

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No:1743/23

Asma Ghaffar D/O Abdul Ghaffar khan SST,GGCMS No 1 Abbottabad

VERSUS

SECRETARY ELEMENTARY & SECONDARY EDUCATION KPK & OTHERS

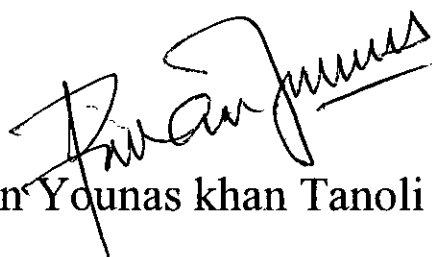
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Dated: 15-11-2023

Appellant

Through counsels,


Imran Younas khan Tanoli
Advocates, Peshawar High court

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

CHECK LIST

Service Appeal NO 1743/23

Case Title: Asma Ghaffar D/o Abdul Ghaffar (Chau)
CONTENTS

S#	CONTENTS	Yes	No
1.	This Appeal has been presented by	—	
2.	Whether counsel / appellant / respondent / deponent have signed the requisite document?	—	
3.	Whether appeal is within time?	—	
4.	Whether appeal enactment under which the appeal is filed is mentioned?	—	
5.	Whether enactment under which the appeal is filed is correct?	—	
6.	Whether affidavit is appended?	—	
7.	Whether affidavit is duly attested by competent oath commissioner?	—	
8.	Whether appeal / annexure are properly paged?	—	
9.	Whether certificate regarding filing any earlier appeal in the subject, furnished?	—	
10.	Whether annexures are legible?	—	
11.	Whether annexures are attested?	—	
12.	Whether copies of annexures are readable/ clear?	—	
13.	Whether copies of appeal is delivered to AG/ DAG?	—	
14.	Whether Power of Attorney of the counsel engaged is attested and signed by Petitioner/ Appellant/ Respondents?	—	
15.	Whether number of referred cases given are correct?	—	
16.	Whether appeal contains cutting / overwriting?		✓
17.	Whether list of books has been provided at the end of the appeal?	—	
18.	Whether case relate to this Court?	—	
19.	Whether requisite number of spare copies are attached?	—	
20.	Whether complete spare copy is filed in separate file cover?	—	
21.	Whether addresses of parties given are completed?	—	
22.	Whether index filed?	—	
23.	Whether index is correct?	—	
24.	Whether security and process fee deposited? On _____	—	
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rule 1974 rule 11, Notice along with copy of appeal and annexure has been sent to respondents? On _____	—	
26.	Whether copies of comments / replay/ rejoinder submitted? On _____	✓	
27.	Whether copies of comments / replay/ rejoinder provided to opposite party? On _____	—	

It is certified that formalities /documentations as required in the above table, have been fulfilled.

Name:- *Jurair Mus Tawali Adv.*

Signature:- *Jurair Mus*

Dated:- *20/11/23*

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No 1743/23

Asma Ghaffar D/o Abdul Ghaffar SST, GGCMS No. 1 Abbottabad

.....Appellant

Versus

Secretary Elementary and Secondary Education KPK Peshawar & others

SERVICE APPEAL

**APPLICATION FOR PERMISSION TO FURTHER DOCUMENTS/PLACE ON
RECORD NECESSARY DOCUMENTS PERTINING TO THE INSTANT
APPEAL.**

Respectfully Sheweth;


1. That instant appeal titled above has been filed before the Hon'ble Tribunal.
2. That the appellant seeks permission to place on record of the instant case following documents.
 - a. Recommendation of the KPK PCS regarding appointment of Appellant as SET/SST as first batch and others.
 - b. Order of the regularization (Act 2009), of the service of respondents (female).
 - c. First page of the service appeal before the prayer be corrected of the clerical mistake as Act 2009 promulgated on 24-10-2009 instead of 24-08-2009 and annexure "C" instead of "A".
 - d. Application for Provision of necessary record from the department according to RTI.
3. That the documents mentioned above are necessary documents for the just fair decision of the case.

It is therefore prayed the appellant may graciously be allowed to further documents/place on record necessary documents for pertaining to instant appeal.

Dated:16-11-2023

Through

Appellant


Imran Younas Khan Tanoli
Advocate, Peshawar High Court
Abbottabad

(a)

Recommendation of First batch including appellant (3)

Phone: 9213563



NWFP Public Service Commission, Peshawar
24 out Road Near Governor House Peshawar Cantt

No. NWFP/PSC/SR-II 39203

Date 15/10/2009

To

The Secretary to Govt of NWFP
Secondary & Elementary Education
Department Peshawar.

