

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

CM No. _____ /2024

In

S.Appeal No.3242 /2021

**Khyber Pakhtukhwa
Service Tribunal**

Diary No. 10549

Dated 15-1-2024

Safia Bibi

...APPELLANT

V/s

Govt. of KPK & others.

...RESPONDENTS

**APPLICATION SOLICITING ENCLUSION
OF ORDER OF DISMISSAL.**

Respectfully Sheweth;

May it please your good self to make the following submission.

1. That main Service Appeal No.3242 is pending disposal before this Honourable Tribunal and the hearing is fixed for 24/01/2024.
2. That during the course of previous hearing; this Honourable Tribunal observed that REMOVAL FROM SERVICE ORDER, is not appended with appeal and then directed to bring the same on record.
3. That through instant application, the annexed removal from service order (18/09/2012) is intended to be included/brought on record.

It is therefore, respectfully requested that, the annexed/attached, removal from service order may kindly be allowed to be brought on record and may kindly be made part of the file.

PETITIONER

Abbottabad
09/01/2024

Through



(Amanullah Khan Salik)
Advocate High Court,
Abbottabad

مستور
نور محمد

Armed



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OFFICE OF THE EXECUTIVE DISTRICT OFFICER ELEMENTARY & PRIMARY EDUCATION TORGHAR

[Redacted]

WHEREAS you Mst: Safia Bibi D/O Said Nabi Shah PST GGPS Lonian Torghar Personal No. 00556899 was proceeded for having committed the following acts which constitute inefficiency and misconduct under rule 3 sub rules (a),(b) and(d) of the Khyber Pakhtunkhwa Govt.Servants (Efficiency and Discipline) rules 2011.

WHEREAS you have been keeping yourself absent from duty w.e.f 18/11/2009 (arrival at GGPS Lonian K.D) without any application /prior permission /leave sanction which is evident from the school attendance register of the school, statements of the inhabitants /parents of the said village, statement of the Head Teacher GGPS Lonian and visit of the undersigned of the said school on 20/06/2012.

AND WHEREAS a Show Cause Notice was served upon you vide this office No.1736 dated 26/06/2012, in response you submitted reply which is unconvincing against the law/rules and facts.

NOW THEREFORE, in Exercise of Power conferred by the Khyber Pakhtunkhwa Govt.Servants (Efficiency & Discipline) rules 2011,the competent authority is pleased to impose major penalty under rule 4 sub rule (b) section (iii)of removal from service of Mst: Safia Bibi PST GGPS Lonian Torghar from the date of absence.

[Signature]
Executive District Officer
7c (E&SE) Torghar

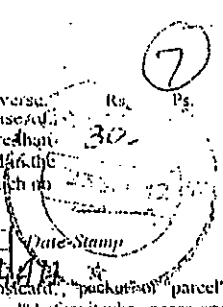
No.2031/PST(F/P) Proceedings(Safia Bibi)/EDO/TG dated: 18/09/2012

Copy for information forwarded to the:-

- 1. PS to Secretary (E&SE) Khyber Pakhtunkhwa Department Peshawar
- 2. Director (E&ES) Khyber Pakhtunkhwa Peshawar
- 3. District Coordination Officer Torghar as per his approval with the request to please make recovery of pay received, from the official for the absent period by adopting the legal procedure.
- 4. FDO (F&P) Torghar
- 5. DO(M&F) Local Office
- 6. District Accounts officer Torghar for further necessary action w.r.t Personal No. 00556899.
- 7. Safia Bibi D/O Said Nabi Shah Ex-PST GGPS Lonian R/O Village Asharay P/O Kuza Banda Tehsil & District Batagram (Registered Post) P.O No. 33 At 28/9/12. Jullana
- 8. Head Teacher GGPS Lonian

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



[Signature]
Executive District Officer
7c (E&SE) Torghar

Addressed to: SAFIA BIBI Date Stamp: _____

By: SAFIA BIBI

with the word "insured" before it when necessary.

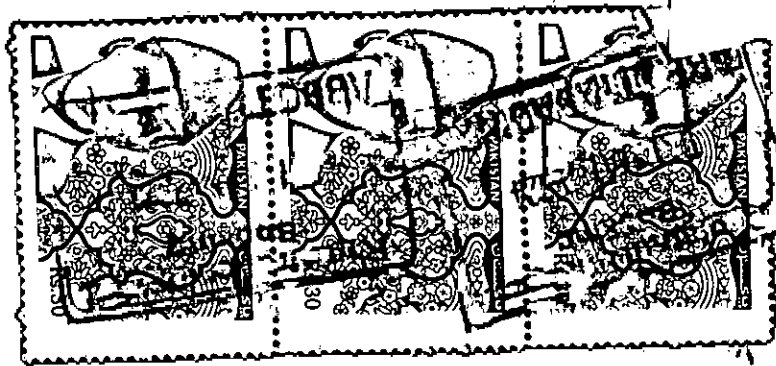
Post for Rs. 100 (in words)

Kuza Banda

Amanullah Khan Salik
Advtali

AYOUB TANOLI PALAZA
OFFICE NO 58

ABBOTABAD



REGISTERED

To,
THE REGISTRAR
KHYBAR KHAWA SERVICE TRIBUNAL
PESHAWAR

