special allowance, is permissible to
Govt. servants, appellant, dedicatedly with full

zeal and enthusiasm for hours walked on foot and never surrendered to climatic changes or reasonable challenges.

3. That, respondent No. 3, issued publication/ advertisement in the newspaper and alleged "Absence" from duty. Copy of Newspaper cutting is annexed asAnnexure "B".
4. That, maternity leave was allowed, to the appellant. Copy is annexed as Annexure "C", but earned leave was denied to the appellant isAnnexure "D".
5. That, respondent, alleges that a show cause notice was issued and served, which is not correct. Copy show cause notice is annexed as ...Annexure "E".
6. That, consequently upon the actions of the respondent No. 3, appellant approached for the removal of her grievance before respondent No. 2 which too did not bear fruits. Copy is annexed asAnnexure "F".

7. That respondent No. 3 has passed the order of removal from service of appellant. Copy is annexed as Annexure "G".

LEGAL:-

- a. That, action taken and order passed by respondent No. 3 is illegal, against the facts, tainted with malafide, hence not maintainable.
- b. That respondent No. 3 has violated the principles of natural justice, when no show cause notice is served according to law and rules on the subject.
- c. That, neither appellant is served with any show cause notice, nor the so-called notice is ever communicated to the appellant, when every now and then appellant used to visit the office, particular in connection with maternity leave or casual leave.
- d. That, the action taken is arbitrary, tainted with malafide and even victimization.

- e. That unlike, the male, service for females in the mountainous areas, away from the home, without link road and transport facilities could never be at par of plane areas on road side and of male service.
- f. That appellant has honestly discharged her duties under all circumstances and without losing courage or by the affects of the weather.
- g. That the so-called, planted reports of surprise visit have never been communicated to the appellant, because it is in fact non-existence and has no record on the "Log Book" of the school or any other record.
- h. That the allegation leveled could never be substantiated with cogent reason.
- i. That, female members of the society have special privileges, both under the substantive and procedural law, much less than guaranteed in the constitution.

It is, therefore, humbly prayed that the orders passed and action taken by the respondent be declared and struck down, as illegal without lawful authority and appellant reinstated her services be restored with immediate effect with all the back benefits.

Dated: _____/2016

Through



...APPELLANT

13202-1877505-2



(Amanullah Khan Salik)
Advocate High Court,
Battagram

VERIFICATION: -

Verified on oath that the contents of forgoing appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



...APPELLANT

13202-1877505-2

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (E&SE) BATTAGRAM.

APPOINTMENTANNEXURE
"A"

Consequent upon the recommendation of the Departmental Selection Committee and approval of the competent Authority, the appointments of the following PST(F) candidates are hereby ordered at the ratio of 60% Open Merit & 40% Union Council wise in BPS-07 @Rs.3530-190-9230) plus usual allowances as admissible under the rules in the interest of public service w.e.f the date of their taking over charge on the terms and conditions given below:-

Mushtaq Ahmad
A.R. Sani

OPEN MERIT

S.No	Name of Candidate	UC	School where posted	Weight age	Remarks
01-	Tayyiba Bibi	Gijbori	GGPS Kara Nara	53.69	A.V.Post
02-	Jameela Bibi	-do-	GGPS Dahrimashakhail	53.56	-do-
03-	Shaheen Baigum	Ajmera	GGPS K. Gujar Khan	51.05	-do-
04-	Walayat Shaheen	P Shareef	GGPS Sultan Abad	50.44	-do-
05-	Fazeelat Alam	K Banda	GGPS Hatal Kandow	50.36	-do-
06-	Baigum Perveen	Batamori	GGPS Chamkatsultan	50.17	-do-
07-	Bibi Asia	Gijbori	GGPS Chanjal	49.66	-do-
08-	Shabnam Gul	K Banda	GGPS Chanjal	49.29	-do-
09-	Sameena	Ajmera	GGPS Karanara	48.52	-do-
10-	Bibi Maryam	K Banda	GGPS Dokhakha	48.50	-do-
11-	Jawairia Baris	Ajmera	GGPS Gandori Yar Mulid	48.28	-do-
12-	Shazia Akhtar	Gijbori	GGPS Kontar Gat	47.32	-do-
13-	Saeeda Bibi	K Banda	GGPS Bar Hatal	47.13	-do-
14-	Basmeena Bibi	K Banda	GGPS Bar Hatal	46.92	-do-
15-	Bibi Ambreen	-do-	GGPS Kanai	46.04	-do-
16-	Bibi Shahida	Banian	GGPS Palang	46.02	-do-
17-	Bibi Gulfariba	K/Banda	GGPS Kass Nogram	45.35	-do-
18-	Amina	Sakargah	GGPS Deshar	45.31	-do-
19-	Safeena Gul	Gijbori	GGPS Shingli Bala	44.90	-do-
20-	Razia Bibi	K/Banda	GGPS Sulian	44.75	-do-
21-	Bibi Nailla	Ajmera	GGPS K/Gujar Khan	44.59	-do-
22-	Rehana Yasmeen	Bateela	GGPS Kass Nogram	44.58	-do-
23-	Bibi Zakia	K/Banda	GGPS Tailoos	44.29	-do-
24-	Farzan Baigum	-do-	GGPS Tailoos	43.96	-do-
25-	Safeena	-do-	GGPS Tailoos	43.63	-do-
26-	Naila Haider	K/Banda	GGPS Sultan Abad	41.70	-do-
27-	Shakeela Naz	-do-	GGPS Tailoos	41.41	-do-
28-	Seema	-do-	GGPS Kasai	41.09	-do-
29-	Sumaira Chishti	Batagram	GGPS Sehri Jehanzaib	40.93	-do-
30-	Aasma Saeed	Banian	GGPS Thaya	40.63	-do-
31-	Bibi Zakya	Batagram	GGPS Gangwal	39.56	-do-