Subject: RECRUITMENT OF FEMAL SETs (B-16) (EARTH QUAKE QUOTA) ADVT: NO. 01/2009

Sir,

I am directed to refer to our letter No. SO(S)3-2/2007/Req dated 23.10.2008 on the subject noted above and to state that the Commission recommends the following candidates to the Government for appointment:-

S.No.	Merit Order	Name with Father's Name	Priority District
✓ 1.	23	✓ Ayesha Siddiqua D/O Pir Zaman Shah	Battagram
✓ 2.	02	✓ Asiya Bibi D/O Sved Gulzar Shah	Manshra
✓ 3.	01	✓ Fozia Khushal D/O Khushal Khan	Abbottabad
✓ 4.	36	✓ Bibi Bultquis Begum D/O Sher Bahadar	Baigram
✓ 5.	03	✓ Miss Nabila Nawaz D/O Muhammad Nawaz	Manshra
✓ 6.	04	✓ Farhat Jabeen D/O Abdul Khaliq Awan	Abbottabad
✓ 7.	05	✓ Nighat Bibi D/O Muhammad Khan	Manshra
✓ 8.	06	✓ Zaineb Bukhuri D/O Syed Inayatullah Shah	Manshra
9.	07	✓ Asma Ghaffar D/O Abdul Ghaffar Khan	Abbottabad
✓ 10.	09	✓ Saima Noreen D/O Chan Muhammad	Abbottabad

2. Recommendation in favour of the recommendees are provisional subject to passing the prescribed medical test.

3. Original applications (with enclosures) of the above recommendees are enclosed for your record. Please acknowledge receipt.

Yours Faithfully,

(Incl. and Dm)

Deputy Secretary-I

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OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION NWFP PESHAWAR
APPOINTMENT ORDER

Consequent upon the recommendation/Selection by the NWFP, Public Service Commission, the selection authority has been pleased to appoint the following candidates (Earth-quake) against the post of SST (Sc) in B-16 plus usual allowances as admissible under the rules on regular basis but without pension & gratuity with immediate effect under the provision of Establishment, & Administration Department circular bearing No.SOR-6 (E&A)1-13/2005 dated 10-10-2005 and they are further adjusted as under:-

S.NO	NAME	ZONE	DISTRICT	PLACE OF POSTING
1	Mst: Aysha Siddiq D/O Fir Zaman Shah (Late) Near, Kaghan Flour Mill, Mohallah upper Channi, Mopahra	V	Balagram	GGHS, Kaghan, Mansohra SST (Sc:)
2	Mst: Asiya Bibi D/O Syed Gulzar Shah C/O Shah Baba General Store Near GPO Mansohra	V	Mansohra	GGHS, Oghi Mansohra SST (Sc:)
3	Mst: Fozia Khushal D/O Khushal Khan Teh: & District A-Abad PO Sherwan, Village Pathool.	V	A-Abad	GGHS, Sherwan A-Abad SST (Sc:)
4	Bibi Bilquis Begum D/O Sher Banadir Village & P.O Kuzabanda Teh: & District Ballagram C/O Fida Mmhammad Mob: No.03018129012	V	Balagram	GGHS, Banian Ballagram SST (Sc:)
5	Miss Nabila Nawaz D/O Muhammad Nawaz Village & PO Tarangri Dala, Mansohra	V	Mansohra	GGHS, Shinkri Mansohra SST (Sc:)
6	Mst: Farhat Jabeen D/O Abdul Khaliq Awan H.No.G-1. P/Colony S.No.1 KTS Haripur	V	A-Abad	GGHS, Toklan Haripur SST (Sc:)
7	Mst: Nighat Bibi D/O Muhammad Khan C/O Indus Modicos Al Mumtaz Plaza near Qurashi Petrol Pump Supply, Abbottabad	V	Mansohra	GGHS, Hajji Gali A-Abad SST (Sc:)
8	Mst: Zaineb Bukhari D/O Syed Inayatullah Shah Mohallah Nogazi near Ziarat Mansohra	V	Mansohra	GGHS, Shamdarha Mansohra SST (Sc:)
9	Mst: Asma Ghaffar D/O Abdul Ghafar Khan Vill: Juhna P/O Chamhathi Via Mansohra A-Abad	V	A-Abad	GGHS, Phulgran A-Abad SST (Sc:)
10	Mst: Saima Noreen D/O Chan Muhammad Vill: & PO Sherwan Khurd, Abbottabad	V	A-Abad	GGHS, Pind Kargu Khan A-Abad SST (Sc:)

