

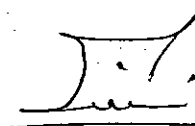
23.11.2021

Nemo for the appellant. On the previous date too, none was present on behalf of the appellant, therefore, it was directed that notice for prosecution of the appeal be issued to the appellant as well as her counsel.

The appeal in hand was called on for hearing after various intervals, however none appeared on behalf of the appellant till the closing time despite notice for prosecution of the appeal being issued to the appellant as well as her counsel through registered post. The appeal in hand is, therefore, dismissed in default. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED

23.11.2021

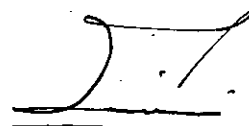


(Salah-Ud-Din)
Member (J)
Camp Court D.I.Khan

24.03.2021

Nemo for the appellant.

Today's date was posted on Note Reader, therefore, notice for prosecution of the appeal be issued to appellant as well as his counsel and to come up for preliminary hearing before S.B at Camp Court D.I.Khan on 26.05.2021.



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT D.I.KHAN

*Due to COVID, 19 therefore to
come up for the same on 29/9/21*

*ON
Reader*

29.09.2021

Nemo for the appellant.


Previous date was changed on Reader Note, therefore, notice for prosecution of the appeal be issued to the appellant as well as her counsel and to come up for preliminary hearing before the S.B on 23.11.2021 at Camp Court D.I.Khan.



(SALAH-UD-DIN)
MEMBER (JUDICIAL)
CAMP COURT D.I.KHAN

28.10.2020

Since the Members of the High Court as well as of the District Bar Association, D.I.Khan, are observing strike today, therefore, learned counsel for appellant is not available today. Adjourned to 23.11.2020 on which date to come up for preliminary hearing before S.B at Camp Court, D.I.Khan.



(MUHAMMAD JAMAL KHAN)
MEMBER
CAMP COURT D.I.KHAN

23.11.2020

Nemo for appellant.

Due to general strike on the preceding date the case was adjourned, therefore, notice be issued to appellant and her counsel for 21.12.2020.

Adjourned for preliminary hearing before S.B at Camp Court, D.I. Khan.


(Rozina Rehman)
Member (J)
Camp Court, D.I. Khan

21-12-2020

*Due to COVID 19, the case is adjourned
to 25-3-2021 for the same.*



24/3/2020

Due to COVID-19 the case is adjourned. To come up for the same 23/4/2020 at Camp Court, D.I Khan

Reader

23/4/2020

Due to COVID-19 the case is adjourned. To come up for the same 23/4/2020 at Camp Court, D.I Khan

Reader

23.09.2020

Nemo for appellant.


Notice be issued to appellant and her counsel for 28.10.2020 for preliminary hearing, before S.B at Camp Court D.I Khan.

(Rozina Rehman)
Member (J)
Camp Court, D.I Khan

Service Appeal No. 508/2019


30.01.2020

Clerk of counsel for the appellant present and requested for adjournment on the ground that learned counsel for the appellant is not available today due to general strike of Khyber Pakhtunkhwa Bar Council. Adjourned to 27.02.2020 for preliminary arguments before S.B at Camp Court D.I.Khan.

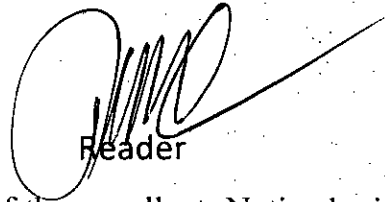

(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan

27.02.2020

Junior counsel for the appellant present and requested for adjournment on the ground that learned senior counsel for the appellant is not available today. Adjourned to 24.03.2020 for preliminary hearing before S.B at Camp Court D.I.Khan.



(M. Amin Khan Kundi)
Member
Camp Court D.I.Khan

23/10/2019 Since tour to D.I.Khan has been cancelled .To come
for the same on 28/11/2019.



Reader

28.11.2019 None present on behalf of the appellant. Notice be issued
to appellant and her counsel for attendance and preliminary
arguments for 30.01.2020 before S.B at Camp Court D.I.Khan.



(Muhammad Amin Khan Kundi)
Member
Camp Court D.I.Khan.

~~23/10/2019~~ ~~Since tour to D.I.Khan has been cancelled .To come~~
~~for the same on 28/11/2019.~~


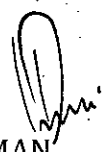
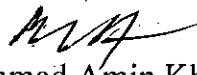



Reader

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 508/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	17/04/2019	<p>The appeal of Mst. Rabia Tabbasum received today by post through Mr. Muhammad Mohsin Ali 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 17/4/19</p>
2-	8-8-2019	<p>This case is entrusted to touring S. Bench at D.I.Khni for preliminary hearing to be put up there on <u>28.8.2019</u></p> <p style="text-align: right;"> CHAIRMAN</p>
28.08.2019		<p>None present on behalf of the appellant. Notice be issued to appellant and her counsel for attendance and preliminary hearing for 25.09.2019 before S.B at Camp Court D.I.Khan.</p> <p style="text-align: right;"> (Muhammad Amin Khan Kundi) Member Camp Court D.I.Khan</p>
25.09.2019		<p>Learned counsel for the appellant present and seeks adjournment. Adjourn. To come up for preliminary hearing on 23.10.2019 before S.B at Camp Court, D.I.Khan.</p> <p style="text-align: right;"> Member Camp Court, D.I.Khan.</p>

The appeal of Mst. Rabia Tabbasum Daughter of Ziamud Din r/o Muhallah Wakelanwala City D.I.Khan received today i.e. on 25.03.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Copy of termination order in respect of appellant mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 2- Copy of judgment of this Tribunal mentioned in the memo of appeal is not attached with the appeal which may be placed on it.
- 3- All the annexures of the appeal are illegible which may be replaced by legible/better one.
- 4- Annexures of the appeal may be attested.
- 5- Annexures of the appeal may be flagged.
- 6- Affidavit may be got attested by the Oath Commissioner.
- 7- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 509 /S.T,

Dt. 25/3 /2019


REGISTRAR

SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

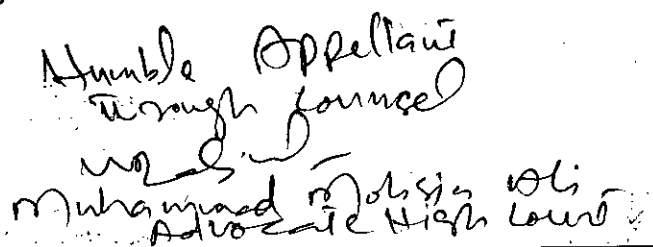
Mr. Muhammad Mohsin Ali Adv.
High Court/Distt. Court D.I.Khan.

Respected Sir

The appeal is re-submitted after removing the objections:

1. Copy of individual Termination order had not been issued by the Authority. However, a general order of Termination is already placed on file at Page No. 12.
2. The judgment of this Tribunal passed in earlier litigation is not relied by the present Appellant. Therefore, there is no need to annex the copy of that judgment.
3. Legible copy of illegible annexure has been replaced.