32-	Shabana Bibi	-do-	GGPS Kass Nogram.	38.18	-do-
33-	Gul Sanam	K/Banda	GGPS Sari Mian Sadar	38.16	-do-
34-	Bibi Farzan Zaib	Shamlai	GGPS Shamlai	37.50	-do-
35-	Razia Sultana	Pashto	GGPS Nal Pashto	37.48	-do-
36-	Gul Rehana	K/Banda	GGPS Kolay Battamori	37.38	-do-
37-	Gul Naib	-do-	GGPS Kund Said Akbar	37.32	-do-
38-	Bibi Hajira	-do-	GGPS Tailoos	36.82	-do-
39-	Bibi Mewash	K/Banda	GGPS Sangoo	36.79	-do-
40-	Gul Zaiba	K/Banda	GGPS Lughray Khawar	36.64	-do-
41-	Shagulta	Battamori	GGPS Batkool Qalla	35.19	-do-
42-	Taj Amraiza	Battamori	GGPS Kund Said Akbar	34.92	-do-
43-	Gul Bibi	Battagram	GGPS Haji Abad	34.60	-do-

UNION COUNCILWISE

Attested
Signature
A.K. SANE

1	Saima Syed	Ajmera	GGPS Kas Gujar Khan	47.07	A.V. Post
2	Sheema Gul	-do-	GGPS Kas Gujar Khan	33.62	-do-
3	Seema	Battamori	GGPS Chamkatsultan	35.37	-do-
4	Roheena Naz	Banna	GGPS Kasay	41.90	-do-
5	Ulfat Bibi	-do-	GGPS Kasay	33.89	-do-
6	Fareeda Sultan	Bateela	GGPS Zareen Abad	25.92	-do-
7	Akhtar Bibi	-do-	GGPS Zareen Abad	22.12	-do-
8	Bas Pari	Gijbori	GGPS Kiargali Umar Khan	34.89	-do-
9	Jameen Gul	K/Banda	GGPS Shahtoot	33.62	-do-
10	Bibi Asma	H/Batkool	GGPS Kanai	38.42	-do-
11	Noorul Ain	-do-	GGPS Kanai	19.80	-do-
12	Zahida Banu	Jumbera	GGPS Kund Said Akbar	37.62	-do-
13	Nazia	-do-	GGPS Cheeran Matak	32.56	-do-
14	Riaz Bibi	Peshora	GGPS Bara Yousaf Shah	25.19	-do-
15	Tahira Bibi	-do-	GGPS Sari Mian Saddar	22.10	-do-
16	Nahced Akhter	Battagram	GGPS Yaqoob Abad	35.06	-do-
17	Gul Zahida	Rajdari	GGPS Sangoo	25.55	-do-
18	Salma Bibi	-do-	GGPS Neelishang	22.66	-do-
19	Saima Bibi	Rashing	GGPS Rashing	21.66	-do-
20	Ameena Pervaiz	-do-	GGPS Rashing	17.50	-do-
21	Fozia Misbah	Shamlai	GGPS Shamlai	33.74	-do-
22	Zainab Bibi	Sakargah	GGPS Deshar	30.63	-do-
23	Nizakatun-Nisa	Thakot	GGPS Taloot Abad	19.10	-do-
24	Uzlefit	-do-	GGPS Thakot	18.91	-do-
25	Jehan Zari	Bateela	GGPS Tibat	20.30	-do-
26	Bibi Rabia	Rashing	GGPS Tibat	16.70	-do-

فائنل شوکار نوٹس بابت غیر حاضری

آپ مندرجہ ذیل لیڈی ٹیچرز غیر معینہ مدت سے سکولوں سے غیر حاضر ہیں۔ اس سے پہلے بھی آپ کو دورہ شوکار نوٹس مگر کے پتے پر ارسال کئے گئے ہیں۔ جن کے غیر اور تاریخ نام کے سامنے درج ہیں۔ لیکن آپ کی طرف سے کوئی جواب موصول نہیں ہوا۔ آپ کو بذریعہ نوٹس ہذا آخری بار مطلع کیا جاتا ہے کہ آپ اس نوٹس کی اشاعت کے پندرہ (15) دن کے اندر راجستریڈ دفتر ہذا پر دستخطی میں ذاتی طور پر حاضر ہو کر اپنی غیر حاضری کی وجہ بتائیں بصورت دیگر آپ کے خلاف یکطرفہ کارروائی عمل میں لاتے ہوئے آپ کو ملازمت سے برخواستہ کیا جائے گا جس کی تمام تر سہاری آپ پر عائد ہوگی۔