TERMS & CONDITIONS OF THEIR APPOINTMENTS

- 1- Their services will be considered as regular but without pension/gratuity in term of Section 19 of the NWFP, Civil Servant Act 1973 as amended vide NWFP, Civil Servants (Amendment) Act 2005. They will however be entitled to Contributory Provident Fund (C.P.Fund) in such a manner and at such rate as may be prescribed by the Govt.
- 2- Their services will be liable for termination on one month's prior notice from either side. In case of resignation without prior notice their one month pay/allowances will be forfeited to Govt.
- 3- The appointees should join their posts within one month after the issue of this Notification.
- 4- The Executive Distt: Officer.(Elementary & Secondary Education) concerned would furnish a certificate to the effect that the candidate has joined the post or otherwise after one month of the issue of this Notification, failing which their candidature will expire automatically and no subsequent appeal etc shall be entertained.
- 5- They would be on probation for a period of two years, extendable for another one year.
- 6- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 7- Their services can be terminated at any time, in case their performance are found unsatisfactory during probationary period. In case of misconduct, they will be proceeded against under the NWFP, Removal from service (Special Powers) Ordinance 2000 and the Rules framed from time to time.
- 8- Charge report should be submitted to all concerned.
- 9- They will be required to furnish copies of all their certificates/degrees along with the original receipts and photocopies thereof pertaining to the verification fee to the concerned Examining body (Board/University), to the Executive District Officer Elementary & Secondary Education concerned
- 10- Their pay should not be released before verification of documents/degrees.
- 11- No TA/DA will be allowed to the appointees for joining their duty.

DIRECTOR
ELEMENTARY & SECONDARY EDUCATION
N.W.F.P. PESHAWAR

Endst: No. 1970-2001 / F.No.A-17/SET(F)PSC-2009 Dated Peshawar the 21/12/2009.

- 1- PS to Secretary to Govt: of NWFP Elementary & Secondary Education Department Peshawar.
- 2- Secretary to NWFP, Public Service Commission.
- 3-5. Executive District Officer Elementary & Secondary Education, Abbottabad, Mansohra, Battagram
- 6-8. District Account Officer, Abbottabad, Mansohra, Battagram
- 9-19 Principal/Headmistress concerned
- 20-30. Candidate concerned/Mistress concerned
31. PA to Director of Elementary & Secondary Education NWFP, Local Office

21/12/2009

Order of Regularization Act 2008
(Female) "B"

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION NWFP PESHAWAR

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NOTIFICATION

The competent authority has been pleased to regularize the services of the following adhoc/contract employees against the post of SST (Female) (BPS 16) with effect from 01-01-2009, under the NWFP, Employees (Regularization of Services) Act, 2009 on the terms and conditions give at the end of this Notification.

