


FORM OF ORDER SHEET

Court of _____

Appeal No. 2518/2023

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/12/2023	<p>The appeal of Mst. Saima Khatoon resubmitted today by Sardar Muhammad Asif Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on _____</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mst. Saima Khatoon received today i.e. on 20.11.2023 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

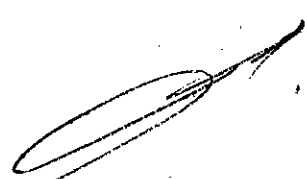
- 1- Check list is not attached with the appeal.
- 2- Appeal has not been flagged/marked with annexures marks.
- 3- Address of appellant is incomplete which may be completed according to rule-6 of the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 4- Annexures of the appeal are unattested.
- 5- In each and every documents the name of the appellant be highlighted.
- 6- Copy of appointment order in respect of appellant be placed on it.
- 7- Annexure-A (Page no. 8 to 15 & 25) of the appeal are illegible which may be replaced by legible/better one.
- 8- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 3641 /S.T,

Dt. 21-11 /2023.



REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.



Sardar Muhammad Asif Adv.
High Court A.Abad.

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5/11/23

D

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKTUNKHWA PESHAWAR

2518
Appeal No. ___/2023

Saima Khatoun R/o Teacher Government Girls Primary School Morata
Torghar.

APPELLANT Paktunkhwa
Service Tribunal

V/S

Diary No. 9239

- 20-11-2023
1. Secretary elementary and Secondary Education KPK, Secretariat
Peshawar.
 2. Director elementary and Secondary Education KPK Directorate
Peshawar.
 3. District Education Officer (Female) Torghar.

...RESPONDENTS

**APPEAL U/S 4 OF SERVICE TRIBUNAL ACT 1974, AGAINST
THE IN-ACTION OF RESPONDENTS QUA TRANSFER OF THE
APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA
FROM DISTRICT TORGHAR DESPITE OF THE FACT THAT
APPELLANT HAVE ALREADY SPENT (10 YEARS) MUCH MORE
TIME THEN THE STIPULATED/PRISCRIBED PERIOD AS PER
LAW AND AS PER CONTRACT SIGNED BETWEEN APPELLANT
AND DEPARTMENT.**

AND

**NON GRANTING OF BPS-15 TO THE APPELLANT AFTER
ALMOST TEN YEARS OF CONTINUES SERVICE, UNLIKE
OTHER SIMILAR PLACED TEACHERS OF DISTRICT MANSHERA**

AND

Filed to-day
20/11/23
Registrar

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKTUNKHWA PESHAWAR

Appeal No. 2518/2023

Saima Khatoon Teacher Government Girls Primary School Morata
Torghar R/o Torghar.

...APPELLANT

V/S

Director Elementary and Secondary Education & Others

...RESPONDENTS

SERVICE TRIBUNAL

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...APPELLANT

Date 17/11/23

Through

(Sardar Muhammad Asif)

&
(Muhammad Asjad Pervaz Abbasi)
Advocates, High Court
Abbottabad

①

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKTUNKHWA PESHAWAR

Appeal No. 25/8/2023

Saima Khatoon Teacher Government Girls Primary School Morata
Torghar R/o Torghar.

...APPELLANT

V/S

1. Director Elementary and Secondary Education KPK Directorate
Peshawar.
2. District Education Officer (Female) Torghar.

...RESPONDENTS

**APPEAL U/S 4 OF SERVICE TRIBUNAL ACT 1974, AGAINST THE IN-
ACTION OF RESPONDENTS QUA TRANSFER OF THE APPELLANT TO
THEIR NATIVE DISTRICT I-E MANSHERA FROM DISTRICT TORGHAR
DESPITE OF THE FACT THAT APPELLANT HAVE ALREADY SPENT (10
YEARS) MUCH MORE TIME THEN THE STIPULATED/PRISCRIBED
PERIOD AS PER LAW AND AS PER CONTRACT SIGNED BETWEEN
APPELLANT AND DEPARTMENT.**

AND

**NON GRANTING OF BPS-15 TO THE APPELLANT AFTER ALMOST TEN
YEARS OF CONTINUES SERVICE, UNLIKE OTHER SIMILAR PLACED
TEACHERS OF DISTRICT MANSHERA**

AND

**AGAINST NON-REDRESSAL OF GREVIANCE OF APPELLANT DISPITE OF
REPEATED APPLICATION/PETITION/APPEAL FILED BY THE APPELLANT.**

AND

**AGAINST THE DISCRIMINATION BEING FACED BY THE APPELLANT AT
THE HANDS OF AUTHORITIRS/RESPONDENTS WHEREBY SIMILARLY
PLACED EMPLOYEES WERE TRANSFERRED AND APPELLANT ARE LEFT
TO FACE RIGORS OF HARD AREAS.**

PRAYER:

