

Appeal No. 317/2016
Mst. Samina Gul vs Govt

26.10.2016

Husband of the appellant alongwith Clerk. to counsel for the appellant and Asst. AG for respondents, present. Husband of the appellant submitted an application for withdrawal of the instant appeal wherein he stated that the respondents have assured the appellant for redressal of her grievances departmentally, therefore in light of the assurance given by the Department the appellant does not want to peruse her appeal at this stage, and seeks for its withdrawal with permission to file a fresh if and when need arise. In light of the above the instant appeal is hereby dismissed as withdrawn. File be consigned to the record room.

Announced:
26.10.2016



(ABDUL LATIF)
MEMBER



(PIR BAKHSH SHAH)
MEMBER

Appeal No. 317/2016
Mst. Samina Gul

31-3-16

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant is serving as Headmistress and was transferred to GGPS Kas Koroona to GGPS Gulbahar No. 2 Peshawar in place of Mst. Bushra Nigat, PHST who was to retire there-from on 22.12.2015. That pursuant to the said order appellant resumed duty at the said school where-after she was transferred from GGPS Kas Koroona, Peshawar to GGPS Gulabad which transfer order was withdrawn vide order dated 09.01.2016 and as such appellant was liable as well as entitled to serve at GGPS Gulbahar No.2 in place of Mst. Bushra Nigat. That the respondents have posted private respondent No. 4 (Mst. Musarat Noor) against the said post orders whereof are not made public. That the appellant preferred departmental appeal for redressal of her grievances on 04.12.2015 which was not answered and hence the instant service appeal on 29.03.2016.

Appellant Deposited
Security & Process Fee

That appellant is entitled to serve as Headmistress at GGPS Gulbahar No. 2 where she was transferred on the basis of transfer order dated 09.03.2015.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 30.05.2016 before S.B.

Chairman

30.05.2016

Husband of the appellant and M/S. Raham Taj, ADO and Ansar Ahmad, AAO alongwith Addl. AG for he respondents present. Written reply of respondents No. 1, 2 & 4 submitted. Learned Addl. AG relies on the same on behalf of respondent No. 3. The appeal is assigned to D.B for rejoinder and final hearing for 26.10.2016.

Chairman

Dismissed as per the provisions
Samina Gul
Through
Husband of Appellant
17901-5656457-5

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 317/2016

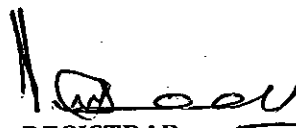
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	30.03.2016	<p>The appeal of Mst. Samina Gul resubmitted today by Mr. Habibullah Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"><i>[Signature]</i> REGISTRAR</p>
2	30.3.16	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>31-3-16</u>.</p> <p style="text-align: right;"><i>[Signature]</i> CHAIRMAN</p>

The appeal of Mst. Samina Gul Headmistress w/o Hashmat Ullah Tehsil and distt. Peshawar City received to-day i.e. on 29.03.2016 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of impugned order dated 04.12.2015 mentioned in the heading of the appeal is not attached with the appeal which may be placed on it.

No. 503 /S.T.

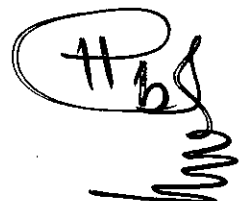
Dt. 30/3/2016


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Habib Ullah Mohmand Adv. Pesh.

objection has been removed.
and at the time of arguments
the appellant council will
produce / provide the order of
4.12.2015 and other relevant
documents etc.

Dated => 30/3/2016

=> 
30/03/2016

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 317/2016

Mst. Samina Gul.....(Appellant)

V E R S U S

Director Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar and others.....(Respondents)

INDEX

S.No	Description of Documents	Annex	Pages
1.	Memo of Appeal		1-7
2.	Affidavit		8
3.	Addresses of the Parties		9
4.	Application for interim relief with affidavit		10-12
5.	Application for condonation of delay with affidavit		13-15
6.	Copy of order dated 28/05/2013	A	16-18
7.	Copy of Charge Report	B	19
8.	Copy of order	C	20
9.	Copy of transfer order dated 09/03/2015 of respondent No. 4	D	21
10.	Copies of transfer order dated 23/12/2015 and cancellation order dated 09/01/2016	E	22-23
11.	Copy of all departmental appeals and relevant documents	F	24-31
12.	Copy of F.I.R	G	32-33
13.	Copy of Show cause notice	H	34
14.	Copy of 2 nd Show cause notice	J	35
15.	Wakalat Nama		36

Appellant

Samina Gul

Through

Habib Ullah Mohmand

Habib Ullah Mohmand
Advocate High Court,
Peshawar.
Cell No. 0321-9087842

Dated: 17/03/2016

①

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. 317 /2016

**A.W.P. Division
Service Tribunal
Diary No. 296
Dated 29-03-2016**

Mst. Samina Gul (Headmistress) W/o Hashmat Ullah

R/o Janatpura, Hashtnagri, Tehsil, and District
Peshawar.....(Appellant)

V E R S U S

- ✓ 1. Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- ✓ 2. District Education Officer (Female), Peshawar.
3. Accountant General of Khyber Pakhtunkhwa, A.G. Office, Peshawar.
4. Musarat Noor (now Headmistress) at Government Girls High School, Gulbahar No. 2, Peshawar.....(Respondents)

**APPEAL UNDER SECTION 4 OF KHYBER
PUKHTUNKHWA SERVICE TRIBUNAL ACT
1974, AGAINST THE IMPUGNED ORDER/
ACTION DATED 09/03/2015, AND
04/12/2015 WHILE THE APPELLANT HAS
BEEN TRANSFERRED FROM ONE STATION
TO ANOTHER AND FOR WHICH THE
APPELLANT ALSO FILED/ SUBMITTED SO**

**Filed to-day
and filed.**

Registration 30/3/16

(2)

**MANY DEPARTMENTAL APPEALS/
REPRESENTATIONS TO THE COMPETENT
AUTHORITY.**

PRAYER:

On acceptance of this appeal that the impugned orders/ action dated 09/03/2015, and 04/12/2015 may kindly be set aside and the appellant may kindly be transferred/ adjusted as Headmistress at Government Girls High School, Gulbahar No. 2, Peshawar for which the appellant is entitled under the APT Rules/Policy 1989.

Any other relief which deems fit may also be granted in favour of appellant.

Respectfully Sheweth:

1. That the appellant is law abiding citizen of Pakistan and is resident of Janatpura, Hashtnagri, Tehsil and District Peshawar.
2. That appellant was initially appointed as P.S.T (Primary School Teacher) BPS-14 and promoted as Headmistress BPS-15 and was transferred from

3

Sarbandpura to Kas Kor on dated 28/05/2013.
(Copy of order dated 28/05/2013 is attached as
annexure "A").

3. That appellant assumed charge at Government Girls Primary School Kas Kor on dated 31/05/2013.
(Copy of Charge Report is attached as annexure "B").
4. That appellant has been transferred from Government Girls Primary School Kas Kor to Government Girls Primary School, Gulbahar No. 2, Peshawar, in place Mst. Bushra Nighat which will be retired from 22/12/2015 on dated 09/03/2015.
(Copy of order is attached as annexure "C").
5. That appellant assume the charge of Government Girls Primary School, Gulbahar No. 2, Peshawar on dated 10/03/2015 but with malafide intention the respondent No. 4 transfer on appellant seat, which is against the law and also against the transfer policy. (Copy of transfer order dated 10/03/2015 of respondent No. 4 is attached as annexure "D").
6. That appellant again transfer from Kas Kor to Gulbahar No. 2 on dated 23/12/2015, but the said

(4)

order was cancelled on dated 09/01/2016 by the competent authority i.e. respondent No. 2, but despite of that the respondent did not compliance of their own order. (Copies of transfer order dated 23/12/2015 and cancellation order dated 09/01/2016 are attached as annexure "E").

