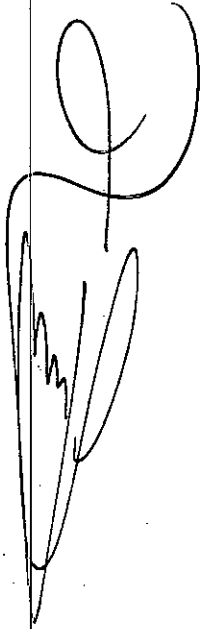


Sr. No.	Date of order/proceedings	Order or other proceedings with signature of Judge/Magistrate
1	2	3
1.	03.09.2015 	<p style="text-align: center;">KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.</p> <p style="text-align: center;">Appeal No. 122/2015</p> <p style="text-align: center;">Mst. Saiqa Versus Sub-Divisional Education Officer(F), Lahor, District, Swabi etc.</p> <p style="text-align: center;"><u>JUDGMENT</u></p> <p style="text-align: center;"><u>PIR BAKHSH SHAH, MEMBER.-</u> Counsel for the appellant (Mr. Rahmanullah, Advocate) and Government Pleader (Mr. Ziaullah) with Khalid Mateen, ADO for the respondents present.</p> <p>2. Arguments heard and record perused.</p> <p>3. Counsel for the appellant stated that the appellant, Mst. Saiqa while posted as PST BPS-12 in GGPS Feroz Pur Jalabai, District Swabi was promoted vide order dated 24.09.2014 as SPST BPS-14 and was transferred to GGPS No. 1 Jehangira, Swabi vide the same order. According to the appellant she also assumed charge in the said school. On record, there is a proposal dated 07.11.2014 for the transfer of the appellant. It is the contention of the learned counsel for the appellant that in the said background, the appellant was forced to relinquish charge in GGPS Jehangira and to report back to GGPS Feroz Pura, Swabi. Feeling aggrieved she has come to this Tribunal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.</p>

4. The learned Government Pleader on behalf of the department submitted that proposal dated 07.11.2014 which the appellant has impugned was not a final order. He submitted that in fact the appellant has been transferred from Jehangira to Feroz Pura Swabi vide order dated 26.1.2015. He contended that this order has not been challenged before the appellate authority.

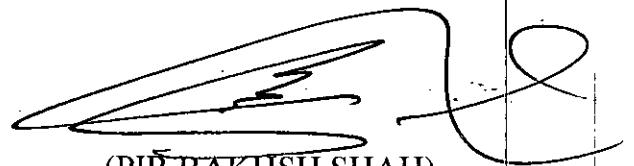
5. After hearing the learned counsel for the appellant and learned GP for the respondent department and perusal of the record, the Tribunal is of the view to remit this appeal to the appellate authority to examine the case and while examining the case, this observation of the Tribunal may be kept in view that if the appellant had assumed charge at GGPS Jehangira on 25.9.2014 as asserted by the learned counsel for the appellant, what prompted the respondent department to transfer her back on 26.1.2015 without observing the tenure policy? Needless to mention that the appeal be decided within a period of one month after the receipt of this judgment. In case the appeal is not decided within the stipulated period, it shall be presumed that the department has no justification to offer. The appeal is disposed of accordingly. Parties are left to bear their own costs. File be consigned to the record.

ANNOUNCED

03.09.2015



(ABDUL LATIF)
MEMBER



(PIR BAKHSH SHAH)
MEMBER

رجسٹر حاضری مدرسین

2014

بابت ماہ نومبر

نام	اسم فاروق	سردار شہباز	صاحبزادہ شہباز	مہاراجہ شہباز
عہدہ	ناٹ	ناٹ	ناٹ	ناٹ

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35
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5	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35
6	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35
7	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35
8	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35
9															
10	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35
11	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35
12	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35
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14	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35
15	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35	✓	8:30	✓	1:35
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دستخط ہید ماسٹر
 7/11/14
 11/11/14

قسم رخصت	حال	سابقہ	میزان	حکال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقیہ		07	11	11	08	11			
استحقاق									
بیماری									
میزان									

دستخط ہید ماسٹر

11/11/14

11.05.2015

Counsel for the appellant and Mr. Khalid Mateen, ADO alongwith Assistant AG for respondents present. Preliminary arguments heard. In the light of preliminary arguments advance on 25.2.2015, the appeal is admitted to regular hearing. The respondents shall agitate their objections in their written reply. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply 28.5.2015 before S.B. Till then status-quo be maintained.

Application for release of pay submitted by the appellant. Notice of the said application be issued for the date fixed.


Chairman

28.05.2015

Mr. Muhammad Iqbal, husband of the appellant, on behalf of the appellant, M/S Khalid Matin, ADO, Javed Ahmed, Supdt. and Khurshid Khan, SO alongwith Addl: A.G for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and hearing on stay application as well as final hearing for 9.7.2015.


Chairman

09.07.2015

Appellant in person, M/S Khurshid Khan, SO and Javed Ahmed, Supdt. alongwith Addl: A.G for respondents present. Rejoinder not submitted. To come up for rejoinder and arguments on stay application as well as main appeal on 03-09-2015


Member


Member

3

25.02.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was promoted from BPS-12 to BPS-14 and posted vide order dated 25.9.2014 in GGPS Jehangira but vide impugned order dated 7.11.2014 she was again transferred and posted from the said school to GGPS Feroz Pur, Jalbai. That the impugned order was passed by SDEO(F) respondent No.1 who was not competent to pass such orders and, furthermore, the same is the result of political interference.

Pre-admission notice be issued to the respondents for 4.3.2015 before S.B. Notice of stay application be also issued for the date fixed.


Chairman

4.3.2015

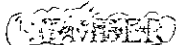
Counsel for the appellant present. Pre-admission notices to the respondents were not found to have been issued. The same be issued for 06.4.2015.

It was submitted on behalf of the appellant that the appellant is still performing her duty at GGPS Jehangira No.1 in BPS-14. Status quo is to be maintained till the date fixed.


MEMBER

06.4.2015

Counsel for the appellant and Mr. Muhammad Jan, GP with Mosam Khan, AD for respondents No. 5 and 6 present and requested for further time. Fresh notices be issued to other respondents. To come up for preliminary hearing on main appeal as well as application for interim relief on 11.05.2014. Till then status is extended.

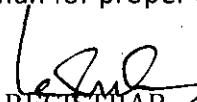


MEMBER


MEMBER

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 122 /2015

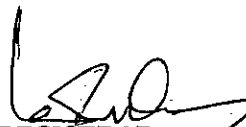
S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	16.02.2015	<p>The appeal of Mst. Saiqa resubmitted today by Mr. Rehmanullah Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p style="text-align: right;"> REGISTRAR</p>
2	23-2-15	<p>This case is entrusted to Bench <u>I</u> for preliminary hearing to be put up thereon <u>25-2-15</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mst. Saiqa SPST GGPS Jehangira No.1 Distt. Swabi received to-day i.e. on 12.02.2015 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 transfer order of the appellant mentioned in para-4 of the memo of appeal is not attached with the appeal which may be placed on it. The order dated 7.11.2014 not a transfer order but a proposed transfer list of the teachers.
- 2- Annexure-B of the appeal is illegible which may be replaced by legible/better one.
- 3- Address of respondent No.1 is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.



No. 187 /S.T.

Dt. 13/2 /2015


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Rehmanullah Adv. Pesh.

16/02/2015
Sir,

Resubmitted after completion all objection 
The Impugned order mentioned at para
4 is the only order, from which
appellant is aggrieved therefore 
is to be treated the impugned
order. Appeal may kindly be
placed before the bench.

- Rave all
7.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

Service Appeal No. 122 /2015

Mst.Saiqa SPSTAppellant

VERSUS

Sub Divisional Education Officer Female Lahore & others.....Respondents

I N D E X

S.NO	Description Of Documents	Annex	Pages
<u>1</u>	Memo of Appeal		1-4
<u>2</u>	Stay Application along-with Affidavit		5-6
<u>3</u>	Copy of Promotion order 24-9-2014	A	7-9
<u>4</u>	Copy of Notification 7-11-2014	B	10-11
<u>5</u>	Copy of Departmental Representation	C	12-14
<u>6</u>	Copy of Appeal & Judgment	D	15-22
<u>7</u>	Copy of Transfer, Posting Policy	E	23-26
<u>8</u>	Wakalatnama		27

Through
Appellant
Rahman Ullah
Rahman Ullah
Shehryar Khan
Shehryar Khan
Advocates Peshawar
High Court Peshawar,
Office 25-A Nasir Mansion
2-Railway Road Peshawar
0333-9125367

1

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

Service Appeal No. 122/2015

K.W.P. Province
Service Tribunal
Diary No. 104
dated 12-2-2015

Mst.Saiqa SPST,

Government Girls Primary School

Jehangira.No.1 District Swabi.....**Appellant**

VERSUS

1. Sub Divisional Education Officer Female Lahor, ^{no.} District Swabi.
2. District Education Officer, Female Swabi.
3. Executive District Officer Schools & Literacy, Swabi.
4. Assistant Sub Divisional Officer(A.S.D.E.O) Female Lahor.
5. Director Education KPK Peshawar.
6. Secretary Education KPK Peshawar**Respondents**

**SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA, SERVICE TRIBUNAL ACT 1974
AGAINST THE POLITICALLY MOTIVATED TRANSFER
ORDER DATED 07-11-2014.**

Prayer in Appeal:

**THAT ON ACCEPTANCE OF THIS APPEAL, THE
ORDER DATED 07-11-2014 MAY BE SET-
ASIDE/CANCELLED/ WITHDRAWN BEING POLITICALLY
MOTIVATED AND PASSED IN VIOLATION OF POSTING
TRANSFER POLICY OF THE GOVERNMENT, AND ANY
OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS
FIT AND APPROPRIATE THAT MAY, ALSO, BE AWARDED
IN FAVOUR OF APPELLANT.**

Filed to-day

Registered

12/2/15

Filed to-day

16/2/15

Re-subm
and filed.


Regis

Respectfully Sheweth:

1. That the appellant was appointed as PST in Govt Girls Primary School Feroz Pur Jalabai District Swabi and served there for about 10 years in the said school, and is residing with her family in Jehangira Swabi.
2. That the appellant was promoted from PST to SPST BPS-14 and was transferred/posted from Government Girls Primary School Feroz Pur Jalabai to GGPS Jehangira No.1 vide order dated 24-9-2014 **(Copy of order dt 24-9-2014 attached as annexure A).**
3. That the appellant has submitted her arrival report and started her duty in GGPS Jehangira No.1.
4. That the Respondent No.1 issued the impugned proposed notification dated 07-11-2014 vide No.755 for the adjustment of Senior Primary School teacher BPS-14, to their previous School and Grade, which is illegal, unlawful and against rule and policy. **(Copy of ~~proposed~~ notification attached as annexure B).**
5. That being aggrieved the appellant filed departmental representation before the Respondents but no response has been given so far **(Copy of departmental representation attached as annexure C).**
6. That the appellant filed suit before the court of Senior Civil Judge Swabi which was dismissed vide order dated 09-01-2015.
7. That then the appellant filed an appeal before the court of District Judge Swabi which was disposed by the learned Additional District Judge Swabi on 02-02-2015 **(Copy of appeal & Judgment attached D).**

- 3
8. That feeling aggrieved from the said order & not giving any positive reply of the departmental representation the appellant prefer this appeal inter-alia on the following grounds.