S.No	Name of candidate	Father's Name	Present Station	Date of Last Appointment Order
PESHAWAR				
1.	Amaid Anjum	Asif Khan	GGHS Budhni	5139-5197 25-11-2008
2.	Nusheen Akhtar	Akhtar Ali	GCMS Charpariza	5139-5197 25-11-2008
NOWSHERA				
3.	Khawaga	Shamsher	GGHS Mohib Banda	5139-5197 25-11-2008
4.	Shandana	Faqir Mohammad	GGMS Zara Maina	5139-5197 16-9-2008
5.	Asma Hanceel	Mohammad Hanceel	GGCMS Mandori	5139-5197 16-09-2008
6.	Kiran Shahzadi	Mian Baheer Shah	GGHS Spin Khok	5139-5197 25-11-2008
7.	Irum Niaz	Pir Mohammad	GGHS Nowshera Cantt	25-11-2008
8.	Shakeela Naz	Mir Rahman	GGHS Bara Banda	5139-5197 25-11-2008
9.	Nusrat Shaheen	Ghulam Qadir	GGHS Izzan	5139-5197 16-09-2008
10.	Nazia Habib	Habibullah	GGHS Pabbi	5139-5197 25-11-2008
CHARSADPA				
11.	Nabeeda	Sana Mohammar	GGHS Palang	5139-5197 16-09-2008
12.	Robina Yousaf	Yousaf Khan	GGMS Ganderi	5139-5197 16-09-2008
13.	Bibi Haleema	Shahzad	GGHS Boobak	5139-5197 16-09-2008
14.	Roohi Bano	Fazle Rabbani	GGHS Nisatta	5139-5197 16-09-2008
15.	Toushiba Naz	Gul Faraz	GGHSS Harichand	5139-5197 16-09-2008
16.	Fouzia Naz	Farmanullah	GGHSS Harichand	5139-5197 25-11-2008
17.	Shaista Zeb	Mohammad Shaib	GGHS Shodag	5139-5197 25-11-2008
18.	Seema Gul	Jan Nisar	GGHS Jamroz Khan Kalay	5139-5197 25-11-2008
19.	Rani Gul	Jan Mohammad	GGHS Doshra	5139-5197 25-11-2008
20.	Menhas Yousaf	Yousaf Khan	GGHS Mandani	5139-5197 16-09-2008
21.	Saima Gul	Anwar Khan	GGHS Shah Afzal Abad	5139-5197 25-11-2008
22.	Nabeed Akhtar	Saif Ur Rahman	GGHS Shah Afzal Abad	
23.	Fatima Bibi	M. Hashmat Ali	GGHS Doshra Pura	5139-5197 25-11-2008
24.	Najma Haq	Faisal Haq	GGHS Kot Baba Tangay	5139-5197 16-09-2008
25.	Shahmaz Kousar	Rahmat Ullah	GGHS Doshra Pura	5139-5197 25-11-2008
26.	Ambareen Majeed	Abdul Majeed	GGMS Ghari Abdullah	5139-5197 25-11-2008
27.	Nargis Saba	Riaz Khan	GGCMS Tekbanih	5139-5197 16-09-2008

Fauzan

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1/10/09
3
(SST)

201.	Nighat Zaman	Muhammad Zaman	GGCMS No. 1	5139-5197 16.9.08
202.	Noshaba Gul	Rehmat Din	GGHS Noordi	5139-5197 25.11.08
203.	Nighat Bibi	Malik Rustam	GGMS Mallah Soha	5139-5197 25.11.08
204.	Roohi Bano	Gulzar Shah	GGHS Pind Kamal Khan	5139-5197 25.11.08

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205.	Rubina Almas	Dil Pazeer	GGMS Pind Muneem	5139-5197 16.9.08
206.	Javeria Irshad	Muhammad Arshad	GGHS Serai Niamat Khan	5139-5197 25.11.08
207.	Atika Gul	Malik Mazhar	GGMS Sherwal	5139-5197 16.11.09
208.	Gul Rehana	Aurangzeb	GGMS Sirikot	5139-5197 16.9.08
209.	Sadia Masroor	Masroor Hussain	GJMPS Vijjian	5139-5197 16.9.09
210.	Ayesha Noreen	Muhammad Yousaf	GGHS Kahal	5139-5197 16.9.08
211.	Noreen Bibi	Ali Gohar	GGHS Dingi	5139-5197 16.9.08

MANSEHRA

212.	Kalsoom Shakir	Irshad Shakir	GGHS Darban	No.1876-88 24-10-08 5139-5197
213.	Aamina Begum	Muhammad Parvez	-do-	16-09-08 5139-5197
214.	Faiza Tabassam	Muhammad Younis	-do-	16-09-08 5139-5197
215.	Nadia Nisar	Nisar Ahmad	GGHS Trangri Bala	5139-5197 16-09-08
216.	Saima Noreen	Muhammad Anwar	GGHS Mangloor	5139-5197 25-11-08
217.	Tanzeela Lohdi	Siddique Lodhi	GGHS Dhodial	5139-5197 16-09-08
218.	Adila Chand	Muhammad Aslim	GGHS Shamdhra	5139-5197 25-11-08
219.	Rani Javeria	Muhammad Zahoor	GGHS Shinkiri	5139-5197 16-09-08
220.	Shazia Ghaffar	Abdul Ghafar	GGHS Talhata	5139-5197 16-09-08
221.	Shamshad Bano	Noor Aslam	-do-	5139-5197 16.9.08
222.	Shabana Azeem	Muhammad Azeem	GGHS GGHS	5139-5197 25-11-08
223.	Phool Bibi	Sardar Shah	GGHS Behali	5139-5197 25.11.08
224.	Bibi Sajida Parveen	Muhammad Aslam	GGHS Afzal Abad.	5139-5197 16-09-08
225.	Chaman Ara	Maqbool ur Rehman	GGHS Kaghan	5139-5197 16.9.08
226.	Bibi Abida	Muhammad Manzoor	-do-	5139-5197 16.9.08
227.	Haleema Shahzadi	Abdur Razaq	GGHS Pathina	5139-5197 16-09-08
228.	Bibi Kalsoom	Mehboor ur Rehman	-do-	5139-5197 16-09-08
229.	Nazia Manzoor	Muhamma Manzoor	-do-	5139-5197 16-09-08
230.	Rahela Anwar	Anwar Khan	-do-	1876-88 24-10-08
231.	Melnaz Shah	Salamat Shah	GGHS Hassa	5139-5197 16-09-08
232.	Fehmina Hina Lodhi	Abdul Hannan Lodhi	GGHS Lassa Nawab.	5139-5197 25-11-08
233.	Amber Jabeen	Muhammad Ajoon Khan	GGHS Atarshisha	5139-5197 25.11.08
234.	Safina Zaman	Ali Zaman	JICA Model Phulra	5139-5197 16-09-08