7. That appellant also submitted so many applications to respondents department to not transfer the appellant from one station to another, but appellant has been transfer again and again, which is against law and also against the rule and policy. (Copy of all departmental appeals and relevant documents are attached as annexure "F").
8. That appellant's husband namely Hashmat Ullah has enmity with other people where the appellant has transfer i.e. Kas Kor, due to this reason appellant's family cannot take the charge at Kas Kor. (Copy of F.I.R is attached as annexure "G").
9. That appellant did not take the charge from Gulbahar No. 2 to Kas Kor, then show cause notice has been issued to appellant for non compliance on

5

dated 03/12/2015, because the threats have been given to the appellant's husband, therefore, she is unable to take the charge. (Copy of Show cause notice is attached as annexure "H").

10. That another Show Cause notice has been given to appeal on same charge/ allegation on dated 07/02/2016. The appellant did not take charge/ assume because of her husband family enmity at Kas Kor area/ territory, but despite of that the respondents given show cause which is against the law fundamental rights of the appellant. (Copy of 2nd Show cause notice is attached as annexure "I").

11. That being aggrieved the appellant approached this Hon'ble Tribunal on the following grounds amongst other inter alia:

GROUND:

A. That the acts of the respondents are against law and also against the APT policy.

6

- B. That appellant is not treated according to law, which is against the law and the natural justice.
- C. That every citizen of Pakistan shall be treated equally and also according to law, but respondents did not treated the petitioner equally, which is against the law and the natural justice.
- D. That there shall be no discrimination on the basis of creed and colour.
- E. That Constitution of Islamic Republic of Pakistan, 1973 also give guarantee to all the Citizens of Pakistan shall be treated according to law.
- F. That any other ground may be adduced during the course of argument, with the kind permission of this Hon'ble Court.

It is, therefore, most humbly prayed that on acceptance of this appeal that the impugned orders/ action dated 09/03/2015, and 04/12/2015 may kindly be set aside and the appellant may

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(7)

transferred/ adjusted as Headmistress at Government Girls High School, Gulbahar No. 2, Peshawar for which the appellant is entitled under the APT Rules, 1989.

Any other relief which deems fit may also be granted in favour of appellant.

Appellant

Sminda Bala

Through



Habib Ullah Mohmand
Advocate High Court,
Peshawar.

Dated: 17/03/2016

8

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2016

Mst. Samina Gul.....(Appellant)

V E R S U S

Director Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar and others.....(Respondents)

AFFIDAVIT

I, Hashmat Ullah S/o Abdullah Jan R/o Janatpura,
Hashtnagri, Tehsil and District Peshawar, solemnly affirm and
declare that the contents of the **Service Appeal** are true and
correct to the best of my knowledge and belief and nothing has
been concealed from this Hon'ble Tribunal.



DEPONENT

CNIC: 17201-5650457-5



9

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No. _____/2016

Mst. Samina Gul.....(Appellant)

V E R S U S

Director Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar and others.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT:

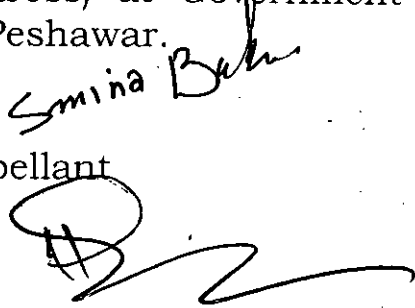
Mst. Samina Gul (Headmistress) W/o Hashmat Ullah
R/o Janatpura, Hashtnagri, Tehsil and District Peshawar.

RESPONDENTS:

1. Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (Female), Peshawar.
3. Accountant General of Khyber Pakhtunkhwa, A.G. Office, Peshawar.
4. Musarat Noor (now Headmistress) at Government Girls High School, Gulbahar No. 2, Peshawar.

Appellant

Through


Habib Ullah Mohmand
Advocate High Court,
Peshawar.

Dated: 17/03/2016

10

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

C.M. No. _____/2016


In

Service Appeal No. _____/2016

Mst. Samina Gul.....(Appellant)

V E R S U S

Director Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar and others.....(Respondents)

**APPLICATION FOR SUSPENSION OF
THE IMPUGNED ORDER/ ACTION
DATED 09/03/2015 AND 04/12/2016** 
**WHILE THE APPELLANT HAS NOT
BEEN TRANSFERRED FROM ONE
STATION TO ANOTHER, TILL THE
FINAL DISPOSAL OF THE MAIN
APPEAL.**

Respectfully Sheweth:

1. That the above mentioned appeal is pending adjudication before this Hon'ble Court, in which no date of hearing has yet been fixed.

11

2. That on the face of it, the appellant has got a strong arguable case and is sanguine about its success.
3. That the balance of convenience also in favour of appellant
4. That if the operation of the impugned orders is not suspended that the appellant would sustain an irreparable loss.

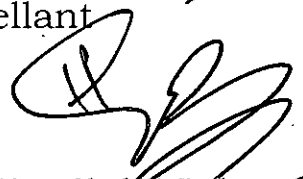
It is, therefore prayed that on acceptance of this application, the operation of the impugned order/ action dated 09/03/2015 and 04/12/2015 may kindly be suspended and appellant may not be transfer from one station to another, till the final disposal of the main appeal.

#

Smirna Beh

Appellant

Through



Habib Ullah Mohmand
Advocate High Court,
Peshawar.

Dated: 17/03/2016

12

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

C.M. No. _____/2016

In

Service Appeal No. _____/2016

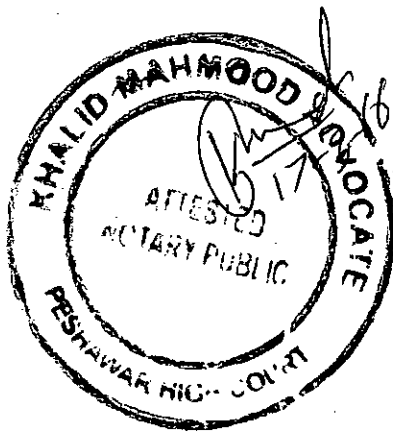
Mst. Samina Gul.....(Appellant)

V E R S U S

Director Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar and others.....(Respondents)

AFFIDAVIT

I, Hashmat Ullah S/o Abdullah Jan R/o Janatpura,
Hashtnagri, Tehsil and District Peshawar, solemnly affirm and
declare that the contents of the **Application** are true and
correct to the best of my knowledge and belief and nothing has
been concealed from this Hon'ble Tribunal.



DEPONENT

CNIC: 17201-5650457-5

13

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

C.M. No. _____/2016

In

Service Appeal No. _____/2016

Mst. Samina Gul.....(Appellant)

V E R S U S

Director Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar and others.....(Respondents)

**APPLICATION FOR CONDONATION OF
DELAY.**

Respectfully Sheweth:

1. That the above mentioned appeal is pending adjudication before this Hon'ble Court, in which no date of hearing has yet been fixed.
2. That appellant's husband namely Hashmat Ullah has enmity with other people and threats have been given to the appellant's husband family, therefore the appellant has appellant filed the appeal on time.

14

3. That the is nor intentional nor deliberately but to the reason mentioned above.
4. That this Hon'ble Tribunal got the jurisdiction to condone the time of delay if any.

It is, therefore prayed that on acceptance of this application, the delay may kindly be condoned, in the best interest of justice.

Appellant

Saima Bano

Through

H

Habib Ullah Mohmand
Advocate High Court,
Peshawar.

Dated: 17/03/2016

15

**BEFORE THE HON'BLE KHYBER PAKHTOON KHWA SERVICE
TRIBUNAL, PESHAWAR**

C.M. No. _____/2016

In

Service Appeal No. _____/2016

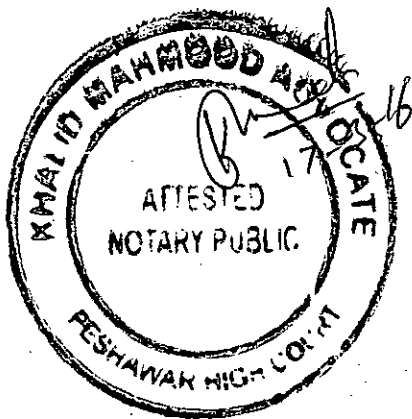
Mst. Samina Gul.....(Appellant)

V E R S U S

Director Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar and others.....(Respondents)

AFFIDAVIT

I, Hashmat Ullah S/o Abdullah Jan R/o Janatpura,
Hashtnagri, Tehsil and District Peshawar, solemnly affirm and
declare that the contents of the **Application** are true and
correct to the best of my knowledge and belief and nothing has
been concealed from this Hon'ble Tribunal.



