

24.07.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was appointed as civil servant in the prescribed manners but vide impugned order dated 3.3.2015 she was dismissed from service on the allegations of discrepancies in appointment regarding which she preferred departmental appeal on 16.3.2015 which was not responded and hence the instant service appeal on 13.7.2015.

That the appellant was given no opportunity of hearing nor the inquiry was conducted in the prescribed manners and major penalty in the shape of dismissal from service was passed which penalty is against facts and law.

Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 20.10.2015 before S.B at camp court A/Abad. Notice of stay application be also issued for the date fixed.

  
Chairman  
Camp Court A/Abad

20.10.2015

Counsel for the appellant and Mr.Sakeenullah, ADO alongwith Mr.Muhammad Tahir Aurangzeb, G.P for respondents present. Representative submitted application alongwith copy of notification dated 25.8.2015 according to which the appellant has been reinstated in service.

In the light of the said application, learned counsel for the appellant requested for withdrawal of the appeal as the grievances of the appellant have been redressed.

Dismissed as withdrawn. File be consigned to the record room.

  
Chairman  
Camp Court A/Abad  
20.10.15

ANNOUNCED  
20.10.2015



Appellant Deposited  
Security & Process Fee



Form- A  
FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No. 805/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	13.07.2015	<p>The appeal of Mst. Manzza Hamayun presented today by Mr. Muhammad Arshad Khan Tanoli 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	14-7-15	<p>This case is entrusted to Touring Bench A.Abad for preliminary hearing to be put up thereon <u>24-7-2015</u></p> <p style="text-align: right;"> CHAIRMAN</p>

**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

Appeal no. 805/2015

Manazza Hamayun D/O Muhammad Hamayun Qaria (GGHS  
Murad Pur) R/O, Tehsil & District Mansehra

.....Appellant

**VERSUS**

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

**INDEX**

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1			1-11
2	Copy of Advertisement	"A"	12
3	Copies of Documents/testimonial are annexed	"B"	13-18
4	Copy of appointment order and corrigendum	"C"	19-23
5	Copy of impugned dismissal order of appellant	"D"	24
6	Copy of departmental appeal /representation	"E"	25-28
7	Wakalatnama		29

Dated: 9/7/2015

Manazza  
Appellant

Through

**Muhammad Arshad Khan Tanoli**

Advocate, High Court

Abbottabad

①

**BEFORE THE KHYBER PUKHTUNKHAW SERVICE  
TRIBUNAL, PESHAWAR.**

Appeal No. 805/2015

Manazza Hamayun D/O Muhammad Hamayun Qaria (GGHS  
Murad Pur) R/O, Tehsil & District Mansehra

.....Appellant

VERSUS

A.W.P. Province  
Service Tribunal

Diary No. 841

Date 13-7-2015

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

**SERVICE APPEAL.**

**Service Appeal u/s 4 of KPK Service  
Tribunal, 1974**

Respectfully Sheweth,

Facts forming the back ground of the instant Service Appeal is  
as under:-

File to be  
13/7/15

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1. That, respondent No 3 announced the posts of Qaria in Dailly "The Aaj" dated 20/5/2011 for appointment of Qaria. The Appellant fulfills the entire criteria which sine qou non for appointment for the post of Qaria. **Copy of Advertisement is annexed as Annexure "A"**
2. That, the appellant qualified test as well as interview conducted by respondent No 3. The appellant is qualified Matric, Hifz, tajweed, teaching of tajweed, Shahadat ul Almia from registered Institution/ Maddaris. **Copies of Documents/testimonial are annexed as Annexure "B"**
3. That, following this, the appellant was appointed as Qaria in respondents' Department on the basis of merits vide appointment order endrst No 893/942/ ESTT Qaria (F) APPTT; (f) 2012 Dated 16/6/2012. **Copy of appointment order is annexed as Annexure "C"**.
4. That, the appellant served the Department with complete devotion and dedication to the entire satisfaction of her superiors from the date of her appointment i.e. 16.6.2012 onwards.

3

5. That, the appellant was though dismissed from service by the respondent's department endrs. No 1626-35/AE-1/ESTB on 3.3.2015.
6. That, Respondent No 3 issued Show Cause notice to the appellant without annexing the statement of allegations however, a page of inquiry which was conducted against the then EDO Umar Khan Kundi DEO, Shamim Akhtar was found attached with the show cause notice, wherein it was mentioned against the name of appellant that "No relevant, sannad for appointment and the appointment is not valid and is against the recruitment policy". AS the inquiry committee did recommend any remarks against the Appellant
7. That, show cause notice issued to the appellant was properly replied by her mentioning that the appellant applied for the post of Qaria and appeared in ETTA Test thereafter was appointed on merit Beside, District Education Officer solicited candid views from respondent No 2 regarding as to whether the candidate who possess their sannads of Hifz and tajweed from registered institutions are to be appointed "as per service structure in prescribe rules the sannad of Qirat from a recognized Institution meant a certificate obtained from Maddaris/Intuition Registered by the Govt. of KPK.

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8. That, the respondent No 3, as stated above, served show cause notice to the appellant, which was properly replied by her. As per law, the appellant was entitled to be heard in person by respondent No 3. But Respondent NO 3 without resorting the rules, without providing opportunity of personal hearing and adopting proper modus operandi required for dismissal of employees from service, dismissed the appellant vide impugned dismissal order endst. No 1626-35/AE-1/ESTB dated 3.3.2015. **Copy of impugned dismissal order of appellant is attached as annexure "D"**.
9. That on receipt of dismissal order, appellant filed departmental appeal against the order of respondent No 3 to respondent No 2 on 16.3.2015. **Copy of departmental appeal /representation is attached as annexure "E"** but respondent No 2 did not bother to reply the representation of the appellant so far. Hence feeling aggrieved, the instant appeal is filed by appellant inter-alia on the following grounds:-

## GROUND

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- a. That, the appellant fulfilled the criteria of appointment as Qaria being qualified. The appellant was appointed on merit on the recommendation of Departmental Selection Committee. Hence impugned dismissal order is illegal, perverse, discriminatory without lawful justification and null and void on the rights of the appellant.
  
- b. That, as per educational record annexed with the appeal, the appellant has been appointed as Qaria according to the laid down procedure and criteria mentioned in the advertisement published by respondent 3. It is further submitted that no institution/madaris of female is not recognized in KPK since 1969 onwards. Therefore Qarias were appointed in Education Department prior to 2012 on the basis of sannads similar to that of appellant. Therefore if hundreds of female Qarias are serving in Educational Department on the basis of similar sannads then the appellant is also entitled to serve the department as per law. Hence impugned dismissal order is liable to be set aside.