Dated: 15/4/2019

Humble Appellant
through counsel

Muhammad Mohsin Ali
Advocate High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. 508 /2019

Rabia Tabbasum

.....APPELLANT

VERSUS

Govt. of KPK and others

.....RESPONDENTS

INDEX

S #	Description of Documents	Annexure	Page #
1	Grounds of appeal	-----	1-6
2	Copy of Appointment Order	A	7-8
3	Copy of Inquiry etc	B	9-12
4	Copy of List of Illegal Appointees	C	14-21
5	Copy of W.P No. 755-D/2015 along with Judgment	D	22-28
6	Copy of Departmental Appeal	E	29-30
7	Vakalatnama	-----	31

Dated: 4/3/2019

Humble Appellant

Rabia

Rabia Tabbasum

Through Counsel

Muhammad

Muhammad Mohsin Ali
Advocate High Court,
District Courts, D.I.Khan.

0336-7969883

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR.

Khyber Pakhtunkhwa
Service Tribunal

Appeal No. 508 /2019

Diary No. 381

Dated 25/3/2019

Rabia Tabbasum daughter of Ziamud Din resident of Muhallah
Wakelanwala, City Dera Ismail Khan.

.....APPELLANT

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Education Govt. of K.P.K, Peshawar.
2. Secretary Elementary & Secondary Education Govt. of K.P.K, Peshawar.
3. Director Education (Elementary & Secondary), Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Female), Dera Ismail Khan.
5. Deputy Commissioner, Dera Ismail Khan.
6. District Account officer, Dera Ismail Khan.

.....RESPONDENTS

Filed to-day

APPEAL UNDER SECTION 4 OF KPK

Registrar

SERVICE TRIBUNALS ACT, 1974

25/3/19

PRAYER; On acceptance of this appeal this august court may be pleased to DECLARE the termination order of appellant from service as illegal, without lawful authority, without jurisdiction, void *ab initio* and ineffective upon the rights of the appellant and is liable to be set aside/quashed and to reinstate the appellant against the subject post on the grounds appearing hereinafter;

OR

GRANT any other relief considered just and appropriate under the given circumstances of the case.

Re-submitted to-day
and filed.

Registrar
20/11/19

Respectfully sheweth;

1. That the brief facts of the case are that she passed PTC exam in the year 1998 from Allama Iqbal Open University. The petitioner also got the decree of B.A, B.Ed and M.A) Islamyat from Gomal University Dera Ismail Khan.
2. That in the year 2007, the respondent advertised the posts of different categories of teachers for District Dera Ismail Khan and being qualified candidate, the present petitioner applied for the post "PST/PTC", and appeared in the Interview for the said post. The process of recruitment was completed, and the petitioner is appointed against the said vacant post vide appointment order Endst: No. 7203-04 dated 31-03-2007.
3. That after getting the medical fitness certificate, the petitioner submitted the arrival report and started her official duty..
4. That later-on, on the basis of political victimization the standing committee 26, Provincial Assembly in the year 2009 conducted the inquiry against the appointments made during Jan-2007 to June-2008 in education department Dera Ismail Khan. The committee also made some recommendation to education department for termination of Illegal appointments.
5. That the District Education officer Dera Ismail Khan on the instruction of government issued the termination order of 1613 irregular appointee. Therefore, the petitioner was also terminated without any notice, although she performed her duties for three years and her salary was also stopped w.e.f. May-2010. Moreover, no list of irregular appointee was given by respondents nor any termination letter was given. The petitioner also filed the departments appeal but the same was turned a deaf ear, therefore, the petitioner

approached to the service tribunal for redressal of her grievance alongwith other affectees, but respondents promised that her grievance would be redressed as the petitioner was appointed with due process and the name of the petitioner is not mentioned in the said list. Copy of letter and list is enclosed.

6. That being aggrieved, the present petitioner filed the writ petition No. 755-D/2015 before Honourable Peshawar High Court Dera Ismail Khan and vide judgment dated 21-03-2018 the writ petition was dismissed being not maintainable on the ground that the petitioner was a civil servant. Therefore, the present appellant filed the Departmental Appeal on 14-09-2018 through registered post along with AD Card to Director Education, KPK, Peshawar but the same was not decided by the authority, hence the appellant filling the instant appeal on the following grounds;

Handwritten signature
GROUND:

1. That the act of the respondents is illegal, against the natural justice, ulterior motives, based on malafide and ineffective upon the rights of the appellant.
2. That the interviews of candidates of different categories of teachers had been conducted in accordance with the policy and merit list was also prepared and, thereafter, the appellant was appointed with due process. It is also very much clear that the appointment of the appellant was not irregular, as the name of the appellant is not mentioned in the said list. But the respondents illegally and without any reason terminated the appellant.
3. That the standing committee conducted the inquiry against the irregular appointments in education department Dera Ismail Khan, and the recommendation was made to terminate those

appointees who were appointed irregularly, but the respondents terminated all those appointees who were appointed during that period. Thus the act of the respondents while terminate the appellant is illegal, as the appointment of the appellant was made through due process.

4. That the appellant was eligible candidate for the appointment against the subject post and qualified in the recruitment process, but the respondents clearly ignored the same and terminated the appellant along with all irregular appointees.
5. That the appellant is the victim of unlawful and illegal act of the respondents and such a malafide act on the part of respondents is against the law and rules, without jurisdiction and lawful authority, against the natural justice, misuse of official powers and is the outcome of victimization known by the respondents and it has caused an immense mental torture and agony to the appellant.
6. That the counsel for the appellant may kindly be allowed to raise the additional grounds at the time of arguments.
7. That the appeal is being filed within the statutory period prescribed in section 4 of The KPK Service Tribunals Act, 1974.

It is, therefore, prayed that on acceptance of this appeal this court may be pleased to pass orders as prayed for in the heading of this appeal.

Dated: 4/31/2019

Humble Appellant

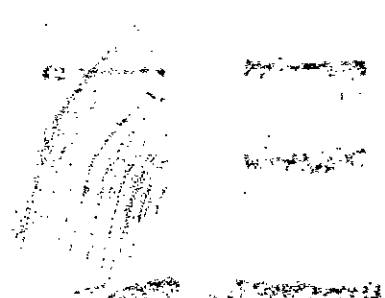
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Rabia Tabbasum

Through Counsel

Muhammad Mohsin Ali

Muhammad Mohsin Ali
Advocate High Court,
District Courts, D.I.Khan.