**ON THE ACCEPTANCE OF INSTANT APPEAL THE RESPONDENTS
MAY BE DIRECTED TO TRANSFER THE APPELLANT TO THEIR NATIVE
DISTRICT I-E MANSHERA AS PER POLICY, FROM DISTRICT TORGHAR,
AND RESPONDENTS MAY ALSO BE DIRECTED TO GRANT BPS-15 TO
THE APPELLANT LIKE OTHER SIMILAR PLACED TEACHERS AND
RESPONDENTS ALSO BE DIRECTED TO TRANSFER APPELLANT, ANY
OTHER RELIEF WHICH IS DEEMED FIT AND PROPER IN THE
CIRCUMSTANCES BE CASE MAY ALSO BE GRANTED TO THE
APPELLANT.**

Respectfully Sheweth:

1. That, the appellant is hailing from District Manshera and are highly educated, having qualification of MA, M.ED, and B.ED etc.
2. That, the appellant were inducted into service on merits as PST BPS-12 in 2013 and 2015 respectively on the strength of District Manshera and were assigned duties to different schools of Torghar, which was once happened to be a provincial administrative tribal area, controlled and managed from District Manshera. **(Copy of Appointment Order is attached as Annexure "A")**
3. That, at the time of appointment, the appellant were directed by the respondents to execute affidavit, individually to the effect that they would serve at torghar continuously for three years without any demand of transfer to their native District nor they would leave the service and after completion of such stipulated period they would be transferred to their own district. The appellant submitted above said affidavit to the respondents. **(Copy of One of Affidavit is Annexed as Annexure "B")**
4. That, besides appellant, there were other teacher who belonged to District Shangla, who were transferred to their District after completion of period of three years as were mentioned in affidavit, and few of them transferred to District Manshera recently.
5. That, since appointment, the appellant were serving at District Torghar, and on completion of agreed period of three years, the appellant moved many application to different forums for their transferred as per law, to their own District but in vain. **(Copy of Departmental Appeal is Attached as Annexure "C")**
6. That, the appellant had been serving the department since 2013 and are still working in BPS 14 to some of the appellant and other are still in BPS-12 unlike other similar teachers of other Districts who had already been granted BPS-15 which itself is a classical example of discrimination. The appellant is entitled for the same scale i-e BPS-15.
7. That, the appellant filled a complained/appeal to the respondents for the redressal of their grievance which has not been decided up till now, hence instant appeal.

Feeling aggrieved from above mentioned in-actions and discriminations of respondents, the appellant have come to this honorable Court on the following inter-alia amongst many other grounds:-

GROUNDS:

1. That, the in-action of non-transferring of appellant to their own District even after spending much more time than stipulated period of three year is illegal, unlawful, perverse, unilateral and against the settled principle of natural justice and fair play.
2. That, as per government policy regarding hard areas, the civil servant must be transferred after one year maximum.
3. That, a lot of similarly placed teachers had already been transferred to their District more particularly District Shangla. Non-transferring of appellant is nothing but to corner the appellant and the appellant is simply victimized of discrimination by the respondents.
4. That, the appellant is female and have to travel for 3 to 4 hours continuously to reach at their destination with fare of almost Rs. 4,000/- per trip, even then the grievance of appellant are not being redressed.
5. That, the appellant had been serving the department since 2013 and are still working in BPS 14 to some of the appellant and other are still in BPS-12 unlike other similar teachers of other Districts who had already been granted BPS-15 which itself is a classical example of discrimination. The appellant is entitled for the same scale i-e BPS-15.
6. That, despite of the continues application/ appeal/ petition/complaint the appellant are still waiting for justice, but a duff ear turn towards them.
7. That, even the transferred policy of the government is put in abeyance by the respondents and the appellant is constrained to serve at the place for along eleven years, which is otherwise hard one.
8. That, other point would be raised at the time of arguments.
9. That, the appeal in hand is well within time.
10. That, the honorable court has exclusive jurisdiction to adjudicate and proper court fee has been annexed.
11. That, notices of appeal in hand has also been issued to respondents.

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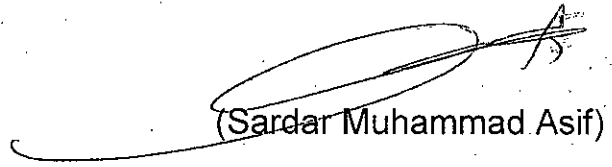
PRAYER:-

IT IS THEREFORE, HUMBL Y PRAYED THAT ON THE ACCEPTANCE OF INSTANT APPEAL THE RESPONDENTS MAY BE DIRECTED TO TRANSFER THE APPELLANT TO THEIR NATIVE DISTRICT I-E MANSHERA AS PER POLICY, FROM DISTRICT TORGHAR, AND RESPONDENTS MAY ALSO BE DIRECTED TO GRANT BPS-15 TO THE APPELLANT LIKE OTHER SIMILAR PLACED TEACHERS AND RESPONDENTS ALSO BE DIRECTED TO TRANSFER APPELLANT, ANY OTHER RELIEF WHICH IS DEEMED FIT AND PROPER IN THE CIRCUMSTANCES BE CASE MAY ALSO BE GRANTED TO THE APPELLANT.

