

02.10.2019

Counsel for the appellant alongwith Mr. Zakirullah, husband of the appellant present.

Learned counsel states that through office order dated 19.07.2019, the appellant has been transferred to GGPS, Jamal Ghari No.3. He is, therefore, under instruction to request for withdrawal of the instant appeal.


Disposed of as withdrawn. File be consigned to the record room.

Announced:
02.10.2019


Chairman

18.06.2019

Husband of the appellant, on behalf of the appellant and Mr. Mr. Kabirullah Khattak, Additional AG for the respondents present. Neither written reply on behalf of respondents submitted nor representative of the department is present therefore, notice be issued to the respondents with the direction to direct the representative to attend the court and submit written reply on the next date. Adjourned to 11.07.2019 for written reply/comments before S.B.


(Muhammad Amin Khan Kundi)
Member

11.07.2019

Junior to counsel for the appellant and Addl. AG present. No representative of the respondents is available.

Learned AAG is required to ensure attendance of representative of respondents and submission of written reply/comments on 04.09.2019 before S.B.


Chairman

04.09.2019

Nemo for the parties.

Fresh notices be issued to appellant/counsel as well as respondents. To come up for written reply/comments on 02.10.2019 before S.B.


Chairman

15.05.2019

Appellant in person present. Security and process fee not deposited. Appellant requested for time to deposit the same. Granted with direction to deposit security and process fee within 3 days. Thereafter notices be issued to the respondents for written reply/comments. Adjourned to 30.05.2019 before S.B.


Appellant Deposited
Security & Process Fee


Member

30.05.2019

Counsel for the appellant and Addl. AG alongwith Shakeel Ahmad, Superintendent for the official respondents present.

Learned counsel for the appellant states that the appellant has been given to understand that in case of recall of restraint order dated 30.04.2019 the appellant may be adjusted/posted at GGPS Jabbar. Learned counsel, therefore, requests for withdrawal of order dated 30.04.2019 to the extent of restraint regarding filling up of the post of PSHT at GGPS Jabbar. Order accordingly.

To come up for further proceedings including submission of reply by official respondents on 18.06.2019 before S.B.


Chairman

374/19

30.04.2019

Counsel for the appellant present.

Contends that under the Khyber Pakhtunkhwa (Appointment, Deputation, Posting and Transfer of Teachers, Lecturers, Instructors and Doctors) Regulatory Act, 2011 a Primary School Teacher is not to be transferred to a school outside the jurisdiction of Union Council where the teacher is already posted. In the said regard the third proviso to Section 3 of the Act was referred to. He stated that in the case in hand the appellant was performing her duty at GGPS Jabbar as PSHT while through the impugned order dated 19.11.2018 she was transferred to GGPS Kandi Sharif Khel. The transfer of appellant was, therefore, in violation of law, it was added.

In view of the submissions of learned counsel, instant appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 15.05.2019 before S.B.

The appeal is accompanied by an application for suspension of operation of impugned order. Notice of the application be also given to respondents for the next date. In the meanwhile the post vacated by the appellant at GGPS Jabbar shall not be filled up till next date.


Chairman

08.04.2019

Counsel for the appellant present.


Learned counsel for the appellant requests for time to place on record the latest policy of Provincial Government regarding posting/transfer of officials of the Elementary & Secondary Education. May do so before the next date of hearing.

Adjourned to 18.04.2019 before S.B.


Chairman

18.04.2019

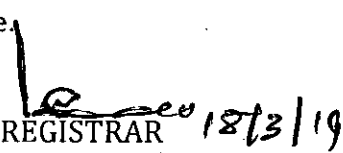


Due to general strike of the bar, the case is adjourned. to come up for preliminary hearing on 30.04.2019 before S.B.


Member

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 374/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/03/2019	<p>The appeal of Mst. Shaheen Ara presented today by Mr. Javed Ali Ghani Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 18/3/19</p>
2-	20/03/19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>28/03/19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
28.03.2019		<p>Clerk of counsel for the appellant present. Due to strike of the Bar learned counsel for the appellant is not available today. Adjourned to 08.04.2019 for preliminary hearing before S.B.</p> <p style="text-align: right;"> (MUHAMMAD AMIN KHAN KUNDI) MEMBER</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. 374 /2019

Mst.Shaheen AraAppellant
Versus

Govt. of Khyber Pakhtunkhwa
through Chief Secretary and others Respondents

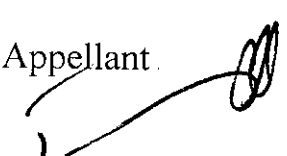
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S.No.	Description of documents.	Pages.
1.	Memo of appeal	1-3
2.	Application for suspension of order with affidavit.	4-5
3.	Copy of appointment order	6
4.	Copy of office order dated 19.11.2018	7
5.	Copy of representation with postal receipt.	8-10
6.	Copy of office order dt.29.05.2012	11-13
7.	Copy of letter dt:01.04.2014	14-15
8.	Cop of COC application.	16-17
9.	Copy of order in appeal No.933/2014	18-19
10.	Copy of judgment dated 9.2.2016 of Service Tribunal.	20-22
11.	Copy of show cause notice.	23-24
12.	Copy of reply to show cause notice.	25
13.	Copy of service book.	26-32
14.	Wakalatnama.	33

Dated: ___/03/2019

Through

Appellant


Javed Ali Ghani
Advocate High Court

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR.

Service Appeal No. 374 /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 344

Dated 18/3/2019

Mst. Shaheen Ara w/o Zakirullah
R/o Jamal Garhi, District Mardan
PSHT Jabbar

Appellant

Versus

- 1) Govt. of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
- 2) Director Education Elementary and Secondary Education, near GHSS No.1 G.T. Road, Peshawar.
- 3) D.E.O. (Female) Mardan Respondents

APPEAL AGAINST ORDER DATED
19.11.2018 VIDE WHICH THE
APPELLANT WAS TRANSFERRED TO
GGPS SHARIF KHEL KANDI, MARDAN.

Filed to-day
Registrar
18/3/19

Respectfully Sheweth;

- 1) That the petitioner was appointed as PST teacher GGPS Jamal Garhi, Mardan in the year 1994. (Copy attached).
- 2) That the respondent No.3 transferred the appellant vide order dated 19.11.2018 to GGPS Sharif Khel Kandi, Mardan from GGPS Jabbar. (Copy attached).
- 3) That the appellant approached the respondents vide departmental representation/ appeal dated 17.12.2018, which is still undecided and after lapse of statutory period the appellant is left with no alternative but to approach this Hon'ble Tribunal

being aggrieved from the impugned transfer order. (Copy attached).