(5)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. _____/2018

Rabia Tabbasum

.....APPELLANT

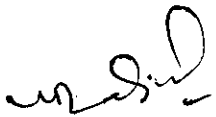
VERSUS

Govt. of KPK and others

.....RESPONDENTS

AFFIDAVIT

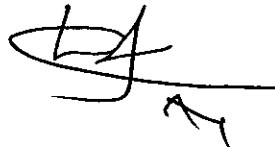
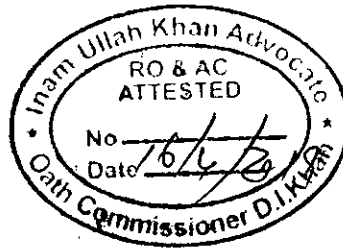
I, the appellant, do hereby solemnly affirm and declare on oath that all the para-wise contents of the appeal are true and correct to the best of my knowledge and belief; and that nothing has been deliberately concealed or kept secret from this Honourable Court.



Identified by Counsel



Deponent



6

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Appeal No. _____/2018

Rabia Tabbasum

.....APPELLANT

VERSUS

Govt. of KPK and others

.....RESPONDENTS

ADDRESSES OF THE PARTIES

Rabia Tabbasum daughter of Ziamud Din resident of Muhallah
Wakelanwala, City Dera Ismail Khan.

.....APPELLANT

1. Government of Khyber Pakhtunkhwa through Secretary
Education Govt. of K.P.K, Peshawar.
2. Secretary Elementary & Secondary Education Govt. of K.P.K,
Peshawar.
3. Director Education (Elementary & Secondary), Khyber
Pakhtunkhwa, Peshawar.
4. District Education Officer (Female), Dera Ismail Khan.
5. Deputy Commissioner, Dera Ismail Khan.
6. District Account officer, Dera Ismail Khan.

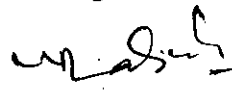
.....RESPONDENTS

Dated: 4/3/2018

Humble Appellant


Rabia Tabbasum

Through Counsel


Muhammad Mohsin Ali
Advocate High Court,
District Courts, D.I.Khan.

OFFICE OF THE EXECUTIVE DISTRICT OFFICER, (SCHOOLS & LIT.)
DIKHAN

APPOINTMENT ORDER:

Apprecial
mudil
Edu

Consequent upon the approval of Selection Committee, the following
Fresh (Female) is hereby appointed against vacant post of ... P. T. C. ... in
the school noted against their name in BPS 07... plus usual allowances being a
qualified, fresh candidate as per existing policy in the interest of public service w.e. from
the date of taking over charge on the following terms and conditions.

<u>S.No.</u>	<u>Name of Candidate with Father's Name</u>	<u>Schools where posted.</u>
1)	Farbia Tabbasum B/O Ziaud Din R/O Dikhan city.	GGPS, Wikeender Janubi.

TERMS & CONDITIONS:

1. Charge reports should be submitted to all concerned.
2. No pensionary benefit will be available.
3. The services of the above named candidate is made purely on temporary basis & liable to terminate at any time with out assigning any notice/ reasons.
4. The candidate will produce Health & Age certificate from the M/S concerned.
5. The original documents may be checked/ verified by concerned Board/ University through DDO concerned before handing over charge.
6. No TADA is allowed.

Sd/-
EXECUTIVE DISTRICT OFFICER,
SCHOOLS & LITERACY DIKHAN

Endst: No. 7203-06

Dated D.I.Khan the 31/3/2007

Copy to the:-

1. Director Schools & Literacy N.W.F.P. Peshawar.
2. District Co-ordination Officer, D.I.Khan.
3. District Accounts Officer, D.I.Khan.
4. Headmistress/ Headmaster concerned.
5. Candidate concerned.

No. _____
EXECUTIVE DISTRICT OFFICER,
SCHOOLS & LITERACY DIKHAN

(8) -
Assessed
Sd/-
Sh

BETTER COPY

OFFICE OF THE EXECUTIVE DISTRICT OFFICER, (SCHOOLS & LIT)

D I KHAN.

APPOINTMENT ORDER:

Consequent upon the approval of selection committee the following fresh (Female) is hereby appointed against the vacant post of P. T. C in the school noted against there name in BPS-07 plus usual allowances being a qualified fresh candidate as per existing policy in the interest of following service w.e. from the date of taking over charge on the following terms and conditions.

<u>S.No.</u>	<u>Name of candidate with father's name</u>	<u>School where posted</u>
1	Rabia Tabsam d/o Zia ud Din r/o Dera ismail Khan City	GGPS, Sikandar Janobi

Terms & Conditions:

1. Charge report should be submitted to all concerned.
2. No pensioner benefit will be available.
3. The service of the above named candidate is made purely on temporary basis and liable to terminate at any time without assigning any notice/ reasons.
4. The candidate will produce health and age certificate from the M/S Concerned.
5. The original documents may be checked/ verified by concerned board/ University through DDO Concerned before handing over charge.
6. No TA/ DA are allowed.

Sd/-

**EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY D.I.KHAN.**

Endst No. 7203-04

Dated: DI Khan the 31/03/2007

Copy to the:

1. Director Schools & Literacy NWFP Peshawar.
2. District Co, ordination Officer D.I.Khan.
3. District Accounts Officer Dera Ismail Khan.
4. Headmistress / Headmaster concerned.
5. Candidate concerned.

**EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY D.I.KHAN.**

ANNEX:- B
Page:- (9)

of the standing
in E & S E
26.08.2009.
ion dated
ined in
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~~As per
in Jul
3~~

OFFICE OF THE DISTRICT COORDINATION OFFICER, DERA ISMAIL KHAN.

OFFICE ORDER :-

Where as the Executive District Officer of the then School & Literacy Deptt, now Elementary & Secondary Education Deptt made hundreds of illegal / irregular appointments of different scales & cadars of teacher in the District of DIKhan with in the period of 01.01.2007 to 31.08.2009 without absorbing the requisite code formalities.

And whereas the issue of illegal appointments was noticed by the Provincial Govt and the following enquiry Officers were appointed to have a probe to the matter of illegal / irregular appointments :-

1. Mr. Falak Naz Khan the then Director Education.
2. Mr. Muhammad Arifeen Khan the then Special Secretary for Education.
3. Mr. Haji Ahmad Khan the then Additional Secretary for Education.
4. Mr. Hidayat Ullah Afghani, Director PITE.

And where as after the enquires, the matter was put before the standing committee No. 26 of the Provincial Assembly on Education, and the Committee after thorough deliberation ordered for termination of all the illegally appointed teachers as communicated in the Govt of NWFP Elementary & Secondary Education Deptt, letter No. SO (AB) E&SED/10-11/Std.Com, 26/09, dated 26.08.2009.

And where as a writ petition No. 252/2009 dated 11.06.2009 was lodged in the Honorable High Court bench at DIKhan by Ms. Husan Arra etc for the implementation of the recommendation of the standing committee which was accepted by the Honorable court and ordered the implementation of the standing committee decision within 60 days vide its decision dated 11.06.2009.

And whereas the decision of the standing committee No. 26 was submitted to the Chief Minister NWFP for approval and implementation, who has been pleased to direct for implementation of the decision of the Standing Committee No. 26 as communicated vide Govt of NWFP, Elementary & Secondary Education Deptt; letter No. SO (AB) E&SED/10-11/Std.Com, 26/09, dated 26.08.2009.