نمبر شمار	نام ٹیچر	نام سکول	شوکار نوٹس بابت تاریخ
1	PST	GGPS-یتوب آباد	09,08/07/2014 مورخہ 2031-34
2	لصرت PST	GGPS رنگڑ	14/5/2015 مورخہ 1124-26
3	کلثوم بی بی PST	GGPS رنگڑ	14/5/2015 مورخہ 1124-26
4	ذکیہ بی بی PST	GGPS مندر والی	29/2/2014 مورخہ 661
5	شمیم النساء PST	GGPS کوئی بد موڑی	11/5/15 مورخہ 1104, 11/6/2015 مورخہ 1161
6	ہما اقبال PET	GGMS گیدڑی خیر آباد	32-35, 01/12/2014 مورخہ 3190-93 مورخہ 07/01/2015
7	رشیہ شیخ AT	GGMS کمری خراسی	1303, 10/11/2013 مورخہ 198-201 مورخہ 17/6/2015
8	صائقہ PST	GGPS کوئی بد موڑی	11/5/15 مورخہ 1106, 12/6/2015 مورخہ 1162
9	دشادہ گیم PST	GGPS چوکاٹ	11/6/2015 مورخہ 1173
10	شمیم اختر PST	GGPS رز	11/6/2015 مورخہ 1173
11	جمیلہ PST	GGPS محلہ جھانگیر	31/7/2014 مورخہ 2031-34
12	فوزیہ PST	GGPS بازار گے	1377-79/11/6/2015 مورخہ 1173
13	رحمانہ PST	GGPS درب قلع	8/6/2015 مورخہ 1144-46
14	شازیہ PST	GGPS سکول کلع	8/6/2015 مورخہ 1144-46
15	یاسمین PST	GGPS کستی	8/6/2015 مورخہ 1144-46
16	شاہ مور چوکیدار	GGPS یتوب آباد	9/7/2014 مورخہ 2031-34

ڈسٹرکٹ ایجوکیشن آفیسر (زنانہ) بٹ گرام

* InfoKPGovt * @infoKPGovt * Send KP to 8333

INF(P)4333

ڈائریکٹریٹ آف لائیو سٹاک ریسرچ اینڈ ڈویلپمنٹ، خیبر پختونخوا ایشیا اور
فون نمبر 091-9210639 / 091-9211062

ٹینڈر نوٹس

ANNEXURE
"B"

Attested
by
AK-Sauk

To,

The D.E.O
Department of Education
Battagram

Subject:- Maternity Leave
Madam,

Attested
by
MR. SAUL

With reference to the Subject
I would like to state that
I am pregnant for more than eight
months. now my delivery due date is
between 20/10/2014 to 3/12/2014, I am really
in need of bed rest now as the
Doctor advise me.

Therefore I request you to grant
me leave for atleast 1/2 month now
onwards.

Thanking you!

Yours Sincerely
Nahid Akhtar
G.G.P School
Pemat Shasif
Taqoob Ubad
Battagram.

Allowial
Zaid
A.S.D.E.O. (FEMALE)
BATTAGRAM

circled
Battagram

IS2930

20 OCT 2013

EDD 22 $\frac{11}{14}$ *Handwritten signature*

Attested
&
C. S. S. S. S.
R. K. S. S. S.

It is Certified Alahud
Aikter is School Teacher

GCIPS *Handwritten signature* is -
advised 45 days *Handwritten signature*

as she is 8/12 *Handwritten signature*

weg 20 $\frac{10}{14}$ up to 3 $\frac{12}{14}$

Handwritten signature
Medical Superintendent
D. S. Hospital Mattagram

Dr. Ghazala Rashid
M.B.B.S. (Pesh)
D.G.O (Pesh)



ڈاکٹر غزالہ رشید
گائیناکالوجسٹ
ڈی۔ ایچ۔ او۔ ہسپتال بٹگرام

Gynaecologist

D.H.Q Hospital
Battagram

Patient's Name

میت

Age

Date

18/11/14

Address

274
22-11-14
29/11/14

Dr. M. M. ...

13

میت

18/11/14

Dr. M. M. ...

AK-Sauk

18/11/14

Dr. M. M. ...

OBSTETRICAL DATA OF ULTRASOUND

No of Fetuses	8/8	C.R.L	
Gestational Sacs	8/8	B.P.D	80 mm
Sex of Foetus	Q	F.L	6.6 mm
Foetal Cardial Activity	w	P.O.G	34152
Foetal Body Movement	w	Position of Placenta	anterior
Position	cephalic	Amount Liqueur	h



18701.81

18701.81

James - 40
D. J. J.