GROUND

- a. That the act of respondent is illegal, against facts and against the record of the case and are not sustainable in the eyes of law.
- b. That appellant is performing her duty to the entire satisfaction of the respondent and no charges or other adverse remarks from the respondent since her appointment.
- c. That the order of respondent is not reasonable, justifiable and according to law and rules i.e. appointment, posting, transfer policy, hence the order of the respondent is not sustainable in the eyes of law.
- d. That appellant cannot be treated in the like manner as this Hon'ble Tribunal in earlier service appeal No.933/2014 has held that the appellant be treated as per policy and not otherwise.
- e. That the impugned order is issued against the policy of the respondent which clearly directs that the appellant being the senior most in the respective school and be retained as per law.

It is, therefore, prayed that on acceptance of this appeal, the impugned order 19.11.2018 may kindly be set aside and the appellant may please be retained in the Govt. Girls Primary School Jabbar as PSHT being senior and eligible for the post.

Further prayed that salary of the appellant may kindly be released as the same has been stopped by the respondent No.3 since January, 2019.

Any other relief which this hon'ble court deems appropriate in the circumstances of the case and not specifically asked for may kindly also be granted.

Dated: 16.03.2019

S. Azal
Appellant

Through

Javed Ali Ghani
Advocate High Court
Peshawar.

Ikramulla
IKRAMULLA Advocate Peshawar

AFFIDAVIT

I, do hereby affirm and declare on oath that the contents of the appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

S. Azal
Deponent



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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR.

C.M.No. _____/2019

IN

Service Appeal No. _____/2019

Mst.ShaheenAppellant

Versus

Govt. of Khyber Pakhtunkhwa
through Chief Secretary and others Respondents

APPLICATION FOR SUSPENSION OF
OPERATION OF IMPUGNED TRANSFER
ORDER DATED 19.11.2018 TILL FINAL
DECISION OF INSTANT APPEAL

Respectfully Sheweth;

- 1) That the above titled appeal is being filed before this Hon'ble Tribunal in which next date is yet to be fixed.
- 2) That grounds of appeal may be read as part and parcel of this application.
- 3) That prima facie good arguable case exists in favour of the appellant and she is sanguine about its success.
- 4) That balance of convenience also lies on favour of appellant.
- 5) That if the operation of the impugned transfer order is not suspended, the appellant will suffer irreparable loss.

It is, therefore, prayed that on acceptance of this application, the operation of the impugned transfer order dated 19.11.2018 may kindly be cancelled and no adverse action may be taken against the appellant till final decision of accompanying appeal.

S. Azeez
Appellant

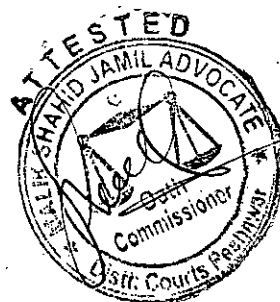
Through

Javed Ali Ghani
Javed Ali Ghani
Advocate High Court

AFFIDAVIT

I, do hereby 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 Court.

S. Azeez
Deponent



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OFFICE OF THE DISTRICT EDUCATION OFFICER(F) PRIMARY MARDAN.

APPOINTMENT ORDER

Consequent upon the advertisement published in the Daily Mashriq dated 20.4.94 and others interviewed held on 23.4.1994, by the Departmental Selection Committee Mardan District and merit lists prepared according to Govt: Rules, the following PTC trained Candidates are hereby appointed as PTC trained in BPS-7 @ Rs. 1095-60-1995 plus usual allowances as admissible under the Rules, with effect from the date of their taking over charge in the schools noted against each in the interest of public service on the following terms and conditions:-

S.No.	Name/Father,s Name Address.	PTC Marks Qualifics:	Posted at	Remarks.
1.	Wafia Begum D/O H.M. Amin, of Ghunde.	810	GGPS, Mata Shewa Banda.	A.V.P.
2.	Razina Akhtar D/O Bakht Wali, of Shamoza.	803	GGPS, Sangawoo	--do--
3.	Shahen Ara D/O Karin Shah, of Jamal Garhi	798	GGPS, Dheri- Likipani,	--do--
4.	Mabeen Begum D/O Karam Kasa, of Qasmi.	765	GGPS, Peopal	--do--
5.	Fehmida Begum D/O Gul Rahman, of Kati Garhi.	736	GGPS, Dheri Likipani	--do--

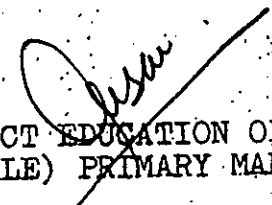
TERMS AND CONDITIONS

1. Their appointments are made purely on temporary basis and liable to termination at any time without assigning any reason or notice.
2. In case of resignation She will have to submit one month notice to the Deptt: or forfeit one month's pay in lieu thereof to the Government.
3. They are required to produce health and age certificate from the Medical Supdt: DHQ Hospital Concerned before taking over charge.
4. Their original Education Certificates should be checked before handingover charge.
5. She Shall be Governed by such services, discipline and conduct Rules as have been or may be prescribed hereafter by the Government NWFP.
6. They should not be allowed to make overcharge in case their age is less than 18 years or above than 35 years.
7. If they failed to take over charge of the post within 15 days on the issue of this order, the order for appointment will stand cancelled.
8. No TA/DA etc is allowed being 1st appointment.

(MISS AFSARI SHAH)
District Education Officer(Female)
Primary Mardan.

Endst: No. 1159/8 /Apptt: PTC/Trd: /DA-I/ Dated Mardan the 17/5

- Copy for information and necessary action to the:-
1. Director Primary Education NWFP, Hayat Abad Peshawar.
 2. P/S, to Minister for Education NWFP. (3) SDEO(F) Mardan/T/Bhai
 4. H/Teacheress Concerned (5) Candidate Concerned.


DISTRICT EDUCATION OFFICER
(FEMALE) PRIMARY MARDAN



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) MARDAN

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OFFICE ORDER

The following PSHT's B-15 (Two PSHTs working in One School)/Surplus are hereby transferred/adjusted on their own pay and BPS with immediate effect in the interest of public service.

S.No	Name/Designation/School	Adjusted at	Remarks
1	Shaheen Ara, PSHT, GGPS Jabbar. (Administrative ground).	GGPS Kandi Sharif Khel	A.V Post
2	Mussarat Jabeen, PSHT (Surplus), GGPS Jabbar	GGPS Baratha	A.V. Post
3	Roseena, PSHT (Surplus) , GGPS Shahdand Baba (Mardan)	GGPS Gadbanu Killi	A.V Post
4	Asima Begum, PSHT (Surplus), GGPS Toru No3	GGPS Gumbat No4	A.V Post
5	Samina Ara, PSHT(Surplus) , GGPS Daramsal.	GGPS Kandari No3	A.V Post
6	Rozina Bibi, SPST (B-14), GGPS Sheikh Maltoon (Mardan) under Promotion as PSHT (B-15) at GGPS Abdul Qadir Koti under adjustment at GGPS Khura Banda (Jalal Killi).	PSHT (BPS-15) Post at GGPS Khat Killi.	A.V.Post.
7	Nasim Begum, PSHT (Surplus), GGPS Sarwar Khan Killi (Mardan).	GGPS Khura Banda (Jalal Killi).	Vice S.No.6

• Notes: No. TA/DA is allowed

Charge Report should be submitted to all concerned

(SOFIA TABASSUM)
District Education Officer
(Female) Mardan

Endst No: 10347-48 /dated: 19/11/2018.