(9)

(10)

Now, therefore, I Arshad Khan District Coordination Officer, DIKhan Competent Authority, in compliance of the decision of the standing committee No. 26 of the Provincial Assembly of NWFP contained in E. & S. E. Deptt: letter No. SO (AB) E&SED/10-11/Std.Com. 26/09, dated 26.08.2009. Order of the Hon'ble Peshawar High Court contained in its decision dated 11.06.2009 and order of the Honorable Chief Minister NWFP contained in Elementary & secondary Education Deptt: letter No. No. SO (AB) E&SED/10-11/Std.Com. 26/09, dated 26.08.2009. do hereby terminate services of all the illegally / irregularly appointed teacher, the detail of which is given in the annexure "A" with this order duly signed on every page from page 1 to 60 with immediate effect.

Arshad Khan
Dera Ismail Khan
Edu

District Coordination Officer,
Dera Ismail Khan
the 04/09/2009

No. 8021 / DCO (Edu) dated DIKhan

Copy forwarded to the :

1. PS to Chief Minister NWFP, Peshawar.
2. PS to Chief Secretary, NWFP, Peshawar.
3. PS to Minister for Education NWFP, Peshawar.
4. Mr. Mukhtiar Ali Khan Advocate MPA, Chairman Standing Committee No. 26, Provincial Assembly NWFP, Peshawar.
5. PS to Secretary for Education NWFP, Peshawar.
6. PS to Director for Education NWFP, Peshawar.
7. All MPAs in DIKhan District.
8. District Accounts Officer, DIKhan.
9. Executive District Officer (Elementary & Secondary Education) DIKhan.
10. All concerned.

District Coordination Officer,
Dera Ismail Khan

OFFICE OF THE EXECUTIVE DISTRICT OFFICER
ELEMENTARY & SECONDARY EDUCATION
DISTRICT DERA ISMAIL KHAN.

Dated Dikhan the 04/08/2009

- 1-2 The District Officer (Male/female) I & S.I. Dikhan
- 3-10 All the Deputy District Officer (Male/female) Primary, Dikhan District
- 11-130 All the Principals/Headmasters/Headmistresses (Male/female) GHS/CHSS/CHMS/CHIS/CHIS of Dikhan District.

ILLEGAL/IRREGULAR APPOINTMENTS IN ELEMENTARY & SECONDARY EDUCATION DEPARTMENT DISTRICT

Subject: Memo

In continuation of this letter No. 10238 dated 04-08-2009

The District Coordination Officer, Dikhan, has terminated the services of all those candidates of Dikhan District whose appointments were made w.e.f. from 01-01-2007 to 30-06-2008

vide his office Enst No. 8021/DCC (Ed) dated 04-09-2009. This all is the compliance & implementation of Standing Committee Provincial Assembly NWFP & the Govt of NWFP I & S.I. Department letter No. SO(AI) I & S.I/D/10-4 STD dated 26-08-2009 & with Petition of 252/2009

dated 11-06-2009 in the Honorable High Court Bench of Dikhan by Hassan Azeem etc.

You are therefore directed to enforce/implement the said order of District Coordination Officer Dikhan & furnish the following informations:

1. No. of existing Vacant Posts (Category Wise, BPS 1-15)
2. Resultant Vacant posts of all category after implementing the District Coordination Officer order, reference above.
3. No. of vacant posts in all Cadres due to superannuation/Retirement/Retirement/Death etc.

EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
EDUCATION, D. I. KHAN

EXECUTIVE DISTRICT OFFICER
ELEMENTARY AND SECONDARY
EDUCATION, D. I. KHAN

- 1. PS to Chief Minister, NWFP, Peshawar.
- 2. PS to Chief Secretary, NWFP, Peshawar.
- 3. PS to Minister for Education, NWFP, Peshawar.
- 4. Mr. Mukhtar Ali Khan Advocate MPA, Chairman Standing Committee No. 26, Provincial Assembly NWFP, Peshawar.
- 5. PS to Secretary for Education, NWFP, Peshawar.
- 6. PS to Director for Education, NWFP, Peshawar.
- 7. All MPAs in Dikhan District.
- 8. District Accounts Officer, Dikhan.
- 9. All concerned.

Copy of the above forwarded for information to the

Enst No. 10238

(Handwritten notes and signatures)

26
11

OFFICE OF THE EXECUTIVE DISTRICT OFFICER, E&SE,
DISTRICT DIKHAN.

Annexure

24
Attested
[Signature]

No. 8301-11 /EDO (Male Section) Dated D.I.Khan the 07/05/2010

To:
1-2) The District Officer (M/F) E&SE, in D.I.Khan.
3-10) The Dy. District Officer (M/F) E&SE, in D.I.Khan.
11) All Heads of Educational Institutions (M/F) Higher / High Schools
in D.I.Khan.

Subject: IMPLEMENTATION OF TERMINATION ORDERS.

It is to inform you that the Peshawar High Court, D.I.Khan Bench has returned the petition to the petitioners and has held in its judgment announced on 29-04-2010, that the matter in issue is to be adjudicated upon the Khairpur Pakhtun Khas, Service Tribunal and the jurisdiction is barred. Moreover, the said court has also held that they present the petition to the proper forum, if they so desire. It means they are no more Govt. Servants.

You are, therefore, requested that the termination orders already issued by the District Coordination Officer, D.I.Khan vide No.8021/DCO (Edu), dated 04-09-2009 duly endorsed by the undersigned vide No.10239, dated 04-09-2009 should be implemented in letter and spirit in the light of above referred judgment. However, 309 PST (Male), 131 PST (Female) appointed on merit and 61 Class IV servants are exempted in view of the decision of the Standing Committee No.26 on E&SE.

You are further directed that their pay should be stopped from the date of judgment, failing which strict disciplinary action will be initiated against the defaulters under Special Powers (Removal from Service) Ordinance, 2000.

[Signature]
Executive District Officer,
E&SED, District D.I.Khan.

Enclst. No 8312-16 /EDO (Male Section).

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

- 1) The Secretary to K.P.K.P, E&SED, Peshawar.
- 2) The Director, E&SED, K.P.K.P., Peshawar.
- 3) The District Coordination Officer, D.I.Khan.
- 4) The S.O. (Litigation) E&SED, Peshawar.
- 5) The District Accounts Officer, D.I.Khan.

[Signature]
Executive District Officer,
E&SED, District D.I.Khan.