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11/12/08

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235.	Samina Naz	Muhammad Irfan	GGMS Faqir Abad.	5139-5197 25-11-08
236.	Dur-E Saim	Muhammad Hussain	GGCMS Khulbaary	5139-5197 16-09-08
237.	Abida Zeb SST	Chian Zeb	GGCMS Charah	5139-5197 25-11-08
238.	Barseela Zeb	Aurangzeb	GGMS Thathi Khurd	5139-5197 16-09-08
239.	Gul Bibi	Haji Akbar	GGMS Chinarkot	5139-5197 25-11-08

240.	Shaista Malik	Muhammad Miskaan	GGMS Mang	5139-5197 25-11-08
241.	Naila Gul	Sarfraz	GGMS Madserian	5139-5197 25-11-08
242.	Nadia Jadoon	Muhammad Younis	GGMS Paras	5139-5197 25-11-08
243.	Bibi Saima	S.Nazir Ahmed Shah	GGMS Morat Mera	5139-5197 25-11-08
244.	Saeeda Bibi	Q.Zaiul Haq	GGMS Ahi	5139-5197 16-9-08
245.	Faiza Tabassum	Muhammad Hamyum	GGMS Agha Gran	5139-5197 25-11-08
246.	Shazia Nasreen	Abdul Jalil	GGMS Bandgesuch	5139-5197 16-09-08
247.	Naima Sultana	Aminul Haq	GGMS Bajmang.	5139-5197 16-09-08
248.	Sultana Bibi	S.Mehmood Shah	GGMS Hassarai	5139-5197 16-09-08
249.	Zuhra Bibi	Abdul Aziz	GGMS Mahandri	5139-5197 16-09-08
250.	Shaista Bibi	Isa Khan	GGMS Manda Buch	5139-5197 5139-5197 16-09-08
251.	Sadaf Qurat-ul Ain	Atta Muhammad	GGMS Sandasar	5139-5197 16-09-08
252.	Shahida Parveen	Abdul Ghani	GGMS Sangar	5139-5197 16-09-08
253.	Bibi Rabia	Muhammad Farced	GGMS Maazullah	5139-5197 16-09-08
254.	Humera Gul	Muhammad Daud	GGMS Parian	5139-5197 16-09-08
255.	Aisha Humna	Ghulam Muhammad	GGMS Bandi Saddiq	5139-5197 16-09-08
256.	Sumera Iqbal	Muhammad Iqbal	GGMS Bai Bkajna	5139-5197 16-09-08
257.	Sumera Bibi	Muhammad Parvaiz	GGMS Bhutto Band	5139-5197 16-09-08
258.	Amireena	Muhammad Saleem	GGMS M.B.Kalan	5139-5197 16-09-08
259.	Takia	Muhammad Muskeen	GGMS Nara Doga	5139-5197 16-09-08
260.	Afshan Faiz	Muhammad Faiz	GGMS Sawan Mera	5139-5197 25-11-08
261.	Samina Gul	Mahizer Khan	GGMS Tarwara	5139-5197 16-9-08
262.	Kalsoom Bibi	Muhammad Ishafaq	GGMS Jisgran	5139-5197 16-09-08
263.	Mehmoona Malik	Muhammad Zubair	GGMS Jehangian	5139-5197 25-11-08
264.	Samina Shahzadi	Taus Khan	GGMS Gali Badral	5139-5197 16-09-08
265.	Aisha Banaras	Muhammad Banaras	GGMS Kawai	5139-5197 25-11-08
266.	Javeria	Ghulam Jalani	-do-	5139-5197 25-11-08
267.	Bibi Mehtab	Naimatullah	-do-	5139-5197 16-09-08
268.	Nighat Rabani	Ghulam Rehman	GGMS L/Nawab	5139-5197 25-11-08