GROUND:

- A. That the impugned malafide order dated 07-11-2014 of the respondent No.1 and not considering the appeal of the appellant is unlawful, illegal and against the rules and regulation on the subject.
- B. That the promotion and adjustment order was passed by the DEO Respondent No.2 while the impugned order was issued by SDEO which is illegal and unlawful and come within the definition of void order.
- C. That the husband of the appellant is serving in motorway police and performing his duty in Jehangira and according to ESTA CODE the husband and wife should be posted in the same station. The family of the appellant settled in Jehangira, therefore the present GGPS Jehangira No.1 is the nearest station of appellant and appellant spent more than 10 years in GGPS Feroz Pur Jalabai.
- D. That the appellant not completed even the normal tenure in GGPS Jehangira No.1 and she was retransferred to the same school on the ground that she filed an application for retransfer but no such application has been filed by the appellant.
- E. That the impugned order (transferred order) was issued by S.D.E.O (Female) based on malafide, ill will and on bias.

- F. And there is no such application filed by appellant for re- transfer from GGPS Jehangira No.1 to GGPS Feroz Pur Jalabai.
- G. That the appellant husband is also Government servant in motorway police and performing his duty from Jehangira to Nowshera, and case of the appellant also come under the spouse policy.
- H. That the impugned transfer is against the posting, transfer policy especially Clause-1 of the posting transfer policy dated 15-2-2003 **(copy of order is attached as annexure E).**
- I. That the appellant has not been treated according to law and rules.
- J. That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is therefore humbly prayed that the on acceptance of this appeal, the order dated 07-11-2014 may be set-aside/cancelled/ withdrawn being politically motivated and passed in violation of posting transfer policy of the government, and any other remedy, which this august tribunal deems fit and appropriate that may, also, be awarded in favour of appellant.


Appellant

Through


Rahman Ullah -


Shehryar Khan

Advocates Peshawar

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

C.M.No. _____/2015 IN

Service Appeal No. _____/2015

Mst.Saiqa SPSTApplicant/*Appellant*

VERSUS

Sub Divisional Education Officer Female Lahor &
others.....Respondents

**APPLICATION FOR SUSPENSION OF THE
IMPUGNED ORDER DATED 07-11-2014 AND
ALLOWING THE APPELLANT TO PERFORMED
HER DUTY AT GGPS JEHANGIRA NO.1 TILL THE
FINAL DISPOSAL OF THE MAIN APPEAL.**

Respectfully Sheweth:

1. That the above mentioned service appeal is filling by the appellant, in which no date of hearing has yet been fixed.
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 order is not suspended then the appellant would sustain an irreparable loss.

It is, therefore prayed that on acceptance of this application, the operation of the impugned order dated 07/11/2014 may kindly be suspended, till the final disposal of the main appeal.

and allowing the applicant to perform his duty at C.A.P.S Peshawar

Appellant

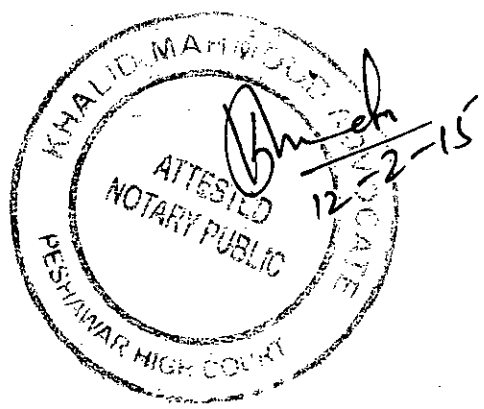
Through

Dated: /02/2015

Rahmanullah
Advocate, Peshawar.

AFFIDAVIT:

I, Mst. Saiqa (Appellant) stated on oath that contents of accompany Application are true and correct to the best of my knowledge and belief and that nothing has been concealed or misstated, deliberately.



Saiqa
DEPONENT

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SWABI

ADJUSTMENT OF SENIOR PRIMARY SCHOOL TEACHERS B-14:-

Consequent upon the promotion order issued vide this office notification Endst: No.1535-G dated 12-7-2014, the following female SPSTs B-14 (8000-610-26300) are hereby adjusted against the vacant posts in the schools noted against their names on the terms and conditions given below in the best interest of public service. The order will be come in the effect as per following detail.

S.NO	DPC SENIORITY NO.	NAME	PRESENT SCHOOL	PLACE OF POSTING	Dated of awarded
1	661	Hanumda Begum	GGPS Kala	GGPS Kala	29-05-2014
2	662	Rozana Naz	GGPS No 1 Swabi	GGPS No 1 Swabi	29-05-2014
3	663	Romna Bibi	GGPS Shagan Turlandi	GGPS Shagan Turlandi	29-05-2014
4	664	Nargis Naz	GGPS Rashaka Bachai	GGPS Rashaka Bachai	29-05-2014
5	665	Zabeen Akhter	GGPS No 1 Dodher	GGPS No 1 Dodher	29-05-2014
6	668	Ameez Zada	GGPS No 1 Baja	GGPS No 1 Baja	29-05-2014
7	669	Sanda Naz	GGCMS Naro Jadeed	GGCMS Naro Jadeed	29-05-2014
8	670	Nabila Begum	GGPS Ahad Khan	GGPS Ahad Khan	29-05-2014
9	671	BLAQ BEGUM	GGPS DHERI YAR HUSSAIN	GGPS URMAL DHERI	29-05-2014
10	679	Mehnaz Begum	GGPS Jama Ulla	GGPS Jama Ulla	29-05-2014
11	673	Naz Begum	GGPS No 2 Shewa	GGPS No 2 Shewa	29-05-2014
12	674	Rameela Naz	GGPS Thand Kor	GGPS Thand Kor	29-05-2014
13	675	Shahz Aman	GGPS No 1 Dagai	GGPS No 1 Dagai	29-05-2014
14	679	Rajia Begum	GGPS Kala	GGPS Kala	29-05-2014
15	678	Bibi Sabira	GGPS No 1 Parmoh	GGPS No 1 Parmoh	29-05-2014
16	681	Safia Rahman	GGPS Jamal Abad KSK	GGPS Jamal Abad KSK	29-05-2014
17	682	Achhar Zai	GGPS No 3 Dandooqa	GGPS No.3 Dandooqa	29-05-2014
18	683	Farda	GGPS No 3 Dagai	GGPS No.3 Dagai	29-05-2014
19	684	Alasarat Begum	GGPS No 1 Shewa	GGPS No 1 Shewa	29-05-2014
20	685	Umaira Begum	GGPS Kala	GGPS Mian Dheri	29-05-2014
21	686	BASMA UN	GGPS LAHOR NO:3	GGPS LAHOR NO:3	29-05-2014
22	688	Shahnaz Achhar	GGPS No 2 Zaida	GGPS No 2 Zaida	29-05-2014
23	689	Shahida Aman	GGPS Firdos Abad	GGPS Firdos Abad	29-05-2014
24	690	Ammi Naseem	GGPS No 1 Zaida	GGPS No 1 Zaida	29-05-2014
25	691	Sahleen Begum	GGPS Mian Kilb	GGPS Mian Kilb	29-05-2014
26	692	Saima Gul	GGPS No 1 Topi	GGPS No 1 Topi	29-05-2014
27	693	BEGUM KAVLELA	GGPS YAR HUSSAIN NO:2	GGPS YAR HUSSAIN NO:2	29-05-2014
28	695	Shazia Noorem	GGPS No 1 Kunda	GGPS No 2 Zaida	29-05-2014
29	697	Rameela Siano	GGPS No 1 Maneri Bala	GGPS No 1 Maneri Bala	29-05-2014
30	698	Shamam Akhtar	GGPS No 1 Ismaila	GGPS No 1 Ismaila	29-05-2014
31	699	Ulla Begum	GGPS Shagan Maneri	GGPS Shagan Maneri	29-05-2014
32	700	BALQES SHAHNAZ	GGPS TORDHER NO:1	GGPS TORDHER NO:1	29-05-2014
33	701	Shahza Khan	GGPS No 1 Maneri Bala	GGPS No.2 Maneri Bala	29-05-2014
34	702	Shakeela	GGPS No 1 Tarakai	GGPS No 1 Tarakai	29-05-2014
35	703	Fardah Asad	GGPS No 1 Darra	GGPS No 1 Darra	29-05-2014
36	704	Ahunnai Begum	GGPS No 1 Ismaila	GGPS No 1 Ismaila	29-05-2014
37	705	Sanje Naz	GGPS Gar Munara	GGPS Gar Munara	29-05-2014
38	706	Nargis Begum	GGPS Gar Shagai	GGPS Gar Shagai	29-05-2014
39	707	Nahced Begum	GGPS No 3 Saleem Khan	GGPS No.3 Saleem Khan	29-05-2014
40	709	WAZIAT	GGPS GAZI KOT	GGPS GAZI KOT	29-05-2014
41	711	Shahida Begum	GGPS No 2 Saleem Khan	GGPS No.2 Saleem Khan	29-05-2014
42	712	Hameeda Aman	GGPS Seen Khel	GGPS Seen Khel	29-05-2014
43	713	Abida Begum	GGPS Shagan Maneri	GGPS Shagan Maneri	29-05-2014
44	714	SUMHRA FARAZ	GGPS LAHOR NO:1	GGPS LAHOR NO:1	29-05-2014
45	716	ZAKIA HAJIB	GGPS TORDHER NO:1	GGPS TORDHER NO:1	29-05-2014
46	717	Manda Naz	GGPS Shamali Banda	GGPS Shamali Banda	29-05-2014
47	718	Sahoon	GGPS No 2 Dagai	GGPS No 2 Dagai	29-05-2014
48	719	Zahra Nazir	GGPS No 1 Baja	GGPS Jamal Abad KSK	29-05-2014
49	720	Zakia Mumawu	GGPS No 5 Dagai	GGPS No 5 Dagai	29-05-2014
50	721	IQZIA	GGPS YAR HUSSAIN NO:2	GGPS YAR HUSSAIN NO:2	29-05-2014
51	723	Romola Kosar	GGPS No 1 Zarabi	GGPS Jama Khan Gari	29-05-2014
52	726	Nargis	GGPS No 3 Maneri Bala	GGPS No.3 Maneri Bala	29-05-2014
53	728	HAGI EM	GGPS DOBAIN NO:1	GGPS DOBAIN NO:1	29-05-2014
54	729	Smitiya Begum	GGPS Gar Panj Pir	GGPS Gar Panj Pir	29-05-2014
55	730	HURBIYAT	GGCMS DOULAT ABAD	GGCMS DOULAT ABAD	29-05-2014
56	731	NASIRA BEGUM	GGPS TORDHER NO:1	GGPS TORDHER NO:1	29-05-2014
57	732	ASMA KHAN	GGPS MASOOD ABAD	GGPS MASOOD ABAD	29-05-2014
58	733	MUSRIAT	GGCMS YAR HUSSAIN	GGCMS YAR HUSSAIN	29-05-2014
59	734	Hanum	GGPS Asota Sharif	GGPS Asota Sharif	29-05-2014

