

BEFORE THE COURT OF KHYBER PAKHTUNKHWA Khyber Pakhtunkhwa
Service Tribunal
SERVICE TRIBUNAL PESHAWAR

Diary No. 10695

Mst. Nagina Bibi **Versus** Education

Dated 22-1-2024

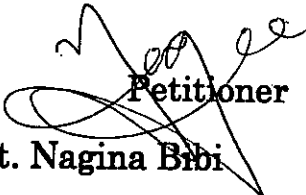
**APPLICATION TO THE EFFECT THAT
RESPONDENT MAY GRACIOUSLY BE
RESTRAINED TO INITIATE THE
DISCIPLINARY PROCEEDING AGAINST
THE APPELLANT AS STATUS QUO ORDER
HAS ALREADY BEEN GRANTED IN FAVOUR
OF APPELLANT OF THIS HONBLE
TRIBUNAL.**

Respectfully Sheweth,


1. That the service appeal No.2324/23 is pending before this Hon'ble Tribunal in the next date of hearing is 19.02.2024.
2. That the applicant was transferred from SDEO (Female) Khanpur by directing the appellant for report to DEO (Female) Haripur
3. That this Hon'ble Service Tribunal has already been granted status quo in favour of appellant.
4. That the respondent department initiate disciplinary proceeding against the appellant after service appeal and also status quo order has been issued/granted in favour of appellant. (Copy of disciplinary proceeding is attached).

It is, therefore, most humbly requested that respondent may kindly be restrained to continue disciplinary proceeding against the appellant as status quo order has already been issued/granted in her favour by this Hon'ble Tribunal.

Dated: 22/01/2024


Petitioner
Mst. Nagina Bibi
SDEO (Female) Khanpur

Through


Kabirullah Khattak
Advocate High Court
Peshawar,



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

No. SO(MC)E&SED/4-16/2024/Nagina Bibi/SDEO
Dated: 18th January 2024

To

District Education Officer (Female)
Haripur

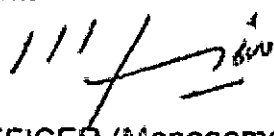
Subject: - DISCIPLINARY ACTION AGAINST MST. NAGINA BIBI SDEO (F)
KHANPUR DISTRICT HARIPUR

I am directed to inform you to attend the office of Mr. Nasar Ali, (PMS-19) Additional Secretary Irrigation Department Peshawar, inquiry officer in the subject case along, with relevant record on 23.01.2024 at 11:00 Am at his office.

(IMRAN ZAMAN)
SECTION OFFICER (Management Cadre)

Copy for information to the: -

1. Director, E&SE Khyber Pakhtunkhwa Peshawar
2. Mst. Nagina Bibi, SDEO (F) Khanpur District Haripur with the direction to appear before the inquiry officer on the date & time quoted above.
3. Section Officer (Estab) Irrigation Deptt, Peshawar w.r to his letter dated 17.01.2024
4. PS to Secretary E&SE Department, Khyber Pakhtunkhwa.


SECTION OFFICER (Management Cadre)



TO BE SUBSTITUTED EVEN NO AND DATE
GOVERNMENT OF KHYBER PAKHTUNKHWA
 ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
 Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
 Phone No. 091-9223588

Dated: 15th January 2024

NOTIFICATION

NO.SO(MC)/4-17/E&SED/INQUIRY/2023/SDEO (F) Khanpur /Nagina Bibi:

The Competent Authority is pleased to nominate Mr. Nasar Ali (PMC BS-19), Additional Secretary Irrigation Department as inquiry officer to probe into a complaint against Mst. Nagina Bibi , SDEO (Female) Khanpur District Haripur, by DEO (F) Haripur.

2. The Inquiry Officer shall submit his report to the Secretary E&SE Department within **fifteen (15) days**, positively.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA
 E&SE DEPARTMENT

Endst: of even No. & date
 Copy forwarded to the:

1. Director E&SE Khyber Pakhtunkhwa, Peshawar.
2. Mr. Nasar Ali (PMS BS-19), Additional Secretary Irrigation Department along with relevant record of the case.
3. DEO (Female) Haripur with the direction to provide relevant record as and when called by the Inquiry Officer.
4. Mst. Nagina Bibi , SDEO (Female) Khanpur District Haripur with the direction to cooperate the Inquiry Officer.
5. Section Officer (Inquiries) E&SE Department.
6. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

11/1/24
 SECTION OFFICER (Management Cadre)



GOVERNMENT OF KHYBER PAKHTUNKHWA
IRRIGATION DEPARTMENT

No. SO(E)/Irr:/9-3/2012/Misc:/Vol-VI
Dated Peshawar the 17th January, 2024

To :

The Section Officer (Management Cadre),
E&SE Department,
Peshawar.

Subject: - DISCIPLINARY ACTION AGAINST MST. NAGINA BIBI SDEO
(FEMALE) KHANPUR DISTRICT HARIPUR.

I am directed to refer to your office notification No. SO(NC)/4-17/E&SED/Inquiry/2023/SDEO dated 15.01.2024 on the subject noted above and to state that the following officers may be directed to appear before the inquiry officer Mr. Nasar Ali, Additional Secretary, Irrigation Department in his office on 23.01.2024 at 11:00 AM, please.

- i. DEO (Female) Haripur/Complainant
- ii. Mst. Nagina Bibi (Accused) SDEO (Female) Khanpur, District Haripur
- iii. Departmental representative alongwith relevant record.


(Magsood Khan)
Section Officer (Estt:)

Endst: No and date even

Copy forwarded for information to: -

1. The Additional Secretary, Irrigation Department/Inquiry Officer.
2. PS to Secretary E&SE Department, Peshawar.


Section Officer (Estt:)