Hashmat Ullah

DEPONENT

CNIC: 17201-5650457-5

Anex A

16

DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.OFFICE ORDER:-

Consequent upon the recommendation of Departmental Promotion Committee held on 30/1/2013 and in pursuance of the Govt: of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO (B&A) 1-18/E&SE/2008 dated 12/10/2012 and No. SO(PE) 4-5/SSRC/Meeting/ 2012/ Teaching Cadre dated 13/11/2012 the following Primary School Teachers BPS.14 are hereby promoted to the post of Primary School Head Teachers (PSHT) BPS.15) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect in schools noted against their names

S. NO.	SENI. NO.	NAME OF CIRCLE	NAME OF TEACHER	NAME OF SCHOOL	POSTED AT
1	439	MATHRA	Tahira Nasreen	GGPS Daag	GGPS Daag
2	650	HAYATABAD	Bibi Kalsoom	GGPS HAYAT ABAD NO.6	GGPS Achani No.1
3	675	CANTT:	SAMEENA SHAHNAZ	GGPS ASIA PARK	GGPS Mera Surizai Umer Gul
4	676	CANTT:	ROBINA QURESHI	GGPS GULSHAN REHMAN COLONY	GGPS Mera Surizai Multan Ghar
5	678	Chaghulpura	GUL NAZ	GGPS NO.2 CHAMKANI	GGPS Mera Urmar Payan
6	679	HAYATABAD	SHAGUFTA BEGUM	GGPS AGRICULTURE COLLEGE	GGPS AGRICULTURE COLLEGE
7	683	Chaghulpura	ROBEENA SHAHEEN	GGPS NO.1 CHAMKANI	GGPS Mera Urmar miana
8	685	Daudzai	SHAHIDA QURESHI	GGPS Daman Hindki	GGPS Ghari Charagh shah
9	688	HAYATABAD	NOOR JAHAN BADR	GGPS ISLAMIA COLLEGE	GGPS Safdar Abad
10	692	CITY	RIZWANA MASOOD	GGPS GUL BAHAR NO.1	GGPS Khapa
11	693	CITY	ANELA REHMAN	GGPS KAKSHAL NO.1 QUAID ABAD	GGPS Gara Tajik No.2
12	694	CANTT:	DILSHAD BANO	GGPS DEHRI BAGHBANAN	GGPS Gara Tajik
13	695	HAYATABAD	NAJMA SHAHEEM	GGPS ISLAMIA COLLEGE	GGPS Shahi Bala No.1
14	696	Daudzai	Zakia Hashmat	GGPS Qila Abdul Jalil	GGPS Khawaja Killi
15	697	CITY	ABIDA KHAN	GGPS AFGHAN COLONY NO.2	GGPS Shagi Bala
16	698	Chaghulpura	FOZIA ZEB	GGPS CHUGHAL PURA	GGPS Dalazak
17	699	CITY	YASMEEN AKHTAR	GGPS KAKSHAL NO.2 QUAID ABAD	GGPS Palosin Abad
18	700	Chaghulpura	NAHEED AKHTAR	GGPS LALA KALLEY	GGPS Lala KALLEY
19	701	CITY	SADAF AFSHEEN	GGPS DHAKKI MUNAWAR SHAH	GGPS Ali zai
20	703	CITY	JASMINE BUKHARI	GGPS GUL BAHAR NO.1	GGPS Takhtabad no.2
21	704	CITY	SHAHZADI SHAHEEN	GGPS ZARGAR ABAD	GGPS Namdar Korona
22	705	CITY	FEHMIDA BEGUM	GGPS IJAZ ABAD SHAHEEN MUSLIM TOWN	GGPS Ijaz abad
23	706	HAYATABAD	TASKEEN KHAN	GGPS NO.5.HAYATABAD	GGPS Hayatabad No.5
24	707	CITY	SAEEDA IQBAL	GGPS AFGHAN COLONY NO.1	GGPS Garhi chandan
25	709	CITY	ALIA BEGUM	GGPS WAZIR BAGH NO.3	GGPS Gula bad Mashogagar
26	710	CANTT:	SAFIA NOUMAN	GGPS POSTAL COLONY	GGPS Surizai Bala
27	711	HAYATABAD	SAJIDA PARVEEN	GGPS HAYAT ABAD NO.1	GGPS Achani No.3
28	712	CITY	MADINA GUL	GGPS SIRKI GATE -	GGPS Ghari Wajid Surizai
29	713	CANTT:	FOZIA BEGUM	GGPS IRRIGATION COLONY	GGPS Garhi Abdul Manan
30	714	DAUDZAI	Noorul Sehat	GGPS Shah Alam	GGPS Khzana Bala
31	715	Chaghulpura	SHAGUFTA	GGPS NO.2 BANDA KACHORI	GGPS NO.2 BANDA KACHORI
32	716	CANTT:	MARAJ BEGUM	GGPS GARHI QAMAR DIN	GGPS Behloul Zai
33	717	CITY	GHAZALA BANO	GGPS NEW KARIM PURA	GGPS Karyana
34	718	Chaghulpura	AMINA MURSALEEN	GGPS NO.1 CHUHA GUJAR	GGPS Garhi Chandan
35	719	CITY	SHAHNAZ AWAN	GGPS FAISAL COLONY NO.2	GGPS: Payari Payan
36	721	HAYATABAD	ZIL E HUMA	GGPS NO.2 ABDARA	GGPS: Abdara No.2
37	722	MATHRA	LAILA KHALID	GGPS SHEENA GARHI	GGPS Shina Garhi
38	723	CITY	SOBIA KARIM	GGPS WAZIR BAGH NO.1	GGPS: Sufaid Sung
39	726	CITY	AKHTAR SULTAN	GGPS NEW KARIM PURA	GGPS: Afridi Abad Badabar