Copy to the:- District Account Office Mardan.

1. SDEO (F) Mardan / Takht Bhai. ✓
2. Head Mistress concerned.
3. P.File.

District Education Officer
(Female) Mardan

No. 868

RGL18479263

For Insurance Notices see reverse.
Stamps affixed except in case of
uninsured letters of not more than
the initial weight prescribed in the
Post Office Guide or on which no
acknowledgement is due.

Rs. 8/-

Received a registered
addressed to

Date-Stamp

Initials of Receiving Officer

Write here "letter", "postcard", "packet" or "parcel"
with the word "insured" before it when necessary.

Insured for Rs. (in figures)

(in words)

if insured.

Insurance fee Rs.

P.

(in words)

Weight

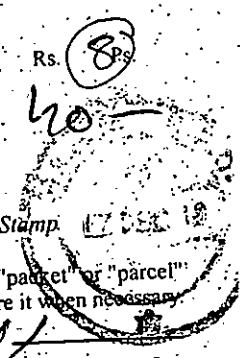
Kilo

Grams

Name and

address

of sender



Handwritten entries:
Addressed to: [illegible]
Date-Stamp: 17 DEC 19
Initials of Receiving Officer: [illegible]
Insured for Rs. (in figures): 100 (in words): 100
Insurance fee Rs. 1 P. (in words): one
Weight: 100 Kilo / Grams
Name and address of sender: [illegible]

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To,

The Director Education,
Elementary & Secondary Education,
Government of Khyber PukhtoonKhwa,
Peshawar.

Through proper channel

Subject: REPRESENTATION AGAINST TRANSFER ORDER

Sir,

My this representation is with reference to my transfer order vide letter No. Endst No. 10347-48/ dated 19-11-2018, (Copy of the letter is attached herewith).

FACTS

1. That I am serving as PSHT, GGPS, Jabbar.
2. That on 15-12-2018, the concern District Education Officer Female Mardan, on her visited, informed me about my transfer.
3. That the said order was never communicated to me.
4. That I have been feeling deeply aggrieved of the aforesaid transfer order, on the following amongst may other grounds, inter alia;

GROUND:-

- I- Because the impugned transfer order is illegal, against the lawful authority, hence ineffective upon my rights, which is liable to cancellation.
- II- Because the impugned transfer order was never communicated, thus I was condemned unheard.
- III- Because the school where, I am transfer is far away from my place of residence. Being a female it is not convenient for me to daily reach my place due to its remote area from my residence.
- IV- Because my transfer order has been made with mala fide intention and for ulterior motive.

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- V- Because during the course of my service, while posted as PSHT, GGPS, Jabbar, my performance is commendable, there is not allegations or negligence from duty has ever been recorded.
- VI- Because my transfer order is against the policy of posting and transfer.
- VII- Because I am a dutiful woman, have a good service record, there is no justifiable reason of my transfer.
- VIII- Because my service record has been clean and unblemished, rather commendable throughout my service.

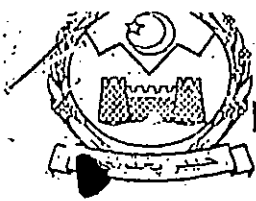
It is requested that, the impugned transfer, order contain in letter No. Endst No. 10347-48/ dated 19-11-2018, may kindly be suspended, and I may be allowed to continue/ perform my duties at PSHT, GGPS, Jabbar.

Yours obediently



Mst. ShaheenAra,

Dated - 17-12-2018



OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION, MARDAN
PHONE No.0937-9230151 – FAX-9230151

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OFFICE ORDER

In compliance with Government of Khber Pukhtoon khwa Elementary & Secondary Education department No. 1351-75 dated 9/5/2012 after the formation of Clusters of Primary Schools Rationalization /deployment of PST Teachers were made. Consequently the following Teachers are adjusted at the Schools noted against each on 1:40 Ratio on the basis of the Enrollment of their schools submitted by the Respective Deputy District Officers (F) Primary Mardan .
.All the Teachers are directed to take over charge in their new schools with immediate effect.

Note: Necessary Entries to this effect may be made in their Service Books.