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- c. That, when law prescribe something which is to be done in a particular manner that must be done in that manner and not otherwise. As per law the appellant was eligible for appointment as Qaria . But the conduct of respondents department towards the appellant is mala fide, discriminatory and not maintainable at law.
- d. That, this fact may not be left to fade in oblivion that the Govt. of KPK removed the then EDO, Mansehra, Umar Kundi from service but the appellant has been dismissed from service due to no fault of her. Once an employee is dismissed he is de-barred to get appointment in Govt. Departments. Therefore, respondents' Department not only illegally dismissed the appellant but snatched her bread and butter in future as well. Hence impugned dismissal order is liable to be set aside.
- e. That, respondent No 3 did not issued final show cause notice to the appellant and dismissed her in hasty manner and wants to induct some blue eyed chaps at the alter of appellant which is discriminatory against the principle of natural justice and fair play.

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- f. That, respondents' Department has led the appellant to the place which is utterly unknown to the principle of jurisprudence and natural justice.
- g. That, right from the appointment of the appellant as Qaria in 2012, there was no rival candidate who contested the appointment of the appellant in any Court of law anywhere in KPK.
- h. That, Govt. of KPK conducted inquiry against the then EDO, Umar Khan Kundi for committing illegalities/irregularities in appointments/promotions etc and finally removed from service. Therefore, the appellant cannot make a scapegoat for illegal acts of the then EDO Umar Kundi. Therefore on the basis of removal of Umar Kundi from service, the appellant cannot be dismissed for the acts committed by the ex-EDO.
- i. That, the Honourable Service Tribunal has jurisdiction to entertain the grievance of the appellant and the appeal of the appellant is within the prescribed period of limitation

It is, therefore, prayed that on acceptance of the instant Service Appeal of the appellant, impugned


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dismissal order endrst. No 1626-35/AE-1/ESTB dated 3.3.2015 may graciously be set aside and respondent No 3 may be directed to reinstate the appellant in service in the School with effect from the date of her dismissal with all service back benefits in terms of pay etc. Any other relief which this Honourable Court deems appropriate in the circumstance may also be done.

Dated: 07/7/2015

Munir  
Appellant

Through

  
**Muhammad Arshad Khan Tanoli**  
Advocate, High Court  
Abbottabad

9

**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

Manazza Hamayun D/O Muhammad Hamayun Qaria (GGHS  
Murad Pur) R/O, Tehsil & District Mansehra

.....Appellant

**VERSUS**

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

**APPLICATION FOR SUSPENSION**  
**OF IMPUGNED ORDER NO 1626-**  
**35/AE-1/ESTB AND GRANT OF**  
**STATUS QUO TILL FINAL DISPOSAL**  
**OF THE MAIN APPEAL .**

Respectfully Sheweth,

1. That the instant service appeal is being filed today and this application may be treated as part and partial of the service appeal.
2. That, competent authority i.e District Education Officer (Male) Mansehra prior to dismissal of the applicant did not followed the procedure laid down in service laws. Hence the applicant has not been provided opportunity of personal hearing and no final show cause notice has been issued

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3. That, valuable rights have been accrued to the applicant for serving teacher and Education Department since 2012 to till date.
4. That, the applicant served the Department with complete devotion and dedications. Besides, the applicant had required qualification/criteria for the said post and the applicant has not been contested by any one as there was no contesting rival candidate.
5. That, the applicant got appointment purely on the basis of merit. The applicant has been dismissed by the competent authority due to no fault of her.
6. That, the balance of convenience is infavour of the applicant and in case, status quo is not granted, the applicant shall suffer irreparable.

It is, therefore, very humbly prayed that on acceptance of the instant application, impugned termination order dated 03.03.2015 may graciously be suspended and status quo may also be granted till final decision of the main appeal.

Dated: 09/7/2015

Munaza  
Appellant

Through

  
**Muhammad Arshad Khan Tanoli**  
Advocate, High Court  
Abbottabad

**BEFORE THE KHYBER PUKHTUNKHAW SERVICE**  
**TRIBUNAL, PESHAWAR.**

(11)

Manazza HamayunD/O Muhammad Hamayun Qaria (GGHS  
Murad Pur) R/O, Tehsil & District Mansehra

.....Appellant

**VERSUS**

1. Govt. of KPK through Secretary Education (E & SE), KPK Peshawar.
2. Director (E & SE), KPK Peshawar.
3. District Education Officer (Female), Mansehra.

.....Respondents

**AFFIDAVIT**

I, Manazza HamayunD/O Muhammad Hamayun Qaria (GGHS Murad Pur) R/O, Tehsil & District Mansehra do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Dated: 09/07/2015

Manazza  
Deponent

### حکومت صوبہ خیبر پختونخوا

موجودہ پبلک سروس کمیشن (پبلیک سروس کمیشن) کے ذریعہ پبلک سروس کمیشن کے تحت  
 31-05-2011 کو 09:30 بجے (دو بجے) کو (پبلک سروس کمیشن) کے ذریعہ پبلک سروس کمیشن کے تحت  
 ADP No. 102 (2010-11) کے تحت پبلک سروس کمیشن کے ذریعہ پبلک سروس کمیشن کے تحت  
 پبلک سروس کمیشن کے ذریعہ پبلک سروس کمیشن کے تحت

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**Pre Bid Meeting**  
 اور پبلک سروس کمیشن کے ذریعہ پبلک سروس کمیشن کے تحت  
 31-05-2011 کو 11:00 بجے ایک میٹنگ منعقد ہوگی جس میں پبلک سروس کمیشن کے ذریعہ پبلک سروس کمیشن کے تحت  
 1000 روپے کا ضمانت نامہ پیش کرنا پڑے گا۔

- پبلک سروس کمیشن کے ذریعہ پبلک سروس کمیشن کے تحت
- پبلک سروس کمیشن کے ذریعہ پبلک سروس کمیشن کے تحت
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- پبلک سروس کمیشن کے ذریعہ پبلک سروس کمیشن کے تحت

0937-870861 فون  
 ڈائریکٹر جنرل پبلک سروس کمیشن

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پبلک سروس کمیشن کے ذریعہ پبلک سروس کمیشن کے تحت  
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0937-870861 فون  
 ڈائریکٹر جنرل پبلک سروس کمیشن

Accepted  
 [Signature]