~~RECEIVED~~

14

خدمت جنابہ SDEo(F) مقبیلہ بگرام

ANNEXURE

Earned leave عنوان : درخواست برائے

w.e.f. 12.03.2015 to 12.03.2016

جناب عالیہ

موردیہ نہ گزارش ہے کہ سالہ G.G.P.S. یعقوب آباد میں بحیثیت PST

فرائض منصبی سرانجام دے رہی ہے۔

Attested
AK-Saied

سالہ اپنے گھریلو مصروفیات کی وجہ سے سکول میں ڈیوٹی دینے میں مشغول نہیں۔

سالہ صرف 12/03/2015 تا 12/03/2016 (ایک سال) کیلئے رخصت استحقاقیہ

Earned leave لے لیا جا رہی ہے۔

بہرہائی فراہم کرنے کے لئے سالہ ایک سال کیلئے Earned leave کی منظوری

غناہت فراہم نمونہ فراہم ہے۔

not allowed

11/5/16

نورزش جوئی

العارضہ

Attested

PST

ناہید اختر

G.G.P.S. یعقوب آباد

15
OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT BATTAGRAM.SHOW CAUSE NOTICE.

I Mstt: Achna Yasmeen DEO (Female) Battagram as competent authority under the Rhyber Pakhtunkhwa Govt. servant (Efficiency and Disciplinary) Rule, 2011 do hereby serve this show cause notice upon you Mstt: Tsta. Ranosh Dabeed 1st G.G.Ps Yaqoob Abad

Consequent upon the report of IMU I am satisfied that you have committed the following acts/omissions specified in rule 03 of the said rules.

Guilty of wilful absence noted against each.

as a result therefore, I am competent authority have been tentatively decided to impose upon you.

Minor Penalty.

- (i) Recovery of the absence period.
- (ii) Stoppage of two increments.

2. Major Penalty.

- (i) Removal from service.

Alleted
AK-Saib

1. Therefore you are required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

2. If no reply to this notice is received within 07 days of its delivery it shall be presumed that you have no defense to put in and in that case ex-parte action shall be taken against you.

DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT BATTAGRAM.

Enst. No. 2031-32 / Dated. 9 / 07 / 2014.

Copy forwarded to the:-

1. Director (E&SE) Education Rhyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Battagram.
3. DDO Concerned with the direction to deduct salary of their absent period.
4. Teacher/J/C/ Class IV Concerned.

اپیل بنام DEO سالانہ (ربانہ) تھانہ
جناب عالیہ 16
F

خودبانہ گڈائش پیرم سالانہ دھکا لایقوب آباد
فرانس سرانجام دیں ایسی ہی صورت 19/06/14 کو سروکل ASDCO
نے سکول بڈا کا اجازت وصالہ کیا ایسی دن سالانہ بیماری
کئی وقت سے سکول کی حاضرگی سے حاضر ایسی ASDCO صاحبہ
کو کسی نا چاہی نہیں دی کئی وقت سے اسی نے سکول کو
بند قرار دیا اور رپورٹ بھیج دیا گیا اسی نے رپورٹ پر فدویہ
کی تنخواہ بحال بند ہے۔

09/07/14 کو پیرا شوکار issue ہوا لیکن بحال ہے تو شوکار نہیں
جدا ہے اور ایسی شوکار کئی بنا پیر سالانہ کو فائنل شوکار
اخبار صحت دیا گیا کا دن ہے انرا انرا فدویہ نے دفتر DEO
رمانہ) میں حاضرگی کی سالانہ DEO صاحبہ کو درخواست ہی دیں گی
کے لیے درخواست SDEO صاحبہ کو دی گئی جو کہ اپیل کے ساتھ لے
بنا برین فدویہ کی Removal غیر قانونی ہے پیر سالانہ فدویہ کا
اپیل پیر بھدوانہ لغو وکار فدویہ کو سرکی جاری رکھ کر موقع فرا



الغافلہ
ناپید دفتر DSO دھکا لایقوب آباد
Attested
Amir
AK Seal

ATTA UR REHMAN KHAN TRAND
District Nazim Battagram

Handwritten notes in the top left corner, including "ATTA UR REHMAN KHAN TRAND" and "District Nazim Battagram".

Handwritten text at the top of the page, possibly a title or header.

Main body of handwritten text, appearing to be a list or detailed notes.

Handwritten notes and signatures in the bottom left corner, including "ANUR KURE-F" and "17".

Handwritten notes and signatures in the bottom right corner, including "17" and "18".

18

Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa, Peshawar

No. 3361 /F.No,61/(F)/Appeal Battagram

Dated Peshawar the 28/12 /2015.

To

The District Education Officer,
(Female) Battagram

F

Subject APPLICATION

I am directed to refer to the e subject cited above and to enclose herewith a copy of application in respect of Mat.Naheed PST GGPSYaquab Abad Battagram and to ask you to submit detail report and factual position to this directorate within (7) days for further necessary action.

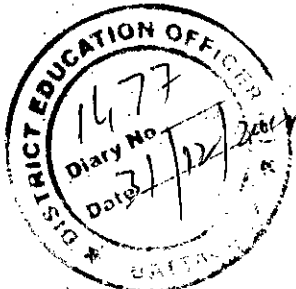
Deputy Director Female
(E&SE) Khyber Pakhtunkhwa,

[Handwritten signature]
23/12/15

[Handwritten signature]
22/12/15

[Handwritten signature]
nk-saule

[Handwritten notes:]
SDD CPs
Fw immediate comments of
24/12/15
D2/CPs



19

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM

NO 011/16

F

Dated B/Gram the 18/11/2016

TO
The Director,
E/S Education KPK, Peshawar.

