


16.01.2018

None for the appellant present. Mr. Usman Ghani,
District Attorney for the respondents present. To come up for
arguments on 17.4.2018 before the D.B. at camp court,
Abbottabad.


Member


Chairman
Camp court, A/Abad.

17.04.2018

Counsel for the appellant and Mr. Usman Ghani,
District Attorney for the respondents present. Counsel for
the appellant requested for withdrawal of the appeal.

Request is accepted and the appeal is dismissed as
withdrawn. File be consigned to the record room.



Member


Chairman
Camp Court, A/Abad

ANNOUNCED
17.04.2018


21.11.2016

Counsel for the appellant and Mst. Saima Raza, ADO (Litigation) alongwith Mst. Bushra Bibi, Government Pleader for respondents present. The Bench is incomplete. To come up for rejoinder and final hearing before D.B on 17.4.2017 at camp court, Abbottabad.


Chairman
Camp Court, A/Abad

17.04.2017


Counsel for the appellant and Mst. Saima Raza, ADO alongwith Mr. Muhammad Siddique, Sr.GP for the respondents present. Seeks adjournment to submit rejoinder. Adjourned for rejoinder and final hearing for 16.10.2017 at camp court, Abbottabad.


Chairman
Camp court, A/Abad

16.10.2017

Counsel for the appellant and Mr. Muhammad Bilal, Deputy District Attorney for the respondents present. Rejoinder received. To come up for arguments on 16.01.2018 before the D.B at camp court, Abbottabad.


Member


Chairman
Camp court, Abbottabad.

20.10.2015

Counsel for the appellant and Ms.Saima Raza, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Requested for adjournment. To come up for written reply/comments on 21.01.2016 before S.B at Camp Court A/Abad.


Chairman
Camp Court A/Abad.


21.1.2016

Counsel for the appellant, M/S Muhammad Hafeez, ADO for respondent No. 1, 2, 4 and 5 and Bahadar Khan, Assistant for respondent No. 3 alongwith Mr. Muhammad Saddique, Sr.GP for respondents present. Written reply on behalf of respondent No. 1, 2 and 4 submitted while representative of respondents No. 1, 2, 4 and 5 as well as learned Sr.GP rely on the same on behalf of respondent No. 5. Representative of respondent No. 3 requested for further adjournment. Last opportunity granted. To come up for written reply/comments on behalf of respondent No. 3 on 20.4.2016 S.B at Camp Court A/Abad.


Chairman

20.04.2016

None is present for the appellant M/S Muhammad Qadeem, Senior Clerk and Asif Shahzada, Assistant (Legal) alongwith Muhammad Siddique, Sr.GP for the respondents present. Written reply of respondents No. 1, 2, 4 and 5 already submitted. The learned Sr.GP relied on the same on behalf of respondent No. 3. The appeal assigned to D.B for rejoinder and final hearing for 21.11.2016 at camp court, Abbottabad.


Chairman
Camp court, A/Abad

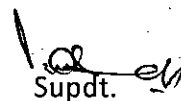
29.05.2015

None for the appellant present. The appeal pertains to territorial limits of Hazara Division as such notice to counsel for the appellant be issued for preliminary hearing at camp court Abbottabad for 20.07.2015 before S.B.


Chairman

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 17.08.2015 for preliminary hearing at Camp Court Abbottabad.


Supdt.

17.08.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as PST at GGPS Haryala where she served for a period of more than 2 years as mandated by Clause-9 of terms and conditions of appointment order dated 09.01.2012 where-after she was adjusted at GGPS Komal Payeen vide order dated 12.05.2014 wherein she served for a period of about 8 months and vide impugned order dated 12.02.2015 the said order was unilaterally cancelled regarding which appellant preferred departmental appeal on 14.02.2015 followed by service appeal on 26.05.2015.

That no reasons whatsoever are given for cancelation of the order of adjustment after lapse of a period of almost 8 months and, moreover, the cancellation order is in fact a pre-mature transfer order which is a nullity in the eye of law. That the appellant is still working at GGPS Komal Payeen.

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 20.10.2015 before S.B at camp court A/Abad. Notice of stay application be also issued for the date fixed. Status-quo be maintained.


Chairman

Camp Court Abbottabad



Appellant Deposited
Security & Process Fee



Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 492/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	26.05.2015	<p>The appeal of Mst. Sumaira Rasheed presented today by Tayyaba Rani Advocate, may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p> REGISTRAR</p>
2	27-5-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>29-5-15</u>.</p> <p> CHAIRMAN</p>

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Appeal no. 492/2015

Sumaira Rasheed D/O Mohammad Rasheed, PST, Govt. Girls Primary School Komal Paen Haripur R/O Village Komal Barkot Tehsil & District Haripur.

Appellant

VERSUS

1. The Secretary Elementary & Secondary Education Department Government of Khyber Paktunkhwa, Peshawar.
2. The Director Elementary & Secondary Education Department Govt of Khyber Paktunkhwa, Peshawar.
3. The Deputy Commissioner, Haripur.
4. The District Education Officer (Female) Haripur.
5. The Sub. Divisional Educational Officer (Female) Haripur.

Respondents

SERVICE APPEAL

S/No	Description of Document	Ann- exure	Page No.
1.	Appeal alongwith application for suspension of impugned order dated 12-02-2015		1-7
2.	Copy of appointment order.	"A"	8-11
3.	Copy of application.	"B"	12
4.	Copies of adjustment order dated 12-05-2014	"C"	13
5.	Copies of attendance sheets	"D1 to D7"	14-20
6.	Copy of the departmental appeal.	"E"	21
5.	Wakalatnama.		

Samina
Appellant

Through:

Rani
(Tayyaba Rani)
Advocate High Court
At Haripur.

Dated 26-05-2015



**OFFICE OF THE
DISTRICT EDUCATION OFFICER (FEMALE)
HARIPUR**

(Office Phone No. 0995-613244)

NO. _____ Date _____ 2017

Adjustment Order

The competent authority is pleased to adjust Mst. Sumaira Rasheed PST (BPS-12) GGPS Haryala against vacant post at GGPS Komal Paeen, on her own pay & grade in the best interest of public service with immediate effect.

- Note:-1. No T.A /D.A is allowed
2. Charge report should be submitted to all concerned.

-sd-
District Education Officer (F)
Haripur

Dated 20 /10/2017

Endst: No. 10323-29 /

Copy to the :-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. Deputy Commissioner Haripur.
3. District Account Officer Haripur.
4. District Monitoring Officer E&SE Haripur.
5. P.A to Distt. Nazim, Haripur.
6. Sub Divisional Education Officer (F) Haripur / Ghazi.
7. ASDEO Circle concerned.
8. Office File.

Sumaira Rasheed
District Education Officer (F)
Haripur

Before The
Khyber Pachtun
Service Tribunal

Jumara Kashed vs Jentry zdu

Application withdrawn on the basis of appeal
on the basis of adjustment order

Respectfully
Sincerely:-

The appeal is filed for

The appeal filed against

transfer order.