Handwritten signature

307	1172	AGHA	GGPS BALU	GGPS BEKA NO:1	29-05-2014
308	1173	ZAFAR GHA	GGPS TOROHLI NO:1	GGPS TOROHLER NO:1	29-05-2014
309	1174	LAWCELA	GGPS, No 1 Mangalchare	GGPS, No 1 Mangalchare	29-05-2014
310	1175	HAZMEEN	GGPS UMAR DHOK	GGPS JALBAI NO:2	29-05-2014
311	1176	Bibi Hafiza	GGPS, Gani kot	GGPS, Gani kot	29-05-2014
312	1177	SALGA	GGPS FERQZ PUR JALBAI	GGPS IEHANGIRA NO:1	29-05-2014
313	1178	Ruqia Naz	GGPS, Kabgani	GGPS, Kabgani	29-05-2014
314	1179	Hakimaz	GGPS, Gulabhad Amrara	GGPS, Gulabhad Amrara	29-05-2014
315	1180	Noor Jehan	GGPS, Sandowa	GGPS, Sandowa	29-05-2014
316	1181	Nuzat Begum	GGPS, Dagai	GGPS, Dagai	29-05-2014
317	1182	Gullam	GGPS, Anwar Shah Banda	GGPS, Anwar Shah Banda	29-05-2014
318	1183	Asa Begum	GGPS No 1 Parmoli	GGPS No. 1 Parmoli	29-05-2014
319	1184	Rwceda	GGPS Bam Khel	GGPS Bam Khel	29-05-2014
320	1185	Bibi Misbah	GGPS No 3 Swabi (B)	GGPS No 3 Swabi (B)	29-05-2014
321	1186	Hameeda Naz	GGPS No 1 Kadhi	GGPS No 1 Kadhi	29-05-2014
322	1187	Basma Jamal	GGPS Fazal Abad (P)	GGPS Fazal Abad (P)	29-05-2014
323	1188	Nazma Begum	GGPS, Hal Banda	GGPS, Hal Banda	29-05-2014
324	1189	Farzana Habib	GGPS No 1 Datta	GGPS No 1 Shagan Pan Pt	29-05-2014
325	1190	MUSHTAQA	GGPS FAZLI HAHEEM BANDA	GGCMS SHAHID ULLAH BANDA	29-05-2014
326	1191	Zahra Nisa	GGPS Fazal Abad (P)	GGCMS Parmoli	29-05-2014
327	1192	AZRA YASNEEM	GGPS GEDER BANDA	GGPS GEDER BANDA	29-05-2014
328	1193	Nozhat Shaheen	GGPS, NO 2 Topi	GGPS, NO 2 Topi	29-05-2014
329	1194	NAEEM	GGCMS YAQOOB SHAM	GGPS ISMAIL ABAD	29-05-2014
330	1195	Ramun Begum	GGPS, Amrai Bala	GGPS, Amrai Bala	29-05-2014
331	1196	Sahna Gul	GGPS, No 1 Topi	GGPS, No 1 Topi	29-05-2014
332	1197	FARZANA	GGPS BABU DHERI	GGPS BABU DHERI	29-05-2014
333	1198	Bibi Hadra	GGPS No 1 Swabi	GGPS No. 2 Swabi	29-05-2014
334	1199	Nagina Naz	GGPS No 2 Saleem Khan	GGPS Bakar Seri	29-05-2014
335	1200	ANES NAZ	GGCMS SHAHID ULLAH BANDA	GGCMS SHAHID ULLAH BANDA	29-05-2014
336	1201	RAISAT	GGPS MIR AFZAL BANDA	GGPS MIR AFZAL BANDA	29-05-2014
337	1202	LUBNA QAMAR	GGPS BALU	GGPS BEKA NO:2	29-05-2014
338	1203	Dilshan	GGPS Takhta Band	GGPS Takhta Band	29-05-2014
339	1204	FALAH NAZ	GGPS SAFFOR BANDA TORDHER	GGPS BAGH HARAM	29-05-2014
340	1205	Gulista	GGPS No 2 Kalu Khan	GGPS Shera Ghund	29-05-2014
341	1206	SHAZIA	GGPS YAQOOB	GGPS YAQOOB	29-05-2014
342	1207	Nizakat	GGPS, No 1 Kotla	GGPS, No. 1 Kotla	29-05-2014
343	1208	Rozina Khan	GGPS No 1 Parmoli	GGPS Spin Kani	29-05-2014
344	1209	SHAKULA	GGPS DOBAIN NO:1	GGPS DOBAIN NO:1	29-05-2014
345	1210	Mehnaz Begum	GGPS, Panjtan	GGPS Panjtan	29-05-2014
346	1211	DUR SHAYAR	GGPS THANA BANDA	GGPS THANA BANDA	29-05-2014
347	1212	DUR SAMEEN	GGPS BATTI NO:1	GGPS BATTI NO:1	29-05-2014
348	1213	Ashraf	GGPS No 2 Maneri Payan	GGPS No. 2 Maneri Payan	29-05-2014
349	1214	Rifana Iqbal	GGPS Lalo Dheri	GGPS Lalo Dheri	29-05-2014
350	1215	Saadia Shireen	GGPS, No 3 Topi	GGPS, No. 3 Topi	29-05-2014
351	1216	Hushra	GGPS Jamal Abad Datta	GGPS Jamal Abad Datta	29-05-2014
352	1217	THESEN	GGPS JALSAI NO:2	GGPS JALSAI NO:2	29-05-2014
353	1218	Gulnar Begum	GGPS, Hal Banda	GGPS, Hal Banda	29-05-2014
354	1219	HIGHAT	GGPS MANKI NO:2	GGPS MANKI NO:2	29-05-2014
355	1220	Nigbat Secuni	GGPS No. 2 Zaida	GGPS Pototar Zaida	29-05-2014
356	1221	Uzma	GGPS No 1 Maneri Payan	GGPS No 1 Maneri Payan	29-05-2014
357	1222	RAZIYAT	GGPS HARIF KHAN KILLI	GGPS HARIF KHAN KILLI	29-05-2014
358	1223	LUBNA	GGPS DOBAIN NO:1	GGPS DOBAIN NO:1	29-05-2014
359	1224	Bibi Nazia	GGPS, Jada sar	GGPS, Jada sar	29-05-2014
360	1225	Shahroz Jehan	GGPS Khusa	GGPS Spin Kani	29-05-2014
361	1226	BASMEEN	GGPS FERQZ PUR JALBAI	GGPS FERQZ PUR JALBAI	29-05-2014
362	1227	SHAZIA	GGCMS YAQOOB SHAH	GGPS ISMAIL ABAD	29-05-2014
363	1228	Shaza Jehan	GGPS Habib Abad (P)	GGPS Habib Abad (P)	29-05-2014
364	1229	Shamun Ara	GGPS, Kund	GGPS, Kund	29-05-2014
365	1230	JumlaRehman	GGPS, Bhoon shoon	GGPS, Bhoon shoon	29-05-2014
366	1231	Nigbat Ishaq	GGPS No 1 Saleem Khan	GGPS No 1 Saleem Khan	29-05-2014
367	1232	Umara Naz	GGPS No. 2 Saleem Khan	GGPS No. 2 Saleem Khan	29-05-2014
368	1233	Hussan Para	GGPS M Akbar Khan Killi	GGPS M Akbar Khan Killi	29-05-2014
369	1234	Fazana Yasmeen	GGPS Firdous Abad	GGPS Firdous Abad	29-05-2014
370	1235	SARECH	GGPS JALBAI NO:1	GGPS JALBAI NO:1	29-05-2014
371	1236	HABIB	GGPS TORDHER NO:2	GGPS MATANI CHANGEN	29-05-2014
372	1237	Mehroz Nisa	GGPS, Seri Chanat	GGPS, Seri Chanat	29-05-2014
373	1238	Yasminaz Shaheen	GGPS Parra Kalu Khan	GGPS Parra Kalu Khan	29-05-2014
374	1239	Shakeela Naz	GGPS No 2 Marghuz	GGPS No 2 Marghuz	29-05-2014
375	1240	Khabida Perveen	GGPS Sapronna Bachan	GGPS Sapronna Bachan	29-05-2014

Handwritten signature and initials.

475	483	Nasira Israr	GGPS No.2 Marghuz	GGPS No.2 Marghuz	29-05-2014
476	571	Tanveer Begum	GGPS Bangladesh Banda	GGPS Bangladesh Banda	29-05-2014
477	604	Nosheen Akhtar	GGPS No.2 KSK	GGPS No.2 KSK	29-05-2014
478	626	Asia Naz	GGSP No.2 KSK	GGPS No.2 KSK	29-05-2014
479	628	Majida Begum	GGPS No.2 Marghuz	GGPS Musa Banda	29-05-2014
480	632	Naila Begum	GGPS No.2 Bachai	GGPS No.2 Bachai	29-05-2014

Terms and conditions.

1. They would be on probation for a period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Government.
3. Their service can be ~~terminated~~ ^{terminated} at any time, in case his performance is found unsatisfactory during probationary period. In case of misconduct, she shall be preceded under the rules, framed from time to time.
4. Charge reports should be submitted to all concerned.
5. Their inter-se-seniority on lower post will remain intact.
6. No TA/DA is allowed for joying duties.
7. They will give an under taking to be recorded in their service books to the effect that if any over payment is made to him in the light of this order will be recovered and if he is wrongly promoted he will be reserved.
8. They will have to take over charge within 15 days after the issue to this adjustment order ,otherwise their promotion will be ceased:

(ULFAT BEGUM)
DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Endst:No. 1970-75 /Dated Swabi the 24/9 /2014

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

1. Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
2. Deputy Commissioner, Swabi.
3. District Accounts Officer, Swabi.
4. All SDEOs (Female) Swabi.
5. ADEO (F) Establishment Primary Swabi.
6. Supdt (Female) Establishment Swabi

DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

Ulfat Begum
12

Annex B

1/19

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) LAHOR (SWABI)

NO: 755 / DATED 7-11-2014 / 2014

To

The District Education Officer
Female Swabi.

Subject: ADJUSTMENT OF SENIOR PRIMARY SCHOOL TEACHERS B-11
Memo:

Reference your order bearing No: 1970-75 dated 24-9-2014, it is submitted for your kind information that the following SPSTs are recently transferred, but not willing to take charge, filled appeals for adjustment on their original schools and now on your strong recommendations these are adjusted in their present schools on the posts of B-12. The proposed list submitted for necessary correction/order please.