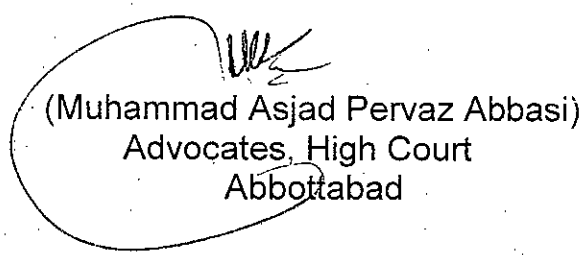

...APPELLANT

Date 17/11/23

Through

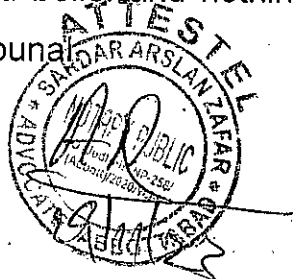

(Sardar Muhammad Asif)

&


(Muhammad Asjad Pervaz Abbasi)
Advocates, High Court
Abbottabad

VERIFICATION:-

Verification on oath that contents of the foregoing appeal are true and correct to best of my knowledge and belief and nothing concealed from this honorable tribunal




...APPELLANT

7 8

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKTUNKHWA PESHAWAR

Appeal No. ____/2023

Saima Khatoon R/o Teacher Government Girls Primary School Morata
Torghar.

...APPELLANT

V/S

Secretary Elementary and Secondary Education & Others

...RESPONDENTS

AFFIDAVIT

I, Saima Khatoon R/o Teacher Government Girls Primary
School Morata Torghar, solemnly affirm and declare on oath that the
contents of the titled "Instant Appeal" are true and correct to the
best of my knowledge belief and nothing has been concealed from
this honorable court.

Date. 17/10/22


...DEPONENT



2013 میں بھرتی ہونے والی اساتذہ جنٹو NOC فراہم کی گئی
 اضلاع انڈیا کے لئے اساتذہ جنٹو NOC فراہم کی گئی
 درجہ ذیل اساتذہ جنٹو NOC فراہم کی گئی ہیں
 Anna A (6)

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) TOR GHAR

OFFICE ORDER/APPOINTMENT

Consequent upon the recommendation/ approval of the District selection Committee Tor Ghar in its meeting held on 18/01/2013 the Competent Authority is pleased to appoint the following fresh trained Female candidates on merit having the prescribed qualifications in BPS 12 (Rs. 7000 - 500-22000) plus usual allowances as admissible under the rules against the vacant post of PSI (Female) mentioned against each their names on regular basis under the existing policy of the Provincial Govt on terms and conditions given below with effect from the date of their taking over charge in the interest of public service.

"Tappa Wise" District Tor Ghar

S.No	Candidate NAME	Father's Name	Tappa	Qualif:	Score	School/Station where posted	Zone	Remarks
1	Sumaira Gul	Muhammad Ismaeel	Hassan Zai	BA	42.41	GGPS Mareer (HZ)	Summer	Against V /P
2	Farzana Habib	Habib Khan	Bassikhail	BA	42.38	GGPS Gul Dheri (BK)	Summer	Against V /P
3	Saba Gul	Shah Jahan	Mada Khail	BA	42.05	GGPS Maira Mada Khail	Summer	Against V /P

"Open Merit" Adjacent Districts

S.N	Candidate Name	Father's Name	Domicile	Qualif:	Score	School/Station where Posted	Zone	Remarks
1	Aysha Humma Swati	Muhammad Shaukat Khan	Mansehra	MSc	77.60	GGPS Palosa (HZ)	Summer	Against V /P
2	Adeela Shaukat Swati	Muhammad Shaukat Khan	Mansehra	MSc	75.70	GGPS Garhi (HZ)	Summer	Against V /P
3	Faiza Tabassum	Muhammad Bashir	Mansehra	MSc	75.65	GGPS Geeto (BK)	Winter	Against V /P
4	Aisha Bibi	Fahim Muhammad	Mansehra	MSc	75.06	GGPS Kand Bala (BK)	Summer	Against V /P
5	Nosheen Kanwal	Sikandar Hayat	Mansehra	MA	65.80	GGPS Gul Dairee (BK)	Summer	Against V /P
6	Phool Bibi	Muhamad Farooq	Mansehra	MA	64.11	GGPS Zeezari (BK)	Summer	Against V /P
7	Raham Bibi	Zamanat Khan	Shangla	BSc	63.78	GGPS Khadang (AZ)	Summer	Against V /P
8	Safia Bibi	Syed Sultan Shah	Mansehra	MA	63.13	GGPS Kand Paayeen (AZ)	Winter	Against V /P
9	Sadia Shoakat	Muhammad Shoakat	Mansehra	MA	62.64	GGPS New Killay (HZ)	Summer	Against V /P
10	Bibi Saeeda Jun Nisa	Oari Abdul Reshid	Mansehra	MA	61.80	GGPS Bimbal (AZ)	Summer	Against V /P

ATTESTED
 ATTESTED
 ATTESTED

Office Order/Appointment

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Consequent upon the recommendation approval of the district selection committee for Tor Ghar in its meeting held on 18-01-2013 the competent authority is pleased to appoint the following fresh trained female candidates on merit having the prescribed qualification in BPS-12 (Rs.7000 500-22000) plus usual allowances as admissible under the rules against the vacant post to PST (Female) mentioned against each their names on regular basis under the existing policy of the Provincial Govt on terms and condition given below with effect from the dates of their taking over charge in the interest of public service.