Annex B P-13  
رقم الشهادة 18

تاريخ الاجراء 01/10/2002

رجسٹریشن  
نمبر 2810

# شهادة الفراغ في حفظ القرآن الكريم

الدرجات  
100/5

الحمد لله رب العالمين والصلوة والسلام على من لا نبي بعده

فان الطالبة الصالحة /الطالبة الصالحة متزه بمايون بنت محمد بمايون  
من مانسهره المولودة في عام 1988 قد امتحن /امتحنت في المدرسة

الجامعة تدریس القرآن خواجگان مانسهره باکستان ونجیح /ونجحت في الامتحان النهائي المنعقد عام 1422  
بتقدير جيد جدا وبناء على ذلك استحق /استحققت الشهادة الفراغ من حفظ القرآن الكريم اذا يمنحه هذه

الشهادة يوصيه /يوصيها بتقوى الله تعالى ويسئال الله عزوجل ان يسلك به سبيل العلماء العاملين والله الموفق

ختم الجامعة

تروقيع المدير

تروقيع المستعن

تروقيع الا اذ




حافظ قاری محمد سران  
MBA  
Associate  
University Course Amnottoban

خطیب ابن خطیب سرمدی  
(مولانا) حافظ محمد نصیر الدین محمد  
خطیب مرکزی جامع مسجد لورکھل خواجگان

تاریخ: 01/10/2002  
حافظ محمد سیف الدین محمد  
خواجگان



  
 Muharraf  
 Distt: Courts, Abbottabad  
 Advocate  
 ۱۳۳۵  
 ۱۳۳۵  
 ۱۳۳۵

۱۳-۱۶

الحمد لله رب العالمين والصلوة والسلام على خاتمة الانبياء والمرسلين وعلى آله وصحبه اجمعين. اما بعد! فان  
 الطائفة العالمة ..... هيتزه ديمكايون ..... عزابنت ..... هجده ديمكايون ..... من ..... مانسهره  
 قد فرغ من تعويد القرآن الكريم في مدرستنا دار العلوم جامعه محمدية عربيه تداريس القرآن والحديث (رجستره)  
 خراجكان مانسهره باكستان المولود في عام 1988م ..... ونظروا ويحجت في الاختيار السنوي عام  
 1322هـ ..... بتقدير ..... هسوسكاه ..... وبشاء على ذلك استخرجت المستحقه الشهادة التجويد  
 وروصها ابو صهيها بتقوى الله عز وجل. لخدمة التجويد القرآن الكريم. والله الموفق المعين.

توفيق مدير الجامعة  
 توفيق رئيس المدرستنا  
 توفيق الامين العام  
 توفيق التوجيهات  
 توفيق الامور  
 توفيق الاعصار  
 توفيق التوجيهات  
 توفيق الامور  
 توفيق الاعصار



توفيق التوجيهات  
 توفيق الامور  
 توفيق الاعصار

توفيق التوجيهات  
 توفيق الامور  
 توفيق الاعصار

توفيق التوجيهات  
 توفيق الامور  
 توفيق الاعصار

MUSTI KAFAYULLAH  
 Member Prevention Assembly  
 K.P.K

لقد ايق كسباني بيده لقل الملايف اهل به  
 يارب وكفارتي ك مطالق درسته به

(مواثيق) كوراج الله بن كوري  
 كوراج الله بن كوري





**ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD**  
**PROVISIONAL RESULT CARD**



Serial No. 333917

Name: MUNAZA HUMAYYUN  
 Father's Name: MUHAMMAD HUMAYYUN  
 Address: VILL AND P/O TRANGRI BALA D/O M HUMAYYUN  
 Tehsil: MANSEHRA  
 District: MANSEHRA  
 has successfully completed BACHELOR OF EDUCATION (B. ED)

Roll No. AF638542  
 Registration No. 07NMA0201  
 Final Semester AUT- 2010

*P-15*

The detail of passed courses are as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
AUT- 09	0514	EVALUATION, GUIDANCE & RESEARCH	100	64
AUT- 09	0651	ENGLISH (COMPULSORY	100	54
AUT- 09	0518	EDUCATIONAL PSYCHOLOGY & CURRICULUM	100	70
AUT- 09	0513	SCHOOL ORGANIZATION	100	64
SPR- 10	0654	TEACHING OF ISLAMIAT	100	63
SPR- 10	0519	TEACHING OF ENGLISH	100	62
AUT- 10	0655	WORKSHOP & TEACHING PRACTICE	100	81
AUT- 10	0652	ISLAM, PAKISTAN AND MODERN WORLD	100	65
AUT- 10	0512	PERSPECTIVES OF EDUCATION	100	62

*M. H. H. H.*

**MARRIAT NAZ**  
 SST BPS 16 GGHS  
 Murad Pur Mansehra

*Munazza Humayyun*  
 District Mansehra  
 Islamabad

CREDITS: 6  
 Result Declared on JULY 18, 2011  
 Date of issue JULY 29, 2011

Total Marks / Obtained 500 / 585  
 Percentage / Grade 65 B

*H. H. H.*  
**Controller of Examinations**

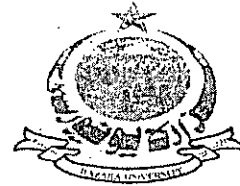
**Disclaimer:**  
 This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

## HAZARA UNIVERSITY, MANSEHRA N.W.F.P, PAKISTAN

## DETAILED MARKS CERTIFICATE

BA ANNUAL EXAMINATION 2007

Part - II



Name : Munazza Hamayyun  
 Father Name : Muhammad Hamayyun  
 Institution / District : GOVT. GIRLS DEGREE COLLEGE NO.1 MANSEHRA

Roll No: 15264  
 Reg No: 06-MSRG-075

Course Name	Max: Marks		Marks Obt:		Total	Marks in Words	Remarks
	TH	PR	TH	PR			
Marks Obtained in Part - I	285				150	One Hundred Fifty Only	
English	75		34	--	34	Thirty-Four	
Islamic Studies	75		54	--	54	Fifty-Four	
English (Elective)	75		37	--	37	Thirty-Seven	
Pakistan Studies	40		18	--	18	Eighteen	
<b>Total : 550</b>					293	Two Hundred Ninety-Three Only	
<b>Division: Second</b>							

Checked By: \_\_\_\_\_

*Munazza Hamayyun*  
 M.A. B.A. B.S. B.P.S. 100-10  
 Murad Pur Mansehra

*[Signature]*  
 Controller of Examinations

Hazara University, Mansehra  
 September 26, 2007

Prepared in: Computer Section Hazara University.