Furqan

11/12/08

[Signature]

269.	Gulnaz		GGMS Rokkot	5139-5197 25-11-08
270.	Tasleem Yaseen		GGHS Hassan	5139-5197 25-11-08

BATTAGRAM				
271.	Qamarun Nisa	Muhammad Hasham	GGHS Bania	5139-5197 16/09/08
272.	Bibi Alyia	Muhammad Hasham(K)	GGHS Bania	5139-5197 16/09/08
273.	Bibi Fatima	Muhammad Fayaz	GGHS Battagram	5139-5197 16/09/08
274.	Sumaira	Noor-ul-Huda	GGHS T.Kharari	5139-5197 16/09/08
275.	Zakia Khan	Muhammad Khan	GGMS Kuza Banda	5139-5197 16/09/08
276.	Nighat Shahna		GGMS Thakote	5139-5197 16/09/08
277.	Shahzia Bibi	Hafiz-ur-Rehman	GGMS Arghashori	5139-5197 16/09/08
278.	Javaria Sakhi	Sakhi Muhamma Tanoli	GGHS Bania	5139-5197 25/11/08
279.	Sajida Sakhi	Sakhi Muhamma Tanoli	GGHS T.Kharari	5139-5197 25/11/08

KOHISTAN				
280.	Asifa Bibi	Muhammad Manzoor	GGMS Chackai	1876-88 24/10/08
281.	Farzana Sunum		GGMS Goli Bagh	1876-88 24/10/08
282.	Sughra Bibi	Muhammad Maskeen	GGHS Dassu Kaloni	1876-88 24/10/08

KARAK				
283.	Shagufta Naz	Abdur Rais	GHSS T/Nasrati	5139-5197 25/11/08
284.	Mehnaz Pari	Hamid Ullah	GGMS Tanga Zanal	5139-5197 16/9/08
285.	Zahida Parveen	Mir Qabiz Khan	GGHS Rahmat Abad	5139-5197 16/9/08
286.	Farida Khanum	W/O Ashraf	GGHS Ghundi Kiila	5139-5197 16/9/08
287.	Hussan Bano	Fateh Jang	GGHS Bogara	5139-5197 16/9/08
288.	Binafshad Shaheen	Gul Shahin Shah	GGHS Bogara	5139-5197 16/9/08
289.	Afsar Parveen	Umar Hassan	GGHS Tarki Khel	5139-5197 16/9/08
290.	Musarrat Pari	Rahim Badshah	GGHS Bazid Khel	5139-5197 16/9/08
291.	Fazilat Pari	Anwar Ghani	GGHS Bazid Khel	5139-5197 16/9/08
292.	Robina Shahnaz	Shah Dad Khan	GGHS Mitha Khel	5139-5197 16/9/08
293.	Tilat Nooreen	Allah Yar Gul	GGHS Nari Panos	5139-5197 16/9/08
294.	Samin Khattak	Muhammad Akbar	GGHS Nari panos	5139-5197 16/9/08
295.	Aisha Gul	Maula Jan	GGHS Esak Chountra	5139-5197 16/9/08
296.	Baseerat Begum	W/O Shohab Ullah	GGHS Bahader Khel	5139-5197 16/9/08
297.	Shazia Begum	M. Aslam Khattak	GGCMS Tater Khel	5139-5197 16/9/08
298.	Ullat Ayub	Ayub Khan	GGMS Khawaja Khel	5139-5197 16/9/08
299.	Rukhsana Yasmin	Sar Gul Khan	GGMS Zara Gandhi	5139-5197 16/9/08
300.	Shazia Rahim	Abdur Rahim	GGMS Totaki	5139-5197 16/9/08
301.	Musarrat Shaheen	Iltam Dad	GGHSS Chokara	5139-5197 16/9/08