"Tappa Wise District Tor Ghar"

S.No	Candidate Name	Father Name	Tappa	Qualif	Score	School/Station where posted	Zone	Remarks
1	Sumaira Gul	Muhammad Ismaeel	Hassan Zai	BA	42.41	GGPS Mareer (HZ)	Summer	Against V/P
2	Farzana Habib	Habib Khan	Bassikhail	BA	42.38	GGPS Gul Dheri (BK)	Summer	Against V/P
3	Saba Gul	Shah jahan	Mada-Khail	BA	42.05	GGPS Maira Made Khail	Summer	Against V/P

"Open Merit" Adjacent Districts

S.No	Candidate Name	Father Name	Domicilo	Qualif	Score	School/Station where posted	Zone	Remarks
1	Ayesha Humma Swati	Muhammad Shaukat Khan	Mansehra	MSc	77.66	GGPS Paosa (HZ)	Summer	Against V/P
2	Adeela Shaukat Swati	Muhammad Shaukat Khan	Mansehra	MSc	76.70	GGPS Garhi (HZ)	Summer	Against V/P
3	Faiza Tabassum	Muhammad Bashir	Mansehra	MSc	75.65	GGPS Geeto (BK)	Winter	Against V/P
4	Aisha Bibi	Faqir Muhammad	Mansehra	MSc	75.00	GGPS Kanda Bala (BK)	Summer	Against V/P
5	Nosheen Karwal	Sikander Hayat	Mansehra	MA	65.80	GGPS Gul Dairee (BK)	Summer	Against V/P
6	Phool Bibi	Muhammad Farooq	Mansehra	MA	64.11	GGPS Zeezari (BK)	Summer	Against V/P
7	Raham Bibi	Zamanat Khan	Shangla	BSc	63.78	GGPS Khadang (AZ)	Summer	Against V/P
8	Safia Bibi	Syed Sultan Shah	Mansehra	MA	63.13	GGPS Kand Paayeen (AZ)	Winter	Against V/P
9	Sadia Shoakat	Muhammad Shoukat	Mansehra	MA	62.64	GGPS New Killay (HZ)	Summer	Against V/P
10	Bibi Saeeda tun Nisa	Qari Abdul Rashid	Mansehra	MA	61.80	GGPS Bimbal (AZ)	Summer	Against V/P
11	Sobia Bibi	Abdul Hamid	Mansehra	MA	58.74	GGPS Bimbal (AZ)	Summer	Against V/P
12	Rabia	Aurangzeb	Mansehra	MA	58.64	GGPS Judba	Summer	Against V/P
13								Against V/P
14	Zahrat Bibi	Rahim Shah	Shangla	BSc	58.00	GGPS Kander (BK)	Summer	Against V/P
15	Nazia Haroon	Muhammad Haroon	Mansehra	MA	57.16	GGPS Gangi (HZ)	Winter	Against V/P
16	Shagulia Bibi	Hazrat Younas	Shangla	MA	55.89	GGPS Cirapa Biratoni (BK)	Winter	Against V/P
17	Tahira Bibi	Abdul Qayyum	Mansehra	BSc	53.52	GGPS Arbay Jalband (AZ)	Winter	Against V/P
18	Farheena Ali Akbar	Ali Akbar	Mansehra	MA	55.42	GGPS Muratu (AZ)	Winter	Against V/P
19	Pari Had	Aniullah		MA	55.17	GGPS Khanday (BK)	Winter	Against V/P

ATTESTED

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	Abdul Hamid	Mansehra	MA	50.74	GGPS Rimbai (AZ)	Summer	Against V / P
	Aurang Zeb	Mansehra	MA	50.04	GGPS Judda Ho. II	Summer	Against V / P
13	Muhammad Ashraf	Mansehra	MA	50.01	GGPS Bute Banda (BK)	Summer	Against V / P
14	Bahira Bibi	Mansehra	MA	50.00	GGPS Kund Tilli (BK)	Summer	Against V / P
15	Hazrat Shakoor	Mansehra	MA	47.14	GGPS Jangra (HZ)	Winter	Against V / P
16	Hazrat Yousaf	Mansehra	MA	46.99	GGPS Chakra Banton (BK)	Winter	Against V / P
17	Tahira Bibi	Mansehra	BSc	43.52	GGPS Arbay Jalbana (AZ)	Winter	Against V / P
18	Ferheena Ali Akbar	Mansehra	MA	56.42	GGPS Murta (AZ)	Winter	Against V / P
19	Barkhad	Mansehra	MA	55.17	GGPS Khanday (BK)	Winter	Against V / P
20	Jawida	Mansehra	MA	55.17	GGPS Kund Bala (BK)	Summer	Against V / P
21	Farah Bibi	Mansehra	MA	55.86	GGPS Tagram (HZ)	Winter	Against V / P
22	Jamila Bano	Mansehra	MA	55.44	GGPS Cheer (BK)	Summer	Against V / P
23	Sumbat Bibi	Mansehra	MA	55.16	GGPS Khanday (BK)	Winter	Against V / P
24	Kubra Urool	Mansehra	MA	55.03	GGPS Cheer (BK)	Summer	Against V / P
25	Tallal Jabben	Mansehra	MA	54.73	GGPS Jalka Syedan (BK)	Summer	Against V / P
27	Gul Baz Khan	Mansehra	MA	54.68	GGPS Geeta (BK)	Winter	Against V / P
28	Jul Karim	Mansehra	MA	53.53	GGPS Kalish (BK)	Winter	Against V / P
29	Bibina Bibi	Mansehra	MA	53.52	GGPS Daba (BK)	Summer	Against V / P
30	Jumta Bagurne	Mansehra	MA	53.01	GGPS Bute Banda (BK)	Summer	Against V / P
31	Shamim Akhbar	Mansehra	MA	52.86	GGPS Kalish (BK)	Winter	Against V / P
32	Shahnaz Bagum	Mansehra	MA	52.80	GGPS Lonia (BK)	Winter	Against V / P
33	Nazma Sherin	Mansehra	MA	52.79	GGPS Chakra Judda (BK)	Summer	Against V / P
34	Bibi Zainab	Mansehra	BSc	52.68	GGPS Bunkot (BK)	Summer	Against V / P
35	Shobana Kousar	Mansehra	MA	52.67	GGPS Kund Tilli (HZ)	Winter	Against V / P
36	Rudra Bibi	Mansehra	MA	52.62	GGPS Szezar (BK)	Summer	Against V / P
37	Samina Bibi	Mansehra	MA	52.60	GGPS Zonglav (AZ)	Winter	Against V / P