Attended
H

28/1/2013

40	727	CANTT:	TAHIRA NOSHEEN	GGPS Nothia No.1	GGPS: Hameed Abad
41	728	Hayat Abad	BUS BEGUM	GGPS Bara Line	GGPS: Bagh Garhi Maryamzai
42	729	Chaghulpura	NIZAKAT BIBI	GGCMS NAWAB ABAD	GGPS Hameed Killi
43	730	CANTT:	RANI GUL	GGPS HASSAN GARHI	GGPS: Nahaqi.
44	731	MATTANI	KALSOOM AKHTAR	GGPS YARAN KHEL	GGPS Yaran Khel
45	732	CITY	IRAM AZIZ	GGPS SHAH QABOOL COLONY	GGPS: Masterano Kali
46	733	CANTT:	GUL SHAHEEN	GGPS CIVIL QUARTERS	GGPS: Mashogagar No.3
47	734	BADABER	SAFIA BIBI	GGPS BAZID KHEL PAYAN	GGPS: Bazid Khel Payan
48	736	City	Kousar Jehan	GGPS Afghan Colony	GGPS: Turky Sara Sang
49	737	CITY	SHABANA	GGPS ZARGAR ABAD	GGPS: Afridi Abad
50	739	CANTT:	ZAKIA MINHAS	GGPS NOTHIA NO.1	GGPS: Umar Gul Zangali
51	740	CANTT:	NAGINA SAEED	GGPS SHAHEEN CAMP	GGPS: Ayaz Koroono
52	741	CITY	SHAZIA MENHAS	GGPS AFGHAN COLONY NO.1	GGPS: Mashai
53	742	CITY	SABIHA KHANUM	GGPS RASHID ABAD PESHAWAR	GGPS Gulabad-2(Mathra)
54	743	CITY	NAGINA FAZAL	GGPS WAZIR BAGH NO.2	GGPS: Garhi Sherdad
55	744	Chaghulpura	HASHMAT JEHAN	GGPS NO.1 URMER PAYAN	GGPS: Urmur Payan No.1
56	746	CITY	SAIMA MUKHTIAR	GGPS IJAZ ABAD SHAHEEN MUSLIM TOWN	GGPS: Panam Dehri Bala
57	745	CANTT:	GULSHAN ARA	GGPS DEHRI BAGHBANAN	GGPS: Mera Sheikhan
58	746	CITY	SHAZIA MAQSOOD	GGPS IJAZ ABAD SHAHEEN MUSLIM TOWN	GGPS: Panam Dehri Payan
59	748	Chaghulpura	FARHAT SULTANA	GGPS DURAN PUR	
60	749	CITY	NARGIS BEGUM	GGPS GULBAHAR NO.2	GGPS: Darwazgai No.1
61	750	CITY	SALIQA BEGUM	GGPS SHAH JEE ABAD	GGPS: Sarkhana
62	751	CITY	SOFIA TABASSUM	GGPS Shiekh Abad	GGPS: Surizai Miana
63	752	CANTT:	SHAKEELA BIBI	GGPS CIVIL COLONY	GGPS: Bara Sheikhan-1
64	753	HAYATABAD	FARIDA IQBAL	AGRICULTURE COLLEGE	GGPS: Regi No.1
65	754	CANTT:	BIBI HALEEMA	GGPS HASAN GHARI	GGPS: Shaghali Payan
66	757	HAYATABAD	NAZAKAT KALSOOM	GGPS NO.3.HAYATABAD	GGPS: No,3 Hayat Abad
67	758	HAYATABAD	SAFIA BEGUM	GGPS NO.1.HAYATABAD	GGPS Sarband No.1
68	759	CITY	FARIDA BANO	GGPS KHYBER COL: YOUSAF ABAD	GGPS: Shahi Bala No.2
69	761	HAYATABAD	NAVIDA NASREEN	GGPS NO.1.BARA LINE	GGPS: Pishtakhara Bala
70	762	HAYATABAD	RUBINA SHAHEEN	GGPS ISLAMIA COLLEGE	GGPS: Regi No.2
71	763	CITY	SAMINA GUL	GGPS SARBILAND PURA	GGPS: Kass Korona Mathra /
72	764	CITY	SADIA BIBI	GGPS ZARYAB COLONY NO.2	GGPS; Dang lakhta Payan
73	765	HAYATABAD	SHAMILA JAMIL	GGPS NO.6.HAYATABAD	GGPS: Sangoo No.1
74	766	CITY	KHALIDA PARVEN	GGPS JEWAN MAAL	GGPS: Barbar Qpozai
75	767	HAYATABAD	RUBINA SHAHEEN	GGPS NO.2.BARA LINE	GGPS: Sangoo No.2
76	768	CITY	SALMA SAEED	GGPS FIDA ABAD	GGPS: Miankhel
77	769	CITY	AISHA BIBI	GGPS JEHANGIR PURA S.K. KHAN	GGPS: Warsak Colony
78	770	CITY	BIBI SAEEDA	GGPS SHAIKH ABAD	GGPS: Mera Mushtaraka Mahal
79	771	CANTT:	SHAHEEN BEGUM	GGPS CANTT NO 3	GGPS: Toor Kany
80	772	CITY	SHAH IRUM	GGPS AFGHAN COLONY NO.1	GGPS Muslim Abad
81	774	BADABER	RIASATH BEGUM	GGPS MASHO GAGAR	GGPS: Masho Gagar
82	775	CITY	IMTIAZ BEGUM	GGPS NO.1 WAZIR BAGH	GGPS: Zore Garhi
83	777	CITY	SHABANA SHAHEEN	GGPS GOAR GATHRI NO.2	GGPS: Sher Abad
84	778	CITY	TAHIRA BEGUM	GGPS HAZAR KHAWANI NO.2	GGPS: Sufaid Sang Bagheecha
85	780	CITY	SHABILA ROHI	GGPS JEHANGIR PURA	GGPS: Hakeem Khan Kali
86	781	CITY	SADIA AMIN	GGPS HAIDER COLONY	GGPS: Sattar Korona
87	782	HAYATABAD	SHABANA JABEEN	GGPS NO.2.BARA LINE	GGPS: Dehri Kali
88	783	HAYATABAD	SADAQAT	GGPS LAKARAI KANEEZA	GGPS: Lakari Kaneeza
89	786	CITY	SHAZIA SHAHEEN	GGPS GULBAHAR NO.2	GGPS: Darwaga No.3
90	788	Chaghuloura	KALSOOM BIBI	GGPS JOGAIN	GGPS Urmur Bala No.2
91	790	CITY	HUMIRA ARSHAD	GGPS NEW KARIM PURA	GGPS: Ashraf Korona
92	791	DAUDZAI	SADIA BEGUM	GGPS SAMMAR BAGH	GGPS: Larama
93	792	CITY	KHALIDA SHAHEEN	GGPS GUL ABAD PESHAWAR	GGPS: Shagali Bala
94	795	CITY	NAGINA AYUB	GGPS WAZIR BAGH NO.1	GGPS: Shagai Tana
95	796	Chaghulpura	HAMEEDA BANO	GGPS BUDNI	GGPS: Mohammad zai-2

Attested
 28/5/2013


18

96	797	CANTT:	ASMAT JEHAN	GGPS RAILWAY QRTS 1	GGPS: Masho Pakey
97	801	Daudzai	Ghazala Nazir	GGPS Khazana Payan	GGPS: Garhi Karim Dad
98	804	CITY	RUKHSANA NAHEED	GGPS GUL ABAD PESHAWAR	GGPS: Ali Mohd Khan
99	805	HAYATABAD	RAZIA MUZAMIL	GGPS DANISH ABAD	GGPS: Shahi Bala
100	806	CITY	BUSHRA ZAHIR	GGPS ZARYAB COLONY NO.1	GGPS: Bridge Nasir Khan

TERMS & CONDITIONS :-

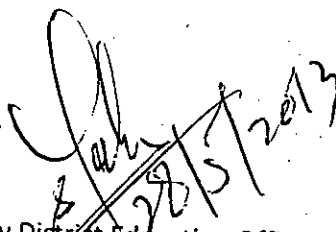
1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulation as may be issued from time to time by the Govt:
3. Their service can be terminated at any time, in case hi performance is found unsatisfactory during probationary period. In case of misconduct, he shall be preceded under the rules framed from time to time,
4. Charge report should be submitted to all concerned.
5. Their inter-see seniority on lower post will remain intact.
6. No TA / DA is allowed for joining his duty.
7. They will give an under taking to this effect to be recorded in their service books.
8. Necessary entry to this effect should be made in their service books

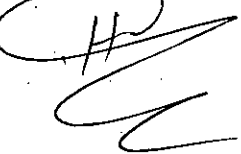
SOFIA TABASSUM
District Education Officer,
(Female) Peshawar.

Endst: No. 5464-5575 /Promotion PSHT(F) /Adj / Dated Peshawar the 28/05/2013

Copy for information to the :-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Sub Divisional Education Officer (Female) Peshawar
4. ASDEO (Female) circles concerned.
5. Supdt: Local Office.
6. Officials Concerned.


Deputy District Education Officer,
(Female) Peshawar.

Attested


حاجزہ رپورٹ

میں صیغہ تیسرے نقل ایم اے، بی ایڈ، سی ٹی نے 2013

مورچہ 31/5/2013 کو آرڈر نمبر 5464-5575

نعت گورنمنٹ گریجویٹ اسکول سکول کورون

میں اپنے محلے کا حاجزہ سفال لیا ہے

حاجزہ دیکھو

حاجزہ دیکھو
کٹینہ گل

31/05/13

31-5-2013

Attested
H

Amer C

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B

OFFICE OF THE SUB DIVL; EDUCATION OFFICER (FEMALE) PESHAWAR.
OFFICE ORDER.