S#	S.NO in Order	Name of Mistress	Present GGPS	Under transfer to GGPS	Adjusted at GGPS
1	360	Tamsila	Kunda No:2	Pak Kiya	Kunda No:2
2	288	Folada	Badu wand	Lahor No:3	Badu Wand
3	299	Bibi Sohila	Rana Ghari	Lahor No:2	Rana Ghari
4	157	Fazilat	Salah	Islam Banda	Salah
5	262	Begum	Sheikh Dheri NO:2	Zakrya Khurd	Sheikh Dheri No:2
6	313	Farzana	Haryan No:1	CMS Nabi	Haryan NO:1
7	314	Basmeen	Lahor No:1	Jalsai No:4	Lahor NO:1
8	318	Filawat	Lahor No:1	Jalsai 1	Lahor NO:1
9	436	Lubna	Balu	Beka No:1	Lahor No:1
10	406	Asia	Balu	Beka NO:1	Balu
11	317	Gul Reza	Kunda No:2	Nabi	Balu
12	361	Shazia	CMS Yaqoob Shah	Ismati Abad	Kunda NO:2
13	428	Nacem	CMS yaqoob Shah	Ismail Abad	CMS yaqoob Shah
14	311	Gulshan	Raees Abad	Adanki NO:2	CMS Yaqoob Shah
15	61	Shmista	Nary Wand	Uch Khawar	Raees Abad Nary wand

DP

Signature

Better copy

10

OFFICE OF THE SUB DIVISIONAL EDUCATION
OFFICER (FEMALE) LAHOR (SWABI)

No.755 /dated 7-11-2014

To,

The District Education Officer
Female Swabi.

SUBJECT: ADJUSTMENT OF SENIOR PRIMARY SCHOOL TEACHER B-14

Memo:

Reference your order bearing No.1970-75 dated 24-9-2014, it is submitted for your kind information that the following SPST as are recently transferred, but no willing to take charge, filed appeals for adjustment on their original school and now on your strong recommendation these are adjusted in their present school on the posts of B-12. The proposed is submitted for necessary correction/order please.

S #	S.No. order	Name of Mistress	Present GGPS	Under Transfer to GGPS	Adjusted at GGPS
1	360	Tamsila	Kunda.No.2	Pak Kiya	Kunda No.2
2	288	Folada	Badu Wand	Lahor No.,3	Badu Wand
3	299	Bibi Sohila	Rana Ghari	Lahor No.2	Rana Ghari
4	157	Fazilat	Salah	Islam Banda	Salah
5	262	Begum	Sheikh Dheri No.2	Zakrya Khurd	Sheikh Dheri No.2
6	313	Farzana	Haran No.1	CMS NAbi	Haryan No.1
7	342	Basmeen	Lahor No.1	Jalabai 1	Lahor 1
8	318	Tilawat	Lahor No.1	Jalsai 1	Lahor NO.1
9	346	Lubna	Bala	Beka No.1	Bala
10	406	Asia	Bala	Beka No.1	Bala
11	317	Gul Reza	Kunda No.2	Nabi	Kunda No.2
12	461	Shazia	CMS yaqoob Sh	Ismail Abad	CMS yaqoob Sh
13	428	Naeem	CMS yaqoob Sh	Ismail Abad	CMS yaqoob Sh
14	82	Gulshan	Raees Abad	Manki No.2	Raees abad
15	61	Shaista	Naray Wand	Khwarh	Nary Wand

Sub Divisional Education Officer
Female Lahor.

1/2

16	436	Falak Naz	Saifoor Banda	Bagh Haram	Saifoor Banda
17	145	Yasmecn	Jamra No:2	Beka No:1	Jamra No:2
18	108	Tilwal Zeb	Yar Hussain NO:2	Hayat Abad	Yar Hussain NO:2
19	175	Firasat	Rafiq Abad	Suether No:1	Rafiq Abad
20	280	Rukhsana	Ball Banda	Unwan Abad	Ball Banda
21	65	Tevyba	Qasim banda	Yaqoobi	Qasim Banda
22	221	Shahida	Qasim Mathra	Yaqoobi	Qasim Mathra
23	358	Sabecha	Sadar Abad	CMS Nabi	Sadar Abad
24	149	Faria	Jalbat No:1	Kunda No:1	Jalbat No:1
25	165	Rajma	Rustam	Jalbat No:4	Rustam Koria
26	355	Bena Gul	Umar Dhok	Jalbat No:2	Umar Dhok
27	476	Kabia	Tordher No:2	Matam Chenge	Tordher No:2
28	269	Naryam	Tordher No:3	Tordher No:3	Tordher No:3
29	409	Nazmeen	Shabaz Pur	Jalbat No:2	Shabaz Pur
30	341	Nehmaz	Manet No:1	Jalsat NO:4	Manki No:1
31	140	Zeenat	Dobain NO:2	Beka No:1	Dobain No:1
32	9	Tilaj	Lhert Yar Hussain	Urnal Dhert	Dhert Yar Hussain
33	147	Malika	Sano Banda	Hayat Abad	Sano banda
34	264	Tevyba	Qasim banda	Yaqoobi	Qasim banda
35	384	Uzma	Shahi Bangh	Jalbat No:4	Shahi Bangh
36	411	Saiga	Feroz Pur	Jehangira No:1	Feroz Pur
37	270	Shaisia	Anbar No:2	Mira Dhok	Sheikh Dhert No:1
38		Shaccela	Cms yar Hussain	Cms haji abad	CMS Yar Hussain

1/2

1/2

16	436	Falak Naz	Saifoor Banda	Bagh Haram	Saifoor Banda
17	145	Yasmeen	Jamra No.2	Beka No.1	Jamara No.2
18	108	Tilawat Zeb	Yar hussain No.2	Hayat abad	Yar hussain NO.2
19	173	Firasat	Rafiq abad	Sudher NO.1	Rafiq abad
20	280	Rukhsana	Bal banda	Unwan abad	Bal banda
21	65	Teyyaba	Qasim Banda	Yaqoobi	Qasim Banda
22	221	Shahida	Qasim Mathra	Yaqoobi	Qasim Mathra
23	358	Sabeeha	Saudan bad	CMS Nabi	Sardar Abad
24	149	Farha	Jalbai No.1	Kunda No.1	Jalbai No.1
25	165	Najma	Rustam	Jalbai No.4	Rustam
26	355	Bena Gul	Umar Dhok	Jalbai No.2	Umar Dhok
27	470	Rabia	Tordher No.2	Matani Chengen	Tordher No.2
28	269	Maryam Shazia	Tordher No.5	Tordher No.3	Tordher No.5
29	409	Nazneen	Shazab Pur	Jalbai No.2	Shabaz Pur
30	341	Mehnaz Ghafoor	Manki No.1	Jalsai No.4	Manki No.1
31	140	Zeenat	Dobain No.2	Beka No.1	Dobain No.1
32	9	Tilaj	Dheri Yar hussain	Urmar Dheri	Dheri Yar Hussasin
33	147	Malika	Sano Banda	Hayat Abad	Sno Banda
34	264	Teyyba	Qasim Banda	Yaqoobi	Qasim Banda
35	384	Uzma	Shahi Bangh	Jalbai No.4	Shahi Bangh
36	411	Saiqa	Feroz Pur	Jehangira No.1	Feroz Pur
37	270	Shaista	Anbar No.2	Mira Dhok	Shiekh Dheri No.1
38		Shakeela	CMS Yar Hussain	Cms Haji Abad	CMS Yar Hussain

Sub Divisional Education Officer
Female Lahor

محترم جناب ڈسٹرکٹ ایجوکیشن افسیسر فیملی اہوالی۔

جناب عالیہ!

گزارش ہے کہ میں گورنمنٹ گریڈ پرائمری سکول جھانڈ
منبر میں ڈپٹی سرانجام رہا رہی ہوں۔ میری ٹرانسفر
اس سکول میں گورنمنٹ پرائمری سکول (گریڈ) جھانڈ آرڈر نمبر
75-1970 کے تحت ہوئی جسکے لیے میں پہلے ہی سے گزار بار
درخواست دے چکی تھی۔ لہذا یہاں ٹرانسفر ہونے کے بعد
میں نے اپنی فوشی سے یہاں چارج لیا۔ کیونکہ یہ سکول مجھے
نزدیک پڑتا ہے۔

لیکن مجھے بتا دیا ہے کہ سب ڈویژنل ایجوکیشن افسیسر
فیملی لایور نے ایک لیٹر جسکا نمبر 755 مورف $\frac{11}{14}$ ہے
از سال کیا ہے۔ جس میں انہوں نے اساتذ کے خواہش کے مطابق
ان کو اپنے پہلے والے سکولوں میں ایڈجسٹ کرنے کہلئے استدعا
کی ہے۔ اور اس لیٹر میں میرا نام بھی شامل ہے۔

جناب عالیہ! میں پہلے ہی عرض کر چکی ہوں کہ میں نے اپنے
نئے سکول گورنمنٹ گریڈ پرائمری سکول جھانڈ منبر میں
فوشی سے چارج سنبھالا ہے۔ اور سب ڈویژنل ایجوکیشن

زیر

22-18
15-11-14

افیسر واپہ لیسٹر جھوٹا پیر مہنی ہے۔ ایذا میرا نام اس لیسٹر
 سے زوالا جائے اور مجھے گورنمنٹ گریڈ لیسٹر سیکول جھوٹا لیسٹر
 نمبر 1 میں فروشی سے روکنے دیا جائے جسکے لیے میں پندرہ ہی اپریل
 اپریل مورف $\frac{11}{14}$ کو تاج سرا جھوٹوں جیسی ماچی اس
 درخواست کیسا تھو لفا ہے۔

السر لیسٹر
 ایک تاج سرا نمبر 1 ماچی جی جی جی ایس ایس
 نمبر 1 مورف $\frac{11}{2014}$

Alstad
 1/15

بخدمت جناب ایگزیکٹو سکولز ایڈیٹر، لکھنؤ یونیورسٹی، حیدرآباد

مخبرہ: ایس۔ ایس۔

جناب عالی!