The concerned department

announced adjustment order
that is attached.

It is therefore humbly
requested on the
basis of adjustment order.

Jumara Kashed

Signature

Dated 17/04/2018

(1)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Appeal no. 492/15

**G.W.F. Peshawar
Service Tribunal**

Diary No. 550

Dated 26-5-2015

Sumaira Rasheed D/O Mohammad Rasheed, PST, Govt. Girls Primary School Komal Paen Haripur R/O Village Komal Barkot, Tehsil & District Haripur.

Appellant

VERSUS

1. The Secretary Elementary & Secondary Education Department Government of Khyber Paktunkhwa, Peshawar.
2. The Director Elementary & Secondary Education Department Govt of Khyber Paktunkhwa, Peshawar.
3. The Deputy Commissioner, Haripur.
4. The District Education Officer (Female) Haripur.
5. The Sub. Divisional Education Officer (Female) Haripur.

Respondents

APPEAL UNDER SECTION-4 KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST ORDER DATED 12-02-2015 WHEREBY SUB. DIVISIONAL EDUCATION OFFICER (FEMALE) HARIPUR HAS CANCELLED HER ORDER DATED 12-05-2014 WITH REGARD TO POSTING/ASJUSTMENT OF APPELLANT AT GOVT. GIRLS PRIMARY SCHOOL KOMAL PAEN HARIPUR HAS BEEN CANCELLED.

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL THE IMPUGNED ORDER DATED 12-02-2015 OF SDEO (FEMALE) HARIPUR MAY GRACIOUSLY BE SET ASISE AND POSTING ORDER OF THE APPELLANT DATED 12-05-2014 PASSED BY SUB. DIVISIONAL EDUCATION OFFICER (FEMALE) HARIPUR BE RESTORED.

Respectfully sheweth,

Filed to-day

26/5/15

1. That the appellant was appointed in the Education Department as a Primary School Teacher on 31-12-2011 and was posted at Government Girls Primary School Haryala, Union Council Barkot, Haripur against a vacant post. **(Copy of appointment order is attached as Annex-"A")**.

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2. That according to para-9 of "Terms and Conditions" of Appointment Order (as placed at Annex-A) the service of the appellant were transferable/adjustable to any other institution after tenure of 02 years.
3. That since ~~her~~ appointment/posting on 31-12-2011, the appellant remained posted at Government Girls Primary School Haryala for a period of more than 02 years and 04. During this period appellant always discharged her assigned duties with zeal, zest, devotion to the satisfaction of his officers.
4. That thereafter appellant moved an application to the S.D.E.O. (Female) Haripur through Worthy Deputy Commissioner, Haripur for her transfer from GGPS Haryala to GGPS Komal Paeen Haripur. **(Copy of the application is annexed as Annex-"B")**.
5. That appellant's aforementioned application was received and considered by the Competent Authority whereupon the Sub. Divisional Education Officer (Female) Haripur vide Endorsement letter No.5150-53 dated 12-05-2014 passed the order for adjustment of the appellant at GGPS Komal Paeen Haripur. **(Copy of the adjustment letter dated 12-05-2014 is attached as Annex-"C")**.
6. That in compliance of the order dated 12-05-2014 the appellant moved and joined her assigned duties at GGPS Komal Paeen Haripur. Since her adjustment the appellant always performed her duties at GGPS Komal Paeen with zeal, zest, devotion, dedication, dexterity and honesty. There is no complaint from any corner against the appellant with regard to her duties and responsibilities. **(Copies of attendance sheets are attached as Annex-"D-1 to D-7")**
7. That just after about 08 months of the appellant posting and adjustment at GGPS Komal Paeen, the SDEO (Female) Haripur suddenly and astonishingly vide her note dated 12-02-2015 on the bottom of her order dated 12-05-2014 (as Annex-C above)

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cancelled the same with a single stroke of her pen, in a slipshod manner and colorful exercise of her powers and that too without any cause or assigning any reason thereof which is a nullity in the eyes of law and unsustainable.

8. That the Appellant preferred a departmental ^{Appeal} dated 14-02-2015 challenging the impugned order dated 12-02-2015 which has not been responded till this day; hence the instant service appeal, inter alia, on the following grounds:

(Copy of departmental appeal is attached herewith as Annex-E).

GROUND:

- a) That the impugned order dated 12-02-2015 is illegal, unlawful, passed in a slipshod, cursory, perfunctory, and whimsical manner, passed in colorful exercise of powers, passed against the mandatory statutory provisions of law; hence liable to be set aside.
- b) That the impugned order is against the departmental rules and regulations as well as Civil Servants Act-197; hence not sustainable in the eyes of law.
- c) That the impugned ^{order} is contrary and in glaring violation of "Terms and Conditions" mentioned in the appointment order of the appellant; hence liable to be turned down straightway.
- d) That the appellant has been transferred just after 08 months of her posting/adjustment at GGPS Komal Paeen Haripur thus the impugned order is liable to be set aside on this score alone.
- e) That according to her appointment order the appellant has already completed her tenure at GGS Haryala; hence impugned order is liable to be set aside.
- f) That appellant has taken over charge at GGPS Komal Paeen and performing her duties over there and therefore a vested right has

(4)

accrued to her; hence cancellation of order dated 12-05-2014 is against the law, rules & regulations hence impugned order dated 12-02-2015 is liable to be set aside.

g) That no reason has been assigned by the SDEO (Female) Haripur while recording the impugned order dated 12-02-2015 and transferring the appellant; hence the same is liable to be struck down on this score alone.

PRAYER;

It is, therefore, humbly prayed that on acceptance of the instant service the impugned order dated 12-02-2015 passed by the Sub. Divisional Education Officer (Female) Haripur may graciously be set aside and that of dated 12-05-2014 be up-held. Any other relief which this Honourable Service Tribunal deems fit may also be granted.

Through:

Samira
Appellant
Rani
(Tayyaba Rani)
Advocate High Court
At Haripur.

Dated 26 -05-2015

VERIFICATION

It is verified that the contents of instant appeal are true and correct to the best of my knowledge and nothing has been concealed therefrom.

Dated: 26 -05-2015

Samira
Appellant

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Sumaira Rasheed D/O Mohammad Rasheed, PST, Govt. Girls Primary School Komal Paen Haripur R/O Village Komal Barkot Tehsil & District Haripur.

Appellant

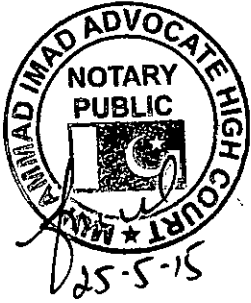
VERSUS

1. The Secretary Elementary & Secondary Education Department Government of Khyber Paktunkhwa, Peshawar and others

Respondents

SERVICE APPEAL

AFFIDAVIT:



I, Sumaira Rasheed D/O Mohammad Rasheed do hereby solemnly declare and affirm on oath that the contents of the instant appeal are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honourable Service Tribunal.