Mst: Samina Gul PSHT (Focal Person) GGPS Kas Korona Peshawar is hereby transferred/adjusted at GGPS Gulbaha No.2/Peshawar in place of Mst: Bushra Nighat PSHT is going to be retired from Govt: Service with effect from 22/12/2015 (AN) on her own pay and BPS in the intrest of public service. She will take over charge as and when Mst: Bushra Nighat PSHT retire.

Note:- NO TA/DA etc allowed.

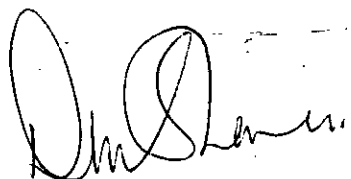
Chrage report report may be submitted to all concerned after taking over charge.

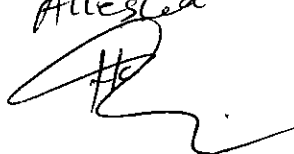
(DUR-E-SHAHWAR)
SUB DIVL; EDUCATION OFFICER,
(FEMALE) PESHAWAR.

Endst: No. 1102-03 dated Peshr; the 9-3- /2015.

Copy of the above is forwarded to the:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. DEO(Female) Peshawar.
3. ASDEO (Female) Peshawar.
4. Head Teacher Concer.
5. Official concerned.


SUB DIVL; EDUCATION OFFICER,
(FEMALE) PESHAWAR

Attested


محرمہ صبا سے فوٹو کیلئے درخواست

پرائمری اسکول گلبرہ

صبا علیہ

گزارش میں ہے کہ میں نے آڈیو فائل 1100-03 کے تحت
10-3-2015 کو بطور PSMT ٹرینڈنگ کالج
گورنمنٹ ٹرینڈنگ کالج گلبرہ میں سوال

پر ایک فوٹو میں (ملا ٹائم) ہے -

الغرض

کھینچ کر

گورنمنٹ ٹرینڈنگ کالج گلبرہ میں سوال

10-3-2015

Noted

Head Mistress
G.C.P.S Gulbahar No 2
Peshawar

10/3/2015

Handwritten scribble

10/3/15

Attested

Handwritten signature

Alex E

92 1

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

OFFICE ORDER :-

Consequent upon the approval of the competent authority, the following teaching staffs is transfer (under report) in the school noted against each their names on her own pay and BPS in the interest of public service with immediate effect.

S. NO.	NAME WITH DESG	FROM	TO	REMARKS
1	Mst. Tabassum Rukhsana, PSHT (under report)	GGPS Achar No.1 Peshawar	GGPS Surizai Payan No.3 Peshawar	Vice S. No.2
2	Mst. Robina Qureshi, PSHT	GGPS Surizai Payan No.3 Peshawar	GGPS Achar No.1 Peshawar	Vice S. No.1
3	Mst. Riffat Jehan Ara, PSHT (Under report)	GGPS Gul Abad Peshawar.	GGPS Kas Karoona Peshawar.	Vice S. No. 4
4	Mst. Samina Gul, PSHT	GGPS.Kas.Karoona Peshawar:	GGPS Gul Abad Peshawar.	Vice S. No.3
5	Mst. Bibi Sadia, SPST (under report)	GGPS Achar No.1 Peshawar	GGPS Deh Bahadar No.1 Peshawar	Vice S. No.6
6	Mst. Nazish Javed, SPST	GGPS Deh Bahadar No.1 Peshawar	GGPS Achar No.1 Peshawar	Vice S. No.5
7	Mst. Bibi Noor Jehan, PST (under report)	GGPS Achar No.1 Peshawar	GGPS Deh Bahadar No. 2 Peshawar.	Vice S. No.8
8	Mst. Humera Kalsoom, PST	GGPS Deh Bahadar No. 2 Peshawar.	GGPS Achar No.1 Peshawar	Vice S. No.7

NOTE:-

- 1 Charge will be sent to all concerned:
- 2 Necessary entry should be made in her service book.

(ULFAT BEGUM)
DISTRICT EDUCATION OFFICER,
(FEMALE) PESHAWAR.

Endst: No. 4309-12 Dated Peshawar the 23/12 /2015

Copy for information to the :-

- 1 Director E&SE Khyber Pakhtunkhwa Peshawar.
- 2 Accountant General Khyber Pakhtunkhwa Peshawar.
- 3 ASDEO concerned.
- 4 Officials concerned.

DISTRICT EDUCATION OFFICER,
(FEMALE) PESHAWAR.

Attested
14

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OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

CANCELLATION :-

The transfer order in /o Mst. Samina Gul PSHT GGPS Kas Karoona Peshawar issued vide this office Endst: No. 4309-12 dated 23/12/2015 at S. No. 4 is hereby cancelled.

To be withdrawn

(ULFAT BEGUM)
DISTRICT EDUCATION OFFICER,
(FEMALE) PESHAWAR.

Handwritten signature in Urdu

Endst: No. 5211-15 / Date: Peshawar the 9/01 / 2016

Copy for information to the :-

- 1 Director E&SE Khyber Pakhtunkhwa Peshawar
- 2 Accountant General Khyber Pakhtunkhwa Peshawar
- 3 SDEO (Female) Peshawar
- 4 ASDEO circle concerned
- 5 Official concerned

DEOF, Peshawar

Why Samina Gul
PAST order issued
on 23/12/2015
cancelled and again
issued on 9/1/2016

[Signature]
DISTRICT EDUCATION OFFICER,
(FEMALE) PESHAWAR.

How to get a transfer
order issued immediately
to the concerned teacher
in the concerned school
on 9/1/2016

Zahid Khan
8/12/16

Attested

[Signature]

13/1/2016

جناب عالی

گزارش کی جاتی ہے کہ سمسٹی حشمت اللہ ولد حاجی عبداللہ جان چیف رپورٹرز نامہ پاکستان پشاور کی وائف شمینہ گل کی پرموشن ہوئی 28 مئی 2013 سر بلند پورہ سٹی گرلز پرائمری سکول سے مٹھر اسرگل کے کس کورنہ کو ٹرانسفر ہوئی بعد میں کس کورنہ گرلز پرائمری سکول سے 9 مارچ 2015 کو گرلز پرائمری سکول گلپہار نمبر 2 سٹی کو ہماری دشمنی کی وجہ سے ٹرانسفر ہوئی اس بناء پر کہ اس سکول سے بشر انگہت ریٹائرڈ ہوگی اس کی جگہ اس کو چارج دیا جائے گا لیکن ایسا نہ ہوا اور گلپہار نمبر 2 سکول میں نو مہینے گزارنے پر اس سیٹ پر سرت نور کو ٹرانسفر کیا گیا نو مہینے گزارنے پر شمینہ گل کے آرڈر کو ایکسپائر کر کے اس کو کس کورنہ جانے کے لیے کہا گیا اور بعد میں 23 دسمبر 2015 کو اس کی ٹرانسفر گل آباد سکول کر دی گئی اور دس دن بعد گل آباد سکول سٹی پشاور سے یعنی 9 جنوری 2016 کو دوبارہ کس کورنہ ٹرانسفر کر دی گئی یہ سراسر زیادتی کے مترادف ہے اس مذکورہ ہیڈ نیچر کو کوئی انصاف نہیں دیا گیا اور اس کے ساتھ جو ایڈوانس میں آرڈر کئے گئے تھے ان کو اپنے ہی سیٹوں پر لگایا گیا جو درج ذیل ہیں

ڈیٹیل پوسٹوں کو پوشیدہ رکھا گیا ان کو واضح نہیں کیا گیا حال ہی میں پرموشن لینے والی معلوموں سے اتنی مہربانیاں کیوں سمجھ سے بالاتر ہے یعنی 16 نومبر 2015 کو چندرہ گریڈ میں پرموشن کی سٹیٹس پوشیدہ رکھی گئی تھی