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TERMS & CONDITIONS OF HER APPOINTMENT

- 1- Their services will be considered as regular but without pension & gratuity in terms of Section-19 of the NWFP, Civil Servants Act, 1973 as amended vide NWFP, Civil Servants (Amendment) Act, 2005. They will, however, be entitled to contributory Provident Fund in such a manner and at such rates as prescribed by the Government.
- 2- Their seniority will be determined according to Section-4 of the NWFP, Employees (Regularization of Services) Act, 2009.
- 3- They will be required to furnish copies of all their certificates / degrees along with original receipts and photo stat copies thereof, pertaining to the verification fee of the concerned Examining body (Board & University) to the EDOs (E&SE) concerned
- 4- The EDOs (E&SE) concerned are directed not to release their pay until the verification of their documents.

DIRECTOR

Encls: No 2472-3056 /F.No.A-17/SET(F) Contract- Appoint:2009 Dated Peshawar the 11/12/2009.

- 1- PS to Minister for Elementary & Secondary Education NWFP, Peshawar
- 2- PS to Secretary to Govt. of NWFP, E&SE, Department Peshawar
- 3- Executive District Officers Elementary & Secondary Education concerned are
- 4- District Account Officer concerned.
- 5- Candidate concerned/Mistress concerned
- 6- PA to Director of Elementary & Secondary Education NWFP, Local Office.

[Signature]
 Deputy Director (Establishment)
 Elementary & Secondary Education NWFP, Peshawar
 11/12/2009
[Signature]

[Signature]

ASMAT
2009/12/12

(D) First page of service appeal as correction of clerical mistake. (2)

(C) 10
malafide, illegal against section 4 of KPK (regularization of service) Act 2009 and against the Judgment of Supreme Court of Pakistan Dated 02-06- 2022, Hence in effective upon the rights of the appellant. That the first batch of the SST consisting of 10 candidates were recommended by the KPK (Public Service Commission) on 24-08-2009 (annexed as annexure "C") which is prior to the commencement of KPK (regularization of service) Act 2009 promulgated on 24-10-2009, Hence the appellant ranks senior in service over the employees initially appointed on Adhoc Basis & later on regularized in service (respondent No 4 to respondent No 626).

PRAYER: On acceptance of instant service appeal, the Honorable court may graciously be pleased to pass the order as under:

- a. Declaration to the effect the impugned seniority list of SST updated with on 31-12-2022 issued by respondent No 2 whereby SST initially appointed on Adhoc basis in the year 2006, 2007, 2008 and were later on regularized on 24-10-2009 (respondent No 4 to respondent No 626) under KPK (regularization of service) Act 2009 have been given seniority over the appellant who was appointed on the recommendation of KPK Public Service Commission is wrong, incorrect, against law and facts, discriminatory, void ab-intio, misuse of authority, malafide, Illegal, against

(e) Applicant for provision of record through RTI

!!
D

To

Chairman,
Public Service Commission
K.P.K. Peshawar.

D. NO- 10992

Dated: 16-08-23

Subject: Provision of Recommendation
Pcs order

Respected Sir,

With great respect, It is stated
that I had passed the pcs Exam
vide advertisement No 25-01-2009
for 8ST (S) vide S.O 5 Dated 24-08-2009.

I have filed the Service Appeal against the
Regularized Candidates also 8ST, before
the Service Tribunal Kp Peshawar, for
the Seniority of 8ST.

Handwritten signature/initials

It is therefore requested that attested/
original above mentioned order have to
Present before the Tribunal with in time,
I shall be obliged for your kindness
as provision of the record concern please

Thanks

Signature
Asma Ghafoor SSI
G.G. Com School ATB
Date: 12-08-2023

To

Directorate of Elementary & Secondary Education
K.P.K. Peshawar.

Subject: Request for provision of ^{order} Seniority
List SST Female 31-12-2022 according
to R.T.I.

Respected Sir,

With great respect it is stated that
seniority of SST on line has been filed
before the Service Tribunal K.P.K. Peshawar
Institution branch has obtained orders
to provide seniority list of SST Female
stated on 31-12-2022 and orders

It is therefore requested before the
competent authority to provide the
seniority list according to R.T.I well
in time please.

Furqan

Thanks

884
21-8-23

Dated: 21-08-2023

RBI call no 0331 9099923
ID no 18701-0351516-8

yours sincerely
Shehbaz Ali SST
G.M.S Tarora
Abbottabad.