Judith

Judith

Judith

ATTESTED

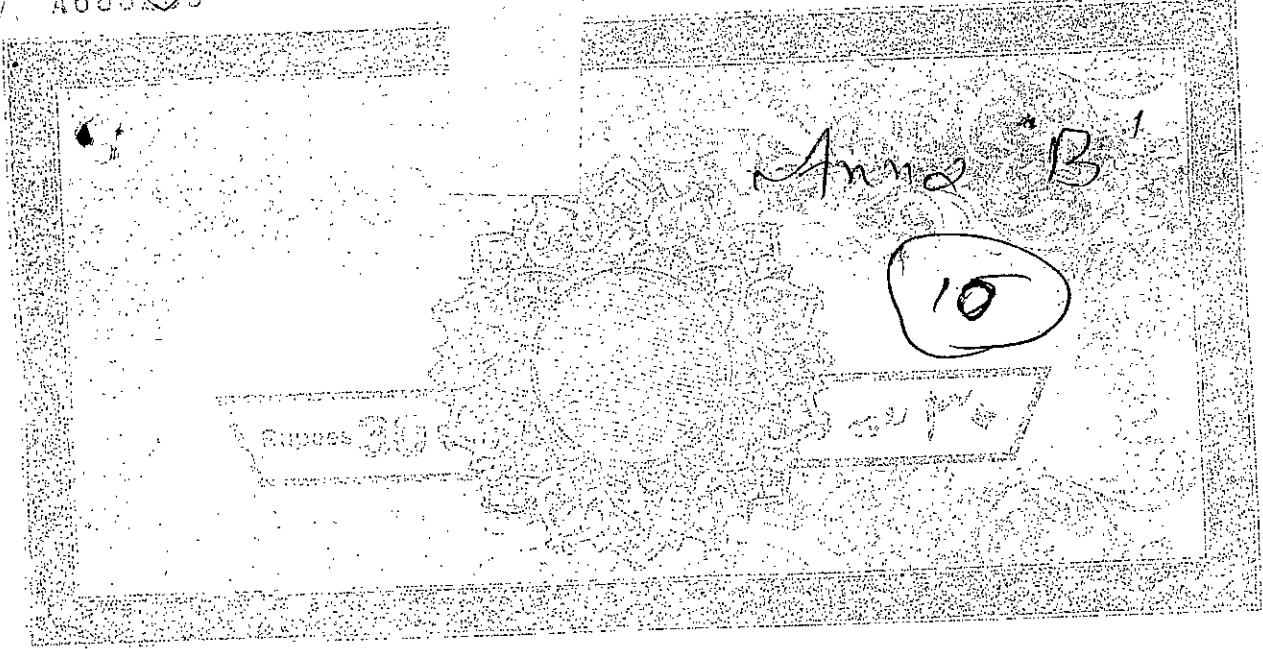
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20	Javaria	Mohammad Iqbal	Mansehra	MA	56.17	GGPS Kund Baia (BK)	Summer	Against VIP
21	Faeh Bibi	Naseer ud Din Shah	Mansehra	MA	55.80	GGPS Taigram (HZ)	Winter	Against VIP
22	Jamila Bano	Duri Aman Qureshi	Mansehra	MA	55.11	GGPS Check (BK)	Summer	Against VIP
23	Sumbal Bibi	Shamsher Ali	Shangla	MA	55.16	GGPS Khandry (BK)	Winter	Against VIP
24	Lubna Urooj	Munawar Khan	Mansehra	MA	55.03	GGPS Check (BK)	Summer	Against VIP
25	Farzana	Habib ur Rehman	Mansehra	MA	54.93	GGPS Kunray (HZ)	Summer	Against VIP
26	Tallat Jabeen	Ashraf Khan	Mansehra	MA	54.73	GGPS Jaika syedan (BK)	Summer	Against VIP
27	Aqal Bibi	Gul Baz Khan	Shangla	MA	54.68	GGPS Geeto (BK)	Winter	Against VIP
28	Faziat Bibi	Abdul Karim	Shangla	MA	53.63	GGPS Kalsa (BK)	Winter	Against VIP
29	Robina Bibi	Khawaj Muhammad	Mansehra	MA	53.42	GGPS Doba (MK)	Summer	Against VIP
30	Mumtaz Bagum	Saji Gul	Shangla	MA	53.01	GGPS Buto Banda (BK)	Summer	Against VIP
31	Shamim Akhter	Sultan Mehmood	Shangla	MA	52.86	GGPS Kalish (BK)	Winter	Against VIP
32	Shahnaz Begum	Siar Khan	Shangla	MA	52.89	GGPS Chapra Judba (BK)	Winter	Against VIP
33	Nazma Sherin	Masta Jan	Mansehra	MA	52.79	GGPS Chapra Judba (BK)	Summer	Against VIP
34	Bibi Zainab	Abdul Qayyum	Mansehra	BSc	52.69	GGPS Geikot (NK)	Summer	Against VIP
35	Shabana Kousar	Gohar Rehman	Mansehra	MA	52.64	GGPS Kund Tili (HZ)	Winter	Against VIP
36	Ruqia Bibi	Abdul Karim	Shangla	MA	52.62	GGPS Zeezat (BK)		Against VIP
37	Samina Bibi	Ghulam Sarwar Khan	Mansehra	MA	52.60	GGPS Zonglay (AZ)	Winter	Against VIP
38	Shabana	Muhammad Zaman	Mansehra	MA	52.57	GGPS Judba No. II	Summer	Against VIP
39	Gazala	Taj Muhammad Khan	Shangla	MA	52.51	GGPS Kareen (BK)	Winter	Against VIP
40	Bushra Iqbal	Muhammad Iqbal	Mansehra	MA	52.32	GGPS	Winter	Against VIP
41	Noshaba Bibi	Muhammad Bashir	Shangla	MA	32.02	GGPS	Summer	Against VIP