Abd-El
Amir

SUBJECT:- APPLICATION.

A.K. Saik

M E M O

Reference your letter No.3361/F.No. 61 (F) /Appeal Battagram Dated 28-12-2015 regarding above sited subject.

It is submitted that Mst: Naheed Akhtar Ex- PST of GGPS: Yaqoob Abad has been removed from service vide this office Endst: No.1763-67 dated 19/10/2015. She has removed from service on the report of A.S.D.E Circle concerned.

Show cause bearing Endst: No. 2031- 34 dated 9/7/2014 served to her.

Final show cause issued in daily News Paper. As per report of S.D.E.O (Female) Battagram she failed to join back her duty or reply. Further she has filed an application for E/Leave, to S.D.E.O (.Female) Battagram for the period with effect from 12/3/2015 to 12/3/2016 (one years) but not allowed by S.D.E.O (F) Concerned.

Now she has filed an appeal to your good self for re- instatement. Her case situation is hereby submitted for necessary action please..

Ali
DISTRICT EDUCATION OFFICER
(FEMALE) BATTAGRAM.
18/11/16

~~20~~ 20

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM.

B
ANNEXURE
9

NOTIFICATION.

WHEREAS, your Mstt: **Naheed PST GGPS Yaqoob Abad** has have been willfully absent from your duty since long. An absence notice was served upon you by the ADEO but you did not respond.

AND WHEREAS, A show cause notice was also served upon you by the undersigned vide this office endstt No 2031-34 dated 9.7.2014

AND WHEREAS, According to rule 9 of Khyber pukhtunkhwa government servants (efficiency & discipline) rules 2011, final show cause notice was also published in daily AJ dated 05.9.2015 wherein you were directed to attend office of the undersigned for personal hearing with in 15 days of the publication of this notice and put forward your written defense if any as to why you may not be proceeded under the (E&D) rules 2011 filing with an ex -parte decision shall be taken against you but you have neither resumed your duty nor submit any reply in this regard so for .

NOW THEREFORE, In the exercise of powers conferred under section IV, of the Khyber pakhtunkhwa government servants removal service (E&D) 2011, I the undersigned being competent authority please to impose major penalty removal from service upon you with immediate effect in the larger public interest

Attested
of
NR Sable


DISTRICT EDUCATION OFFICER

(FEMALE) BATTAGRAM

dated Battagram the 19/10 /2015

Endstt: No 1763-67

Copy of the abobe is forwarded the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar,
2. District Account Officer Battagram.
3. SDEO (F) Battagram
4. Teacher Concerned
5. Deputy Commissioner Battagram.


DISTRICT EDUCATION OFFICER

(FEMALE) BATTAGRAM.

وکالت نامہ

کورٹ فیس
قیمتی

K.P.K SERVICES TRIBUNAL

بعدالت

ناہید اختر بنام حکومت

منجانب: اسپلانٹک دعویٰ یا جرم سروس اسل

باعث تحریر آنکے

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیرونی وجوہات ہی برائے پیشی بمقام: کورٹ آف ایپل آباد

آمان اللہ سالک ایڈووکیٹ ہائی کورٹ (بٹگرام)

(جمال عبدالناصر، امیر محمد خان، نیاز محمد خان، عنایت اللہ خان) ممبر ڈسٹرکٹ بار ایسوسی ایشن "BATTAGRAM"

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہونگے نیز وکیل صاحب موصوف صدر مقام کچہری کے علاوہ کسی جگہ یا کچہری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہونگے اور مقدمہ کچہری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا کچہری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا عینانہ کے واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہونگے مجھ کو کل ساختہ پر داخنت صاحب موصوف مثل کردا ذات منظور و مقبول ہوگا۔ اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اس پر ثالثی و راضی نامہ و فیصلہ برحلاف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا۔ اور بصورت جانے بیرونجات از کچہری صدر اپیل و برآمد کی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم انتہائی یا قریبی یا گرفتاری قبل از گرفتاری و اجراء ڈگری بھی صاحب موصوف کو بشرط ادا نیگی علیحدہ مختانہ بیرونی کا اختیار ہوگا اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکورہ یا اس کے کسی جز کی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل یا پیرسٹر کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے قانون کو بھی ہر امر میں وہی اور ویسے ہی اختیار حاصل ہونگے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

ATTESTED & ACCEPTED

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے مورخہ ہاہ
مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔
AK. Saleh Advocate
Battagram

العبد العبد

ناہید اختر

Handwritten notes in Urdu, starting with "میں نے اس وقت تک نہیں دیکھا تھا" (I had never seen it until then).