حمیرا گل کی پرموشن ہوئی وزیر باغ (1) سے کسی گاؤں میں ہو وہاں اس نے صرف اے ڈی او کے ساتھ چارج لیا سکول نہیں گئی اور ایڈوانس میں اس کا آرڈر کو بائی گیت سکول میں کیا گیا ہے کیونکہ وہاں کی ہیڈ سٹ پرموشن میں جائے گی شہلا صدف کی پرموشن ہوئی ایڈوانس میں وہ ڈیٹیل پوسٹ پر شاہ جی آباد سکول میں بیٹھی تھی ایک سال سے اس کا آرڈر ایکسپائر نہیں ہوا اور وہی چارج لیا ہے کیونکہ وہاں کی ہیڈ جاویدہ اختر ریٹائرڈ ہو گئی ہے خوشنود بیگم کا آرڈر 3 مارچ 2015 کو ایڈوانس میں جو گیواڑہ سکول میں کیا گیا کیونکہ وہاں کی مس ریٹائرڈ ہو رہی تھی اس کا آرڈر دس ماہ میں ایکسپائر نہیں ہوا اور جو گیواڑہ اسکول ہی میں اس کو چارج دیا گیا اور اسی سکول میں ایڈوانس میں 23 نومبر 2015 کو ایک اور آرڈر سلمی الہی کا کیا گیا خوشنود بیگم کے آرڈر پر اے ڈی اور نعت بانوں نے لکھا تھا کہ مس خوشنود بیگم set پر پرموشن میں جائے گی تو اس کی جگہ سلمی الہی ہی چارج لے گی

فرزانہ غلام 16 نومبر 2015 کو چندرہ گریڈ میں پرموشن ہوئی اور اس کی گرلز پرائمری سکول زریاب کالونی سے ازرا خیل ٹو میں ٹرانسفر کی گئی وہ وہاں گئی ہی نہیں تھی کہ ان کو پہلے ہیڈ شاہ جی آباد سکول میں تعینات کیا گیا جہاں پر انہوں نے نو دن گزارے اور پھر وہاں سے 9 جنوری 2016 کو ٹرانسفر کر کے گل آباد میں شمینہ گل کی سیٹ پر تعینات کر دیا گیا کیونکہ وہاں پہلے سے ایڈوانس میں شہلا صدف کا آرڈر کیا گیا تھا جو بد نتیجے کے مترادف ہے اس ایک معلقہ سے نا انصافی کیوں لمحہ فکریہ ہے لہذا آپ صاحبان سے التماس کیا جاتا ہے کہ شمینہ گل کو گلپہار نمبر 2 میں تعینات کیا جائے کیونکہ اس سکول میں اس نے نو ماہ اس انتظار میں گزارے کہ اس کی ٹرانسفر اس بناء پر ہوئی تھی کہ اسی سکول میں ہیڈ نیچر بشر انگہت ریٹائرڈ ہوگی اور اس کی جگہ چارج شمینہ گل لے گی لیکن ایسا نہیں ہوا لہذا شمینہ گل کو گلپہار نمبر 2 سٹی پشاور میں ٹرانسفر کر کے تعینات کرنے کے احکامات جاری کئے جائیں کیونکہ ہماری دشمنی ہے جو ایف آئی آر کے کاغذات درخواست کے ساتھ لف ہیں

حشمت اللہ ولد حاجی عبداللہ جان

چیف رپورٹرز نامہ پاکستان پشاور

المرقوم 26 فروری 2016

4.2.2016

Attested



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10

Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa, Peshawar

No. 2208 /F.No, KC-32/(F) Appeal Peshawar

Dated Peshawar the 12/02 /2016.

To

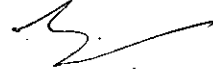
The District Education Officer,
(Female) Peshawar

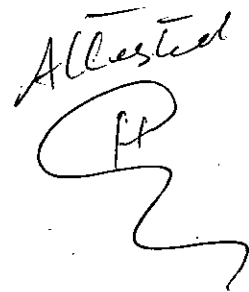
Subject Cancellation of Transfer Order

I am directed to refer to the subject cited above and to enclose herewith a copy of cancellation order in respect of Mst. Samina Gul PSHT GGPS Kas Koroona Peshawar and to ask you to submit detail report/factual Position within (2) days positively to this directorate for further necessary action


10/2/16

Deputy Director Female
(E&SE) Khyber Pakhtunkhwa,


9/2/16

Attested


گیت مابے دی ری او قیدل رشام در اقبال

مابے عالی

گزارش کا بارے میں جس وقت اللہ کا واکف عینہ لکھی گئی تھی اس وقت اس کا بارے میں
 کسی کو روتہ سے ٹرانسفر ہونے سے پہلے یہاں پر کسی کو اطلاع نہ دی گئی تھی اور اس سے پہلے ہی سے
 محکمہ اور ٹی بی بی کے خلاف یہاں سے بھی اطلاع نہیں دی گئی تھی جس سے یہ سمجھا گیا ہے
 زیادہ تاوان فراہم ہو سکتا ہے اور وہاں جان بوجھ کر اور بھی ایسی کوئی ایسی نہ ہو
 اور فیصلے کے لیے اس سے بھی یہ سمجھا گیا ہے کہ یہاں پر ہم کو اس بارے میں اطلاع نہ ہو
 جس کے اندر لکھا گیا ہے اور اس کے احکامات جاری ہو گئے ہیں اور اس کے بارے میں
 سے لکھا گیا ہے اور اس کے احکامات جاری ہو گئے ہیں اور اس کے بارے میں

محمد سعید داد کا کی

المترجم 23/2
2016

محمد سعید داد کا کی
 محمد سعید داد کا کی

⑤ 23-2-2016

Attested
H

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Directorate of Elementary & Secondary
Education Khyber Pakhtunkhwa, Peshawar

No. 2208 /F.No, KC-32/(F) Appeal Peshawar

Dated Peshawar the 12/02 /2016.

To

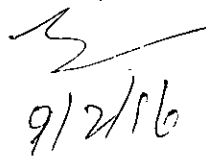
The District Education Officer,
(Female) Peshawar

Subject Cancellation of Transfer Order


I am directed to refer to the subject cited above and to enclose herewith a copy of cancellation order in respect of Mst. Samina Gul PSHT GGPS Kas Koroona Peshawar and to ask you to submit detail report/factual Position within (2) days positively to this directorate for further necessary action


10/2/16

Deputy Director Female
(E&SE) Khyber Pakhtunkhwa,


9/2/16

Attested



گیت پاب دی ری او فیصلہ پشاور در اقصاء

میا علی

گزارش کارخانه در خصوص...
 کسب و کار...
 محکمہ اورنگ...
 زیارت خان...
 اندرون...
 در خصوص...
 در خصوص...

المکرّم 23
2016

میں سے دار کا کاپی

میں سے...
...
...

[Handwritten signature]

23-2-2016

Attested
[Signature]

(31)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR

OFFICE ORDER:-

The transfer orders issued vide this office Endst: Nos.5216-20 dated 09/01/2016, 4309-12 dated 23/12/2015, 4622-26 dated 04/01/2016, 7061-66 dated 06/01/2016 and 5211-15 dated 03/01/2016 are hereby cancelled with immediate effect.

Note: compliance report should be submitted to all concerned.


(ULFAT BEGUM)
DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

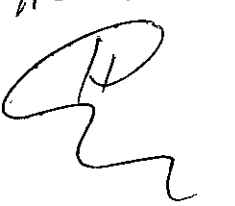
Endst: No. 8909-13

Dated 22/2 /2016.

Copy of the above is forwarded for information to the:-

1. Accountant General Khyber Pakthunkhwa Peshawar.
2. Director Elementary & Secondary Education Khyber Pakthunkhwa Peshawar .
3. Sub Divisional Education Officer (Female) Peshawar.
4. ASDEO (Female) Circle Concerned.
5. Teachers Concerned.