42	Tehmina Bibi	Gul Rehman	Mansehra	MA	51.87	GGPS	Winter	Against VIP
43	Rabia Bibi	Aurang Zeb	Mansehra	MA	51.86	GGPS taigram (HZ)	Winter	Against VIP
44	Uzma Faraz	Sarfraz Khan	Mansehra	MA	61.65	GGPS Korlay (NK)	Summer	Against VIP
45	Shahida Bibi	Moulvi Muhammad Zaman	Mansehra	MA	51.66	GGPS Kotlay (NK)	Summer	Against VIP
46	Rizwana Bibi	Hayder Zaman	Mansehra	MA	51.56	GGPS Shokati (HZ)	Winter	Against VIP
47	Saima Khatoon	Noor Rehman	Mansehra	MA	51.51	GGPS Murata (AZ)	Winter	Against VIP
48	Aisha Begum	Taj Muhammad Khan	Mansehra	MA	51.47	GGPS Mundo (AZ)	Winter	Against VIP
49	Sajeda Bibi	Rozi Khan	Shangla	MA	51.39	GGPS Karoon (BK)	Winter	Against VIP
50	Irum Bashir	Muhammad Bashir	Mansehra	MA	51.29	GGPS Katna (HZ)	Summer	Against VIP
51	Rubi Isamul Haq	Isamul Haq	Mansehra	MA	51.10	GGPS Dour payee (BK)	Summer	Against VIP
52	Rabia Khatoon	Molvi Muhammad Zaman	Mansehra	MA	60.51	GGPS Kama (HZ)	Summer	Against VIP
53	Irum Shezadi	Abdul Harneed	Mansehra	MA	50.51	GGPS Judba No. 1	Summer	Against VIP
54	Sidra Hamayun	Muhammad Hamayun	Mansehra	BA	52.42	GGPS Shokati (HZ)	Winter	Against VIP
55	Naila Bibi	Muhammad Iqbal	Mansehra	MA	50.14	GGPS Murado (AZ)	Winter	Against VIP
56	Naila Bibi	Sain Muhammad	Mansehra	MA	50.01	GGPS Ormal (HZ)	Summer	Against VIP
57	Gul Rehana	Muhammad Rehan	Mansehra	MA	40.75	GGPS Kameel Banda	Summer	Against VIP

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Handwritten text in Urdu script, appearing to be a signature or a short note.

Multiple lines of handwritten text in Urdu script, likely a detailed statement or report.



Handwritten initials or a signature, possibly 'S/B'.

Handwritten text and a signature in the bottom left corner, partially overlapping the stamp area.

Handwritten text and a signature in the bottom center, including the word 'ATTESTED' written in a stylized font.

Handwritten initials 'S/B' and the word 'ATTESTED' written in a bold, blocky font.