Samira
Deponent/Appellant

Dated: *25*-05-2015

Identified By:

Rani
Tayyaba Rani,
Advocate High Court
At Haripur,

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Sumaira Rasheed D/O Mohammad Rasheed, PST, Govt. Girls Primary School Komal Paen Haripur R/O Village Komal Barkot Tehsil & District Haripur.

Appellant

VERSUS

1. The Secretary Elementary & Secondary Education Department Government of Khyber Paktunkhwa, Peshawar and others

Respondents

SERVICE APPEAL

CERTIFICATE

It is certified that no such Appeal on the subject has ever been filed in this or any other court prior to the instant one.

Samira
APPELLANT

Dated: 26-05-2015

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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Sumaira Rasheed D/O Mohammad Rasheed, PST, Govt. Girls Primary School Komal Paen Haripur R/O Village Komal Barkot Tehsil & District Haripur.

Applicant/Appellant

VERSUS

1. The Secretary Elementary & Secondary Education Department Government of Khyber Paktunkhwa, Peshawar and others.

Respondents

SERVICE APPEAL

**APPLICATION FOR SUSPENSION OF IMPUGNED ORDER DATED
12-02-2015 TILL DICISION OF THE TITLED APPEAL.**

Respectfully Wheweth:

1. That the applicant/appellant haS filed today the titled appeal against the respondents before this Honourable Court which may be treated as an integral part of this application.
2. That Respondent No.5 is bent upon to transfer applicant/appellant from GGPS Komal Paen to GGPS Haryala through impugned order dated 12-02-2015 illegally, unlawfully contrary to the departmental rules & regulations.
3. That for restraining the Respondent No.5 from acting upon the impugned order dated 12-02-2015, the same needs to be suspended for the sake of justice & till decision of the titled appeal.
4. That appellant's case is strong one and based on reasons/solid grounds and balance of convenience also titles in her favour.
5. That in case impugned order is not suspended, the applicant will have to suffer irreparable loss.

It is, therefore, humbly prayed that the impugned order may graciously be suspended from its operation till decision of the titled appeal.

Applicant/Appellant *Samina*

Through

Dated: 26-05-2015

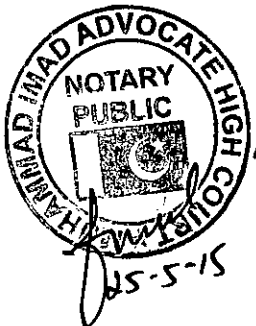
Rani
(Tayyaba Rani)
Advocate High Court
At Haripur

AFFIDAVIT.

I, Sumaira Rasheed, do hereby solemnly declare and affirm on oath that the contents of this application are correct to the beset of my knowledge and belief.

Dated: 25-05-2015

Samina
Deponent



A

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PAGE NO. 5

Annex-A

OFFICE OF THE EXECUTIVE DISTRICT OFFICER

Appointment Order

PII No. 0995-610178, 613244



Consequent upon the selection of the candidates by the Departmental Selection Committee in final meeting held on 31-12-2011 and approval of the competent forum the appointments of the following trained PST (Female) are hereby ordered in BPS 07 on regular basis without pension and gratuity as per new service structure 100% Union Council Wise recruitment for PST post provided by the Govt of Khyber Pakhtunkhwa Elementary & Secondary Education Department Peshawar vide Notification No. SO (PE) 1-5/SSRC/Vol-III dated 18-01-2011 and revised notification dated 16.6.2011 in the schools as noted against the name of each on the terms & conditions mentioned below with effect from the date of taking over charge in the interest of public service.

Union Council Barkot

S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
01	00410	FOUZIA BIBI D/O RAZA MUHAMMAD R/O: Vill: Barkot HR	05-04-1989	BA/PTC	51.50	GGPS Jandi	Against Vacant Post
02	01302	Samira Rasheed D/O Muhammad Rasheeda R/O Kamal Barkot HR	01-01-1991	BA/PTC	46.08	GGPS Haryolian	Against Vacant Post
03	01584	Abida Inqum D/O Barkhurdagar R/O: Vill Dassera Halli HR	09-01-1986	BA/PTC	45.53	GGPS Romul	Against Vacant Post

Union Council Musilmabad

S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
04	01479	Naheed Akhtar D/O Abdul Razaq R/O Vill: Ratanoli	26-03-1985	BA/PTC	48.58	GGPS Karwani	Against Vacant Post
05	00543	UZMA SHATIBEN D/O KALA KHAN R/O Vill: Garani Theon HR	15-07-1983	MA/PTC	48.30	GGPS Raj Dhani	Against Vacant Post
06	01086	Aasma Saeed D/O Saeed Akhtar Vill: B.P.Dhara HR	31-12-1983	BA/PTC	45.54	GGPS Marri	Against Vacant Post
07	00608	SARWAR JAN D/O MUHAMMAD AKRAM Village Bani Ban HR	16-06-1984	BA/PTC	44.46	GGPS Marri	Against Vacant Post

Union Council Jabri

S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
08	01057	RUQIA ASHRAF D/O M ASHRAF ABBASI R/O: Vill Jabri HR	03-10-1987	BA/PTC	50.55	GGPS Nullah	Against Vacant Post
09	01054	AZRA PARVEEN D/O LAL KHAN R/O: Vill Jabri HR	02-04-1986	BA/PTC	49.01	GGPS Nullah	Against Vacant Post

Union Council Bandi Sher Khan

S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
10	00430	SAMINA GUL D/O ABDUL HAMEED R/O: Vill Durshkhail HR	01-03-1984	MA/PTC	58.27	GGPS Chumawan No. 2	Against Vacant Post

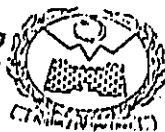
Prepared By: Malik Ashraf Ahmad & Inayat Khan

Samina

Attested
Ravi

PAGE 3 OF 5

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
Union Council Bait Gali



S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
21	00557	NASREEN BIBI D/O Qari Muhammad Zaman Vill: Gallat HR	19-04-1990	BA/PTC	52.39	GGPS Singah	Against Vacant Post
22	02849	Shabana D/O Ali Zaman Village Kancer Haripur	10-02-1985	BA/PTC	49.86	GGPS Sathana	Against Vacant Post
23	00667	NABEELA BIBI D/O NIAZ MUHAMMAD Village Gujartina HR	09-09- 1989	BA/PTC	41.20	GGPS Ferosa	Against Vacant Post

Union Council Nara Amazal

S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
24	02574	Rahat Bibi D/O Jamal Akbar, Village Chorwal HR	15-03-1992	BA/PTC	46.75	GGPS Kupri	Against Vacant Post
25	02573	Gul Nazak D/O Jamal Akbar, Village Chorwal HR	06-01-1991	BA/PTC	40.88	GGPS Shingari	Against Vacant Post