14

گزارش کی جاتی ہے کہ میں عمر ۴۴ برس دراز سے جی جی پی ایس میڈیسن ہار جملی میں ڈیڑھی سہ ماہیام دے رہی تھی جو کہ میرے لیے انتہائی مشکل تھی کیونکہ میں جھانگیرہ خلع نوشہرہ میں ریٹائرمنٹ پر ہوں تھا۔ ہزار بار اندر جان سے درخواست کی کہ مجھے جی جی پی ایس جھانگیرہ نمبر 1 لٹرائٹس کیا جائے۔ مافی گزارش کے بعد اب لٹرائٹس ہر ماہ لٹرائٹس جی جی پی ایس جھانگیرہ نمبر 1 کیا گیا لیکن اب دفتر کے چند روزے مجھے کچھ دوا ایس پرانے تعیناتی پر مجبور کر رہی ہے۔

لہذا آپ صاحبان سے گزارش استدعا کی جاتی ہے کہ میری تعیناتی جی جی پی ایس جھانگیرہ نمبر 1 میں ہی دیا جائے جس پر میں صاحبان شکر گزار رہوں گی۔ شکریہ

الکھنڈ

آرٹھی صاحب فرماں پھر صاحبہ بی. بی. جی جی پی ایس جھانگیرہ نمبر 1

Received Date - 08-11-2014

Hand

8/11/2014

AM

پیشتر و بجات اپنی از من قبل فیصلہ شدہ عدالت عالیہ کو پیش
اپنی پیشتر و بجات اپنی از من قبل فیصلہ شدہ عدالت عالیہ کو پیش



Judge Swabi

22/15
SUPERINTENDENT
District & Sessions Judge
Swabi

Mst, Siyga w/o Mohd Iqbal Khan

Tehsil Lahore Dist, Swabi

Appellant

v/s

1- Mst, Safia Ameen S.D.E.O Lahore

2- Mst, Shakeela A.S.D.E.O Lahore

3- Dist Education Officer Female

Swabi Shalmansoor

4- Director Education KPIC Peshawar

5- Secretary Education KPIC Peshawar

Respondent

ATTESTED
22/2/15
Examining & Issuing Deptt:
Sessions Court Swabi

Civil Appeal

(2)

6272/15
SUPERINTENDENT
District & Sessions Judge
Swabi

This is an appeal against the order
Judgment dated 9-1-15 where by
the Suit of the Appellant was
dismissed upon the application
of Respondent of order 7-R-11, which
is against Law and facts and needs
to be reversed.

Prayer or

To set aside the order
dated 9-1-15 and the Suit may
kindly be decided after pro and
Contra evidence.

ATTESTED
9/2/15
Examining Deptt:
Sessions Court Swabi

(3)

21/07/15
 SUPERINTENDENT
 District & Sessions Judge
 Swabi

Grounds of

1- That the learned Civil Judge has misread and non read the important aspect of the enacted law and hence fell into error, which needs to be corrected.

2- That the learned Civil Judge has ignored the enacted law and particularly the Plaintiff where in the Appellant brought the suit against the proposed order and not the final order, because the

ATTESTED

21/07/15
 Examined by
 Sessions Court Swabi

final order was awaited at that very time. And previous order was tainted with mala fidee.

(4)

2/2/15
SUPERINTENDENT
District & Sessions Judge
Swabi

3 - That Plaintiff / Appellant only
filed suit against the Proposed
order, where in the Civil Court
has got the jurisdiction to entertain
the suit not the Services Tribunal

It is therefore requested that the
order dated 9-1-15 may kindly
be set aside and case be decided

ATTESTED
3/2/15
Deputy
Sessions Court Swabi

MAJED ALLADY
Distt. Commr. Swabi
O.S. No. 286
Date 2/2/15
Distt. Courts Swabi

Recording of pro and Contra

Mst, Siara Bibi - Appellant

It is solemnly affirmed and
declared that contents of this affidavit are
true and correct. Deponent. M. J. [Signature]

①

30/01/15
SUPERINTENDENT
District & Sessions Judge
Swabi

Before Disst, Judge Swabi

mst, Siaga - Appallant vs mst, Safia Ameen et
Respondent
Civil Appeal

mb of Application to Restrained the
Respondent No-1-2 not to stop
the Appallant from marking their
her attendance in G.G.P.S No-1
Jhangira

P/Shaweth of

1- That the details has
been given in the main Appeal
which is filing before this Honorable
Court.

ATTESTED
Examiner Copying Dept.
Sessions Court Swabi

That Appallant was lawfully
summoned to the G.G.P.S No-1
where in she started her

B.M.S.
SUPERINTENDENT
District & Sessions Judge
Swabi

educational activities.

3- That Respondent No-1- and 2 are trying to restrained the Appellant from marking her attendance in the school, and in case of such there is apprehension of irreparable loss to the Appellant.

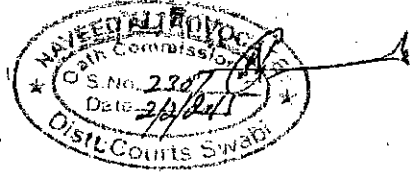
3- That from facie case balance of convenience also lies in favour of Appellant.

It is therefore requested that Respondent No-1-2 may kindly be restrained not to order the Appellant or her Headmaster

from marking her attendance in school.

ATTESTED
3/2/15
District & Sessions Court Swabi

mst, Siag, a. — Appellant.



Affidavite of

It is Solemnly affirmed
and declare that contents of the
applications are true and correct.

Deposited
M. J. Saad

ATTESTED
3/2/15
Examiner/Copying Deptt:
Sessions Court Swabi

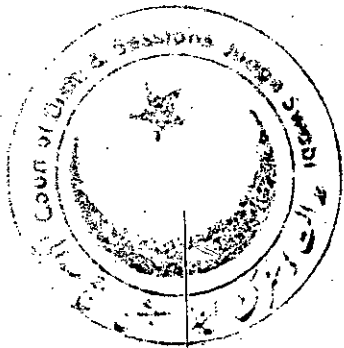
Certified True Copy
3/2/15
Copying Department
Session Court Swabi

No. of Application 2151
Date of Application 3/2/15
Date of 3/2/15
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Date of Copyist
Date of
3/2/15

~~Annex D~~

(21) (15)

مستند رقم 189/1 مورخ 26/11/2014
مستند رقم 09/01/2015



2/2/15

2/2/15

4/13

Order No. 01
02/02/2015

Case file received. Be entered in the relevant register.

Appellant through representative along with counsel present.

Preliminary arguments heard and available record perused.

Mst. Saiqa appellant/ plaintiff instituted the subject civil Suit bearing No.189/1 dated 26/11/2014, for declaration and decree for injunction, during the course whereof arguments on maintainability of the suit were heard with reference to which the learned trial court returned the plaint vide order dated 09/01/2015, of which the appellant/plaintiff felt aggrieved and preferred the subject appeal on the grounds that the order of the learned trial court is against the facts and law, particularly to the fact that the appellant/ plaintiff has challenged the proposed order for

2/2/15

ATTESTED
Examined by: 2/2/15
Sessing Court Swabi

Conti Or-01
02/02/2015

which Civil Court has got jurisdiction to entertain the present suit.


The operative part of the impugned dated 09/01/2015, is reproduced below for the proper appreciation of material available on file.

"Perusal of record further indicates, suit of the plaintiff apropos to government department, related to transfer & posting, which purely comes under the jurisdiction of the Service Tribunal, therefore, this court lacks jurisdiction under 23-B of Civil Service Act 1973 and Article 212 of Constitution of Pakistan. In view of the above, this court has legal bar while entertaining such like cases and for the purpose of proper forum i.e. Service Tribunal already exist, which may be approached.

In sequence of my above discussion, suit of the plaintiff stands dismissed on the ground of jurisdiction".

With reference to findings of the learned trial court, submission of the learned counsel for the appellant and objective perusal of the record, the appellant/plaintiff sought declaration along with injunctive relief against the order bearing No. 755 dated 07.11.2014 vide which she was restrain from putting her attendance in attendance register. Admittedly the matter in issues is related to services in nature and injunction has also been sought, whereas, section 23-B of the N.W.F.P Civil Servants Act, 1973 and Service Tribunal Act, 1974 (N.W.F.P Act No.1 1974) , or the rules made thereunder, no order made or proceedings taken under this Act, or the rules made thereunder by the Governor or any officer authorised by him shall be called in question in any court and no injunction shall be granted by any Court in respect of any decision made, or proceedings taken in pursuance of any power conferred by or under Act of the rules made thereunder".


22/15

ATTESTED

Examiner of Accounts Deptt
Sessions Court Swabi

Conti Or- 01
02/02/2015

Similarly Article 212 of the Constitution of Pakistan 1973 (2) also provides that "Notwithstanding anything hereinbefore contained, where any Administrative Court or Tribunals is establishing under clause(1), no other court shall grant an injunction, make any order or entertain any proceedings in respect of any matter to which the jurisdiction of such Administrative Court or Tribunal extents **[and all proceedings in respect of any such matter which may be pending before such other court immediately before the establishment of the Administrative Court or Tribunal ***[other than an appeal pending before the Supreme Court of Pakistan) shall abate on such establishment]:

Keeping in view the nature of the suit, being service matter and in light of aforesaid quoted law the proper and the right forum for the determination of the rights of the appellatant/plaintiff is Service Tribunal and in the circumstance the Civil Court has got no jurisdiction to entertain the present suit. Thus, the appeal in hand is hereby dismissed in lemini. The appellatant can knock the door of the proper forum for the subject purpose, if he so desire. There is no order as to cost. The learned trial court be informed accordingly. File be consigned to record room after completion and compilation.

ATTESTED
Examined & Certified
Session Court Swabi

Announced
02/02/2015

(Tahir Mehmood Khan)
Additional District Judge-III, Swabi

Certified Copy
3/2/15
Session Court Swabi

No. of Application 1157
Date of Presentation of Application 3/2/15
Date of Advan of Payment
Date on which copy 3/2/15
Date on which copy
Fee on words
Court Fee.....
Urgent Court Fee.....
Signature of Copyist..... 3/2/15

GOVERNMENT OF N.W.F.P.
ESTABLISHMENT & ADMINISTRATION DEPARTMENT
(REGULATION WING)

NO.SOR-1(E&AD)1-1/85(Vol:II)

Dated the Peshawar the 15th February, 2003.

- 1- All Administrative secretaries to Govt: of NWFP.
- 2- The Secretary to Governor, NWFP.
- 3- The Secretary to Chief Minister, NWFP.
- 4- All Heads of Attached Departments in NWFP.
- 5- All the Heads of Autonomous/Semi Autonomous Bodies in NWFP.
- 6- All Distt: Co-Ordination Officer/Political Agents in NWFP.
- 7- The Registrar Peshawar High Court Peshawar.
- 8- All Distt. & Session Judges in NWFP.
- 9- The Secretary NWFP Public Service Commission, Peshawar.
- 10- The Director Anti-Corruption Establishment, Peshawar.
- 11- The Secretary Board of Revenue, NWFP, Peshawar.
- 12- The Registrar, NWFP Service Tribunal, Peshawar.

SUBJECT: POSTING/TRANSFER POLICY OF THE PROVINCIAL GOVERNMENT.

I. I am directed to refer to the subject noted above and to say that in super-session of all policy, instructions issued in this behalf, the competent authority has approved the following Posting/Transfer Policy: -

All the posting /transfer shall be made strictly in the public interest and shall not be abused/misused to victimize the Government Servant...

ii) All Government servants are prohibited to exert political, Administrative or any other pressure upon the posting /transfer authorities for seeking posting transfer of their choice and against the public interest.

iii) All contract Govt: employees appointed against specific posts cannot be posted against any other post.