DISTRICT EDUCATION OFFICER
(FEMALE) PESHAWAR

Attested


ابتدائی اطلاع رپورٹ

کوئیٹ

(فائیل) ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زخمی دفعہ ۴ کی مجموعہ ضابطہ فرجاری

تعمانہ

میں

نمبر ۲۱۹۵

تاریخ و وقت وقوعہ ۱۱/۵/۱۹۶۵

<p>۱ تاریخ و وقت رپورٹ</p> <p>۲ نام و سکونت اطلاع دہندہ و مستفید</p> <p>۳ مختصر کیفیت جرم (معہ دفعہ) حال اگر کچھ لیا گیا ہو</p> <p>۴ سے وقوعہ فاصلہ تعمانہ سے اور سمت</p> <p>۵ نام و سکونت ملزم</p> <p>۶ روائی پور تفتیش کے متعلق کی گئی دیگر اطلاع درج</p> <p>۷ سے روایت کی تاریخ و وقت</p>	<p>۱ تاریخ و وقت رپورٹ</p> <p>۲ نام و سکونت اطلاع دہندہ و مستفید</p> <p>۳ مختصر کیفیت جرم (معہ دفعہ) حال اگر کچھ لیا گیا ہو</p> <p>۴ سے وقوعہ فاصلہ تعمانہ سے اور سمت</p> <p>۵ نام و سکونت ملزم</p> <p>۶ روائی پور تفتیش کے متعلق کی گئی دیگر اطلاع درج</p> <p>۷ سے روایت کی تاریخ و وقت</p>
--	--

صداک و علی فتح علی راجہ

گورنمنٹ ہسپتال راولپنڈی

یہ واقعہ ۱۱/۵/۱۹۶۵ء کو راولپنڈی میں واقع گورنمنٹ ہسپتال میں پیش آیا۔ اطلاع دہندہ صاحب نام و سکونت ملزم کے مکان پر گئے اور اطلاع دی کہ ایک شخص نے اس کے مکان پر زخمی کیا ہے۔ اطلاع دہندہ صاحب نے فوراً پولیس کو اطلاع دی اور ساتھ ساتھ گورنمنٹ ہسپتال میں بھی اطلاع دی۔ گورنمنٹ ہسپتال میں اطلاع پر فوراً ڈاکٹر صاحب نے اطلاع دہندہ صاحب کو لے کر ہسپتال میں لایا جہاں ڈاکٹر صاحب نے زخمی شخص کو معائنہ کیا اور اسے زخمی پایا۔ زخمی شخص کی شناخت صاحب نام سے ہوئی۔ ڈاکٹر صاحب نے زخمی شخص کو راولپنڈی گورنمنٹ ہسپتال میں داخل کیا اور اسے طبیعتاً معالج کیا۔ اطلاع دہندہ صاحب نے پولیس کو اطلاع دی کہ ایک شخص نے اس کے مکان پر زخمی کیا ہے۔ پولیس نے اطلاع دہندہ صاحب کے مکان پر گئے اور اطلاع دی کہ ایک شخص نے اس کے مکان پر زخمی کیا ہے۔ پولیس نے اطلاع دہندہ صاحب کے مکان پر گئے اور اطلاع دی کہ ایک شخص نے اس کے مکان پر زخمی کیا ہے۔

۱۹۶۵

Ann — H
209 134

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

SHOW CAUSE NOTICE.

I Mst: Ulfat Begum DEO(F) Peshawar, as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) Rules, 2011, do hereby serve you, Mr/Mst: Samina Gul /Design; PSHT /School Kas Korona as follows:-

Not obeyed the order

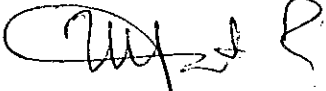
I am satisfied that you have committed the act/omissions specified in rule-3 of the said rule.

a) Mis-conduct.


As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of removal from Service under rule-4 of the said rules.

You are thereof, required to Show Cause as to why the aforesaid penalty should not be imposed upon you and also intimate where you desire to be heard in person.

If no reply to this notice is received within 7-days or not more than 15-fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case and ex-parte action shall be taken against you.


(ULFAT BEGUM)
(COMPETENT AUTHORITY)
DISTRICT EDUCATION OFFICER,
(FEMALE) PESHAWAR.

Received on
7/2/2016

Attested


30

Ann - J

35

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) PESHAWAR.

SHOW CAUSE NOTICE.

I Mst: Ulfat Begum DEO(F) Peshawar, as competent authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency and Disciplinary) Rules, 2011, do hereby serve you, Mst: Samina Gul PSHT GGPS Gulistan as follows:-

You have promoted to PSHT and posted at GGPS Kaskorona but fail to takeover the charge.

I am satisfied that you have committed the act/omissions specified in rule-3 of the said rule.

a) Mis-conduct.

As a result thereof, I, as competent authority, have tentatively decided to impose upon you the penalty of removal from Service under rule-4 of the said rules.

You are thereof, required to Show Cause as to why the aforesaid penalty should not be imposed upon you and also intimate where you desire to be heard in person.

If no reply to this notice is received within 7-days or not more than 15-fifteen days of its delivery, it shall be presumed that you have no defence to put in and in that case and ex-parte action shall be taken against you.

(ULFAT BEGUM)
(COMPETENT AUTHORITY)
DISTRICT EDUCATION OFFICER,
(FEMALE) PESHAWAR.

3-12-2015

Received on
3-12-2015

Attested

10 تہمت

ایڈووکیٹ/دستخط
بارکوسل بازار ایسوسی ایشن
رابطہ نمبر: 0321-9087842

PESHAWAR BAR ASSOCIATION
PBA

40148

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: جسٹس سر سید محمد امجد علی خان

منجانب:	دعوی:
مس شمسہ علی بیگم	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

باعت تحریر آنکہ

Handwritten notes on the left side of the form.

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ

Alleged
admission

آن مقام
کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو
راضی نامہ کرنے و تقریر حالت و فیصلہ برطین دینے جواب دعوی اقبال دعوی اور درخواست ازہر قسم کی تصدیق
زریں ہر دستخط کرنے کا اختیار ہوگا، نیز یہ صورت عدم پیروی یا تاخیر کی صورت یا اپیل کی برآمدگی اور منسوخی نیز
دائر کرنے اپیل نگرانی و نظریاتی و پیروی کرنے کا اختیار ہوگا اور یہ صورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقریر کا اختیار ہو گا اور صاحب
مقرر شدہ کو بھی وہی حملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساتھ ہر ذمہ منظور قبول ہوگا دوران مقدمہ
میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وکیل کرنے کا مختار ہوگا کوئی تاریخ پیشی مقام
دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم:

العبد واہ شد العبد

مقام
Attest
Simina Bader
4-3-2016

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL NO. 317/2016

Sameena Gul

V/S

GOVT.

Reply on behalf of the Respondents No. 1, 2 & 4

Respectfully Sheweth:-

The Respondents submit below:-

Preliminary objections:-

1. That the Appellant has got no cause of action/ locus standi.
2. That the instant appeal is badly time barred.
3. That the instant Appeal is not maintainable in its present form.
4. That the instant Appeal is bad for mis- joinder and non- joinder of the necessary parties.
5. That the Appellant has not come with clean hands to this Hon, able Tribunal.
6. That the instant appeal is barred by law.
7. That this Hon, able Tribunal has got no jurisdiction to adjudicate upon the instant Service Appeal.
8. That the instant Appeal is based on malafide intentions.
9. That this Hon, able Tribunal has got no jurisdiction to adjudicate upon the instant Appeal.
10. That the Appellant does not obey the legal orders of the competent authority.

On Facts:-

1. That Para-1 pertains to the Appellant's personal record, hence no comments.
2. That in reply to Para-2, it is submitted that the Appellant was promoted to BPS-15 and due to the availability of vacant post, was transferred as PSHT to GGPS Kass Koron, Peshawar. It is important to mention that as per policy, any civil servant if promoted will be transferred to other school.