Union Council Kalinjar

S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
26	01476	Atiya Bibi D/O Sakhi Shah, R/O Village Swabi Maira HR	23-06-1979	MA/PTC	56.08	GGPS Swabi Maira	Against Vacant Post
27	01500	Jamil un Nisa D/O Raj Muhammad, R/O Vill: Kalinjar HR	14-06-1981 14-06-1981	BA/PTC	54.25	GGPS Sawar, Maira	Against Vacant Post
28	00503	ASIA BIBI D/O MUHAMMAD MAROOF R/O Village Swabi Maira HR	20-05-1983	BA/PTC	50.61	GGPS Sawar Maira	Against Vacant Post
29	01959	Saima Riaz D/O M. Riaz R/O Vill: Kalinjar HR	03-03- 1982	BA/PTC	47.95	GGPS Jam	Against Vacant Post

Union Council Kundi

S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
30	02060	Noalam Bibi D/O Ashiq Hussain : Vill Kundi, Ghazi Haripur	12-03-1990	B.Sc/PTC	52.16	GGPS Al Dara	Against Vacant Post
31	02319	Sadia Bibi D/O Fazal Khan, Village Salam Khand Ghazi Haripur	10-02-1989	BA/PTC	51.84	GGPS Dara Ghazi	Against Vacant Post

Union Council Kotehra

S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
32	03260	Asifa Bibi D/O Rehmat Shah, R/O Village Badha Ghazi Haripur	13-04-1987	B.A/ PTC	50.19	GGPS Amphiyh	Against Vacant Post

Prepared By: M. Amir Ahsan & Inayat Khan

Samin

*Amir
Ravi*

OFFICE OF THE EXECUTIVE DISTRICT OFFICER

Union Council Dhendha



S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
33	01186	Sidra Ilyas D/O Muhammad Ilyas Qureshi, Village Kalas Haripur	25-12-1984	MA/PTC	64.68	GGPS Chohar Sharif	Against Vacant Post
34	01752	SITUMILIA BIBI D/O Muhammad Javed, Village Chohar Sharif HR	19-03-1989	BA/PTC	55.71	GGPS Chohar Sharif	Against Vacant Post

Union Council Jattal Pind

S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
35	01490	Farhana Bibi D/O Rafique R/O Village Kag Haripur	20-10-1985	MA/PTC	55.38	GGPS Silma Nagar	Against Vacant Post
36	01518	Nighat Shaheen D/O Javed Iqbal, Village Kag Haripur	24-10-1979	MA/PTC	52.20	GGPS Kag No.2	Against Vacant Post
37	01549	Sobia Fida D/O Fida Muhammad, Village Silma Nagar Haripur	20-08-1990	BA/PTC	52.12	GGPS Kag No.2	Against Vacant Post

Union Council Tofkian

S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
38	01509	Junior Bibi D/O Nura Hussain, Vill: Jolian HR	01-01-1984	BA/PTC	48.98	GGPS Pind Gakra	Against Vacant Post
39	00549	SAMAR FATIMA D/O Syed Abbas Ali Shah Village Gahri Bandan Haripur	12-01-1988	BA/PTC	47.89	GGPS Pind Gakra	Against Vacant Post

Union Central Haripur

S.No	Roll No	Name/F.Name & Address	D.O.B	Qualification	Total Merit Score	Place of Posting	Remarks
40	00874	Sahrah Khalique D/O Muhammad Khalique, R/O Moh: Khoo Haripur	03-03-1989	FA/PTC	52.12	GGPS No.2 HR	Against Vacant Post

Terms & Conditions

- The appointments of the above candidates are on regular basis but without pension and gratuity in terms of Section 19 of NWFP Civil Servant Act 1973 and as amended vide Khyber Pakhtunkhwa Civil Servants (Amendment) Act 2005 they will however be entitled to contributory provident fund in such a manner and at such rates as may be prescribed by the Government.
- They will get Salary in BPS 07 plus usual allowances as due and admissible under the rules.
- These services can be terminated at any time in case their performances are found unsatisfactory, in case of misconduct they will be proceeded under the rules framed by Govt of Khyber Pakhtunkhwa from time to time & E&D Rules 2011.
- The Drawing & Disbursing officer concerned are bound to examine original Certificates/ Degree of candidates before handing over charge and salary of the candidates be released after obtaining successful verification of certificates / Degree from the board universities concerned. In case of any illegality / irregularity in this regard the Drawing & Disbursing Officer concerned will be held responsible for the consequences.
- In case a document or documents is/are found fake or forged or bogus on such scrutiny or the verification the service of the teacher concerned shall be terminated. The whole amount paid to his/her as salary shall be recovered and a case against him/her shall be registered under relevant section of law.

Prepared by: Ms. Anshu Ahmed + Inarah Khan

Samina

Anshu
Rai



OFFICE OF THE EXECUTIVE DISTRICT OFFICER

6. If they want to resign form the service, they will have to serve one-month prior notice, failing which they will have to deposit one month pay in lieu of such notice, in the Government treasury.
7. They should join their post with in 15 days of the issuance of this order. The DDOs concerned should furnish certificates to the effect that the candidates appointed have join the post or otherwise after 15 days of the issuance of this order.
8. They will bound to produce Health and age certificate issued by the Medical Superintendent District Head Quarter Hospital Haripur with in 07 days of taking over charge.
9. The appointment for institution where candidates have been appointed / posted will be transferable / adjustable to any other institution after tenure of 02 years.
10. The appointees will provide the Character Certificate verified by the two Gazzetted Officers at the time of taking over charge.
11. Charge report should be submitted to all concerned in duplicate.
12. No under age / over age candidate should be allowed to take charge with out relaxation by the authority concerned if any found in notice, this office may informed immediately.
13. They will be entitled for annual increment after completion of one year service.
14. No TA/DA is allowed to any one.

-----sd/-----
ABDUL RUDDOOF
 Executive District Officer
 Elementary & Secondary Education
 Haripur

Dated: 9/1/2012

Endst: No. 408-462

Cc:

1. The Secretary Elementary & Secondary Education Department Govt of Khyber Pakhtunkhwa Peshawar.
2. The Director Elementary & Secondary Education Department Govt of Khyber Pakhtunkhwa Peshawar.
3. The District Coordination Officer Haripur.
4. All the members of District Selection Committee.
5. The Senior District Accounts Officer Haripur.
6. The Principals /Headmistresses concerned.
7. Candidates concerned.
8. Office record file.