The normal tenure of posting shall be three years subject to the condition that for the officers/off cials posted in unattractive areas, the tenure shall be two years and for the hard areas the tenure shall be one year. The unattractive and

ATTESTED

[Signature]

[Signature]

while the remaining departments shall make posting/transfers in full. There shall be a ban on posting/transfers throughout the year excluding the aforementioned two months due to promotion/retirement/creation of new post/return from long leave/involvement in disciplinary proceedings and adjustment of surplus staff for which specific relaxation shall be obtained from the Chief Minister.

- vi) While making posting/transfers from settled area to FATA vice-versa specific approval of the Governor NWFP needs to be obtained.
- vii) Officers may be posted on executive/administrative posts in the Distt: of their domicile except District Co-Ordination Officers (DCOs), and Superintendent of Police (SP). Similarly Deputy Superintendent of Police (DSP) shall not be posted at a place where a Police Station (Thana) of his area/residence is situated.
- viii) No posting/transfers of the officers/officials on the detailment basis shall be made.
- ix) Regarding the posting of husband/wife, both in the Provincial Services, efforts where possible would be made to post such persons at one station and this will be subject to the public interest.
- x) All posting/transfers authorities may facilitate the posting/transfers of unmarried female Govt: Servant at the station of their residence or their parents.
- xi) Officer/officials except DCOs and SPs who are due to retire within one year may be posted on their option, on posts in the Distt: of their domicile and be allowed to serve there till retirement.
- xii) In terms of Rule-17 (1) and (2) read with schedule-III of the Govt: of NWFP Rules of Business 1985, transfer of officers shown in column 1 of the following table, table shall be made by the authorities shown against each officers in column 2 thereof: -

COLUMN-1	COLUMN-2
<p><u>Outside the Secretariat.</u></p> <ol style="list-style-type: none"> 1. Officers of the all Pakistan Unified Group i.e. DMG, PSP including Provincial Police Officers in BPS-18 and above. 2. Other officers in BPS-17 and above to be posted against scheduled posts or posts normally held by the APUG, PCS (EG) and PCS (SG) 3. Head of attached Deptt: and other officers in B-19 & above in all the Deptt: 	<p>Chief secretary in consultation with the Establishment Deptt. With the approval of the Chief Minister.</p>

Allsted
M

In the Secretariat.	Chief Secretary with the approval of the Chief Minister.
4. Secretaries.	
5. Other officers and above the rank of Section Officers: -	Secretary of the Deptt: concerned.
a)- Within the same Deptt:	
b)- Within the Secretariat from one Deptt: to another.	Chief Secretary/ Secretary Establishment.
6. Officers up to the rank of Superintendents	Secretary of the Deptt: concerned.
a)- Within the same Deptt:	Secretary of the Deptt: in consultation with the Head of Attached Deptt:
b)- To and from Attached Deptt:	Secretary Establishment.
c)- Within the Secretariat from one Deptt: to another.	

xiii) While considering the posting/transfers proposals all the concerned authorities shall keep in mind the following: -

- a). To ensure the posting of proper persons on proper posts the annual confidential reports, past and present record of service, performance on post held presently and in the past and general reputation with focus on integrity of the concerned officer/officials be considered.
- b). Tenure on present post shall also be taken into consideration and the posting/transfers shall be in the best public interest.

xiv) Government servants including Distt: Government employees feeling aggrieved due to the orders of posting/transfers authorities may seek remedy from the next higher authority/ the appointing authority as the case may be brought an appeal to be submitted within seven days of the receipt of such order. Such appeal shall be disposed of within fifteen days. The option of appeal against posting/transfers orders could be exercised only in the following cases: -

- i)- premature posting/transfers or posting/transfers in violation of this policy.
- ii)- Serious and grave personal(humanitarian) grounds.

AHSB
 MR

S.No	Officers	Authority
1-	Posting of Distt. Coordination Officer and Executive Distt. Officer in a Distt.	Provincial Govt.
2-	Posting of Distt. Police Officer.	Provincial Govt.
3-	Other officer in BPS-17 and above posted in the Distt.	Provincial Govt.
4-	Official in BPS-16 and below.	Executive Distt. Officer in consultation with Distt. Coordination Officer.

3. As per Rule-25 (2) of the Rules mentioned above the Distt. Coordination Department shall consult the Govt. if it is proposed to:-
- a)- transfer the holder of the tenure post before the completion of his tenure or extend the period of his tenure; and
 - b)- Acquire an officer to hold charge of more than one post for a period exceeding two months.
4. I am directed further to request that the above noted policy may be strictly observed/implemented.

Your Faithfully,

S/xxx
(GHULAM JALAN ASIF)
ADDL. SECRETARY (REG.)

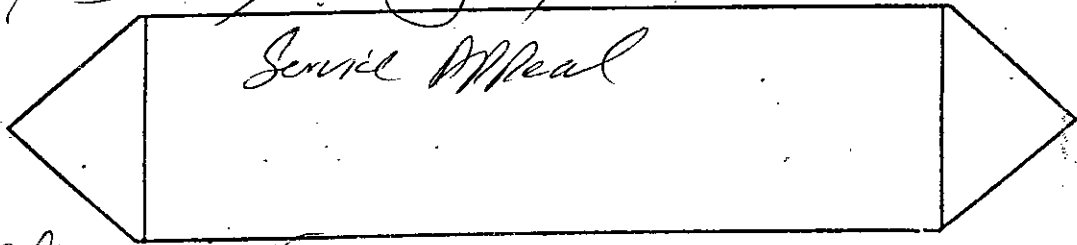
Endst: NO. SOR-1 (E&AD) 1-1/S5

dated Peshawar the 15.2.2003.

ATTESTED
[Signature]

ATTESTED
[Signature]

بعدالت سرویس بیرونی میں بطور ضمیمہ لکھنا



کے 20 بجائے ماہ نومبر 20

صاحب کی بنام SDE-5 لاہور

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیروی و جواب دہی وکل کاروائی متعلقہ
آن مقام _____ کیلئے درخواستیں عارضہ اعلیٰ میں لکھی گئی ہیں۔
مقرر کر 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 تقرر ثالثہ فیصلہ برحلف دیے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل نگرانی و نظر ثانی و بیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور
کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ دہر جانہ التوائے مقدمہ کے سبب سے وہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ بیروی
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم _____ ماہ _____ فروری 20 _____

_____ واہ العی

بمقام _____ کے لئے منظور ہے۔

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

C.M No. _____/2015

IN

Service Appeal No.122/2015

Mst.Saiqa SPST**Appellant**

VERSUS

1. Sub Divisional Education Officer Female Lahor.
2. District Education Officer, Female Swabi.
3. Executive District Officer Schools & Literacy, Swabi.
4. Assistant Sub Divisional Officer (A.S.D.E.O) Female Lahor.
5. Director Education KPK Peshawar.
6. Secretary Education KPK Peshawar.....**Respondents**

**APPLICATION FOR THE RELEASE OF SALARIES BEING
WITHHELD FROM MARCH 2015**

Respectfully Sheweth:

1. That the above titled appeal is pending before this Hon,ble Tribunal and is fixed for hearing i.e. 11-5-2015.
2. That the applicant/Appellant has got a good case in his favour and that is why this Hon,ble tribunal was pleased to grant/status quo dated 04-03-2015.

- 3. That the Respondent No.1 makes a letter No.146 dated 9-2-2015 to the Respondent No.2 for stopping the pay of applicant/appellant taking a wrong plea that the transfer of applicant/appellant was made on the order of the court, while no order was passed by any court **(Copy of letter attached)**.
- 4. That the respondent No.2, has stop the pay of the applicant/appellant inspite of the status quo granted by this Hon,ble Tribunal in favour of the applicant/appellant, the compliance of which is binding on all the respondent by showing disobedience to the order of court would make him liable to face the contempt of court proceeding.
- 5. That the salary of applicant/appellant has been withheld by respondent No.2 without any legal justification.

It is therefore humbly prayed that on acceptance of this application that the Hon,ble Tribunal may graciously released the pay of the applicant/appellant till the final disposal of the case.

[Handwritten Signature]

Applicant/Appellant.

Through

Counsel.

[Handwritten Signature]

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

C.M. No. _____/2015

IN

Service Appeal No.122/2015

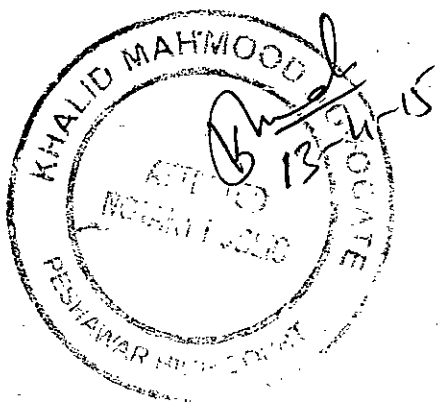
Mst.Saiqa SPSTApplicant/*Appellant*

VERSUS

Sub Divisional Education Officer Female Lahor Swabi &
others.....**Respondents**

AFFIDAVIT:

I Saiqa Bibi Wife of Muhammad Iqbal Khan Barakzai R/o Mohallah Sani village & P.O Toor Dher, Tehsil Lahor District Swabi, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon,ble Tribunal.



Saiqa
DEPONENT

4

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR



Service Appeal No. 122 /2015

K.W.P. Province
Service Tribunal
Diary No. 1011
Dated 12-2-2015

Mst.Saiqa SPST,
Government Girls Primary School
Jehangira No.1 District Swabi.....Appellant

VERSUS

1. Sub Divisional Education Officer Female Lahor, District Swabi.
2. District Education Officer, Female Swabi.
3. Executive District Officer Schools & Literacy, Swabi.
4. Assistant Sub Divisional Officer(A.S.D.E.O) Female Lahor.
5. Director Education KPK Peshawar.
6. Secretary Education KPK PeshawarRespondents

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER
PAKHTUNKHWA, SERVICE TRIBUNAL ACT 1974
AGAINST THE POLITICALLY MOTIVATED TRANSFER
ORDER DATED 07-11-2014.

4.3.2015

Counsel for the appellant present. Pre-admission notices to the respondents were not found to have been issued. The same be issued for 06.4.2015.

It was submitted on behalf of the appellant that the appellant is still performing her duty at GGPS Jehangira No.1 in BPS-14. Status quo is to be maintained till the date fixed.

Certified to be true copy
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Sd/-
Member

Received on 10/3/2015
no. 546
10/3/2015

Amir
M

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5

OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

No 512 Dated 28/2 2015

To

The Sub-Divisional Education officer
(Female) Lahor

SUBJECT: -

LIST OF THOSE TEACHERS WHO ADJUSTED BY THIS OFFICE
AND DID NOT TOOK CHARGE TILL DATE (IN PROMOTION/
RATIONALIZATION)

Memo:-

Reference your letter No.146 dated 09-02-2015 on the subject noted
above.