Note: Errors / Omissions excepted with in 30 days of issuance date of this Certificate.

*Munazza Hamayyun*  
 M.A. B.A. B.S. B.P.S. 100-10  
 Murad Pur Mansehra

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD**  
**DETAILED MARKS CERTIFICATE**

Secondary School Certificate Examination

(Class X)

Session: 2003 (Annual)

Group (HUMANITIES GROUP)

Name: Munazza HamayunFather's Name: Muhammad HamayunRoll No. 57100

Subjects	Marks	MARKS OBTAINED			
		Theory	Practical	Total	In Words
1. English	150	55	44	99	Ninety-Nine
2. Urdu	150	43	55	98	Ninety-Eight
3. Islamiyat	75	51		51	Fifty-One
4. Pakistan Study	75	51		51	Fifty-One
5. New Riazi	100	34		34	Thirty-Four
6. General Science	100	65		65	Sixty-Five
7. Islamic Study	100	62		62	Sixty-Two
8. Management For Better Home	100	57		57	Fifty-Seven

Total 850

517-B Five Hundred Seventeen Only

Remarks

Checked By: [Signature]

Date: 25-06-2003

Note: Errors / Omissions are excepted

Khaksar and BRAINS Software Enterprise (KBSOft)

[Signature]  
Controller of Examinations  
BISE Abbottabad

Accepted

FARHAT BAJWA  
557 BPS 16 GGHF  
Mured Pur Manshera

[Signature]  
Advocate  
Distt. Courts Abbottabad

2576

Certificate No: \_\_\_\_\_

**BOARD OF INTERMEDIATE & SECONDARY EDUCATION ABBOTTABAD**Roll No: 39761Group: HUMANITIES**RESULT CARD****HIGHER SECONDARY SCHOOL CERTIFICATE EXAMINATION****Part - II**Session: 2005 (Annual)

P-18

Name: MUNAZA HAMAYYUN  
 Father Name: MUHAMMAD HAMAYYUN  
 Institution/  
 District: GGHSS BAFFA MANSEHRA

has secured the marks shown against each subject in the Higher Secondary School Certificate Examination Part-II held in the month of May/June as a Regular Candidate

Subjects	Marks	Marks Obtained					
		Part-I		Part-II		Total	Marks in Words
		Theory	Pract	Theory	Pract		
English	200	63	--	57	--	120	One Hundred Twenty Only
Urdu (Comp)	200	63	--	75	--	138	One Hundred Thirty-Eight
Islamic Education	50	27	--	--	--	27	Twenty-Seven
Pakistan Studies	50	--	--	32	--	32	Thirty-Two
Islamic History	200	63	--	70	--	133	One Hundred Thirty-Three
Islamic Studies	200	76	--	66	--	142	One Hundred Forty-Two
Health & Physical Edu	200	44	23	46	24	137	One Hundred Thirty-Seven

Total : 1100

729-B Seven Hundred Twenty-Nine Only

Remarks :

Date : 11-August, 2005

Checked By : \_\_\_\_\_

Note: Errors / Omissions excepted. Any mistake in Name, Father Name etc must be intimated within 30 days of the issuance date of this certificate to BISE Abbottabad. Visit us: [www.biseatd.edu.pk](http://www.biseatd.edu.pk)

Controller of Examinations

**FARHANA**  
 SST BPS 16 GGH  
 Murad Pur Manshehra

District Office  
 Abbottabad

# ALLAMA IQBAL OPEN UNIVERSITY, ISLAMABAD



## PROVISIONAL RESULT CARD

Serial No. 96003

Name: MUNAZA HUMAYYUN  
 Father's Name: MUHAMMAD HUMAYYUN  
 Address: VILL AND P/O TRANGRI BALA D/O M HUMAYYUN

Roll No. AN641451  
 Registration No. 07NMA0201  
 Final Semester SPR-2013

Tehsil: MANSEHRA  
 District: MANSEHRA

has successfully completed MASTER OF EDUCATION (M. ED)  
 TEACHER EDUCATION

18-A

The detail of passed courses is as under:

Semester	Course Code	Title of Course	Marks	
			Maximum	Obtained
SPR-12	0831	FOUNDATIONS OF EDUCATION	100	55
SPR-12	0837	EDUCATIONAL RESEARCH	100	57
SPR-12	0838	CURRICULUM DEVELOPMENT & INSTRUCTION	100	65
SPR-12	0840	EDUCATIONAL PSYCHOLOGY	100	63
AUT-12	0826	ELEMENTARY EDUCATION	100	71
AUT-12	0827	SECONDARY EDUCATION	100	56
AUT-12	0829	TEACHER EDUCATION IN PAKISTAN	100	63
AUT-12	0828	HIGHER EDUCATION	100	68
SPR-13	6505	ISLAMIC SYSTEM OF EDUCATION	100	63
SPR-13	6552	TEXTBOOK DEVELOPMENT-I	100	62
SPR-13	6507	EDUCATIONAL MEASUREMENT & EVALUATION	100	62
SPR-13	6550	TEXTBOOK DEVELOPMENT-II	100	64

*Attested*  
*M. H. M. M. M.*  
 M. H. M. M. M.  
 551 B.P. 14, 15014  
 Mirpur Pur Manshehra

CREDIT HOURS: 36

Total Marks / Obtained

1200 / 759

Result Declared on FEBRUARY 29, 2014

Percentage / Grade

63 B

Date of issue MARCH 25, 2014

*H. H. H.*

Controller of Examinations

Disclaimer: This result card is issued provisionally, errors and omission excepted, as a notice only. Any entry appearing in this card does not itself confer any right or privilege on a candidate for the grant of certificate/degree/diploma, which will be issued under the rules/regulations on the basis of the original record of the university student.