(Signature)
 Director, (S.D.O.) (Haripur)
 Elementary & Secondary Education
 Haripur

Saming

(Signature)
 Ri

SDEO(F)

For consideration and taking appropriate necessary action

21/4/14

DEPUTY COMMISSIONER HARIPUR

جناب عالیہ! ہودبانہ نڈارشن چھترہ میں سماؤ سمیرر شہد کو پھل پائٹن کی ریٹنٹی رٹوں۔ اور 2012-13 سے بطور (PST) اپنے ٹرائٹن انجام دے رہی رتوں۔ جو کہ آپ دور دراز اور مکمل علاقہ ہے۔ سارار اسے قبلا سے زربا ہے۔ اور گاڑی کا بھی انتظام کوئی نہیں ہے سارار اسے ہیرل لے کر رہی رتوں۔ تقریباً ایک ساٹھڈ کاسٹری فٹسے رتوں لے پوتا ہے اور گھرتے آپ فرد کا جانا بھی لازمی پوتا ہے۔ اور سارر آپ جوٹا سا ہے بھی ہے۔ اے سا کہ لے کر جانا بھی میرے لے لازمی پوتا ہے۔ اور گھرتے میں بھی اس کا خاص دیکھ جال کرنے وال کوئی نہیں ہے۔ سارار اسے قبلا سے زربا جانا کوئی آسان بات نہیں ہے اور بچے سول سے واپسی ہرتے لے بھی ماننے۔ جس تین سال سے (P.P.C) میں بھی آ رہی رتوں تین سرامبلہ حل نہیں ہوا۔ میں سب لوگوں سے ایسے کر چکی رتوں تین کسی نے جو پتر ٹی ریم نہیں کیا۔ میں آپ لوگوں کو دقیقہ بنا رہی رتوں کیونکہ میں بہت متعلق سے وہاں اپنی ڈوٹی باقاعدگی سے انجام دے رہی رتوں۔ میں سبار ہم رتوں سبار بلڈریشروال مسئلہ پوتا ہے۔ تو میں آپ سے نڈارشن کر رہی رتوں نہ ان تمام پریشنا رتوں کو دیکھ کر سبار مسئلہ حل کیا جائے۔ میں تین سال اتنے کو خاطر و نظر رکھ کر اپنی ڈوٹی انجام دے رہی رتوں میں سے نڈارشن کر رہی رتوں کہ سب سے ٹرائٹن پائٹن پائٹن میں کی جائے میں آپ کی ساری زندگی سبب زار رہی اور بچے میں اپنی ڈوٹی بھی اسانی سے لے کر سکوں۔ راستے میں مختلف قسم کے جانوروں کا بھی بچے خطرہ پوتا مسئلہ ہے۔ ساری اور تمہیر وغیرہ۔ جس وجہ سے میں آپ سے نڈارشن کر رہی رتوں کہ سب سے ٹرائٹن ہے

اول مکملہ سمیرر شہد

جی جی پی ایس ٹرینالہ

Saminga
Head Teacher
C.G.S
Haripura Dist. Haripur

ATTESTED
Saminga

Saminga



13

Annex - C

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) HARIPUR
TELEPHONE NO.0995-610814

ADJUSTMENT ORDER

As Authorised by the competent authority and recommended by the DC Haripur after considering her problems the Mst. Sumaira Rasheed PST GGPS Haryala is hereby adjusted at GO Komal Payeen against vacant post on her own pay and grade in the interest of public service.

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA & TG is allowed.
3. This order should be effected w.e.f.01-09-2014.

Sd/-
Sub Divisional Education Officer
(Female) Haripur

Endst: No. 5150-53

Dated Haripur the, 12/05/2014.

Copy of the above is forwarded for information and necessary action to the: -

1. District Education Officer (F) Haripur.
2. Cluster incharge.
3. ASEDO Concerned Circle.
4. Head Teachers concerned.
5. Office record.

ASDEO

Cancelled
The teacher is hereby directed to take charge immediately
Mst. Sumaira Rasheed
in GGPS Haryala
subject from duty from
13 Jun 2014

Sub Divisional Education Officer
(Female) Haripur
12/5/2014

DEO
12/12/15
Attested
Ran
Samina

رہنما شری مہرین

بابت ماہ 20			
نام	خدیجہ بیگم	محمد رفیق	فانہ زعفران
عہدہ	اولیٰ معلم	نائب معلم	مدرسہ

تاریخ	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
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تاریخ	آدم	دستخط	زراعتی	آدم	دستخط	زراعتی	آدم	دستخط	زراعتی	آدم	دستخط	زراعتی	آدم	دستخط	زراعتی	آدم	دستخط	زراعتی	آدم	دستخط	زراعتی	آدم	دستخط	زراعتی	آدم	دستخط	زراعتی	آدم	دستخط	زراعتی
1	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
2	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
3	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
4	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
5	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
6	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
7	SUNDAY																													
8	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
9	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
10	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
11	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
12	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
13	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
14	SUNDAY																													
15	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
16	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
17	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
18	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
19	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
20	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
21	SUNDAY																													
22	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
23	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
24	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
25	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
26	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
27	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
28	SUNDAY																													
29	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30	K.P	7:30	S.R	7:30	S.R	7:30	S.J	7:30	S.J	7:30	K.P	7:30	K.P	7:30
31	SUNDAY																													

نمبر رخصت	3
اقتاریہ	0
اتحقاتی	0
بیاری	0
میزان	3

نمبر رخصت	3	0	0	0	0	0	0	0	0	0	3	0
اقتاریہ	0	0	0	0	0	0	0	0	0	0	0	0
اتحقاتی	0	0	0	0	0	0	0	0	0	0	0	0
بیاری	0	0	0	0	0	0	0	0	0	0	0	0
میزان	3	0	0	0	0	0	0	0	0	0	3	0

دستخط: *Rahimuddin Pasruy* 7249810 تاریخ: 18 روز مارچ 20

Samira *Ameron*

رجسٹر حاضر مدد رسیدین

تاریخ	نمبر	نام	پتہ	تاریخ	نمبر	نام	پتہ
1	1	K.Z	12.45	1	1	K.P	7.30
2	2	K.Z	12.45	2	2	K.P	7.30
3	3	K.Z	12.45	3	3	K.P	7.30
4	4	K.Z	12.45	4	4	K.P	7.30
5	5	K.Z	12.45	5	5	K.P	7.30
6	6	K.Z	12.45	6	6	K.P	7.30
7	7	K.Z	12.45	7	7	K.P	7.30
8	8	K.Z	12.45	8	8	K.P	7.30
9	9	K.Z	12.45	9	9	K.P	7.30
10	10	K.Z	12.45	10	10	K.P	7.30
11	11	K.Z	12.45	11	11	K.P	7.30
12	12	K.Z	12.45	12	12	K.P	7.30
13	13	K.Z	12.45	13	13	K.P	7.30
14	14	K.Z	12.45	14	14	K.P	7.30
15	15	K.Z	12.45	15	15	K.P	7.30
16	16	K.Z	12.45	16	16	K.P	7.30
17	17	K.Z	12.45	17	17	K.P	7.30
18	18	K.Z	12.45	18	18	K.P	7.30
19	19	K.Z	12.45	19	19	K.P	7.30
20	20	K.Z	12.45	20	20	K.P	7.30
21	21	K.Z	12.45	21	21	K.P	7.30
22	22	K.Z	12.45	22	22	K.P	7.30
23	23	K.Z	12.45	23	23	K.P	7.30
24	24	K.Z	12.45	24	24	K.P	7.30
25	25	K.Z	12.45	25	25	K.P	7.30
26	26	K.Z	12.45	26	26	K.P	7.30
27	27	K.Z	12.45	27	27	K.P	7.30
28	28	K.Z	12.45	28	28	K.P	7.30
29	29	K.Z	12.45	29	29	K.P	7.30
30	30	K.Z	12.45	30	30	K.P	7.30
31	31	K.Z	12.45	31	31	K.P	7.30