You are directed to stop the pay of those teachers whose are not obeying
the orders/ taking over charge on their original posts.

DISTRICT EDUCATION OFFICER
(FEMALE) SWABI.

Handwritten initials/signature

Handwritten note:
cided the town of
AS per date of Takaw and charge
present result.

Handwritten signature and date:
4/2/15

OFFICE OF THE SUB DIVISIONAL EDUCATION
OFFICER FEMALE LAHOR

NO: 146 DATED: 9/2/2015

The District Education Officer,
Female Swabi.

Subject: List of those teachers who adjusted by this office and did not took charge till
Date (in promotion/Rationalization)

Memo:

It is submitted for your kind information that the following teachers were
adjusted by this office as approved by your good self in promotion/rationalization process
but till date they did not took charge. In this connection this office informed the
concerned teachers verbal through ADO Circles/Center In charge and later on through
letters vide No:773 dated: 15-11-2014, but still these are all did not obeying the official
order.

A. adjustment order of B-14

1. Nazneen SPST adjusted at GGPS Shah baz Pur jaba while working at GGPS jalbai No:2
2. Folada SPST adjusted at GGPS Badu Wand while working at GGPS Jalsai No:1
3. Saiqa SPST adjusted on court order at GGPS Feroz Pur jalbai while working at GGPS Jehangira No:1
4. Shahida SPST adjusted at GGPS Qasim mathra while working at GGPS Yaqoobi
5. Teynaba SPST adjusted at GGPS Qasim Banda while working at GGPS yaqoobi
6. Mehnaz SPST adjusted at GGPS Manki No:1 while working at GGPS jalsai No:4

B. Rationalization order of Bps-12

1. Musrat From CMS Nabi To GGPS Nabi
2. Asmat robi From Toradher No:2 To Tordher No:1
3. Anwar Sultan From Bazar No:2 To Bazar No:1
4. Zakia Minhas From Tano To Bazar No:1
5. Nasreen From CMS Kunda To Kunda No:1
6. Nusrat From CMS Kunda To Kunda No:2
7. Tabsum Naz From CMS Shahid Ullah To GGPS Rukhani
8. Hadia From GGPS Dobain No:1 To GGPS Masood Abad
9. Zahida Nisar From GGPS jalsai No:4 To GGPS Jalsai No:1
10. Yasmin From GGPS Sudha No:1 To GGPS Rafiq Abad

The report is submitted for your necessary guidelines please.

SUB DIVISIONAL EDUCATION OFFICER
FEMALE LAHOR

Adhira

BEFORE THE SERVICE TRIBUNAL K.P.K , PESHAWAR

Service Appeal No. 122/2015

Mst. Saiqa.....Appellant.

VERSUS

District Education Officer (Female) Swabi and others.....Respondents.

Respectfully Sheweth,

The Respondent most humbly submit as under:

- 1) *That the titled service appeal is pending adjudication before this Honorable Tribunal, next date of hearing is 11/05/2015*
- 2) *Incorrect the respondents have got a prima Facie case and are sanguine of its success.*
- 3) *Incorrect balance of convenience lies in favour of respondents.*
- 4) *That if impugned order is not suspended, the respondents will suffer from irreparable loss.*

In the wake of the above submissions, it is requested that this Honourble Tribunal may very graciously be pleased to dismiss the instant application.

for Rabia
District Education Officer
(Female) Swabi

AFFIDAVIT

We do hereby solemnly affirm and declare on oath that the content of the accompanying Para-wise reply submitted by respondents are true and correct to the best of our knowledge and belief that nothing has been concealed from this Honorable tribunal.

for Rabia
District Education Officer
(Female) Swabi

*O.T.
28.05.15*

(1) (2)

BEFORE THE SERVICE TRIBUNAL K.P.K , PESHAWAR

Service Appeal No. 122/2015.

Mst Saiqa SPST -----Appellant

VERSUS

**Secretary to the Govt. of Khyber Pakhtunkhwa Education
Department, Peshawar and others.....Respondents.**

REPLY ON BEHALF OF THE RESPONDENTS NO.1 to 6

Respectfully Sheweth,

PRELIMINARY OBJECTIONS:

1. That, the appellant has neither locus standi nor cause of action to file the instant appeal.
2. That, the instant appeal is badly time barred/pre-mature..
3. That, the appellant has filed the instant appeal just to pressurize respondents.
4. That the appeal is bad for misjoinder and nonjoinder of the necessary party.
5. That the appellant has not come to the Tribunal with clean hands.
6. That the appellant concealed the material facts from Honourable Tribunal.
7. That appellant is estopped by his own conduct.
8. The appellant appeal is pre-mature hence liable to be dismissed.
9. That under section 10 of the Khyber Pakhtunkhwa Civil Servant Act 1973, a Civil Servant is liable to serve anywhere in the province.
10. That this no final order, hence not maintainable Under Section 5.4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 and 2006 SCMR 1630.

ON FACTS:

1. That appellant was appointed in her Union Council, under 100% Union Council based recruitment policy for PST teacher, as per her Domicile and application.
2. That the said adjustment order was passed wrongly/enerrously, with the reason that in said school no vacant post of SPST was available.
3. That the appellant took over charge as surplus and until now no class has been assigned to her, as no vacant post is available in the said school. The other teachers of the said school submitted an application in this respect. (Annexure A).
4. Incorrect, as per proposal the appellant will perform her duties at her previous station of duty in BPS-14, due to no vacant post in GGPS Jehangira. In-fact the grade i-e BPS-14

is not withdrawn from the appellant. Furthermore there is no final order, hence not maintainable according to the law.

- 5. That the appellant filed suit on dated 24/11/2014, before the approval of competent authority of impugned proposal, which was approved on 26/11/2014 and yet final order has not been passed, hence not maintainable. (Annexure B).
- 6. That this para of appeal is related to the judicial record.
- 7. That this para of appeal pertain to the record.
- 8. That appellant filed the Departmental Appeal on dated 15-11-2014 and on dated 24-11-2014 filed suit pre-maturely and not to proper forum, hence the present appeal is not maintainable and liable to be dismissed on the following ground.

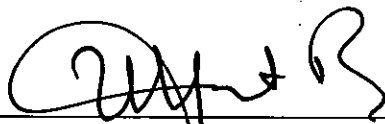
GROUNDS:


- A. Not admitted that the impugned proposal is not addressed to the appellant and the final order was passed on dated 26/01/2015. In-fact the said proposal was addressed to DEO (F) Swabi for approval. (Annexure C & D).
- B. As already explained above that the said proposal was addressed to competent authority for approval and the final order was passed on dated 26/01/2015.
- C. Incorrect, that in U/C Jehangira no post is vacant to adjust the appellant. That appellant was appointed in her Union Council, under 100% Union Council based recruitment policy, as per her Domicile and application.
- D. That the said proposal was for correction in previous order dated 24/9/2014, it is not a transfer order.
- E. As already explained in above Para.
- F. Incorect that the said adjustment order dated 24/9/2014 was passed wrongly/erroneously, with the reason that in said school no vacant post was available.
- G. Correct to the extent of policy, but that in the said school no vacant post was available.
- H. As already explained that the said proposal was for correction in previous order dated 24/9/2014, it is not a transfer order.
- I. That the petitioner has been treated in accordance to law, rules and policy presently prevailing.

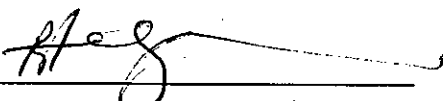
(3)

J. That respondent also would like to seek the permission of this Honourable Tribunal to advance some more grounds and proofs at the time of arguments.

In the wake of the above submissions. It is requested that this Honourable Tribunal may very graciously be pleased to dismiss the instant appeal with cost in favour of the respondent departments.


DISTRICT EDUCATION OFFICER
(FEMALE) SWABI


Sub-Divisional Education Officer
(Female) Lahor, Swabi
SUB-DIVISIONAL EDUCATION OFFICER
LAHOR (FEMALE) SWABI

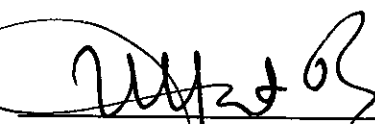

ASSTT: SUB-DIV: EDUCATION OFFICER
LAHOR (FEMALE) SWABI


DIRECTOR
(ELEMENTARY. & SECONDARY) EDUCATION
GOVT OF KHYBER PAKHTUNKHWA PESHAWAR


SECRETAR
(ELEMENTARY. & SECONDARY) EDUCATION
GOVT OF KHYBER PAKHTUNKHWA PESHAWAR

AFFIDAVIT

We do hereby solemnly affirm declare that the content of the accompanying Para-wise comments submitted by respondents are true and correct to the best of my knowledge and belief that nothing has been concealed from this Honorable Court


DISTRICT EDUCATION OFFICER
(FEMALE) SWABI

خدمت جناب ای ڈی او صاحب آفیسر نرسنگ ہسپتال

جناب عالیہ!

گزارش کی جاتی ہے کہ گورنمنٹ نرسنگ ہسپتال میں
 مسئلہ نرسنگ سٹاف میں 260 طالبات ہیں اور چھ اساتذہ موجود
 ہیں جن کا پوسٹل کورس جوائننگ ہے پریکٹس ہاسپتال میں
 کلاسوں میں موجود ہے۔ عیسی صافقہ جو کہ فیروز پور (جلی) ٹوڑھہ سے
 ہیں اور ان کا گھر دو بڑی صاحبہ لوشیرہ تحصیل لوشیرہ میں ہے
 لہذا آپ صاحبان سے گزارش ہے کہ عیسی صافقہ کی وجہ
 سے ہمیں خطرہ ہو سکتا ہے آپ صاحبان ہماری عیوض
 کو مدنظر رکھتے ہوئے عیسی صافقہ کو انکی پوسٹل کورس
 میں ایڈجسٹ کر دیں تو سٹی ہسپتال عیوضی ہوگی۔

اساتذہ گورنمنٹ نرسنگ ہسپتال

- حالہ خاتون
- زاهدہ بیگم
- سمیرا بیگم
- آمنیہ بیگم
- سورجہ بیگم
- ارجمت بیگم

HEAD MISTRESS
 G.G.P.S No 1
 Wazirpur

Amer-B

32

P# 05

DA-1
24
12/11/14

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) LAHOR (SWABI).

NO: 755 / DATED 7-11-2014 /2014.

To

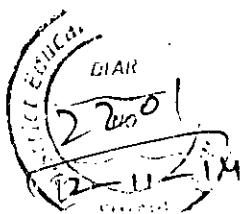
The District Education Officer
Female Swabi.