LIST SHOWING PST (FEMALE) IRREGULAR RECRUITMENT W.E.F 01-01-2007 to 30-06-2008 IN DISTRICT DI KHAN

ANNEX-1
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S.No	Dairy #	Name with father Name	place of posting	Edst No. & date	result declaration	Remarks/Observations
1	1	Mehwish Batol D/O Sadiq Hussain	GGPS Maskotah	101-05 dated 12-05-2007	31/03/2002	
2	2	Safina Bibi D/O Muhammad Akram	GGPS Masu	11-15 dated 01-01-2008	21/02/2005	
3	3	Anbar Gul D/O Ghulam Qasim	GGPS Lachra	121974-13116 dated 02-07-2007	20/09/2007	U.T. at the time of appointment
4	4	Mahnoor Bibi D/O Ghulam Abbas	GGPS Sardarwala	12310-14 dated 01-10-2007	31/12/1996	
5	5	Aziz Fatima D/O Abdul Qadus	GGPS Qazi Kekar	12474-13116 dated 01-10-2007	31/12/1996	
6	6	Haisa Bibi D/O Ghulam Akbar	GGPS Wanda Bochra	12655-971 dated 02-07-2007	07/08/2003	
7	7	Samina Shaheen D/O Muhammad Ramzan	GGPS Kachi Pahar Pur	12655-973 dated 02-07-2007	28/04/2000	
8	8	Sajida Ashiq w/o Hashmat Ullah	GGPS Shadai	12655-973 dated 02-07-2007	09/01/1995	
9	9	Khurshid Bibi D/O Ghulam Sultan	GGPS Wanda Nadir Shah	12655-973 dated 02-07-2007	11/05/1999	
10	10	Mahnaz Begum D/O Gul Daraz	GGPS Band Korai	12655-973 dated 02-07-2007	09/01/2006	
11	11	Kalsom Akhtar D/O Muhammad Aslam	GGPS Wanda Bochra	12655-973 dated 02-07-2007	Session 1999	
12	12	Sumair Sattar D/O Abdus Sattar	GGPS Chan Muchal	12655-973 dated 02-07-2007	25/04/2000	
13	13	Nazeena Bano D/O Hussain Bakhsh	GGPS Karim Abad	12655-973 dated 02-07-2007	20/10/1998	
14	14	Seeda Aqeela Bibi D/O Arif Hussain	GGPS Kolla Saidan	12655-973 dated 02-07-2007	20/09/2007	U.T at the time of appointment
15	15	Fahmeeda Andaleeb D/O Aman Ullah	GGPS Kiri Shamoza	12655-973 dated 02-07-2007	20/10/1998	
16	16	Naseem Akhtar D/O Khalid Mahmood	GGPS Kekar	12655-973 dated 02-07-2007	19/01/2002	
17	17	Tara Janjua D/O Ghulam Abbas	GGPS Singara	12655-973 dated 02-07-2007	31/12/1996	
18	18	Ranjeela Andaleeb D/O Malik Razzaq	GGPS JK Sokhani	12655-973 dated 02-07-2007	19/07/2003	
19	19	Karwal Yasmin D/O Bashir Ul Hassan	GGPS Wanda Belouchan	12655-973 dated 02-07-2007		UT
20	20	Lubna Iram D/O Imam Sakhsh	GGPS Wanda Ali	12854-53 dated 02-07-2007		PTC Not available
21	21	Rizwana Zehar D/O Abdur Rahman	GGPS S/Abbad	12974-13110 dated 02-07-2007	25/09/1999	
22	22	Mahmat Bibi D/O Khurati Khan	GGPS Wanda Dost Ali	12974-13116 dated 01-09-2007	25/03/1995	
23	23	Musarat Andaleem D/O Alla Ullah	GGPS Shala Shari	12974-13116 dated 01-09-2007	21/02/2005	
24	24	Asmat Batol D/O Naseer Hussain Shah	GGPS Miha Pur Kalan	12974-13116 dated 01-10-2007	20/09/2007	
25	25	Shaziz Parveen D/O Faiz Ur Rahman	GGPS Wanda Bochra	12974-13116 dated 01-10-2007	21/02/2005	
26	26	Akhtar Shaheen D/O Muhammad Ramzan	GGPS Kachi Pahar Pur	12974-13116 dated 01-10-2007	31/07/2002	
27	27	Shafiqat Batol D/O Ghulam Raza Naqvi	GGPS Miha Pur Khurd	12974-13116 dated 01-10-2007	20/10/1998	
28	28	Shahana Parveen D/O Roshan Din	GGPS Nawab	12974-13116 dated 01-10-2007	09/01/2006	
29	32	Zubaida Bibi D/O Allah Yar	GGPS Dhothar Jadeed	12974-13116 dated 02-07-2007	06/05/2003	
30	33	Zeenat Bibi D/O Saleh Muhammad	GGPS Awan	12974-13116 dated 02-07-2007	09/01/2006	
31	34	Humra Khatoon S/O Ghulam Abbas Shah	GGPS Dhothar Jadeed	12974-13116 dated 02-07-2007	06/03/2003	
32	35	Rozeena Nawaz D/O Muhammad Nawaz	GGPS Awan	12974-13116 dated 02-07-2007	09/01/2006	
33	36	Memona Akram D/O Muhammad Akram	GGPS Khaki	12974-13116 dated 02-07-2007	09/01/2006	
34	37	Shabnam Mulazim D/O Mulazim Hussain	GGPS Basthi Sheikhhan Wali	12974-13116 dated 02-07-2007	14/11/1990	

ANNEX-1-C
Page 1- (14)

Att-verified
M. G. J. Sadiq

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GGPS Miha Pur Kalan
12974-13116 dated 02-07-2007
22/11/1992
09/01/2006