تاریخ
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تاریخ	نمبر	نام	پتہ
1	1	K.Z	12.45
2	2	K.Z	12.45
3	3	K.Z	12.45
4	4	K.Z	12.45
5	5	K.Z	12.45
6	6	K.Z	12.45
7	7	K.Z	12.45
8	8	K.Z	12.45
9	9	K.Z	12.45
10	10	K.Z	12.45
11	11	K.Z	12.45
12	12	K.Z	12.45
13	13	K.Z	12.45
14	14	K.Z	12.45
15	15	K.Z	12.45
16	16	K.Z	12.45
17	17	K.Z	12.45
18	18	K.Z	12.45
19	19	K.Z	12.45
20	20	K.Z	12.45
21	21	K.Z	12.45
22	22	K.Z	12.45
23	23	K.Z	12.45
24	24	K.Z	12.45
25	25	K.Z	12.45
26	26	K.Z	12.45
27	27	K.Z	12.45
28	28	K.Z	12.45
29	29	K.Z	12.45
30	30	K.Z	12.45
31	31	K.Z	12.45

تاریخ	نمبر	نام	پتہ	تاریخ	نمبر	نام	پتہ
1	1	K.Z	12.45	1	1	K.P	7.30
2	2	K.Z	12.45	2	2	K.P	7.30
3	3	K.Z	12.45	3	3	K.P	7.30
4	4	K.Z	12.45	4	4	K.P	7.30
5	5	K.Z	12.45	5	5	K.P	7.30
6	6	K.Z	12.45	6	6	K.P	7.30
7	7	K.Z	12.45	7	7	K.P	7.30
8	8	K.Z	12.45	8	8	K.P	7.30
9	9	K.Z	12.45	9	9	K.P	7.30
10	10	K.Z	12.45	10	10	K.P	7.30
11	11	K.Z	12.45	11	11	K.P	7.30
12	12	K.Z	12.45	12	12	K.P	7.30
13	13	K.Z	12.45	13	13	K.P	7.30
14	14	K.Z	12.45	14	14	K.P	7.30
15	15	K.Z	12.45	15	15	K.P	7.30
16	16	K.Z	12.45	16	16	K.P	7.30
17	17	K.Z	12.45	17	17	K.P	7.30
18	18	K.Z	12.45	18	18	K.P	7.30
19	19	K.Z	12.45	19	19	K.P	7.30
20	20	K.Z	12.45	20	20	K.P	7.30
21	21	K.Z	12.45	21	21	K.P	7.30
22	22	K.Z	12.45	22	22	K.P	7.30
23	23	K.Z	12.45	23	23	K.P	7.30
24	24	K.Z	12.45	24	24	K.P	7.30
25	25	K.Z	12.45	25	25	K.P	7.30
26	26	K.Z	12.45	26	26	K.P	7.30
27	27	K.Z	12.45	27	27	K.P	7.30
28	28	K.Z	12.45	28	28	K.P	7.30
29	29	K.Z	12.45	29	29	K.P	7.30
30	30	K.Z	12.45	30	30	K.P	7.30
31	31	K.Z	12.45	31	31	K.P	7.30

دستخط پیدائشی

Amrta
Rum

Samung

Khondol

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Amrta Khondol



رجسٹرڈ ڈاکو سببی

کراچی کے لیے ڈاکو سببی

نام	حصہ	پہلو	تاریخ
محمد رفیق	حصہ اول	پہلو اول	2015

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
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SUNDAY

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دستخط ہیڈ ماسٹر

Saminga

Amir

رجسٹر نوری مدرسین

وزیر تعلیم و تربیت، گلشن اعلیٰ کالج، کراچی

نام	محلہ	بابت ماہ	تاریخ
محمد عمران	اول صفحہ	اپریل 20	محمد عمران
عبدلرحمن	دوئم صفحہ	مئی 20	عبدلرحمن

تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
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3	8:30	K.P	1:35	K.P	8:30	S.R	1:35	S.R	8:30	S.J	1:35	S.J	8:30	S.R	1:35	S.R
4	8:30	K.P	1:35	K.P	8:30	S.R	1:35	S.R	8:30	S.J	1:35	S.J	8:30	S.R	1:35	S.R
5	8:30	K.P	1:35	K.P	8:30	S.R	1:35	S.R	8:30	S.J	1:35	S.J	8:30	S.R	1:35	S.R
6	8:30	K.P	1:35	K.P	8:30	S.R	1:35	S.R	8:30	S.J	1:35	S.J	8:30	S.R	1:35	S.R
7	8:30	K.P	1:35	K.P	8:30	S.R	1:35	S.R	8:30	S.J	1:35	S.J	8:30	S.R	1:35	S.R
8																
9	8:30	K.P	1:35	K.P	8:30	S.R	1:35	S.R	8:30	S.J	1:35	S.J	8:30	S.R	1:35	S.R
10	8:30	K.P	1:35	K.P	8:30	S.R	1:35	S.R	8:30	S.J	1:35	S.J	8:30	S.R	1:35	S.R
11	8:30	K.P	1:35	K.P	8:30	S.R	1:35	S.R	8:30	S.J	1:35	S.J	8:30	S.R	1:35	S.R
12	8:30	K.P	1:35	K.P	8:30	S.R	1:35	S.R	8:30	S.J	1:35	S.J	8:30	S.R	1:35	S.R
13	8:30	K.P	1:35	K.P	8:30	S.R	1:35	S.R	8:30	S.J	1:35	S.J	8:30	S.R	1:35	S.R
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استحقاق												
بیماری												
بمیزان												

دستخط ہیڈ ماسٹر

7249810-اردو بازار لاہور

(24)