Subject: ADJUSTMENT OF SENIOR PRIMARY SCHOOL TEACHERS B-14

Memo:

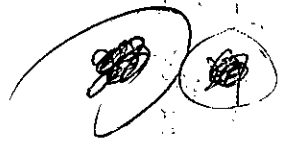
Reference your order bearing No: 1970-75 dated 24-9-2014, it is submitted for your kind information that the following SPST,s are recently transferred , but not willing to take charge , filled appeals for adjustment on their original schools and now on your strong recommendations these are adjusted in their present schools on the posts of B-12. The proposed is submitted for necessary correction/order please.

S#	S.NO in Order	Name of Mistress	Present GGPS	Under transfer to GGPS	Adjusted at GGPS
1	360	Tamsila	Kunda No:2	Pak Kiya	Kunda No:2
2	288	Folada	Badu wand	Lahor No:3	Badu Wand
3	299	Bibi Sohila	Rana Ghari	Lahor No:2	Rana Ghari
4	157	Faziat	Salah	Islam Banda	Salah
5	262	Begum	Sheikh Dheri NO:2	Zakrya Khurd	Sheikh Dheri No:2
6	313	Farzana	Haryan No:1	CMS Nabi	Haryan NO:1
7	344	Basmeen	Lahor No:1	Jalsai No:4	Lahor NO:1
8	318	Tilawat	Lahor No:1	Jalsai 1	Lahor No:1
9	436	Lubna	Balu	Beka No:1	Balu
10	406	Asia	Balu	Beka NO:1	Balu
11	317	Gul Reza	Kunda No:2	Nabi	Kunda NO:2
12	461	Shazia	CMS Yaqoob Shah	Ismail Abad	CMS yaqoob Shah
13	428	Naeem	CMS yaqoob Shah	Ismail Abad	CMS Yaqoob Shah
14	82	Gulshan	Raes Abad	Manki NO:2	Raes Abad
15	61	Shaista	Nary Wand	Uch Khawa r	Nary wand



[Signature]
Sub Divisional Education Officer
(Female) Lahor Swabi

R# 06



	436	Falak Naz	Saifoor Banda	Bagh Haram	Saifoor Banda
17	145	Yasmeen	Jamra No:2	Beka No:1	Jamara-No:2
18	108	Tilwat Zeb	Yar Hussain NO:2	Hayat Abad	Yar Hussain NO:2
19	173	Firasat	Rafiq Abad	Sudher No:1	(Rafiq Abad) Sudher-1
20	280	Rukhsana	Ball Banda	Unwan Abad	Ball Banda
21	65	Teyyaba	Qasim banda	Yaqoobi	Qasim Banda
22	221	Shahida	Qasim Mathra	Yaqoobi	Qasim Mathra
23	358	Sabeeha	Sardar Abad	CMS Nabi	Sardar Abad
24	149	Farha Deeba	Jalbai No:1	Kunda No:1	Jalbai No:1
25	165	Najma	Rustam Koroona	Jalbai No:4	Rustam Korna
26	355	Bena Gul	Umar Dhok	Jalbai No:2	Umar Dhok
27	470	Rabia	Tordher No:2	Matani Chengen	Tordher No:2
28	269	Maryam Shazia	Tordher No:5	Tordher No:3	Tordher No:5
29	409	Nazneen	Shabaz Pur	Jalbai No:2	Shabaz Pur
30	341	Mehnaz Ghafoor	Manki No:1	Jalsai NO:4	Manki No:1
31	140	Zeenat	Dobain nO:2	Beka No:;1	Dobain No:1
32	9	Tilaj	Dheri Yar Hussain	Urmal Dheri	Dheri yar Hussain
33	147	Malika	Sano Banda	Hayat Abad	Sano banda
34	264	Teyyba	Qasim banda	Yaqooi	Qasim banda
35	384	Uzma	Shahi Bangh	Jalbai No:4	Shahi Bangh
36	411	Saiqa	Feroz Pur	Jehangira, No:1	Feroz Pur
37	270	Shaista	Anbar No:2	Mira Dhok	Sheikh Dheri No:1
38	219	Shakeela	Cms yar hussain	Cms haji abad	CMS Yar Hussain

01 to 38
 The proposal approved
 for corrigendum except
 at s. No. 19 of the proposal list
 and issue.

Sub Divisional Education Officer
 Female Lahor.

District Edu. Officer (Female) Swabi
 District Edu. Officer (Female) Swabi



R# 09 Annex-c

31

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER FEMALE LAHOR
CORRIGINDEUM

As approved by the District Education Officer Female Swabi the following correction in the order issued vide DEO (F) Swabi Endst.NO:197-75 dated 24-9-2014 and Rationalization Adjustment order Endst.NO:1976-81 dated 24-9-2014 is hereby ordered in the best interest of public service.

S.No	S.NO in order	Name	Present GGPS	Under to GGPS	Adjusted at GGPS
1	360	TAMSILA	KUNDA NO:2	NABI	KUNDA NO:2
2	299	BIBI SOHILA	RANA GHARI	LAHOR NO:2	RANA GHARI
3	288	FOLADA	BADU WAND	JALSAI NO:1	BADU WAND
4	157	FAZILAT	SALAH	ISLAM BANDA	SALAH
5	262	BEGUM	SHEIKH DHERI NO:2	ZAKRYA KHURD	SHEIKH DHERI NO:2
6	313	FARZANA	HARYAN NO:1	CMS NABI	HARYAN NO:1
7	344	BASMEEN	LAHOR NO:1	JALSAI NO:4	LAHOR NO:1
8	318	TILAWAT	LAHOR NO:1	JALSAI NO:1	LAHOR NO:1
9	436	LUBNA	BALU	BEKA NO:1	BALU
10	406	ASIA	BALU	BEKA NO:1	BALU
11	317	GUL REZA	KUNDA NO:2	NABI	KUNDA NO:2
12	461	SHAZIA	CMS YAQOOB SHAH	ISMAIL ABAD	CMS YAQOOB SHAH
13	428	NAEEM	CMS YAQOOB SHAH	ISMAIL ABAD	CMS YAQOOB SHAH
14	82	GULSHAN	RAEES ABAD	MANKI NO:2	RAEES ABAD
15	61	SHAISTA	NARY WAND	UCH KHAWAR	NARY WAND
16	436	FALAK NAZ	SAIFOOR BANDA	BAGH HARAM	SAIFOOR BANDA
17	145	YASMEEN	JAMRA NO:2	BEKA NO:1	JAMRA NO:2
18	108	TILAWAT ZEB	YAR HUSSAIN NO:2	HAYAT ABAD	YAR HUSSAIN NO:2
19	173	FIRASAT	RAFIQ ABAD	SUDHER NO:1	SUDHER NO:1
20	280	RUHSAANA	BALL BANDA	UNWAN ABAD	BALL BANDA
21	65	TEYYABA	QASIM BANDA	YAQOOBI	QASIM BANDA
22	221	SHAHIDA	QASIM MATHRA	YAQOOBI	QASIM MATHRA
23	358	SABEEHA	SARDAR ABAD	CMS NABI	SARDAR ABAD
24	149	FARHA DEEBA	JALBAI NO:1	KUNDA NO:1	JALBAI NO:1
25	165	NAJMA	RUSTAM KORONA	JALBAI NO:4	RUSTAM KORONA
26	355	BEENA GUL	UMAR DHOK	JALBAI NO:2	UMAR DHOK
27	470	RABIA	TORDHER NO:2	MATANI CHENGEN	TORDHER NO:2
28	269	MARYAM SHAZIA	TORDHER NO:5	TORDHER NO:2	TORDHER NO:5
29	409	NAZNEEN	UMAR DHOK	JALBAI NO:2	UMAR DHOK
30	341	MEHNAZ GHAFUOR	MANKI NO:1	JALSAI NO:4	MANKI NO:1
31	140	ZEEENAT	DOBAIN NO:2	BEKA NO:1	DOBAIN NO:1
32	9	TILAJ	DHERI YAR HUSSAIN	URMAL DHERI	DHERI YAR HUSSAIN
33	147	MAILKA	SANO BANDA	HAYAT ABAD	SANO BANDA
34	264	TEYYABA	QASIM BANDA	YAQOOBI	QASIM BANDA
35	384	UZMA	SHAH BAGH BANDA	JALBAI NO:4	SHAH BAGH BANDA
36	411	SAIQA	FEROZ PUR	JEHANGIRA NO:1	Pending till to court decision
37	270	SHAISTA	ANBAR NO:2	MERA DHOK	SHEIKH DHERI NO:1
38	219	SHAKEELA	CMS YAR HUSSAIN	CMS HAJI ABAD	CMS YAR HUSSAIN
39	296	BUSLIQAT	TANO	TANO DHERI	TANO
40	395	AMINA	CMS MANKI	TANO	CMS MANKI
41	320	SHAHEEN NUSRAT	CMS MANKI	TANO	CMS MANKI
42	301	BAKHT ZARI	LAHOR NO:1	CMS LAHOR	LAHOR NO:1
43		Yasmeen B-12	Sudher No:1		Rafiq Abad
44		Noreen B-12	Kunda No:1		Kunda No:2
45		Nishat b 12	Sheikh Dheri NO:1		Anbar No:2
46		Zahida Nisar b-12	Jalsai No:4		Jalsai NO:1
47		Saeeda zakir B 12	Jalsai No:5		Jalsai No:5
48		Nazma B-12	Rukhani		CMS Shahid Ullah banda

Endst No: 934

Dated: 22/12/2014

Copy forwarded for information and necessary action to the
1. District Education Officer Female Swabi

MISS SAFIA AMEEN
SUB DIVISIONAL EDUCATION OFFICER
FEMALE LAHOR

SUB DIVISIONAL EDUCATION OFFICER
FEMALE LAHOR

R# 08 Mur e

(3) 11

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER FEMALE LAHOR SWABI
CORRECTION ORDER

In continuation of this office Memo. NO: 934 dated: 22-12-14.
As approved by the DEO(F) Swabi/decision declared by the civil
judge iv Swabi on 9-1-2015, the following necessary correction is hereby made
in the order issued vide DEO(F) Swabi Endst. NO: 1970-75 dated 24-9-2014.
SNO Name Present GGPS Under transfer to Adjusted at GGPS

1.	Saiga	Feroz Pur Jalbai	Jehangira NO: 1	Feroz Pur Jalbai
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SJ
MISS SAFIA AMEEN
SUB DIVISIONAL EDUCATION OFFICER
FEMALE LAHOR

Endst. NO: 71 DATED: 26-1- /2015.

Copy forwarded to the District Education Officer Female Swabi for
information and necessary action please.

SJ
SUB DIVISIONAL EDUCATION OFFICER
FEMALE LAHOR.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

No. 1380/ST

Dated 9 / 9 / 2015

To

The SDEO,
Lahore, District Swabi.

Subject: - Judgement

I am directed to forward herewith certified copy of Judgement dated 3.9.2015 passed by this Tribunal on subject Judgement for strict compliance.

Encl: As above

af

Hasan
REGISTRAR
KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL
PESHAWAR.