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18-03-2016

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صدق کھائی ہے کہ سماعت نامہ آخری برادری سکول میٹر
 گورنمنٹ گرلز ہائی سکول لہنہ آباد نے اپنی ڈیوٹی پامال شہر
 لاہور سے ہے۔ مندرجہ پتے سکول ہذا سے کسی
 غیر حاضری نہیں کی ہے۔ میٹر بر غیر حاضری کا الزام قاطع اور
 من گھڑت ہے۔ میٹر کے حق میں دستاویزی حقائق کی جانے
 اور میٹر کو کسی سرورس پر مجال فرمایا جائے

Ghulam Akbar Khan
 Member Tehsil Council
 U/C Paimal Sharif

YAQOOB KHAN
 Member District Council
 Battagram

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER

PAKHTUNKHWA CAMP COURT ABBOTTABAD

Service Appeal No. 347/2016

Mst: Naheed AkhtarAppellant

VERSUS

**Government of Khyber Pakhtunkhwa through Secretary Education
and others.....Respondents**

Index

S. No	Description /Documents	Annexure	Pages
1	Comments		1 to3
2	Affidavit		4
3	(copy of Absent report of the SDEO (f)	A	5 to 8
4	Show cause Notice	B I II	9&10
5	Removal Order	C	11

Respondent

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA CAMP COURT ABBOTTABAD

Service Appeal No. 347/2016

Mst Naheed AkhtarAppellant

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Education
and others.....Respondents

**Joint Para-wise comments /Reply on behalf
of Respondents No: 1. 2&3**

Respectfully Sheweth:

Preliminary Objections

1. The appellant has got no cause of action or locus standi to file the instant appeal.
2. The appellant has not come to this Honorable Court with clean hands.
3. The appellant has concealed the material facts from this Honorable Tribunal. Hence not entitled for any relief and appeal is liable to be dismissed.
4. The appellant has filed the instant appeal on malafidly.
5. The Appeal of the appellant is against the prevailing law and rules.
6. The Appellant is estopped by her own conduct to file instant appeal.
7. The instant appeal is not maintainable in its present form and also in the present circumstances of the case.

8. That the appellant is time barred, Hence, liable to be dismissed without any further proceeding that the appellant has treated in accordance with law and rules. Hence, appeal is liable to dismissed.

Facts:

1. **Correct.** Relates to record
2. **Para 2.** Is subject to proof
3. **Correct.**
4. **Correct.**
5. Para No.5 is incorrect, hence denied, Show cause notice was served vide Endstt: No 2031-34 Dated 09-07-2014 on the appellant. And the appellant did not bother to submit reply to show cause notice. Furthermore, final show cause notice was published in daily AAJ dated 05-09-2015. Wherein she was categorically directed to attend the office for personal hearing but she did not comply with direction. Copy of show cause notice and publication are annexure-"A&B"
6. **Para 6.** In reply of Para No. 6, it is submitted that the appellant is not entitled for any relief because all the proceeding has been done by the authority as per law and rules.
7. **Correct.**

d. Incorrect: Denied.

e. It is submit that appellant herself joined the education department with free consent.

f. Para is incorrect. The appellant was found absent during surprise visit on 1,2,3 dated 19-03-2015 , 05-06-2014 and 03-05-2014 visit report are annexed as annexure "C&D"

g. In Correct: Denied. Log book report is already annexed as annexure "E"

h. In correct: Denied.

[Faint, illegible text, possibly a stamp or signature]

i. No comments but appellant do not deserve any concession.

Therefore it is humbly prayed that the appeal of the appellant may graciously be dismissed with cost.

RESPONDENTS

1. District Education Officer (F)
Battagram Respondent No 3

[Signature]
[Signature]

2. Director of E&SE Department KPK
Peshawar respondent 2

10/10/15
[Signature]

3. Secretary E & SE Department KPK
Peshawar Respondent

*Verified connections
Subject To Attachment
of Annexures other
relevant received
and Counter Affidavit*
[Signature]
13/01/17

BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER

PAKHTUNKHWA CAMP COURT ABBOTTABAD

Service Appeal No. 347/2016

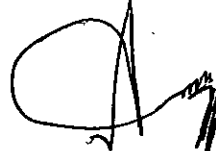
Mst: Naheed AkhtarAppellant

VERSUS

**Government of Khyber Paktunkhwa through Secretary Education
and others.....Respondents**

AFFIDAVIT

I Amir Muhammad ADEO khan (Litigation) o/o the DEO (f) Battagram do hereby affirm and declare on oath that content of Para-wise comments are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court.



**ADEO (Litigation)
Office of the DEO (f) Battagram**

Annexure - A (1)

OFFICE OF THE DEPUTY DISTRICT OFFICER (FEMALE) PRIMARY BATTAGRAM

~~Handwritten scribble~~
5

Year visit Month of: 5 A-C,

Name: ZUHIDA BEGUM

Designation: ASDEO, F, circ BTM

Date of School visit: 3-5-2014

Name of school visit: G.G.P.S. Yaqoob Abad

Building	Rent	<input type="checkbox"/>	Govt	<input checked="" type="checkbox"/>	Not available	<input type="checkbox"/>
	Shelter	<input type="checkbox"/>	Rooms	<input type="checkbox"/>		
Basic facilities	Water	<input type="checkbox"/>	Electricity	<input type="checkbox"/>	Sanitation	<input type="checkbox"/>
	Boundary Walls	<input type="checkbox"/>	Latrines	<input type="checkbox"/>		

Staff Statement	<input type="checkbox"/>	Working condition	<input type="checkbox"/>	Vacant post	<input type="checkbox"/>
Sanction post					