D.No 338 -
Dt 14-2-15

Annex - E¹⁰
ADEO(F) P8Y
for N/A

To

The District Education Officer (Female)
Haripur

Subject

**DEPARTMENTAL APPEAL AGAINST THE TRANSFER ORDER OF
THE APPELLANT DATED 12.02.2015 BY THE ASDEO(F) HARIPUR**

DEO(F)
14/2/15

Respected Sir,

The appellant submits as under:-

1. That appellant was appointed by the education department as a PST on 31.12.2011 In GGPS Haryala Union Council Barkot against vacant post. Appointment order is attached as **Annexure "A"**.
2. That after laps of 3 years appellant moved an application to the concern department through D.C Haripur for transfer / adjustment against vacant post in Komal Paen Unlon council Barkot, due to some valid reasons said application was accepted by the DEO(F) Haripur. Copy of application is annexed as **Annexure "B"**.
3. That the adjustment / transfer order was announced under order Endst. No. 5150-53 dated 12.05.2014. Adjustment order is annexed as **Annexure "C"**.
4. That the appellant served her duty for 8 months with due diligence and to the entire satisfaction of my superior and never involved in any ratios, activity, attendance sheets of the applicant at GGPS Komal Paen are annexed as **Annexure "D1 to D7"**.
5. That the appellant was not given any show cause notice throughout her service. Appellant serving her duty in above said school since 12.05.2014 till date.
6. That the ASDEO(F) cancelled the order dated 12.05.2014 Endst: No. 55150-53 that the ASDEO(F) Haripur without lawful justification and without any reason cancelled the order vide dated 12.05.2014, the version of order of ASDEO(F) as under:-
"ASDEO (F) cancelled the teacher Mst. Sumaira Rasheed is hereby directed to take charge in GGPS Haryala immediately otherwise she will be absented from duty from 18.06.2014"
7. That the order of the ASDEO (F) is based on personal gradges, malafide, vicarious, and against the law and natural justice which is liable to be set aside. The said order shows colourful use of power and misuse of her power which is condemnable and liable to be dismissed and appellant may be please be allowed to continue her duty In GGPS Komal Paen.

It is most humbly prayed that the instant appeal may graciously be accepted and Impugned order passed by the ASDEO(F) dated 12.02.2015 may kindly be set aside In the interest of justice and the service of appellant may kindly be remained to her present school / position.

Dated 14.02.2015

Appellant

Samira
Sumaira Rasheed
PST GGPS Komal Paen
Haripur

Attested:
Rani

(LOCAL GOVERNMENT ELECTION)
KHYBER PAKHTUNKHWA

OFFICE OF THE RETURNING OFFICER

No & Name of District Council Ward 06-BARKOTE No. & Name of Tehsil / Town Council Ward
06-BARKOTE No. & Name of Village / Neighborhood Council 22-NEELAN BHUTTOO

Ref. No. 2574/Elec. 2015

Date 14th May 2015

OFFICE MEMORANDUM

In pursuance of the provision of Rule 11 of the Khyber Pakhtunkhwa Local Council (Conduct of Elections) Rules, 2014, the following appointments of Presiding Officer / Assistant Presiding Officers / Polling Officer are hereby made:

Polling station for: -

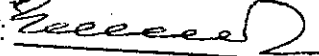
District / Tehsil / Town Council Ward: 06-BARKOTE
(Number and Name of Polling Station)

Village / Neighborhood Council: 22-NEELAN BHUTTOO (GHS Kharian) Combined
(Number and Name of Polling Station)

to be held on the 30th May 2015

1. Name & Designation of Presiding Officer designated as Officer	2. Name & Designation of Assistant Presiding Officers	3. Name & Designation of Polling Officer	4. Name of Assistant Presiding	5. Presiding Reserve Staff
Kala Khan BS-17, SST GMS Kachi 0336-1553088	Fida Muhammad GHSS Beer BS-16 SST	Nusrat Khan BS-09, Care Taker WF GHSS No.1 Female	Fida Muhammad GHSS Beer 0332-5085222	
	Abdul Waris Khan GHS Amgah BS-16 SST			
	Liaqat Ali GPS Kamal Pur BS-15 PSHT			
	Bilquees Bibi GGHS Tofkian BS-17 H/M	Ms. Farhat Naseem BS-09, LHV BHU Mang		
	Gulnaz Bibi GGPS Khoi Narra BS-12 PST			
	Samira Arshad GGPS Kohmal BS-12 PST			

Place: C&W Department Haripur

Signature of: 
Returning Officer
(Ward: Barkot, Jabri & BS Khan)
C&W Deptt: Haripur
0342-9006655 / 0333-5070647

NOTE: Training schedule to be held on 19th May 2015 at 12:00 PM at Govt. Postgraduate College for Boys Haripur with no excuse.

Samina

Attested
Ravi

Father's Name: MUHAMMAD YUNAS REF. No. 211
 Address: VILLAGE MOONAN TEHSIL DISTRICT HARIPUR
 Office Tel: 0995-319610, 0301-5430794
 Enrolment Date L.C. 16-10-2009
 Enrolment Date H.C. 20-01-2012
 Place of Practice HARIPUR
 Date of Birth 30-07-1978
 Blood Group
 N.I.C. No. 13302-0381671-8
KHYBER PAKHTUNKHWA BAR COUNCIL
 1st Floor G-Block, Khyber Road Peshawar, Ph. 091-6211172, Fax: 091-6213814
 E-mail: support@khybarcouncil.com, www.khybarcouncil.com

KHYBER PAKHTUNKHWA BAR COUNCIL
ADVOCATE HIGH COURT
TAYYIBA RAMI
 Adv. D.B.C. 10-177
 Secretary's Signature

وکالت نامہ

کورٹ فیس
 قیمت

بعدالت جناب چتر مین خسر بنو خواجہ سروس ٹریڈنگ کمپنی پشاور
 منجانب ایپلائنٹ

دعویٰ یا جرم سروس ایپل نام سکریٹری ایپل کمپنی
 باعث تحریر آئی ہے

مندرجہ بالا عنوان میں اپنی طرف سے بیرونی وجود ہی مقام پشاور ایپل ٹریڈنگ کمپنی
طیبعہ راجی ایڈووکیٹ بدیں شرط وکیل مقرر کیا۔ کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص
 رو برو عدالت حاضر ہوتا رہوں گا۔ اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دے کر حاضر کروں گا۔ اگر کسی
 پیشی پر مظہر حاضر نہ ہوا۔ اور حاضری کی وجہ سے کسی وجہ پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ
 ہونگے۔ نیز وکیل صاحب موصوف صدر مقام پشوری کے علاوہ کسی اور جگہ یا پشوری کے مقرر اوقات سے پہلے یا بروز
 تعطیل بیرونی کرنے کے مجاز نہ ہونگے۔ اگر مقدمہ مقام پشوری کے کسی اور جگہ سماعت ہونے یا بروز پشوری کے اوقات
 کے آگیا یا پیچھے ہونے پر مظہر کو کوئی نقصان پہنچے تو ذمہ دار یا اس کے رابطے کسی معاوضہ ادا کرنے مختار نامہ واپس کرنے کے
 بھی صاحب موصوف ذمہ دار نہ ہونگے۔ مجھے کل ساختہ پرواختہ صاحب مثل کردہ ذات خود منظور و قبول ہوگا اور صاحب
 موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق
 کرنے کا بھی اختیار ہوگا۔ اور کسی حکم یا ڈگری کے اجرا کرنے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے
 کا ہر قسم کا بیان دینے اور سپروائزنگ و راضی نامہ و فیصلہ برخلاف کرنے اقبال دعوے کا اختیار ہوگا۔ اور بصورت اپیل و
 برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم انتہائی یا ڈگری قبل از فیصلہ اجراءے ڈگری بھی صاحب موصوف کو
 اختیار ادا کیے علیحدہ بیرونی مختار نامہ کرنا مجاز ہوگا۔ اور بصورت ضرورت اپیل یا اپیل کے واسطے کسی دوسرے وکیل یا ایئر سٹری
 کو بجائے اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہونگے 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 سند ہے مضمون
 مختار نامہ لکھ دیا ہے اور اچھی طرح سمجھ لیا اور منظور ہے۔