GOVERNMENT DISTRICT OFFICER, P.S. EDUCATION, MANSEHRA

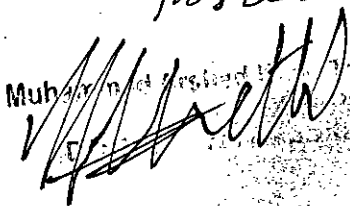
As approved by the Departmental Selection Committee, the Competent Authority has been pleased to appoint the following **Qaria teachers (Female)** against vacant posts mentioned against each in BPS-9 @ Rs 6200-330-17600 pm plus usual allowances as admissible under the rules in the interest of Public Service with effect from the date of their taking over of the posts subject to the following terms & conditions:-

Sl. No.	Name	Father Name	Address	Place of Posting	Remarks
1	IBTI BUREHKA	FIDA HUSSAIN	MANGLOOR	GGHS HANSA	AV/Post
2	OLETA	M. AFZAL KHAN	BANDI GESUCHI	GGHS JAROLI	AV/Post
3	FATMA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DOGA	AV/Post
4	LAKHAT BIBI	M. HAMAYUN	DHODIAL	GGHS DYARYAL	AV/Post
5	MANAZZA	MOHD HAMAYUN	TRANGRI BALA	GGHS MIRAD PUR	AV/Post
6	LIADHIA BIBI	ALI KHAN	AFZALABAD	GGHS AFZAL ABAD	AV/Post
7	BIBI SAEEDA SALAMA	FIDA HUSSAIN	MANGLOOR	GGHS THIATHI KHURD	AV/Post
8	ASMAT BIBI	ABDUL REHMAN	LASSAN NAWAB	GGHS LASSAN NAWAB	AV/Post
9	PIBI GABHUM	FIDA HUSSAIN	MANGLOOR	GGHS PAIRAN	AV/Post
10	MOHIBYA BASHIRUM	RAHIM SHAH	OGHI MANSEHRA	GGHS OGHII	AV/Post
11	SABKA BIBI	FIDA HUSSAIN	MANGLOOR	GGHS DANDA KHOLIAN	AV/Post
12	MEVLA BIBI	ALI KHAN	AFZALABAD	GGHS SANGAR	AV/Post
13	SHIFA KAMMAL	KHALIL UR REHMAN	LABARKOT	GGHS MAIRA AMJID ALI	AV/Post
14	FIBER QLI	ALAM ZEB	PHULRA	GGHS PHULRA	AV/Post
15	AISHA BANO	SHAHZADA	M.M. POLE MANSEHRA	GGHS BAFFA	AV/Post
16	RUSHRA BIBI	LAL KHAN	PHULRA	GGHS SAWAN MAIRA	AV/Post
17	MAMOONA WAJID	WAHJID	BHERKUND	GGHS GHANOOL	AV/Post
18	HAMEEDA	MOHD YOUSAF	PHULRA	GGHS JARFD	AV/Post
19	FARHUA	MOHD NAZIR	OGHI MANSEHRA	GGHS TRAWIRA	AV/Post
20	SABA DOOR	SHIEKH NOOR ELLAHI	MANSEHRA	GGHS TALHATA	AV/Post
21	SHIBHALI	RAJA MANZOOR HUSSAIN	BEHALI	GGHS MOHAYIAN	AV/Post

The pay of the candidates, falls at N<sup>o</sup> 1, 5, 16 & 20 will be effective from 01/09/2012 after the re-opening of summer vacation; Zone Schools

TERMS & CONDITIONS:

1. Their appointments are purely on temporary basis and liable to termination at any stage without assigning any reason/notice.
2. They will be governed by such rules and regulations enforce and as may be prescribed by the Government from time to time for the category of the Government servants to which they belong.
3. In case they failed to assume the charge of their posts within 15 days of their appointment, candidature ship will be stand automatically cancelled.

Attested  
  
 District Officer, P.S. Education, Mansehra

P-20

1. Their services are regular but will not be entitled for pension/gratuity & they will not contribute any amount towards GP Fund however they will contribute CP fund on the prescribed rate & half contribution will be made by the Government.
2. They will submit to the office, their all testimonial/Registration copy of their Madrasa (Institutions), along with bank draft in the name of controller / treasurer of the concerned BISE / University within 7 days after the taking over charge for verification.
3. The release of the pay by the concerned DDOs will be subject to the (a) receipt of verified documents by the appointing authority / (EDO E&SE Manshira) (b) duly attested & verified registration copy of the concerned Dini Madrasa (Institutions), where he/she has obtained his/her Sanad/Certificate.
4. In case a document or documents is / are found fake or forged or Bogus on such scrutiny or all the verification, the service of the teachers concerned shall be terminated. The whole amount paid to him/her as salary will be recovered and a case against him/her shall be registered under relevant section of Law.
5. Their services are liable to termination on one month prior notice from either side in case of resignation without prior notice. Their one month pay/allowances if any shall be forfeited to Government Treasury.
6. Their services can be terminated at any time in case their performance is found un-satisfactory; they will be proceeded against under the removal from service under E&D Rules 2011.
7. They should produce Age & Health Certificate from the MS DHQ Hospital Manshira.
8. They may not be handed over the charge if their age is above 35 years and below 18 years.
9. The Candidates who are working as regular before 1<sup>st</sup> July 2001 in previous post, their entitled for pension / gratuity etc.
10. No. TA/DA etc is allowed.
11. Charge report should be submitted to all concerned in duplicate.

(Umar Khan Kundi)  
EXECUTIVE DISTRICT OFFICER  
E&S EDU: MANSEHRA

Endst: No. 833-22 /Estt: (F)Apptt: Qaria (F)/2012 Dated Manshira the 16/6 2012

Copy to the:-

1. Secretary to Govt: of KPK E&SE Department Peshawar.
2. Director E&SE Department KPK Peshawar.
3. District Accounts Officer, Manshira.
- 4-5. District Officer (M&F) Local Office.
- 6-26. Principal/Headmistresses School concerned.
27. PA to District Coordination Officer, Manshira.
28. Budget & Accounts Officer, local office, Manshira.
- 29-50. Candidates concerned.