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Page no 4

بیان حلفی

شکستہ سادات لہجہ سلطانی نگار دستہ سید میر اعظم سید فیروز آباد تحصیل بلاکوہ ضلع ماٹیرہ

حقیقتی طور پر یہ ہے کہ حقہ سداوت محکمہ ایجوکیشن میں انٹرو لوو وغیرہ رہا ہے
اگر حکم حقہ کو ضلع نور شہر میں کسی بھی سکول میں لکھنا کر دیا تو حقہ وہاں پر
ڈیوٹی سر انجام دینے کی پابندی ہوگا کہ درجہ سال تک کوئی تبدیلی حقہ نہیں کرے
اور نہ ہی ملازمت چھوڑے گا اگر حقہ درجہ سال کے اندر تبدیلی کے پابندی
چھوڑے گا تو حکم حوالہ خواہد کہ حقہ حقہ کے خلاف کاروائی کرنے کا حراز
ہوگا۔ بیان حلفی سید فیروز آباد

۱۱ نومبر ۱۹۷۴ء
صاحب لہجہ سلطانی نگار

13503-295774-2

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Anna C 12

بخدمت جناب سیکرٹری صاحب ایگزیکٹو اینڈ سیکنڈری ایجوکیشن پشاور۔

عنوان:- مکملہ اہل

جناب عالی!

مودبانہ گزارش کی جاتی ہے کہ 2013ء میں ضلع مانسہرہ سے ضلع تورغر تعینات کئے گئے تھے۔ اس شرائط کے ساتھ کہ ہمیں تین سال بعد اپنے ضلع ٹرانسفر کر دیا جائے گا۔ مگر گیارہ سال ہونے کو ہیں اور ہمیں ٹرانسفر نہیں کیا جا رہا۔

جبکہ اس دوران 145 ساتھ اور ضلع تورغر سے تعلق رکھنے والی اساتذہ سفارش اور اعلیٰ تعلقات کی بناء پر اپنے اضلاع ٹرانسفر ہو چکی ہے۔ یہ سب آپ کے علم میں ہے۔

جناب عالی! DEO (Female) تورغر نے ہم سے وعدہ کیا تھا کہ اب ایک یا دو ٹیچرز تورغر سے ٹرانسفر نہیں ہوں گی۔ بلکہ آپ سب کو ایک ساتھ ٹرانسفر کیا جائے گا۔ جبکہ شازیہ زیب جی جی پی ایس سرگوا اور رضوانہ جی جی پی ایس شوکانی ضلع مانسہرہ اور ایبٹ آباد ٹرانسفر ہو چکی ہیں۔ کیا ان کے جٹے سے Staff Gap نہیں ہوگا؟؟ کیا اسکول بند نہیں ہوئے؟ کیا ٹیچرز کی کمی نہیں ہوگی؟؟؟

جناب عالی!

ہم تو آپ سے انصاف کی امید لگائے ہوئے ہیں جبکہ ہمارے ساتھ کھیل کھیلا جا رہا ہے۔ شازیہ زیب 2017ء میں Appoint ہوئی۔ مگر ٹرانسفر ہم سے پہلے ہو رہی۔ اس سمیابی بی 2016ء میں Appoint ہوئی مگر ان کی ٹرانسفر کو بھی سال گزر چکا ہے۔ اور اس سا تورغر ڈو میٹریل ہولڈ تھیں۔ کس قدر زیادتی کی جا رہی ہے۔ ہمارے ساتھ اس لیے ہمارے پاس کوئی بڑی سفارش نہیں؟؟

جناب عالی! ضلع مانسہرہ سے بھرتی ہونے والی چند اساتذہ کو سکیل 14 دیا گیا ہے جس میں شرط یہ رکھی گئی تھی کہ اگر سکیل 14 یا تو NOC نہیں دی جاسکے گی۔ اگر سکیل 14 لینے تو ٹرانسفر کی صورت میں آپ کو سکیل 14 Refuse کرنا پڑے گا۔ ہماری بے بسی کا اندازہ اس بات سے لگایا جاسکتا ہے کہ ہم نے تعلیمی قابلیت ہونے کے باوجود سکیل نہیں لیا کیونکہ ہمارے گھریلو حالات بہت زیادہ خراب ہیں ہمارے بچے دوسروں کے رحم و کرم پر چل رہے ہیں۔

جناب عالی! ترقی کے نہیں چاہیے اگر ہم اپنے گھروں سے ڈیوٹی پر قرار رکھ سکتے تو ہم سکیل 14 لازمی لیتے

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11 سالوں سے ہم سکیل 12 میں ہی ڈیوٹی کر رہے ہیں۔

جناب عالی! آپ کے پاس اپنے سکول چلانے کیلئے کئی اور راستے ہیں ہماری زندگیاں قربان کرنے کا راستہ کیوں؟؟؟ ہم ساری زندگی تو غر کے نام نہیں کر سکتے۔ ہمارے بچے دوسروں کے رحم و کرم پر رہ رہے ہیں۔ ہمارے گود کے بچے آئے روز نئی بیماریوں میں مبتلا ہو گئے ہیں اور آپ ان تمام باتوں سے بخوبی آگاہ ہیں۔ لہذا تمام ٹیچرز کا آپ سے پروزور مطالبہ ہے کہ ان ٹیچرز کی ٹرانسفر کو روکا جائے یا پھر ہم سب کو ایک ساتھ ٹرانسفر کیا جائے۔ بصورت دیگر ہم عدالت کا رخ کریں گے۔ سیکرٹریٹ جائیں گے۔ سکول بند کریں گے اور جو مناسب ہو اپنے حق کے لیے کریں گے۔ ضلع ہانسہرہ سے تعلق رکھنے والی اساتذہ کے نام مندرجہ ذیل ہیں۔