مورخہ 26/15/20

BEFORE THE KHYBERPAKHTUNKHWA SERVICE TRIBUNAL HIGH COURT
ABBOTABAD BENCH ,ABBOTABAD

Service Appeal 492 /2014

Sumaira Rasheed VERSUS Government of Khyber Pakhtunkhwa
through Secretary E&SE Department , Peshawar.

INDEX

S.No	Description of Documents	Annex	Pages
1	Para wise Reply / Comments		01-02
2	Affidavit		03
3	Report of Circle ASDEO Khanpur	A	04

Through

Respondents

M. I. Khan
27/1/14

BEFORE THE KHYBERPAKHTUNKHWA SERVICE TRIBUNAL HIGH COURT
ABBOTABAD BENCH ,ABBOTABAD

Service Appeal 492 /2014

Mst Sumaira Rasheed D/o Muhammad Rasheed PST Govt Girls Primary Komal
Paien Haripur Tehsil Ghazi (Appellant)

VERSUS

1. Government of Khyber PakhtunKhwa through Secretary E&SE Department ,
Peshawar.
2. Director Elementary & Secondary Education ,Peshawar
3. District Education Officer (F) Haripur.
4. Mst Sub Divisional Officer Haripur

(Respondents)

Respectfully Sheweth:-

Reply / Comments for & on behalf of respondent No: 1,2 & 3.

Preliminary Objections

1. That the appellant has no cause of action.
2. That the appellant has not come to this Honorable Tribunal with clean hands.
3. That the appellant has got no locus standi to file the instant Appeal.
4. That appellant has concealed the material facts from this honorable Tribunal,
hence liable to be dismissed.
5. That the appellant has filed the instant appeal on malafide motives.
6. That the appellant has filed the instant appeal just to pressurize the
respondents.
7. That the appeal is time barred.

Reply /Comments on facts.

1. Para 1 Pertains to the record. Appellant was appointed on union Council
quota GGPS Haryana UC Barkot.
2. Para 2 Subject to record.
3. In correct she was adjusted in GGPS Komal Paien but later the adjustment
order was withdrawn on 12-02-2015 As the GGPS Komal Paien was single
teacher school and she was only local teacher from her own UC and school
was closed due to her transfer and she did not inform the department that
school will be closed and children will be suffer.
4. Para 4 was subject to proof.
5. Correct to the extent that she was adjusted in Komal Peien and the
adjustment order was withdrawn due to reason that GGPS Haryala is single
teacher school.
6. Correct to the extent that she was adjusted and order withdrawn.

7. Correct to the extent that her adjustment order was withdrawn /cancel as the GGPS Haryala was single Teacher School and she was directed to go to GGPS Haryala but she did not obey the order school was closed.
8. Incorrect the Appellant was directed to go to GGPS Haryala as students of School were suffering and she was only local teacher of U/c barkot.

Reply /Comments on Grounds.


- a. Incorrect, The act of the respondents are legal and in accordance with rules , policy and facts and in the interest of public interest.
- b. Incorrect and not admitted.
- c. Incorrect and not admitted.All orders are according to law and policy .
- d. Incorrect and not admitted the action of department is accordance with law.
- e. Incorrect and not admitted the action of department is in accordance with law.
- f. Incorrect. There is no illegality in the impugned order .The act of the respondents are legal and in accordance with rules ,policy and facts.
- g. Incorrect. As per para mentioned above.
- h. That the respondents also seek the permission of the honorable court .to adduce further points, facts at the time of arguments.

Prayer:

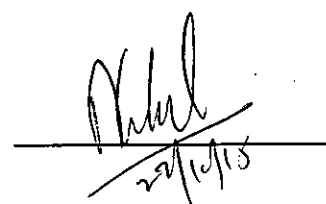
In the view of the above submission it is requested that this Honorable Tribunal may graciously be pleased to dismissed the appeal of appellant with cost please.

Respondents.

1. The Secretary : E&SE Department KPK
Peshawar Respondent No: 1
2. The Director Elementary &Secondary
Education Peshawar Respondent No: 2
3. District Education Officer (F)Haripur
4. Sub Divisional Education (F)Haripur


_____ ✓





BEFORE THE PESHAWAR HIGH COURT ABBOTABAD BENCH

Appeal No 492 - A/2015

Sumaira Raseed

VS

Government of KhyberPakhtunkhwa

AFFIDAVIT

I **Mst: Naheed Anjum** Deo (Female) Haripur do hereby solemnly affirm and declare that content of accompanying reply to the appeal filed by the appellant are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

(Deponent)



Respondent

رپورٹ لبرائے جی جی پی ایس سرکار (سکھیا ارشد)

معلم سکھیا ارشد ایچ اے برکٹ سے تعلق رکھنے والے سرکار سکول میں ہرگز ہوگا۔

سرکار سکول میں یہ سٹفل شیفٹی - اسٹیٹ لٹرائٹ سکول ڈائری سکول

میں سرکار ADO ڈیویژنل لہ concerned سے بغیر کسی بھی

جوہر علم میں ہونے لگی - بعد ازاں میں نے جیت سرکار سکول کا

ڈیوٹی لیا - تو یہ صدمہ - سرکار سکول بند ہے لہ متعلقہ پمپج

لٹرائٹ سکول ڈائری سکول میں ہوئی ہے - میں نے والدین اکثر

سکول سے بند ہونے کی رپورٹ ایچ اے (F) DED طلبہ کوئی


الفون نے اس معلم کا آرڈر cancell کرنا۔

یونٹہ یہ سٹفل شیفٹی - لہ Hard area میں سکول ہونا

جی جی سے دھتکے پڑھائی کا پیرج طور سافٹا - اسلئے میں نے

سکول سے بند ہونے کی رپورٹ ایچ اے DED طلبہ کوئی -

میں اس معلم سے سافٹ کوئی ذاتی دشمنی میں


A. U. Khan
Jirle/Khanpur
Jolo/DC(F)
E&S Edu. Haripur

99-09-15