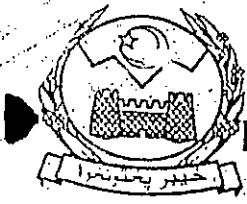
S.NO	NAME OF TEACHER	FROM	TO	REMARKS
1	SAEEDA	GGPS KHORA BANDA-2	GGPS BEHRAM KHAN KALLI	
2	ISMAT	GGPS MASATI	GHALLA DHER	
3	SAMINA	GGPS MASITI	GGPS ITEFAQ COLONY	
4	SHAZIA	GGPS TAMBULAK	GGPS KORAGH MALIK ABAD	
5	ZUHRA	GGPS TAMBULAK	GGPS MAHO DHERI	
6	ZUBAIDA	GGPS MANGA.1	GGPS SALEEM KHAN	
7	FARIDA	GGPS KHAKSAR MANZAL	GGPS KAS KOROONA.3	
8	SHAHIDA	GGPS KHAKSAR MANZAL	GGPS KAS KOROONA.3	
9	HAMEEDA	GGPS KASS KOROONA-2	GGPS FARAM KOROONA	
10	NIGHAT SEEMA	GGPS JAN ABAD	GGPS GUL ABAD	
11	RAZIA SULTANA	GGPS BICKET GUNJ	GGPS ITEFAQ COLONY	
12	JEHAN ARA	GGPS BICKET GUNJ	GGPS KORAGH KHAS	
13	SHAGUFTA NAZ	GGPS BICKET GUNJ	GGPS KORAGH MALIK ABAD	
14	RIFFAT JABEEN	GGPS BICKET GUNJ	GGPS ITEFAQ COLONY	
15	PARVEEN	GGPS SHAM GUNJ	GGPS LABOUR COLONY	
16	SALMA NASREEN	GGPS SHAM GUNJ	GGPS FARAM KOROONA	
17	NASEEM AKHTAR	GGPS DURAN ABAD	GGPS SERAI KOROONA	
18	SARWAT JEHAN	GGPS DURAN ABAD	GGPS SERAI KOROONA	
19	RUKHSANA	GGPS SAEED ABAD	GGPS FARAM KOROONA	
20	NAHEED PARVEEN	GGPS DAGAI SHAH	GGPS FARAM KOROONA	
21	SHAHEEN	GGPS CITY NO.1	GGPS MOHABAT ABAD	
22	NAZANEEN	GGPS CITY NO.2	GGPS SHER PUR	
23	NASIRA NEELAM	GGPS CITY NO.2	GGPS SHER PUR	
24	ISHRAT	GGPS TOUHEED COLONY	GGPS ITEFAQ COLONY	
25	NAZ PARVEEN	GGPS KATLANG	GGPS BABOZAI.KATLANG.1	
26	RUKHSANA	GGPS KUNJ	GGPS SALAK	
27	NAJMA	GGPS HAJI ABAD.2	GGPS BABOZAI.KATLANG.2	
28	AMTUL HAWA	GGPS KATI GARHI	GGPS MEHER DIL BANDA	
29	DILSHAD	GGPS MIANGANO KALLI	GGPS SHIKRAI BABA	
30	NUSRAT	GGPS NOWSHER KHAN	GGPS KOTKEY	
31	MAHEEN	GGPS DHERI-2	GGPS GHALA	
32	RABIA SULTANA	GGPS LIKPAN-1	GGPS GHALA	
33	SAFIA	GGPS SNAGAHOO	GGPS ALAM GANJ	
34	ZAKIA	GGPS MIAN KHAN	GGPS PEPAL	
35	SEEMA	CMS NOSHER KHAN BANDA	GGPS AZI KHEL	
36	RSHAT HUSSAIN	GGPS MIAN KHAN	GGPS PEPAL	
37	JAMAL BEGUM	GGPS RUSTAM	GGPS QAMARGAI	
38	SHABANA BIBI	GGPS DHERI SHER KHAN	GGPS GUL BAHAR (RUSTAM)	
39	GUL NIHAR	GGPS NAWAN KILLI (RUSTAM)	GGPS ALI RUSTAM	
40	MUSARRAT BEGUM	GGPS PALO DHERI-1	GGPS LANDI RUSTAM	
41	ZUHRA	GGPS KOTAN PAN	GGPS CHAGHARZAI-1	OWN REQUIRE



OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION, MARDAN
PHONE No.0937-9230151 – FAX-9230151

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42	IFTINAZ	GGPS MACHI	GGPS TAJA	
43	RAZIA BEGUM	GGPS JAVED ABAD DOBAI ADDA	GGPS GHARIB ABAD DOBAI ADDA	
44	HIDAYAT BEGUM	GGPS SAWAL DHER	GGPS YAHYA JADEED	
45	BIBI KHATOON	GGPS SAWAL DHER	GGPS YAHYA JADEED	
46	MEHER ANGEZA	GGPS SHEWA KHAN	GGPS HAMZA KHAN	
47	ZAINAB BIBI	GGPS JAMAL GARHI-3	GGPS FATEH ABAD	
48	MUSARRAT JABEEN	GGPS JAMAL GARHI-1	GGPS HAMZA KHAN	
49	RUKHSAR BEGUM	GGPS JAMAL GARHI.1	GGPS FATIMA.1	
50	TASLEEM BEGUM	GGPS BAKHSHALI.2	GGPS BABINI	
51	FAZEELAT BEGUM	GGPS BAKHSHALI.1	GGPS QAZI ABAD	
52	DILSHAD BEGUM	GGPS BAKHSHALI.1	GGPS QAZI ABAD	
53	RAHAT ZARI	GGPS BAKHSHALI.1	GGPS QAZI ABAD	
54	MUSARRAT BEGUM	GGPS JUNGARA.1	GGPS SAHIB ABAD	
55	ZUBAIDA KHATOON	GGPS GUJRAT	GGPS BABINI	
56	MUJAHIDA	GGPS GADDAR.1	GGPS FATIMA.2	
57	FARZANA BIBI	GGPS BAKHSHALI-1	GGPS NARSHAK	
58	SHAFQAT ARA	GGPS BAKHSHALI-1	GGPS BABINI	
59	WAHEEDA	GGPS JABBAR	GGPS SAJID ABAD	
60	SADAF BEGUM	GGPS SAWAL DHER	GGPS FATHMA-1	
61	NAZ GUL SYEDA	GGPS CHAGHARZAI-2	GGPS NARO CHIRAGAH	
62	TEHSEEN BEGUM	GGPS GUJRAT	GGPS SAMARQAND	
63	ZULFAN BEGUM	GGPS GUMBAT NO.2	GGPS GUMBAT NO.1	
64	NAYAB KHALIL	GGPS MOHAMMAD ABAD	GGPS GULSHAN ABAD	
65	AKHTAR BIBI	GGPS SURKH DHERI	GGPS CHARGULI	
66	ABIDA NASREEN	GGPS KHAIR ABAD	GGPS GHARIB ABAD	
67	YASMEEN	GGPS BAGHICHA DHERI NO.3	CMS KHANA KILLI	
68	WAKEELA NAZ	GGPS SERI GARYALA	GGPS HUSSAI	
69	RAHAT JABEEN	GGPS SEPI GARYALA	GGPS HUSSAI	
70	NAJMA	GGPS BALA GARHI.1	CMS KHANA KILLI	
71	SHAHIDA BEGUM	GGPS G.I.ZAI-1	GGPS G.D.ZAI-1	
72	ILTAF BEGUM	GGPS MAYAR-1	GGPS DOB MAYAR	
73	TANIA	GGPS MAYAR-1	GGPS MUHMAND ABAD	
74	MUNAWAR SULTANA	GGPS MAYAR-2	GGPS NODEH TORU	
75	RASHEEDA BEGUM	GGPS MAYAR-2	GGPS NODEH TORU	OWN REQUEST
76	RAHEELA	GGPS QAYUM ABAD	GGPS KASS KALLI	
77	ZARNIGAR	GGPS HASHAM ABAD	GGPS KALA KHEIL	
78	NEELUM BEGUM	GGPS TORU-1	GGPS TALAW INZO	
79	SALIQA ZAIB	GGPS TORU-1	GGPS SHOKAT ALI	
80	AKHTAR BEGUM	GGPS MAYAR-2	GGPS MAYAR.3	
81	KARISHNA	GGPS MIRWAS	GGPS GHALLA DHER	
82	RANA BEGUM	GGPS SIKANDARI	GGPS PAR HOTI.1	
83	SALOON	GGPS HOTI.1	GGPS PAR HOTI.1	
84	SIRAJ BEGUM	GGPS SIKANDARI	GGPS PAR HOTI.1	
85	FARIDA TAJ	GGPS SIKANDARI	GGPS CHEIL BANDA	
86	SHAHJEHAN	GGPS SIKANDARI	GGPS NALA PAR HOTI	
87	ROBINA HASSAN	GGPS BARI CHAM	GGPS CHAR BANDA	
88	MUSARRAT YASMIN	GGPS BARI CHAM	GGPS MOHIB BANDA.1	
89	SALTANAT BEGUM	GGPS BARI CHAM	GGPS MOHIB BANDA.2	
90	NASEEM AKHTAR	GGPS BARI CHAM	GGPS MOHIB BANDA.2	
91	RAZIA BEGUM	GGPS SHAHDAND-1	GGPS SHAHDAND NO.2	OWN REQUE
92	SHAHEEN ARA	GGPS TORU-2	GGPS QSIM-1	
93	NIGAR AKHTAR	GGPS TORU-1	GGPS KHAWOO BANDA	
94	ZEEENAT BEGUM	GGPS SWARYAN	GGPS RAHIM SHAH KILLI	



OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION, MARDAN
PHONE No.0937-9230151 – FAX-9230151

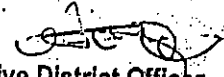
95	FIRASAT BEGUM	GGPS SWARYAN	GGPS INAM ABAD
96	HAJIRA	GGPS SHAMAT PUR	GGPS SUR PUL
97	NASEEM	GGPS SHAMAT PUR	GGPS MAHO DHERI

(BAHADAR KHAN MARWAT)
Executive District Officer,
E/S Education Mardan

Endst:No 7799/67 dated 29.5/2012

Copy forwarded for information & Necessary action to the :-

1. PS to Secretary Education Govt of Khyber Khyber Pakhtunkhwa Peshawar.
2. Director , Elementary & Secondary Education Kyber Pakhtunkhwa Peshawar
3. District Coordination Officer Mardan
4. Deputy District Officer (F) Mardan.
5. All ADO,s / Circle Officers(F) Tehsil Mardan
6. All Head Teacheress concerned.


Executive District Officer,
E/S Education Mardan

D: Fawad Khan / EMIS File

MARK - 13

14



**Directorate of Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar**

PH No. 091-9201389, 9210938,
9210437, 9210957, 9210468.
Fax 091-9210936 0800-33857
Nos/24-57/Rationalization/Estab
Dated Peshawar the 01/04/2013.

DB/AD/LPO/3-8/1
5/4

To: All the District Education Officers,
(Male & Female), in Khyber Pakhtunkhwa.

Subject: - Guidelines for Posting of Teachers as a result of rationalization.
Memo:

I am directed to refer to the subject noted above and to clarify that posts of PST B-12 /Senior PST B-14/PSHT B-15 may be rationalized and re-distributed among the Primary schools in the following manner and PST B-12, Senior PST B-14 and PSHT B-15 may be posted as under:-

Distribution of Posts in Primary Schools

Rationalization of Posts @ 1-40 ratio in Primary Schools (Female)									
S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization					Total
				SST B-16	CT B-15	PSHT B-15	SPST B-14	PST B-12	
1	25288	GGPMS A (JICA)	1-100	1	2	0	1	1	5
2	25048	GGPMS B (JICA)	101-140	1	2	0	1	2	6
3	25143	GGCMS C	141-180	1	0	0	2	2	5
4	30056	GGPS D	181-220	0	0	1	0	1	2
5	25224	GGPS E	101-140	0	0	1	1	1	3
6	25244	GGPS F	141-180	0	0	1	1	2	4
7	25277	GGPS G	181-220	0	0	1	1	2	4
8	25221	GGPS H	221-260	0	0	1	1	3	5
9	32912	GGPS I	261-300	0	0	1	2	3	6
10	25097	GGPS J	301-340	0	0	1	2	4	7
11	25138	GGPS K	341-380	0	0	1	2	5	8
12	32606	GGPS L	381-420	0	0	1	2	6	9
13	25278	GGPS M	421-460	0	0	1	3	7	11

Rationalization of Posts @ 1-40 ratio in Primary Schools (Male)

S.No	School Code	Name of Primary School	Total Enrolment	Sanctioned Posts after Rationalization			Total
				PSHT B-15	SPST B-14	PST B-12	
1	30056	GPS A	1-100	1	0	1	2
2	25224	GPS B	101-140	1	1	1	3
3	25244	GPS C	141-180	1	1	2	4
4	25277	GPS D	181-220	1	1	3	5
5	25221	GPS E	221-260	1	2	3	6
6	32912	GPS F	261-300	1	2	4	7
7	25097	GPS G	301-340	1	2	5	8
8	25138	GPS H	341-380	1	2	6	9
9	32606	GPS I	381-420	1	3	6	10
10	25278	GPS J	421-460	1	3	7	11

Note:-

- Each Primary School (except JICA & Community Model School where SST post is sanctioned) will have one post of PSHT B-15 and one post PST B-12.
- There will be no post of PSHT B-15 & SPST B-14 in MPS.

1587

5-4-14

15

OFFICE OF
NOTIFICATION

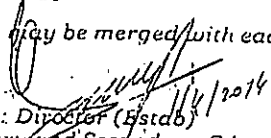
Rationalization of CT Posts @ 1 CT per 1.5 Section in Middle/High/Higher Secondary Schools (Male)						
S.No	School Code	Name of Primary School	Total Enrollment	Sanctioned Posts after Rationalization		
				Class	No. of Sections	CT
1	30056	GPS A	1-80	6 th	1	Minimum 2 CT per school afterward 1 per 1.5 section
			1-120	7 th	2	
			1-120	8 th	3	
2	25277	GPS B	1-60	6 th	1	Minimum 2 CT per school afterward 1 per 1.5 section
			1-80	7 th	2	
			1-120	8 th	2	
			1-60	9 th	1	Minimum 4 SST per school (one Bio Chem) + one Math, Phy) and 2 SST Gen) afterward 2 SST per Section
			1-80	10 th	2	

posting
imm

Posting of Teachers on Rationalization.

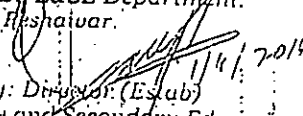
I am further directed to further clarify that:

1. On rationalization surplus teachers in Primary Schools, PST B-12, Senior PST B-14, may be posted in the nearest school if possible then in the same UCs and then in the same circle and then in the same Sub Division and then in the same District Subject to the provision of need.
2. Senior most PSHT 1-15, SPST B-14 & PST B-12 (According to the Seniority list) may be retained in the same school of their present posting and junior most may be transferred to other nearby schools.
3. No teacher of CT B-16, F:TT B-16, AT B-1, DM B-16, TT-16, will be posted in Middle Schools.
4. Senior most Senior T and SST (According to the Seniority list) may be retained in the schools of their present posting and junior most may be transferred to other schools.
5. Disable teacher may be retained in the schools of their present posting, another teacher may be shifted in stead of disabled.
6. Widow teacher may not be transferred to another school on rationalization, another teacher may be shifted instead of disabled.
7. Two schools of same level working in one building may be merged with each other.