Assesed
29 July 08

35	38	Sanam Aslam D/O Muhammad Aslam	GGPS Budhan	12974-13116 dated 02-07-2007	20/09/2007
36	39	Shagufta Nauraen D/O Ihsan Ullah	GGPS Wanda Boucharni	12974-13116 dated 02-07-2007	21/02/2005
37	40	Shahraz D/O Muhammad Remzan	GGPS Hafiz Abad	12974-13116 dated 02-07-2007	31/03/2002
38	41	Kalsoom D/O Ijaz Shah	GGPS Kurar Shidi	12974-13116 dated 02-07-2007	28/04/2000
39	42	Ghazala Begum D/O Ghulam Sarwar	GGPS Kurar Shidi	12974-13116 dated 02-07-2007	20/10/1998
40	43	Rehana Tajat D/O Muhammad Ali	GGPS No.1 Pahar Pur	12974-13116 dated 02-07-2007	31/05/2000
41	44	Shaista Bibi D/O hafiz Ullah	GGPS Awan Abad	12974-13116 dated 02-07-2007	20/09/2007
42	45	Amina Batol D/O Abdul Qadus	Directed for further posting	12974-13116 dated 02-07-2007	31/12/1996
43	46	Rukhsana Bibi D/O Abdul Aleem	GGPS Chah Matwana	12974-13116 dated 02-07-2007	PTC N.A
44	47	Robina Shaheen D/O Khan Muhammad	GGPS New Shinki	12974-13116 dated 02-07-2007	11/05/1999
45	48	Zibun Nisa D/O Ghulam Sarwar	GGPS Noor Pur Shomali	12974-13116 dated 02-07-2007	02/09/2002
46	49	Farzana D/O Muhammad Nawaz	GGPS Chah Matwana	12974-13116 dated 02-07-2007	20/09/1997
47	50	Zakia Batol D/O Ghulam Rasool	GGPS Bilot	12974-13116 dated 02-07-2007	03/02/2005
48	51	Kausar Bibi D/O Saad Ullah	GGPS Noor Pur Shomali	12974-13116 dated 02-07-2007	11/03/2005
49	52	Sahira Yasmin D/O Ghulam Muhammad	GGPS Duri Khel	12974-13116 dated 02-07-2007	21/11/1992
50	53	Rukhsana Habib D/O Habib Ullah	GGPS Kharu Wali	12974-13116 dated 02-07-2007	19/06/2002
51	54	Naseem Akhter D/O Khadim Hussain	GGPS Mathra Abad	12974-13116 dated 02-07-2007	01/04/1996
52	55	Adeela Zeb D/O Syed Aurangzeb Shah	GGPS Kat Ger	12974-13116 dated 02-07-2007	19/06/2002
53	56	Khadija Bibi D/O Muhammad Rafoeq	GGPS Machora Shomali	12974-13116 dated 02-07-2007	14/11/1990
54	57	Shafigat Batool D/O Ijaz Ul Islam	GGPS Sardarwala	12974-13116 dated 02-07-2007	01/04/1996
55	58	Shazia Batol D/O Ghulam Abbas Shah	GGPS Wanda Khan Pir	12974-13116 dated 02-07-2007	09/01/2006
56	59	Badrun Nisa D/O Abdur Rahman	GGPS Aman Abad	12974-13116 dated 02-07-2007	05/05/2003
57	60	Saeeda Tanveer Fatima D/O Muread Hasan S	GGPS Band Kurai	12974-13116 dated 02-07-2007	20/05/2000
58	61	Shaheen Akhter D/O Kareem Uddin	GGPS Wanda Khani	12974-13116 dated 02-07-2007	22/11/1992
59	62	Johar Fatima D/O Iqbal Hussain	GGPS Wanda Madat	12974-13116 dated 02-07-2007	09/01/2006
60	63	Tasleem Bibi D/O Musa Khan	GGPS Civil Rock Band Korai	12974-13116 dated 02-07-2007	09/01/2006
61	64	Marah Deeba D/O Inayat Ullah	GGPS Barid Kurai	12974-13116 dated 02-07-2007	21/02/2005
62	65	Bibi Rukia D/O Rab Nawaz	GGPS Khano Khel	12974-13116 dated 02-07-2007	28/04/2000
63	66	Abida Nazneen D/O Sibth Ul Hassan	GGPS Mubarak Shah	12974-13116 dated 02-07-2007	31/12/1996
64	67	Salma Bibi D/O Muhammad Hashim	GGPS Qazi Khokar	12974-13116 dated 02-07-2007	14/11/1990
65	68	Rihana D/O Muhammad Nawaz	GGPS Chura	12974-13116 dated 02-07-2007	20/09/2007
66	69	Wazira Bibi D/O Nazer Hussain	GGPS Shah Dau	12974-13116 dated 02-07-2007	06/06/2006
67	70	Rehana Yasmin D/O Abdur Rahman	GGPS Thathal Balouchan	12974-13116 dated 02-07-2007	11/05/1999
68	71	Shamim Akhter D/O Ihsan Ullah	GGPS Mian Wada	12974-13116 dated 02-07-2007	09/01/2006
69	72	Tayyaba Qausar D/O Abdul Aziz	GGPS Mubarak Shah	12974-13116 dated 02-07-2007	25/05/1996
70	73	Sumaira Nazir D/O Muhammad Nazir	GGPS Lang Khair Shah	12974-13116 dated 02-07-2007	31/03/2002
71	74	Aqzeefa D/O Muhammad Hanif	GGPS Thatha Balouchan	12974-13116 dated 02-07-2007	21/12/1992

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... D/O ... Hassan ... Nawaz ...
GGPS ...
... dated ... 01-10-2007 ...
... 20/01/2005 ...

72	75	Snazia Tabassum D/O Muhammad Amir	GGPS Chura	12974-13116 dated 02-07-2007	07/07/2003	
73	76	Naseem Akhtar D/O Muhammad Ramzan	GGPS Kachi Kal Ger	12974-13116 dated 02-07-2007	10/07/1994	
74	77	Nusrat Shaheen D/O Noor Hussain	GGPS Kharo Wali	12974-13116 dated 02-07-2007	31/07/2002	
75	78	Naseem D/O Ghulam Saniyar	GGPS Rodi Khel	12974-13116 dated 02-07-2007	19/06/2002	
76	79	Humaira Rahman D/O Fazal Rahman	GGPS Wanda Shero	12974-13116 dated 02-07-2007	05/05/2003	
77	80	Ulfiat Sumera D/O Khuda Bakhsh	GGPS Aman Abad	12974-13116 dated 02-07-2007	07/07/2003	
78	81	Nigal Bibi D/O Ghulam Hassan	GGPS Zander Band Korai	12974-13116 dated 02-07-2007	20/05/2000	
79	82	Rehana Rashid D/O Abdur Rashid	GGPS Civil Rock Band Korai	12974-13116 dated 02-07-2007	31/08/2000	
80	83	Badrin Nisa D/O Faiz Ur Rahman	GGPS Ajmal Abad	12974-13116 dated 02-07-2007	11/03/2008	
81	84	Zahida Rashid D/O Abdur Rashid	GGPS No.1 Pahar Pur	12974-13116 dated 02-07-2007	20/10/1998	
82	85	Ulfiatun Nisa D/O Noor Muhammad	GGPS Kurar	12974-13116 dated 02-07-2007	20/06/2006	
83	86	Fozia Nisa D/O Noor Muhammad	GGPS Keri Pawanda	12974-13116 dated 02-07-2007	09/01/2006	
84	87	Ijaz Akhtar D/O Muhammad Bakhsh	GGPS Ijaz Abad	12974-13116 dated 02-07-2007	14/05/1997	
85	88	Gulshan Bibi D/O Ghulam Jafer	GGPS Ghari Sadu Zair	12974-13116 dated 02-07-2007		U.T at the time of appointment
86	89	Asia Batol D/O Abdur Rauf	GGPS Muryali	12974-13116 dated 02-07-2007	19/01/2002	
87	90	Samina Bibi D/O Muhammad Ashraf	GGPS Chah Mughal	12974-13116 dated 02-07-2007	31/12/1996	
88	91	Humera Yasmin D/O Maqbool Ahmad	GGPS Jhok Sokani	12974-13116 dated 02-07-2007	31/03/2002	
89	92	Ferzia Rahman D/O Fazal Rahman	GGPS KPK	12974-13116 dated 02-07-2007	05/05/2003	
90	93	Amina Batol D/O Muhammad Khalid	GGPS Karim Abad No.2	12974-13116 dated 02-07-2007	09/01/2006	
91	94	Rabia Bibi D/O Hussain Bakhsh	GGPS KPK	12974-13116 dated 02-07-2007	09/01/2006	
92	95	Rabia Nourdeen D/O Muhammad Khalid	GGPS Shyndan Chikhan	12974-13116 dated 02-07-2007	07/07/2003	
93	96	Amina Mahmood D/O Tahir Qayyum	GGPS Wanda Budh	12974-13116 dated 02-07-2007	31/03/2002	
94	97	Kaneez Bano D/O Ahmad Said	GGPS Sadhi Faqir	12974-13116 dated 02-07-2007	20/10/1998	
95	98	Nagina Bibi D/O Rahmat Ullah	GGPS Diwala No.1	12974-13116 dated 02-07-2007	20/10/1998	
96	99	Rakhshanda Majabeen D/O Muhammad Nawaz	GGPS Madni Town	12974-13116 dated 02-07-2007	31/03/2002	
97	100	Alia Batol D/O Ghulam Jafer	GGPS No.2 Diwala	12974-13116 dated 02-07-2007	31/12/1996	
98	101	Sajida Bibi D/O Khuda Bakhsh	GGPS Chah Lalwala Muryali	12974-13116 dated 02-07-2007	28/12/2006	
99	102	Irum Majid D/O Abdul Majid	GGPS Chah Mughal	12974-13116 dated 02-07-2007	09/01/2006	
100	103	Gulsahn Nigar D/O Zafar Iqbal	GGPS Wanda Balouchan	12974-13116 dated 02-07-2007	01/06/2001	
101	104	Gul Naz Sardar W/O Zubair Shaheen	GGPS Kalrian Wala	12974-13116 dated 02-07-2007	Session 1995	
102	105	Rihana Andaleeb D/O Aziz Ur Rahman	GGPS Zafar Abad Colony	12974-13116 dated 02-07-2007	26/04/2000	
103	106	Shehla Gulshan D/O Mali ullah	GGPS New Zafar Abad	12974-13116 dated 02-07-2007	20/09/2007	U.T at the time of appointment
104	107	Iram Bibi D/O Ijaz Hussain	GGPS Iqbal Town	12974-13116 dated 02-07-2007	20/04/2005	
105	108	Razia Bibi D/O Bashir Hussain Shah	GGPS Ara	12974-13116 dated 02-07-2007	20/04/2005	
106	109	Noureen Akhtar D/O Parvez Khan	GGPS Kolla Saidan	12974-13116 dated 02-07-2007	31/03/2001	
107	110	Shaista Qaiser D/O Inayat Ullah	GGPS Chah Mapal	12974-13116 dated 02-07-2007	14/05/1997	
108	111	Saira Yasmin D/O Ghulam Baqir	GGPS Bucha	12974-13116 dated 02-07-2007	31/07/2002	