Attested  
M. J. Khan  
Manshira  
Ottabad

EXECUTIVE DISTRICT OFFICER  
E&S EDU: MANSEHRA



P-21

Merk List of Applicants for TAT III (Applied for Qaria) District Mansehra

Sl. No.	Roll No.	Name	Father Name	Post Applied for	Address	D/O BIRTH	DATE OF DEC. OF RESULT	ETEAMark	ETEAMARK			Academic						T/Per					
									Tot	Ptage	Obt	SSC			FA/FSC				BA/BSC			MA/MSC	
									Obt	Tot	Ptage	Obt	Tot	Ptage	Obt	Tot	Ptage	Obt	Tot	Ptage			
1	782	FOZIA	MOHD RIAZ	QARIA	AFZALABAD	02/05/1987	22/09/2003	200	300	26.37	710	900	11.98	766	1100	10.45						49.10	
2	330	BIBI BUSHRA	FIDA HUSSAN	QARIA	MANGLOOR	02/02/1988	23/06/2007	184	300	24.53	540	850	9.671	687	1100	9.368	237	550	5.473			49.04	
3	756	SHAZIA	M AFZAL KHAN	QARIA	BANDA GESUCH	08/07/1977		172	300	22.93	400	850	3.7	642	1100	3.755	233	550	4.873	679	1100	3.09	48.35
4	85	AYSHA	M SADIO	QARIA	OGHI MANSEHRA	16/03/1987	17/07/2006	136	300	18.13	541	850	9.547	641	1100	8.741	322	550	5.927	759	1100	3.63	48.93
5	328	FATIMA BIBI	FIDA HUSSAIN	QARIA	MANGLOOR	01/04/1984	09/08/2003	164	300	21.87	507	950	10.01	814	1100	8.373	311	550	5.655			48.90	
6	640	KARAN FARID	M FARID	QARIA	SABAR SHAH	20/04/1990	02/05/2002	152	300	20.27	564	850	9.353	704	1100	9.6	303	550	5.543			48.57	
7	552	Farnat Bibi	M Hamawan	QARIA	Dhodial	18/02/1981	14-03-200	136	300	18.13	469	850	8.276	665	1100	9.335	312	550	5.873	770	1100	3.5	44.65
8	442	MANAZZA	MOHD RAMYUN	QARIA	TRANGRI SALA	20/04/1988	17/09/2006	152	300	20.27	517	850	9.124	729	1100	9.54	233	550	5.127			44.17	
9	454	MADHIA BIBI	ALI KHAN	QARIA	AFZALABAD	04/11/1988	01/10/2002	172	300	22.93	654	850	11.54	711	1100	9.55						48.95	
10	331	BIBI SAEEDA SALAMA	FIDA HUSSAIN	QARIA	MANGLOOR	12/04/1979	1993	176	300	23.47	507	850	8.947	531	1100	7.241	233	550	4.221			49.37	
11	66	ASMAT BIBI	ABDUL REHMAN	QARIA	LASSAN NAWAJ	03/02/1981	17/05/2002	172	300	22.93	449	850	7.924	544	1100	7.412	200	550	5.001			49.00	
12	325	BIBI MARIUM	FIDA HUSSAIN	QARIA	MANGLOOR	06/09/1986	09/08/2003	176	300	23.47	458	850	8.082	520	1100	7.031	242	550	4.334			42.51	
13	731	SAMMIYA RAHIEM	RAHIM SHAH	QARIA	OGHI MANSEHRA	02/02/1988	01/12/2010	132	300	17.6	510	850	9	738	1100	10.06	458	800	5.25			40.40	
14	327	SAIMA BIBI	FIDA HUSSAIN	QARIA	MANGLOOR	01/04/1982	09/08/2003	140	300	18.67	559	850	9.865	557	1100	7.595	233	550	4.273			39.79	
15	451	ALYIA BIBI	ALI KHAN	QARIA	AFZALABAD	27/06/1983	01/10/2002	164	300	21.87	378	850	6.671	536	1100	7.309	217	550	3.943			38.87	
16	92	AYSHA Khowal	Khalid ur Rehman	QARIA	Labarkot	02/12/1991		164	300	21.87	579	900	9.65	539	1100	7.35						38.27	
17	332	AMBER ZEB	ALAM ZEB	QARIA	PHULRA	31/03/1939	2008	148	300	19.73	701	1050	10.01	625	1100	8.523						35.27	
18	275	GHAZALA JAVED	MOHAMMAD JAVEED	QARIA	MANSEHRA	17/05/1984		124	300	16.53	421	850	7.429	624	1100	8.506	233	550	4.727			35.27	
19	639	AISHA GANO	SHAHZADA	QARIA	M.M.POLE MANSEHRA	11/03/1990	20/05/2002	120	300	16	731	975	11.25	632	1050	9.029						35.22	
20	439	BUSHRA BIBI	LAL KHAN	QARIA	PHULRA	25/12/1991	2008	128	300	17.07	559	900	9.483	636	1100	8.673						35.16	
21	282	MAMOONA WAJID	WAJID	QARIA	BHERKUND	12/08/1992	02/05/2003	120	300	16	612	900	10.2	657	1100	8.959						35.03	
22	200	HAMEEDA	MOHD YOUSAF	QARIA	PHULRA	20/06/1987	09/02/2009	124	300	16.53	768	1275	9.035	547	1100	7.459							

*Alfesta*  
*M. M. M. M.*

F-12 B.A CC 35.27

P-22

Attested  
 Muzaffar Ahmad  
 District Courts Abulhabad

Alex - D

293

List of Decision of Security committee:

کیفیت	مدارس	سندھ		ردیف نمبر	نام امیدوار مع ولایت
		تجوید القرآن	تجوید القرآن		
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ عثمانیہ اٹک	صنعت قرآن	تجوید القرآن	330	بی بی لبرائی دفتر فدا حسین شاہ
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ عثمانیہ اٹک	صنعت قرآن	تجوید القرآن	750	سازہ افضل دفتر محمد افضل
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ عثمانیہ اٹک	صنعت قرآن	تجوید القرآن	328	غافل بی بی دفتر فدا حسین شاہ
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ اسلامیہ کراچی	صنعت قرآن	تجوید القرآن	583	عزیز بی بی دفتر محمد عارف
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ اسلامیہ کراچی	صنعت قرآن	تجوید القرآن	460	سوزہ عارف دفتر محمد عارف
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ اسلامیہ کراچی	صنعت قرآن	تجوید القرآن	454	حریم بی بی دفتر محمد عارف
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ اسلامیہ کراچی	صنعت قرآن	تجوید القرآن	331	بی بی سرہ سید دفتر فدا حسین
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ اسلامیہ کراچی	صنعت قرآن	تجوید القرآن	388	عمرت بی بی دفتر محمد عارف
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ عثمانیہ اٹک	صنعت قرآن	تجوید القرآن	329	بی بی ارم دفتر فدا حسین شاہ
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ اسلامیہ کراچی	صنعت قرآن	تجوید القرآن	731	سیدہ رحیم دفتر محمد عارف
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ عثمانیہ اٹک	صنعت قرآن	تجوید القرآن	327	صائمہ بی بی دفتر فدا حسین شاہ
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ اسلامیہ کراچی	صنعت قرآن	تجوید القرآن	453	عائشہ بی بی دفتر محمد عارف
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ اسلامیہ کراچی	صنعت قرآن	تجوید القرآن	92	عائشہ کنواں دفتر خلیل الرحمن
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ اسلامیہ کراچی	صنعت قرآن	تجوید القرآن	387	کنیزہ زینہ دفتر بلال زینہ
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ اسلامیہ کراچی	صنعت قرآن	تجوید القرآن	639	عائشہ بی بی دفتر فدا حسین شاہ
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ اسلامیہ کراچی	صنعت قرآن	تجوید القرآن	03	اشرف بی بی دفتر لعل خان
سندھات صحیحہ و تجوید علیٰ نحوہ	جامعہ اسلامیہ کراچی	صنعت قرآن	تجوید القرآن	812	جموئہ والہ دفتر واجد