 Dy: Director (E&SE)
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar.

Endst: No. 8160-67 / File No. 1/A-88/KC/S list: Dated Peshawar the 01/04/2014.

- Copy forwarded for information and necessary action to the:-
1. PS to the Secretary to Govt. Khyber Pakhtunkhwa, E&SE Department.
 2. PA to the Director E&SE, Khyber Pakhtunkhwa, Peshawar.
 3. M/ File


 Dy: Director (E&SE)
 Elementary and Secondary Education
 Khyber Pakhtunkhwa Peshawar

10/11/14

16

BEFORE THE HONOURABLE
SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

In matter of Service appeal No. 933/2014

Shaheen Ara

(Petitioner / Appellant)

V E R S U S

Samina Usman

(Respondent)

**Application for initiating contempt of court
proceeding against the respondent for not
obeying the order dated 03.09.2015 passed
by this honourable tribunal.**

Respectfully Sheweth,

- 1) That above titled appeal is pending before this honourable tribunal wherein the next date of hearing is fixed for 10.11.2015.
- 2) That this honourable tribunal has already suspended orders impugned in the above cited appeal vide order sheet dated 03.09.2015. (Copy of order dated 03.09.2015 is annexed as Annexure A)
- 3) That the appellant time and again approached the respondent and produced the order dated 03.09.2015 of

this honourable tribunal to her. But she contemptuously refused to follow the same and also refused to release the monthly salary of the petitioner / appellant.

- 4) That the attitude of respondent was very contemptuous toward the order dated 03.09.2015 of this honourable tribunal.

It is, therefore, humbly prayed that on acceptance of this application, the contempt of court proceedings may kindly be initiated against the respondent and the respondent may be awarded exemplary punishment according to law.

S. Ara

Petitioner / appellant

Through

Javed Ali

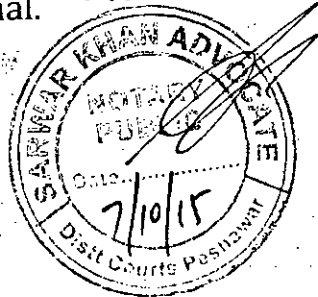
Javed Ali Mohammadzai
Advocate, High Court,
Peshawar

Dated: 07.10.2015

AFFIDAVIT

I, **Shaheen Ara**, do hereby solemnly affirm and declare on Oath that the contents of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this honourable tribunal.

ATTESTED



S. Ara

DEPONENT

IN THE JUDGE, SERVICE TRIBUNAL KPK, PESHAWAR



Service Appeal No 933 / 2014

789
28/5/2014

Shaheen Ara w/o Zakirullah
Resident of Jamal Garahi, District Mardan
..... (Appellate)

Versus

1. Government of KPK through Secretary
Education, Civil Secretariat, Peshawar
2. District Education Officer (Female)
District Mardan

..... (Appellant)
(Respondent)

ATTACHED
28/5/14

28/5/14

Appeal under section 4 of Service Tribunal Act, against the transfer Order No. 3258/G dated 18-06-2013 and Order No. 1525/G dated 20-11-2013 of respondent No. 2 and the departmental appeal dated 28-11-2013 is un-responded even after laps of 90 days which is illegal against the law and facts.

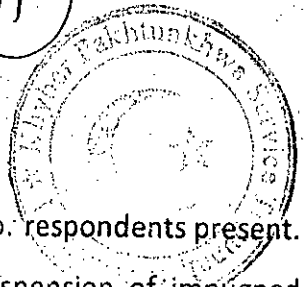
re-submitted to-dep
and filed.

8/7/14

Prayer:

On acceptance of this appeal, the impugned transfer orders may please be set aside to the extent of appellant and the appellant may please be re-instated in service at GGPS Jabber District Mardan

9



03.09.2015

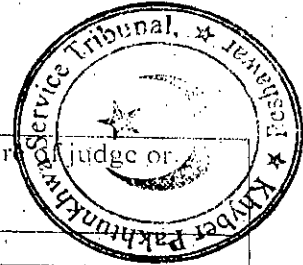
Counsel for the appellant and Addl: A.G for respondents present. Requested for adjournment. Application for suspension of impugned orders submitted. Learned counsel for the appellant argued that the appellant is still performing her duties at GGS Jabber and that the respondents are not submitting written statement and that notice of application was already issued to the respondents regarding which no reply whatsoever has been submitted.

In view of the above, the impugned orders are suspended. To come up for written reply/comments on 1.10.2015 before S.B.

Handwritten signature and a circular stamp with the text 'copy'.

Handwritten signature: S.B. Chakrabarti

Date of Presentation of Application 4.9.2015
 Number of Words 600
 Copying Fee 6
 Rent 2
 Fuel 8
 Date of Completion of 4.9.2015
 Date of Delivery of 4.9.2015



S.No.	Date of order proceedings	Order or other proceedings with signature of Judge or Magistrate
1	2	3
	09.02.2016	<p align="center"><u>KHYBER PAKHTUNKHWA SERVICE TRIBUNAL</u> <u>PESHAWAR.</u></p> <p align="center">Service Appeal No. 933/2014</p> <p align="center">(Shaheen Ara-vs- Govt: of Khyber Pakhtunkhwa through Secretary Education, Civil Secretariat, Peshawar and others.)</p> <p align="center"><u>JUDGMENT</u></p> <p align="center"><u>PIR BAKHSH SHAH, MEMBER</u>, - Counsel for the appellant (Mr. Javed Ali, Advocate) and Government Pleader (Mr. Ziaullah) for the respondents present.</p> <p>2. Appellant was promoted from the post of PST(BPS-14) to PSHT, (BPS-15) vide order dated 21.05.2013, and posted in GGPS Jabber District Mardan. She took over charge there on 24.05.2013. Vide order dated 18.06.2013, she was transferred to GGPS Dalasa and again vide order dated 30.11.2013 to GGPS Kodinaka Mardan. Feeling aggrieved, she filed departmental appeal which has not been decided so far, hence, this appeal under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.</p> <p>3. Arguments heard and record perused.</p> <p>4. The learned counsel for the appellant submitted that</p>

ATTESTED


[Signature]

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

due to political interference in favor of Mst. Musarrat Jabeen, appellant was ousted from GGPS Jabber. Secondly, that frequent Posting/Transfers have been made in violation of law and the posting/transfer policy. He submitted that the respondent-department may be directed to deal the appellant strictly on merits and in accordance with the law and rules.