Student attendance	KG	<input type="checkbox"/>	1 st	<input type="checkbox"/>	2 nd	<input type="checkbox"/>
	3 rd	<input type="checkbox"/>	4 th	<input type="checkbox"/>	5 th	<input type="checkbox"/>

Academic Condition - school was found closed

General Remarks - 1- کاپی تو ڈی ای او نے سیکرٹری
2- کاپی تو ایس ڈی ای او نے سیکرٹری
3- اس کا بی

ASDEO
F
3/5/14

Absent Report

Annexure - A (ii)

OFFICE OF THE DEPUTY DISTRICT OFFICER (FEMALE) PRIMARY BATTAGRAM

A - D page **6**

Long visit Month of: _____

Name: ZUHIDA BELSUM

Designation: ASDEO F3 cum (BTM)

Date of School visit: 5/6/2014

Name of school visit: GGPS Yaqoob Abad

Building	Rent	<input type="checkbox"/>	Govt	<input checked="" type="checkbox"/>	Not available	<input type="checkbox"/>
	Shelter	<input type="checkbox"/>	Rooms	<input type="checkbox"/>		
Basic facilities	Water	<input type="checkbox"/>	Electricity	<input type="checkbox"/>	Sanitation	<input type="checkbox"/>
	Boundary Walls	<input type="checkbox"/>	Latrines	<input type="checkbox"/>		

Staff Statement	<input type="checkbox"/>	Working condition	<input type="checkbox"/>	Vacant post	<input type="checkbox"/>
Sanction post					

Student attendance	KG	<input type="checkbox"/>	1 st	<input type="checkbox"/>	2 nd	<input type="checkbox"/>
	3 rd	<input type="checkbox"/>	4 th	<input type="checkbox"/>	5 th	<input type="checkbox"/>

Academic Condition

General Remarks

میں نے صرف 6 مئی کو گورنمنٹ پرائمری سکول لہور میں آنا
 2014 کا ایجنڈا تھا۔ یہاں تک کہ وقت درجہ چارہ سکول
 صوبہ سکول میں آیا گیا تھا۔ یہاں پر اساتذہ کرام
 اور فوٹو گرافنگ کے علاوہ دیگر کاموں پر ان دونوں
 کو توجہ دینی چاہیے۔ دارالافتاء میں بھی
 لکھو سکول کے سال سکول میں چارہ چارہ چارہ
 و کافرونی کا اور دینی کاموں کے ساتھ ساتھ
 1) کاپی رول ڈس آر ای او سکول میں
 2) کاپی رول ڈس آر ای او سکول میں
 3) آفس کاپی

(Signature)
ASDEO

M

**OFFICE OF THE DEPUTY DISTRICT OFFICER
(FEMALE) PRIMARY BATTAGRAM**

Time visit Month of:

Name:

JOHIDA BEGUM

Designation:

ASDEO F. in (BTM)

Date of School visit:

19-3-2015

Name of school visit:

GLPS YADOOBABAD

Building

Rent

Govt

Not available

Shelter

Rooms

 2

Basic facilities

Water

Electricity

Sanitation

Boundary Walls

Latrines

Staff Statement

Working condition

Vacant post

Sanction post

Student attendance

KG

1st

2nd

3rd

4th

5th

Academic Condition

General Remarks

حرف 3
19 جو گزرتا ہے اس میں سے 15
کا یہ کہہ سکتے ہیں کہ اس دوران میں
میں نے اس میں تبدیلیاں دیکھی ہیں
بائے گئے۔ اس میں سے کچھ
سیاہ کر دیا ہے۔ اس میں سے کچھ
نے جوڑے ہیں۔ اس میں سے کچھ
کیا نہ ہو گا تو اس کا اس میں سے
میں نے اس میں سے کچھ
اس میں سے کچھ
اس میں سے کچھ
اس میں سے کچھ

(Signature)
ASDEO F.

Annexure = B ①

② ③ ④ ⑤ ⑥ ⑦ ⑧ ⑨

① I Show cause ②

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) DISTRICT BATHURAI

Ms. Yashoda Devi, Bhatagran
an assistant teacher under the Mysore Government
(Bathur, Co. and Disciplinary) Rule, 2014 do hereby serve this show
cause notice upon you Name: NAMED ANHTAR Yashoda Devi

Consequent upon the report of ASST I am satisfied
that you have committed the following acts/commissions specified in
rule 15 of the said rules.
Guilty of willful absence noted against each.
As a result therefore, I as competent authority have been tentatively
decided to impose upon you:

- Major Penalty.
- (i) Recovery of the absence period.
- (ii) Stripping of two increments.
- Minor Penalty.
- (i) Removal from service.

1. Therefore you are required to show cause as to why the aforesaid
penalty should not be imposed upon you and also intimate whether you
desire to be heard in person.
2. If no reply to this notice is received within 07 days of its
issuance it shall be presumed that you have no defense to put in and
immediate punitive action shall be taken against you.

[Signature]
DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT BATHURAI.

No. 76-73 / Date 24/03/2014.

- Copy returned to the:-
- Officer (Bathur) Mysore Government Higher Education, Bathur.
- Officer (Bathur) Mysore Government Higher Education, Bathur.
- Copy returned with the instruction to deduct salary of their absent
period.
- Officer (Bathur) Mysore Government Higher Education, Bathur.