- 12
3. That Para-3 is correct.
 4. That Para-4 is incorrect. The mentioned transfer order was wrong and illegal. The Sub Divil: Education Officer(F) Peshawar was not authorized to make transfer in BPS-15 and without the formal approval of the competent authority. Moreover, the Appellant also has wrongly taken over charge on such wrong and invalid transfer order.
 5. That Para-5 is incorrect and misleading. The Appellant was not authorized to take over charge on a wrong and invalid transfer order while the transfer order of Respondent No.4 is correct and lawful. (Transfer order of Respondent No.4 is attached Annex: A)
 6. That in reply to Para-6, it is submitted that the Appellant gets wrong and invalid transfer orders from the incompetent authorities which are not executable.
 7. Incorrect and misleading. It is the Appellant who gets wrong and invalid transfer orders from the incompetent authorities which are not executable.
 8. Incorrect and misleading. FIR which is Ann: G with the instant Appeal, it reveals that the husband of the Appellant has enmity in District Nowshehra. Rather the Appellant has taken the law in her hands and does not obey the lawful orders of the competent authorities.
 9. That as the Appellant does not obey the transfer order and does not perform her duty in the school where she has been transferred, therefore, the competent authority has issued Show cause notice to the Appellant under the (E&D) Rules while rest of the Para is incorrect and misleading, hence denied.
 - 10- That as the Appellant does not obey the lawful orders of the competent authorities and has taken the law in her hands, therefore, the Respondent Department has to proceed her under the (E&D) Rules for non performing her duty.
 - 11- Incorrect and denied. The Appellant has no cause of action to file the instant Appeal.

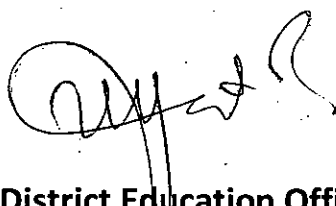
Grounds.

- A. That Ground-A is incorrect and denied. The Respondent Department has acted under the Law.
- B. That Ground-B is incorrect and denied. The Appellant has been treated under the law and Rules.
- C. Incorrect. The Respondent Department has not discriminated the Appellant and it is the Appellant who has taken the law in her hands and does not obey the lawful orders of the competent authorities.
- D. That it is the Appellant who has taken the law in her hands and does not obey the orders of competent authorities.

- 3
- E. That in reply to Ground-E, it is stated that the Respondents have acted according to law, rules and policy and have not violated any Article of the Constitution of Pakistan.
- F. That the Respondents also seek leave of this Hon, able Tribunal to present case law and raise additional grounds at the time of arguments.

It is therefore, humbly prayed that on acceptance of this reply, the instant appeal may very kindly be dismissed with cost.


Director,
(E & SE) KPK


District Education Officer
(Female) Peshawar.


Headmistress,
GGPS, Gulbahar No.2

MUSARAT NOOR
Head Mistress
G.G.P.S. Gulbahar # 2
Peshawar.

14 15

OFFICE OF THE DISTRICT EDUCATION OFFICER(FEMALE)PESHAWAR.

OFFICE ORDER.

Consequent upon approval by the competent authority Mst: Mussarat Noor PSHT Govt: Girls Primary School Nelavi Peshawar is hereby adjusted at Govt: Girls Primary School Gul Bahar No.2 Peshawar vice Mst: Bushra Nighat PSHT is going to be retired from service with effect from 21/12/2015 in the intrest of public servive.

Note:- No TA/DA etc is allowed.

Charge report should be submitted to all concerned.

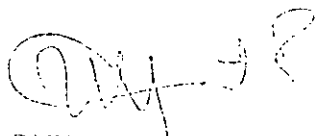
(ULFAT BEGUM)
DISTRICT EDUCATION OFFICER,
(FEMALE) PESHAWAR.

Endst:No/1707/11

Dated Pesh: the 30/11/2015

Copy of the above is forwarded for information and n/a to the:

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Sub Divisional Education Officer (F) Peshawar.
3. ASDEOs (FameI) Circles concerned.
4. Head teachers concerned.


DISTRICT EDUCATION OFFICER,
(FEMALE) PESHAWAR

خدمت جناب اے ایس ڈی اوصاف

زمانہ حدراس صلح پشاور

عنوان فارغ رپورٹ

جناب عالیہ!

گزارش ہے 11-1707 کے تحت آجورخم 2015-12-21 کو


لعبہ از دوپہر گورنمنٹ گرلز ہیر اٹھری سکول گلبار غبرہ میں P.S.H.T

کا چارج میں مسرت نوز P.S.H.T کو دے دیا ہے۔

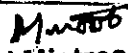
آپ کی خدمت میں اطلاع عرض ہے۔

الحارثہ - بشیری نگیٹ

گورنمنٹ گرلز ہیر اٹھری سکول گلبار غبرہ


Nighat
Head Mistress
G.G.P.S Gulbahar No. 2
Peshawar

چارج دہندہ - بشیری نگیٹ


Musabb
Head Mistress
G.G.P.S Gulbahar No. 2
Peshawar

چارج گرہندہ - مسرت نوز

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL NO. 317/2016

Sameena Gul

V/S

GOVT.

**Reply to Application for Condonation of Delay on behalf
of the Respondents 1, 2 & 4**

Respectfully Sheweth:-

The Respondents submit below:-

Preliminary objections:-

1. That the Applicant has got no cause of action/ locus standi.
2. That the instant Application is badly time barred.
3. That the instant Application is not maintainable in its present form.
4. That the instant Application is bad for mis- joinder and non- joinder of the necessary parties.
5. That the Applicant has not come with clean hands to this Hon, able Tribunal.
6. That the instant application is barred by law.
7. That the instant Appeal is based on malafide intentions.
8. That this Hon, able Tribunal has got no jurisdiction to adjudicate upon the instant Appeal.
9. That the Applicant does not obey the legal orders of the competent authority.
10. That the instant Application is against the Service Rules.
11. That the instant Application is against the Service Rules.

On Facts.

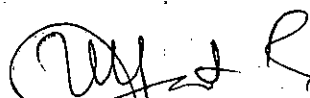
1. That Para-1 is correct.
2. That enmity of the Applicant's husband is their personal matter, hence needs no comments. However, the Applicant does not obey the lawful orders of the competent authority and wants to misguide this Hon, able Tribunal, therefore, the Applicant has file the Service Appeal at very belated stage which is not maintainable under the law.
3. That Para-3 is incorrect and misleading. The instant Service Appeal is badly time barred.
4. That Para-4 is incorrect, hence denied.

It is therefore, humbly prayed that on the acceptance of this reply, the instant Application may very kindly be dismissed.



Headmistress,
GGPS, Gulbahar No.2

MUSARAT NOOR
Head Mistress
G.G.P.S. Gulbahar # 2
Peshawar.



District Education Officer,
(Female) Peshawar.

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL NO. 317/2016

Sameena Gul

V/S

GOVT.

**Reply to Application for suspension of impugned
transfer order on behalf of the Respondents1 ,2 & 4**

Respectfully Sheweth:-

The Respondents submit below:-

Preliminary objections:-

1. That the Applicant has got no cause of action/ locus standi.
2. That the instant Application is badly time barred.
3. That the instant Application is not maintainable in its present form.
4. That the instant Application is bad for mis-joinder and non-joinder of the necessary parties.
5. That the Applicant has not come with clean hands to this Hon, able Tribunal.
6. That the instant application is barred by law.
7. That the instant Appeal is based on malafide intentions.
8. That this Hon, able Tribunal has got no jurisdiction to adjudicate upon the instant Appeal.
9. That the Applicant does not obey the legal orders of the competent authority.
10. That the instant Application is against the Service Rules.
11. That the instant Application is against the Service Rules.

On Facts:-

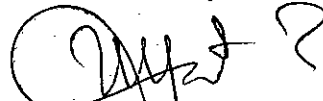
1. That Para-1 is correct.
2. That Para-2 is incorrect and misleading. The Applicant neither has prima facie case nor has cause of action to file the instant Application.
3. That Para-3 incorrect and misleading, hence denied. The Applicant does not obey the orders of competent authority and has taken the law in her hands, therefore, the Applicant has not balance of convenience.
4. That Para-4 is incorrect, hence denied. The Applicant does not obey the orders of the competent authority and is guilty of misconduct.

It is therefore, humbly prayed that on the acceptance of this reply, the instant Application may very kindly be dismissed.



Headmistress,
GGPS, Gulbahar No.2

MUSARAT NOOR
Head Mistress
G.G.P.S. Gulbahar # 2
Peshawar.



District Education Officer,
(Female) Peshawar.