5. In rebuttal it was submitted by the learned Government Pleader that the appeal is hopelessly time barred and that Mst. Musarrat Jabeen has not been made party. He further submitted that the appellant has already completed her tenure in GGPS Jabber and that the impugned order was made in public interest.

6. After hearing arguments and perusal of the record, it was found that three posting/transfer orders have been made in one year in 2013, affecting appellant one way or the other. On the record recommendations in favor of Mst. Musarrat Jabeen, was also shown to have been made on the instruction of political entities. Departmental appeal of the appellant has not been decided so far. As Musarrat Jabeen has not been made party, hence it is the considered view of the Tribunal to remit the case to the appellate authority with the directions to decide departmental appeal of the appellant within one month of the receipt of this judgment strictly in the accordance with the law and keeping in view the Government posting/transfer policy. It revealed that appellant is still working at GGPS Jabber therefore, till disposal of the departmental appeal of the

ATTESTED

 YKAMNES
 Member Pakistana
 Service Tribunal,
 Peshawar

appellant or till her transfer order by the competent authority in routine, she will continue to perform duty in GGPS Jabber, Mardan. The appeal is disposed of accordingly. Parties are left to bear their own costs. File be consigned to the record.

Announced
09.02.2016

Sd/- PIR Bakhtish Shah,
Member

Sd/- Abdul Latif,
Member

Certified to be true copy

EX-117
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 23-02-2016
 Number of Words 1600
 Copying Fee 10
 Urgent 2
 Total 12
 Name of Copyist [Signature]
 Date of Completion 23-02-2016
 Date of Delivery 23-02-2016



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MARDAN

PHONE NO: 0937-9230150

EMAIL ADDRESS:- EMISMARDAN@YAHOO.COM-

23

16 PP
4/3/19


SHOW CAUSE NOTICE

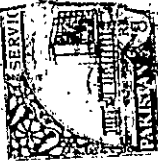
I Mst. Rukhsna Rahim, as a competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules 2011, do hereby serve you, Mst. Shaheena Ara & Mst. Musarrat Jabeen (Surplus) PSHTs, GGPS Jabbar as follows:

- (1) (i) That Consequent upon the reports of IMU & SDEO (F) Mardan that you both PSHTs are sitting in the same school, that is in GGPS Jabbar, while Shaheena Ara PSHT you have been transferred to GGPS Kandi Sharif Khel against vacant post vide this office Endst No 10347-48 Dated 19-11-2018 on Administrative ground. Musarrat Jabeen PSHT Surplus in GGPS Jabbar you have been transferred to GGPS Baratha vide this office Endst No, 10347-48 dated 19-11-2018, while you both are sitting in the same school and not obeyed the above cited order.
- (ii) On going through the findings and recommendations of IMU and SDEO Female Mardan, I am satisfied that you both have committed the following acts/omission as specified in rule 03 (a) (b) of the said rules:

Inefficiency & Misconduct.

2. As a result thereof, I as competent authority decided to impose upon you the penalty withholding promotion for a specific period, or increment, under rule 04 (a) of the said rules:
3. you are thereof, required to serve show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
4. If no reply to this notice is received within seven days of its delivery, it shall be presumed that you have no defence to put in and in that case an ex-parte action will be taken against you.
5. A copy of the findings of the IMU/SDEO (F) Mardan is enclosed.


(RUKHSANA RAHIM)
DISTRICT EDUCATION OFFICER (F)
MARDAN 2/3/019

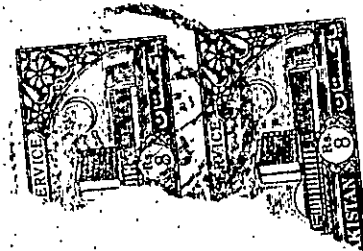
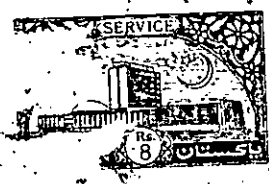
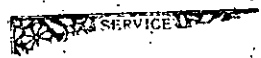
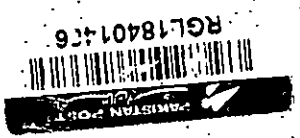


29

Shahana Begum
P.O. No. 105
Jabon

MARDAN G.P.O.

DESPATCHER
D.E.O (F) Mardan



To

The District Education Officer,
Female Mardan.

25

Subject:- **SHOW CAUSE NOTICE.**

Madam,

In response to show cause notice served upon me in connection with my transfer from present school GGPS Jabbar to GGPS Kandi Sharif Khel vide Endst" No.10347-48 dated 19-11-2018, I have to submit my reply as under"-

1. The above mentioned order was not communicated to me well in time
2. I was promoted to the post of PSHT in BPS-15 in the year 2013 and posted as Head Teacher at GGPS Jabbar and continued there till date
3. That I was transferred from the present post without any reason, or misconduct, Or In-efficiency on my part to a far flung school for accommodating Shaheen Ara At GGPS Jabbar on political influence which is against the norms and policy of the provincial Government in vogue.
4. That it is the policy of the Government to post female teachers at the station nearer to their home station.
5. That before the present transfer order, my transfer order was issued in November 2013, feeling aggrieved, I knocked the door of the service Tribunal Peshawar by Filing appeal for setting aside the said impugned order which was decided on 9.2.2016 allowing me to continue my duty at GGPS Jabbar till my transfer order by the competent authority in routine.
6. As General posting/transfer of Civil Servants in Education Department is not followed/adopted by the competent/higher authorities since long, therefore my Present transfer order is also illegal and violation of rules/policy.
7. That I am performing my duty honestly and efficiently at GGPS Jabbar.
8. Being a Civil servant, I cannot think of misconduct or inefficiency on my part.

It is therefore, prayed that I may kindly be exonerate of the Charges leveled against me and I may kindly be allowed to continue my duty at GGPS Jabbar And the transfer order issued on 19-11-2018 may kindly be withdrawn.

S. Ara
Shaheen Ara
PSHT GGPS Jabbar.

29. 93 - 160194

26

PN^o ~~123~~
129431

SERVICE BOOK

Shahen Mr. D/o Karim Shah

Likhani chail

Spirit Jamal Karhi

Rahmatullah
Bach

[Handwritten signature]

[Handwritten signature]

14

L.T.R.C. *[Arabic/Urdu text]*

شاہین آراء

1804
81
— 5

[Handwritten mark]

27

Heirs,

- 1) Passed S.S.C A in 1991 under R.No: 2547 and
- 2) obtained 534/850 marks from B.S.E. Peshawar.
- 3.

Chubb
 S.D.S. (P)
 Peshawar

Verification Roll No. dated received back

2) Passed P.T.C Exam. in the session of 1992-93 under R.No: 2636 and obtained 788/1200 marks from R.D. Education Peshawar. Result declared on 25-12-93 with left thumb impression.