[Signature]
DISTRICT EDUCATION OFFICER
(FEMALE) DISTRICT BATHURAI.

فائنل شوکار نوٹس بابت غیر حاضری

آپ سندھ ڈیپارٹمنٹ آف ایجوکیشن سے سکولوں سے غیر حاضر ہیں۔ اس سے پہلے ہی آپ کو دوسرا نوٹس کر کے پتہ پر ارسال کئے گئے ہیں۔ جن کے نمبر اور تاریخ نام کے سامنے درج ہیں۔ لیکن آپ کی طرف سے کوئی جواب نموصول نہیں ہوا۔ آپ کو بذریعہ نوٹس ہذا آخری بار مطلع کیا جاتا ہے کہ آپ اس نوٹس کی اشاعت کے بعد (15) دن کے اندر اندر دستخط شدہ نوٹس میں ذاتی طور پر حاضر ہو کر اپنی غیر حاضری کی وجہ بتائیں بصورت دیگر آپ کے خلاف کیٹرز کارروائی عمل میں لاتے ہوئے آپ کو ملازمت سے برخاست کیا جائے گا جس کی تمام تر ذمہ داری آپ پر عائد ہوگی۔

نمبر شمار	نام نمبر	نام سکول	شوکار نمبر مع تاریخ
2	نصرت PST	GGPS بہتوب آباد	09,08/07/2014 مورچہ 2031-34
3	کلثوم بی بی PST	GGPS رنگڑ	14/5/2015 مورچہ 1124-26
4	ذکیہ بی بی PST	GGPS سندھ روال	29/2/2014 مورچہ 661
5	فہیمہ انصاری PST	GGPS کوئی بند موڑی	11/5/15 مورچہ 1104, 11/6/2015 مورچہ 1161
6	ہانا اقبال PET	GGMS گیدڑی خیر آباد	32-35, 01/12/2014 مورچہ 3190-93 07/01/2015 مورچہ
7	رشیہ شیخ AT	GGMS گری خراسی	1303, 10/11/2013 مورچہ 198-201 17/6/2015 مورچہ
8	سائقہ PST	GGPS کوئی بند موڑی	11/5/15 مورچہ 1106, 12/6/2015 مورچہ 1162
9	دلشادہ بی بی PST	GGPS چکات	11/6/2015 مورچہ 1173
10	نہیمہ اختر PST	GGPS جڑ	11/6/2015 مورچہ 1173
11	جمیلہ PST	GGPS محلہ جھانگیر	31/7/2014 مورچہ 2031-34
12	نوزیہ PST	GGPS بازار گے	1377-79/11/6/2015 مورچہ 1173
13	رعناہ PST	GGPS دراب تلاح	8/6/2015 مورچہ 1144-46
14	شازیہ PST	GGPS سکول کالے	8/6/2015 مورچہ 1144-46
15	یاسمین PST	GGPS گتھی	8/6/2015 مورچہ 1144-46
16	شاہ مور چوکیدار	GGPS بہتوب آباد	9/7/2014 مورچہ 2031-34

~~Handwritten signature~~

(B)

Attested
by
A.K. Saik

ڈائریکٹ ایجوکیشن آفیسر (زنانا) بٹ گرام

* InfoKPGovt * @infoKPGovt * Send KP to 8333 INF(P)4333

ڈائریکٹریٹ آف لائیو سٹاک ریسرچ اینڈ ڈاویلپمنٹ، خیبر پختونخوا ایشاور

فون نمبر 091-9210639 / 091-9211062

ٹیکنو لوجی

Annexure (C) ~~10~~

(H)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) BATTAGRAM.

NOTIFICATION.

WHEREAS, your Mstt: Naheed PST GGPS Yaqoob Abad has have been willfully absent from your duty since long. An absence notice was served upon you by the ADEO but you did not respond.

AND WHEREAS, A show cause notice was also served upon you by the undersigned vide this office endstt No 2031-34 dated 9.7.2014

AND WHEREAS, According to rule 9 of Khyber pukhtunkhwa government servants (efficiency & discipline) rules 2011, final show cause notice was also published in daily AJ dated 05.9.2015 wherein you were directed to attend office of the undersigned for personal hearing with in 15 days of the publication of this notice and put forward your written defense if any as to why you may not be proceeded under the (E&D) rules 2011 filing with an ex -parte decision shall be taken against you but you have neither resumed your duty nor submit any reply in this regard so for .

NOW THEREFORE, In the exercise of powers conferred under section IV, of the Khyber pakhtunkhwa government servants removal service (E&D) 2011, the undersigned being competent authority please to impose major penalty removal from service upon you with immediate effect in the larger public interest

Attested
of
RK Samir


DISTRICT EDUCATION OFFICER


(FEMALE) BATTAGRAM

dated Battagram the 19/10 /2015

Endstt: No 1763-67

Copy of the abobe is forwarded the:-

1. Director (E&SE) Khyber Pakhtunkhwa Peshawar,
2. District Account Officer Battagram.
3. SDEO (F) Battagram
4. Teacher Concerned
5. Deputy Commissioner Battagram.


DISTRICT EDUCATION OFFICER

(FEMALE) BATTAGRAM.