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Approved
M. S. M.

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146	155	Umeira Bibi D/O Malik Muhammad Afzal	GGPS Jatta			
147	155	Bushra Bibi D/O Shah Nawaz	GGPS Jatta	12974-13116 dated 02-07-2007		
148	157	Rashida Bibi D/O Habib Ur Rahman	GGPS Jatta	12974-13116 dated 02-07-2007	20/09/2007	U.T at the time of appointment
149	158	Sadia Naheed D/O Muhammad Nawaz	GGPS Mahra	12974-13116 dated 02-07-2007	20/09/2007	U.T at the time of appointment
150	159	Kaneez Rubab D/O Bakhtiar Hussain	GGPS Proa No.2	12974-13116 dated 02-07-2007	session 1997-98	
151	160	Safia Bibi D/O Ghulam Hussain	GGPS Hazara	12974-13116 dated 02-07-2007	09/01/1995	
152	161	Khadija D/O Muhammad Rafeeq	GGPS Malakhi	12974-13116 dated 02-07-2007		PTC Not available
153	162	Sajida Bibi D/O Ghulam Shabir	GGPS Hazara	12974-13116 dated 02-07-2007		UT
154	163	Asia Parveen D/O Bashir Ahmad	GGPS Gara Tahir	12974-13116 dated 02-07-2007	09/01/2006	
155	164	Asia Bibi D/O Nazar Hussain	GGPS Sara Gara	12974-13116 dated 02-07-2007		UT
156	165	Rubina Shaheen D/O Rab Nawaz	GGPS Gara Tahir	12974-13116 dated 02-07-2007		PTC Not available
157	166	Ambreen D/O Sher Zaman	GGPS Sara Gara	12974-13116 dated 02-07-2007		
158	167	Tehmeen D/O Aurangzeb	GGPS Kot Zafar	12974-13116 dated 02-07-2007	Session 1993	
159	168	Abida Jabeen D/O Muhammad Ishaq	GGPS Kot Zafar	12985-89 dated 02-07-2007	20/05/2000	
160	169	Sajida Bibi D/O Muhammad Nawaz	GGPS Gomal Kalan	13161-210 dated 02-07-2007	28/04/2000	
161	170	Fozia Bibi D/O Ghulam Qasim	GGPS Kot Zafar	16076-79 dated 01-09-2007		PTC not available
162	171	Nasreen Gul D/O Muhammad Sullan	GGPS Gara Ashiq	16835-39 dated 01-07-2007	21/02/2005	
163	172	Shaheen Akhtar D/O Allah Dad Raja	GGPS Hassa	17654-68 dated 01-02-2007	25/05/1996	
164	173	Saheen Akhtar D/O Allah Dad Raja	GGPS Kurar Shidi	19775-79 dated 01-09-2007	15/02/1999	
165	174	Tahira Anjum D/O Qamar Uddin	GGPS Kurar Shidi	20045-49 dated 01-10-2007	19/01/2002	
166	174	Tahira Anjum D/O Qamar Uddin	GGPS Kurar Shidi	20045-491 dated 01-10-2007	19/09/2006	
167	175	Musarrat Batol W/O Jamshid Nawaz	GGPS Babar Kacha	20051-55 dated 01-10-2007		6 month Diploma from Skill Development council
168	176	Paras Rashid D/O Rashid Ahmad	GGPS Jk Machi Ramak	20080-84 dated 01-10-2007	31/01/2007	
169	177	Rehana Bibi D/O Haq Nawaz	GGPS Musa Kar	20130-84 dated 01-10-2007	11/05/1999	
170	178	Rihana Yasim D/O Allah Wasaya	GGPS Adil Sipra	20130-34 dated 01-10-2007	22/07/2003	
171	179	Saima Bibi D/O Allah Bakhsh	GGPS Musa Kar	20130-34 dated 01-10-2007	01/04/1995	
172	180	Shabnum Qausar D/O Hussain Bakhsh	GGPS Gara Rahman	20131-35 dated 01-10-2007	17/02/2004	
173	181	Rukhsana Saddiqa D/O Muhammad Ali	GGPS Thalha Balouchan	20145-49 dated 01-10-2007	09/01/2006	
174	182	Najma Nishat D/O Muhammad Aslam	GGPS Ikhtiar Khel JK	20155-59 dated 01-10-2007	15/08/2001	
175	183	Sunbat Nawaz D/O Qayyum Nawaz	GGPS Mitha Pur	20160-64 dated 01-10-2007	26/07/2007	
176	184	Nighat Sultana D/O Abdur Rahman	GGPS Kot Jai	20165-69 dated 01-10-2007	05/05/1996	
177	185	Abida Khaloon D/O Muhammad Bashir	GGPS Mubarak Shah	20165-69 dated 01-10-2007	06/03/2004	
178	186	Rehana Bibi D/O Abdul Majid	GGPS Athog	20170-74 dated 01-10-2007	21/02/2005	
179	187	Tasleem Akhtar D/O Karim Bakhsh	GGPS Muhammad Akbar	20180-84 dated 01-10-2007	30/06/1997	
180	188	Ghazala Jabeen D/O Ghulam Hussain	GGPS Rind	20189-92 dated 01-10-2007	Session 1999	
181	189	Aneela Iram D/O Muhammad Asad Lodi	GGPS Rohella	20201-04 dated 01-10-2007	28/04/2000	
182	190	Fozia Anbareen D/O Abdur Rashid	GGPS Thalha Balochan	20209-12 dated 01-10-2007	24/02/2006	
183	190	Fozia Anbareen D/O Abdur Rashid	GGPS Ramak	20218-22 dated 01-10-2007	01/04/1996	
184	190	Fozia Anbareen D/O Abdur Rashid	GGPS Ramak	20223-24 dated 01-10-2007	20/07/2006	Transferred from Tank