B.M.
 S.D.S. (P)
 Peshawar

3) Passed P.T.C. (A) Examination 2005 for B.S.E. Peshawar under roll No 35594. Marks obtained out of 1100. Result declared on 10-8-2005.

Qualification	Date	Qualifications	Date
English		First Arts	

Verified
 Pashtu

B. L. or B. A. D. Peshawar Education (F) Mar 2006

4) Urdu Passed B.A Examination University (AJK) Under R.No-2304 obtained marks 704/800 and has been placed in 1st Division.

Session 2010 from AL-Khair Pleadship examination Training School Final examination

Verified
 Finger print

Other qualifications -

Drill instructing Passed B.Ed Examination. Session 2012 from AL-Khair University (AJK) Under R.No-5863 obtained marks 704/1200 and has been placed in 1st Division.

Reserve duties

Wishu
 S.D.S. (P)
 Peshawar

Note:—The entries in this page should be renewed or re-attested at least every five years and the signature to lines 9 and 10 should be dated.

1. Name ... Shaheen Ara

2. Race ... Pathan

3. Residence ... Moh. Khattak Vcl. Jamal Gache Maidan



4. Father's name and residence ... Kaim Shah as above



5. Date of birth by Christian era as nearly as can be ascertained ... 31.3.1975 (Thirty first March N.H. Seventy five)

6. Exact height by measurement ... 5' 3"

7. Personal marks for identification ... Mole below the chin

8. Left hand thumb and Finger impression of (non-gazetted) officer

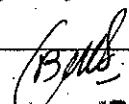
Little Finger.  Ring Finger 

Middle Finger.  Fote Finger 

Thumb. 

9. Signature of Government servant. ... Shaheen Ara

10. Signature and designation of the Head of the Office, or other Attesting Officer.


 C. S. D. (P)
 W. S. S. S.

26
/

1	2	3	4	5	6	7	8
Name of post	Whether substantive or officiating and whether permanent or temporary	If officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371 C. S. R.	Pay in substantive post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of appointment	Signature of Government servant
BPS Dkari Lixani	Officer	BPS-7	Rs. 1095	✓	1095 - 60 - 1995	18.5.94	Shakeen Aka
Chail		B-7	1480-81-26-95				
- do -	-		Rs 1480/- P.M.	✓		1 ⁶ / ₉₄	Shakeen Aka
Rehmatullah Bando	-		Rs 1561/- P.M.	✓		2 ¹⁰ / ₉₄	Shakeen Aka
- do -	-		Rs 1642/- P.M.	✓		1 ¹² / ₉₅	Shakeen Aka
- do -	-		Rs 1723/- P.M.	✓		1 ¹² / ₉₆	S.Aka
<p>Office of The Accountant General, M. J. F. P. Peshawar Pay fixed in the revised basic pay scales 1994 @ Rs 1480-81-2695..... (B. 7) @ Rs 1480/- P.M.W.E.F. 1-6-1994 with annual increment on 1-12-1994</p> <p>Accounts Office, Revolution Party NWFP, Peshawar</p>							
- do -			Rs 1804/- P.M.	✓		1 ¹² / ₉₇	S.Aka
- do -			Rs 1885/-	✓		1 ¹² / ₉₈	S.Aka
4			Rs 1966/-	✓		1 ¹² / ₉₉	S.Aka
11			Rs 2017 ¹ / ₂	✓		1 ¹² / ₂₅	S.Aka
11			Rs 2128	✓		1 ¹² / ₂₀₀₁	S.Aka

Signa designa head of other officer in of coln

SS

10

10

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30
Reference to any record of punishment or censure, or reward or praise of the Government servant.

Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8

Date of termination of appointment

Reason of termination (such as promotion, transfer, dismissal, etc.)

Signature of the head of the office or other attesting officer

Nature and duration of leave taken

Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government

Signature of the head of the office or other attesting officer

Period Government to which debitable

S.D.E.O (F) MARDAN

S.D.E.O (F) MARDAN

S.D.E.O (F) MARDAN

Promotion to the Post SPST - B-14
Consequent upon of the departmental promotion committee and in pursuance of the Govt. of K.P.K. Elementary & Secondary Edu: No. SO(B&A)/1-18/1-SE 2012 dated 11-07-2012 and S.O(PE) 51/SSRC/Meeting/2012/teaching cadre dated 13/11/2012
Promoted to SPST vide D.E.O.(M) Mardān Post No. 1686/14 Date 25/12/13 S.No. 906

UNDER TAKING

I Mr. Shahen Ara is hereby given an undertaking to the effect that if any overpayment is made to me as incorrect fixation of my pay on promotion to B-14, B-15 it shall be recovered from my pay, pension and gratuity

Signature.....

District Accounts Officer Mardān

MF No 733
12/15 8/10/14
13/15 2/31/10
14/15 15/15
Total Rs 231283/- less
deduct Rs 13496/-
Net Rs 217787/-

28/11
30/12/15
235
41/11/16
Promotion to 268600/-
Pay for the period 1/3/15 to 31/10/15
Rs 155000/-
Allowance on 9/1853-26602/-
Less deduction Rs 15624/-
Net Rs 248600/-

Promotion to the Post PSMT - B-15
Consequent upon of the departmental promotion committee and in pursuance of the Govt. of K.P.K. Elementary & Secondary Edu: No. SO(B&A)/1-18/1-SE 2012 dated 11-07-2012 and S.O(PE) 51/SSRC/Meeting/2012/teaching cadre date 13/11/2012
Promoted to PSMT vide D.E.O.(M) Mardān Post No. 1686/14 Date 26/12/13 S.No. 906

Signature.....

7/11/16

بعد الت صاحب سروس ٹریبونل ICPC

Appellant

2ء مخائب

بنام گورنمنٹ وائس

معاہدہ شامیہ

موزخہ
مقدمہ
دعویٰ
جرم

باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیردی وجواب دہی دکن کاروائی متعلقہ
آن مقام کیا جاوے علی غرض انڈیا انڈیا انڈیا کے لئے
مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز
دیکل صاحب کو راضی نامہ کرنے و تقرر ثبات ہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور
بصورت ڈگری کرنے اجراء اور صولی چیک دروپہ ار عرضی دعویٰ اور درخواست ہر قسم کی تصدیق
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برادگی اور منسوخ
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی 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 کسی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ
پرداختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے وہ ہوگا۔
کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی
مذکور کریں۔ لہذا ادکالت نامہ لکھد یا کہ سدر ہے۔

الرقوم 16 ماہ 3 2019

گواہ

کے لئے منظور ہے۔

مقام

سید علی

S. Azeem
ر شامیہ آراء
8-2054-101-101