المرقوم: 20-07-2023

<i>K. J. Ar</i>	13501-1295774-2	جی جی پی ایس بمبل	بی بی سلیمی نگار	1
<i>Rabia</i>	13503-0491117-0	جی جی پی ایس کرنل حسن زئی	رابعہ خاتون	2
<i>Mila</i>	13501-3879556-0	جی جی پی ایس بگدو	صاعقہ	3
<i>Mila</i>	13501-9098694-6	جی جی پی ایس جلینگ	نانکہ بی بی	3
<i>Mila</i>	13503-5580290-8	جی جی پی ایس کمال بانڈہ	بشرہ بی بی	5
<i>Saimon</i>	13504-7245998-6	جی جی پی ایس بانڈہ دوست محمد	صائمہ بی بی	6
<i>Mila</i>	13501-0421418-0	جی جی پی ایس دارو	حزلیہ امان	7
<i>Mila</i>	13501-1289875-0	جی جی پی ایس اوریل	نانکہ بی بی	8
<i>Mila</i>	13504-948480-1-6	جی جی پی ایس طہارہ	روبینہ بی بی	9
<i>Mila</i>	13504-1691737-0	جی جی پی ایس گڑھی جدہ	ظاہرہ بی بی	10
<i>Mila</i>	13503-1884845-4	جی جی پی ایس کنڑے	شہناز بی بی	11
<i>Mila</i>	43801-85729818	جی جی پی ایس لٹوئے نارنج	سعدیہ بی بی	12
<i>Mila</i>	13504-0574838-0	جی جی پی ایس موراتاں	کائنہ بی بی خاتون	13
<i>Mila</i>	13503-9493867-4	جی جی پی ایس کنڈپائیں	فرینہ بی بی	14
<i>Mila</i>	13503-7790636-8	جی جی پی ایس مرادو	صفیہ بی بی	15
<i>Mila</i>		جی جی پی ایس مکیہ	مکیہ	16

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GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

No. SO E&SED (P/F)2-1/Torghar/2023
Dated Peshawar, the 24th July, 2023

To:

The Director,
E&SE-Khyber Pakhtunkhwa,
Peshawar.

Subject: - DEPARTMENTAL APPEAL

I am directed to refer to the subject cited above and to enclose herewith a copy of self-explanatory joint appeal submitted by Bibi Salma Nugat GGPS Bembal District Torghar and others for submission of views/comments within 07-days positively for further processing of the case accordingly.

Encl: As above.

SECTION OFFICER (P/F)

Endst: of even No & date: -

Copy forwarded to the: -

1. PS to Secretary E&SE Department Khyber Pakhtunkhwa.
2. Master File.

SECTION OFFICER (M)

12-07-2023
20-07-2023
24-07-2023
25-07-2023

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**GOVERNMENT OF
KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

No. SO/E&SED (P/F)2-1/Torghar/2023
Dated Peshawar the 24th July, 2023-11-30

To

The Director
E&SE Khyber Pakhtunkhwa
Peshawar

Subject; DEPARTMENTAL APPEAL.

I am directed to refer the subject cited above and to enclose herewith a copy of above explanatory of joint appeal submitted by Bibi Salma Nagar GGPS Bembal District Torghar and others for submission of views/ comments within 07-Days positively for further processing of the case accordingly.

Ends As above.

SECTION OFFICER (P/F)

Ends: of even No & date:

Copy forwarding to the:-

1. PS to Secretary E&SE Department Khyber Pakhtunkhwa.
2. Master File.

SECTION OFFICER (P/F)

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BC 12-3863

Mob. 0346-9225049

CNIC 37405-657620-1

وکالت نامہ 17

Email: mahamirza.assjad@uqmiid

کورٹ فیس

بجرت الٹ سروس ٹرانسپورٹ کورٹ P.O. 16/ شنبہ اور

عنوان: صائمہ خاتون بنام سکریٹری ایجوکیشن و سٹیٹ

منجانب: ایڈوائس

توجیہ مقدمہ: سروس ایبل

باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کاروائی متعلقہ آن مقام

سروا محمد آصف / محمد اکبر پرویز صاحب کی ایجوکیشن

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز وکیل

صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف دینے اقبال دعویٰ اور بصورت دیگر ڈگری

کرانے اجراء و وصولی چیک روپیہ وغرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت

ضرورت مقدمہ مذکور کی کل یا کسی جزوی کاروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی

بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا

ساختہ پرداختہ مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب ہوگا اس کے

مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا

حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں

کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد

استجارت نالاش بصیغہ مفلسی کے دائرہ کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کیا تاکہ عند جے

مقام: ٹیپو سٹریٹ لاہور

المرقوم: 11/2/23

مقام: ٹیپو سٹریٹ لاہور

المرقوم: 11/2/23

مقام: ٹیپو سٹریٹ لاہور

المرقوم: 11/2/23