200	0301244306	دائری بی	دائری بی	جامعہ تعلیم اسلامیہ فیصل آباد	جامعہ تعلیم اسلامیہ فیصل آباد	دستور محمد یوسف
469	03469611895	دائری بی	دائری بی	وفاق المدارس ملتان	اساتذہ کرام لکھنؤ	انجمن تدریس دستور محمد یوسف
139	03335372123	دائری بی	دائری بی	فحات تعلیم اسلامیہ فیصل آباد	اساتذہ کرام لکھنؤ	صبا ندر دستور محمد یوسف
2002	03005616110	دائری بی	دائری بی	وفاق المدارس ملتان	اساتذہ کرام لکھنؤ	ماصہ ناز دستور محمد یوسف
81	03018122017	دائری بی	دائری بی	جامعہ اسلامیہ لکھنؤ	اساتذہ کرام لکھنؤ	طابہہ نماز دستور بنابر نور
275		دائری بی	دائری بی	جامعہ عقیدہ عقائد اسلامیہ لکھنؤ	اساتذہ کرام لکھنؤ	نزالہ طاہرہ دستور محمد عابد
698	03315714180	دائری بی	دائری بی	جامعہ زینبہ نالسنوہ	اساتذہ کرام لکھنؤ	صافقہ تبسم دستور سید عالم
				جامعہ اسلامیہ گجرات	اساتذہ کرام لکھنؤ	

Agreed with the opinion of experts members of the committee.

Attested  
 Multan District Courts  
 Dist: Courts Abbottabad

دستور محمد عمران لطیف

دستور محمد سعید حسن لطیف  
 دستاویز اضافہ خان

محمد طارق

AT 12/05/2015

محمد طارق

AT 12/05/2015



Annex-D  
P-24

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

**NOTIFICATION**

- 1:- Where as Mst: Mamazza D/O Muhammad Hanayun working as Don GGHS/GGMS/GGP Mamadpur was served with show cause notice and was proceeded under the Khyber Pukhtunkhwa Govt: Servants (Efficiency and Disciplinary) Revised Rules 2011 for the charges mentioned in her Show-Cause Notice.
- 2:- And where as the inquiry committee comprising the following officers conducted an inquiry regarding the illegal appointments in the office of Ex- Executive District Officer Elementary and Secondary Education Mansehra.
  - i) Syed hidayat Jan, (PCS SG B-20) Agricultural Department Khyber Pukhtunkhwa, Peshawar (Now Secretary Zakat, Usher and Social Welfare Department)
  - ii) Mr. Akhalhaq Baig, Principal BS-20 RITE Male Haripur.
- 3:- And where as the inquiry Committee after having examined the record pointed out that you were appointed illegally and against the recruitment rules and policy.
- 4:- And where as District Education Officer (Female) in the capacity of competent Authority, after having considered the charges, evidence on record, recommendation of report of the inquiry committee and replies in response to Show Cause Notices, is of the view that the charges against you have been proved.
- 5:- Now, therefore, in exercise of the powers conferred under Khyber Pakhtunkhwa Govt: Servants (Efficiency and Discipline) Revised Rules 2011 the District Education Officer (Female) Mansehra in the capacity of competent Authority is pleased to impose major penalty of "DISMISSAL" from Govt: Services upon Mst. Mamazza D/O Muhammad Hanayun CT/PET/TT Don GGHS/GGM GGPS Mamadpur

*[Handwritten Signature]*

DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

Endst: No. 1626-35 /AE-I /Estab: dated 10/03/2015  
Copy to the:-

1. Secretary Elementary and Secondary Education Department Khyber Pakhtunkhawa, Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhawa, Peshawar.
3. District Accounts Officer Mansehra.
4. District Monitoring Officer Mansehra.
5. Deputy Commissioner Mansehra.
6. Principal/Headmistress \_\_\_\_\_
7. SDEO(F) Mansehra:
8. Budget and Accounts Officer Local Office.
9. Mst: \_\_\_\_\_
10. Office File.

Attested  
*[Handwritten Signature]*  
M. A. Khan  
Associate  
Dist. Courts Abbottabad

*[Handwritten Signature]*

DISTRICT EDUCATION OFFICER  
FEMALE MANSAEHRA.

Annex - E

To,

The Director (E&SE)

Peshwar.

P-25

Subject

**DEPARTMENTAL APPEAL/REPRESENTATION**

1. Reference made to dismissal order Endst. NO. 1626-35/AE-I/Estab dated 03/03/2015. Copy attached.
2. That the applicant writes to submit as under;-
  - i. That as per advertisement appeared in the daily news paper, the applicant submitted her documents to ETEA authorizes for ETEA test on 19/06/2012.
  - ii. That the applicant passed ETEA test and there after qualified interview for the post of Qaria.
  - iii. That EDO(E&SE) Mansehra issued appointment order of the applicant purely on the bases of merit vide order Endst.NO 893-942/Esst dated 16/06/2012 and the applicant was posted to Govt. Girls High School Murad Pur against the vacant post of Qaria.
  - iv. That the applicant is eligible for the post of Qaria according to the recruitment policy and qualification prescribed for appointment for the said post.

Attested  
Muhammad Tahir Tanch  
District Courts Abbottabad

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- v. That the applicant is qualified Tajweed ul Quran and Hifz ul Quran and obtained sanads/certificates from the recognized institutions.  
(Copies of Sanads are attached)
- vi. That the applicant served in the Education Department from the date of appointment till the date of impugned dismissal order dated 03/03/2015 with complete devotion/ dedication and to the entire satisfaction of her superiors.
- vii. That DEO(F) Mansehra issued impugned dismissal order referred in para No. 1 above which is malafide, against the law, perverse, and void and liable to be set aside on the following grounds:-

**GROUND:-**

- a. That the applicant was recruited according to the prescribed rules as well as on merit on the basis of requisite qualification. Therefore, applicant is entitled to remain in Govt. service as Qaria.
- b. The district Education (Female) Mansehra dismissed the applicant but some similar employees have not been dismissed by her. Hence dismissal order of the applicant is discriminatory and same is not maintainable as law.
- c. That the DEO(F) (E&SE) Mansehra has made room to accommodate some blue eyed chaps who are in her good books.
- d. That impugned dismissal order is against the law and without lawful justification.

Attested  
Muhammad Arshad  
Advocate  
District Courts Abbottabad

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e. That as per law, DEO(F) was supposed to issue statement of allegations, show case notice, and conduct proper inquiry but the requisite formalities have not been observed.

It is further added that the applicant was not afforded opportunities of personal hearing as well as cross Examining the person who leveled allegation against her hence dismissal order is based on hypothesis, surmises and conjectures.

f. That valuable rights to continuing service in Education Department have been accrued to the applicant and DEO(F) Mansehra dis not mention appointment order of the applicant and the impugned dismissal order. Hence impugned dismissal order is illegal and liable to be cancelled.

g. That district Education officer(F) being inquiry officer is not competent to issue dismissal order of the applicant as per law.

It is therefore, prayed that on acceptance of instant departmental appeal, impugned dismissal order dated 03/03/2015 of the applicant may graciously be set aside.

Dated; 16/03/2015

Your's sincerely

MUNAZZA

D/o MUHAMMAD

HAMAYOUN

Qaria G.G HSS Murad Pur

Attested  
*Munazza*  
Munazza  
D/o Muhammad

کورٹ فیس  
قیمتی

# وکالت نامہ

بعدالت RPK سرورس کنزرنڈ پت اور

عنوان: سمنہ خارجہ بنام گورنمنٹ RPK ایجوکیشن ڈیپارٹمنٹ

منجانب: ایڈووکیٹ

نوعیت مقدمہ: اصل

## باعث تحریر آنکہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی وجواب دہی کل کاروائی متعلقہ آں مقام

سندھ ہائی کورٹ کے جج صاحب

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 و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء

وصولی چیک روپیہ 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 پر داختمہ مجھ کو منظور و قبول

ہوگا۔ دوران مقدمہ جو خرچ و ہرجانہ 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 جز و بقایا ہو تو وکیل صاحب موصوف

مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست براد استجارت ناش بصیغہ مفلسی کے دائرہ کرنے اور اس کی

پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

المقوم:

بمقام:

Attested

M. Hoshad Khan Tanoli  
Adv High Court, Attd

مستندہ کلا یون

Munaza



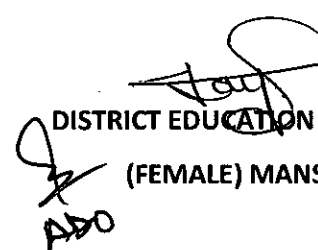
BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.805/2015

Respectfully Shewth

1. That the services appeal No: 805/2015 in respect of MST: Munaza Humayun is pending before this honorable court for reinstatement.
2. That reference director E & SE department notification Endst: No 4178-83 /F.No.79/Appeals Female MSR Dated Peshawar 25/8/15, the appellant has been conditionally reinstated against the post of Qaria (Notification attached).

It is requested that the above mentioned appeal may kindly be dispose off please.

  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA

ADO

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

WHEREAS, Mst. Munazza, Qaria at Government Girls High School Murad Pur District Mansehra was dismissed from service by the DEO (Female) Mansehra vide Order No. 1626-35 dated 03/03/2015 after serving Show Cause Notice and giving her an opportunity of personal hearing on charge of irregular/fake/bogus appointment.

WHEREAS, consequently the above aggrieved teacher lodged/preferred an appeal to the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) against her dismissal from service with the pray to set aside her dismissal order issued by the DEO concerned followed by her reinstatement.

AND WHEREAS, the Director E&SE Khyber Pakhtunkhwa, Peshawar constituted a committee vide Notification No. 5500-09 dated 23-04-2015 for the scrutiny of appeals of above dismissed teacher.

AND WHEREAS, the committee having scrutinized appeal of above affected teacher on the basis of available record and merit of the case submitted its report to the Director E&SE Khyber Pakhtunkhwa, Peshawar with the findings and recommendations reproduced briefly below:-

1. Her name was at S.No. 06 of the merit list. Both her asnad of Hifzul Quraan and sanad of Tajveedul quraan are from Darul Uloom Jamea Muhammadia Arbia Tadreesul quraan Wa Hadees Khwajgan Mansehra. She was appointed as Qaria vide a general order Endst: No. 893-942 dated 16/06/2012 at S. No.05.
2. Appeal may be accepted subject to condition that the madaris/ institution from where she acquired asnad (Qirat & Hifz ul Quran) for the post of Qaria must be affiliated with Wafaq ul Madaris in line with the Govt. of KPK E&SE Deptt. Letter No. SO(PE)5-12/ Darululoom Swat/ Chitral/ 10 dated 7/6/2012?


NOW THEREFORE, in exercise of powers conferred upon the Director E&SE Khyber Pakhtunkhwa, Peshawar (appellant authority) under E&D Rules 2011 read with rules 17 (2) (b) & (c) and keeping the findings/recommendations of the committee into consideration, accepts the appeal of aforesaid sacked teacher and set aside the order of DEO (F) Mansehra No. 1626-35 dated 03/03/2015 and reinstate Mst. Munazza, Qaria, at Government Girls High School Murad Pur District Mansehra with effect from the date of her dismissal with all back benefits subject to production of the requisite registration & affiliation to the DEO (F) Mansehra.

Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4178-83 /F.No. 79 /Appeals Female MSR Dated Peshawar the 25/8/2015

Copy of the above is forwarded for information & n/action to the:-

1. District Education Officer (Female) Mansehra with the remarks to obtain/ascertain the requisite registration & affiliation from Mst. Munazza, Qaria and place on record under intimation to this office.
2. District Accounts Officer Mansehra
3. Principal, Concerned
4. Appellants concerned
5. PA to Director E&SE KP, Peshawar
6. Master File.

  
Deputy Director (Female)  
Directorate E&SE, KP  
Peshawar


**BEFORE THE KHYBER PAKHTUNKHAWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No.805/2015**

Respectfully Shewth

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It is requested that the above mentioned appeal may kindly be dispose off please

  
DISTRICT EDUCATION OFFICER  
(FEMALE) MANSEHRA

ADD

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

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Director  
Elementary & Secondary Education,  
Khyber Pakhtunkhwa, Peshawar.

Endst: No. 4178-83 /F.No. 79 /Appeals Female MSR Dated Peshawar the 25/8/2015

Copy of the above is forwarded for information & n/action to the:-

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5. PA to Director E&SE KP, Peshawar
6. Master File.

  
Deputy Director (Female)  
Directorate E&SE, KP  
Peshawar