[Handwritten signatures and initials]

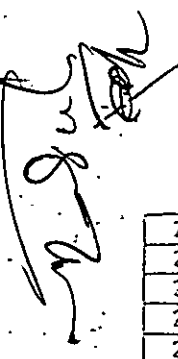
Approved
M. S. M.
17
Bahar D/O Ahmad
155-60 dated 01-10-2007
31/02/2006
Appointment

132	191	Iram Bibi D/O Saqlain Shah	GGPS Wanda Mala Khel	20225-29 dated 01-10-2007	09/09/2008	CT instead of PTC
133	192	Fahmida D/O Mehraban	GGPS Takwara 1	20230-34 dated 01-10-2007	19/01/2002	
134	193	Fozia D/O Abdur Rashid	GGPS Takwara 1	20230-34 dated 01-10-2007	13/11/2002	
135	194	Deeba Saghir D/O Sighir (Hindu)	GGPS Wazir Abad	20230-34 dated 01-10-2007	14/10/1990	
136	195	Nabila Anbareen D/O Ghulam Baqir	GGPS Ghulame Wala	20235-45 dated 01-10-2007	31/03/2001	
137	196	Rukhsana Gul D/O Hamid ul Hassan	GGPS Wanda Narkani	20240-44 dated 01-10-2007	19/05/2002	
138	197	Shamshad Bibi D/O Allah Wasaya	GGPS Gara Mir Alam	20245-49 dated 01-10-2007	10/07/1999	
139	198	Farzana Bibi D/O Shams Ur Rahman	GGPS Madi Khel	20260-64 dated 01-10-2007	19/06/2002	
140	199	Sumaira D/O Muhammad Bilal	GGPS Diyal	20265-69 dated 01-10-2007	19/06/2002	
141	200	Parveen Sibi D/O Aman Ullah	GGPS Dhap shomali	20270-74 dated 01-10-2007	01/04/1996	
142	201	Badar Bibi D/O Muhammad Sadiq	GGPS Shah Dau	20270-74 dated 01-10-2007	06/03/2003	
143	202	Azra Batsi D/O Ghulam Rabbari	GGPS Zangazan Wali	20270-74 dated 01-10-2007	21/02/2005	
144	203	Tahzeeta Naz D/O Manzoor Hussein	GGPS Shala Sharif	2027-31 dated 01-10-2007	19/01/2002	
145	204	Naeema Sadia D/O Khuda Bakhsh	GGSMS Band Korai	20274-78 dated 01-10-2007	09/01/2006	
146	205	Saima Mumtaz D/O Mumtaz Khan	GGPS Wanda Mala Khel	20275-79 dated 01-10-2007	20/03/2007	U.T at the time of appointment
147	206	Fozia Bibi D/O Karim Bakhsh	GGPS Thata Balouchan	20285-89 dated 01-10-2007	09/01/2006	
148	207	Shahnaz D/O Abdul Aziz	GGPS Zangaizan Wali Lar	20294-98 dated 01-10-2007	20/09/2007	
149	208	Naheed Akhtar D/O Hussain Ahmad	GGPS Ajmal Abad	20310-14 dated 01-10-2007	08/07/2006	
150	209	Shezia Bibi D/O Bahir Ahmad	GGPS Thathal	203118-22 dated 01-10-2007	20/09/2007	
151	210	Sidra Nawaz D/O Haq Nawaz Shah	GGPS Mubarak Shah	20312-16 dated 01-10-2007	20/09/2007	
152	211	Farzana Perveen D/O Juma Khan	GGPS Jk Rab Nawaz	20320-24 dated 01-10-2007	20/09/2007	U.T at the time of appointment
153	212	Najma Shaheen D/O Said Ahmad Shah	GGPS Dhap shomali	20320-24 dated 01-10-2007	15/02/1999	
154	213	Khurshid Bibi D/O Pir Ghulam	GGPS Phulari	20320-24 dated 01-10-2007	21/02/2005	
155	214	Rubina Bibi D/O Allah Dad	GGPS Wanda Karim	20320-24 dated 01-10-2007	20/10/1998	
156	215	Saima Rahim D/O Abdul Rahim	GGPS Zander	20320-24 dated 01-10-2007	09/01/2006	
157	216	Aneela Sahar D/O Muhammad Aslam	GGPS Budhan	20320-24 dated 01-10-2007	20/10/1998	
158	217	Robina bibi D/O Abdul Sattar	GGPS Dhallah	20320-24 dated 01-10-2007	09/01/2006	
159	218	Rubina Bibi D/O Allah Nawaz	GGPS Khano Khel	20320-24 dated 01-10-2007	09/01/2006	
160	219	Shabiha Zuhra D/O Ghulam Azhar Shah	GGPS Milha Pur Khurd	20320-24 dated 01-10-2007	01/04/1996	
161	220	Shabana Shamir D/O Muhammad Shamir	GGPS Wanda Balouchan	20320-24 dated 01-10-2007	21/11/1999	
162	221	Qaiser Begum D/O Muhammad Ramzan	GGPS Shahzad Kot	20320-24 dated 01-10-2007	05/05/2003	
163	222	Asia Rashid D/O Abdur Rashid	GGPS Rind	20320-24 dated 01-10-2007	09/01/1995	
164	223	Zahida Zakria D/O Ghulam Zakria	GGPS Maddi No.3	20320-25 dated 01-10-2007	31/12/1996	
165	224	Ravida Bibi D/O Muhammad Sharif	GGPS Wanda Balouchan 1	20325-29 dated 01-10-2007	20/04/2000	
166	225	Shaheen Akhtar D/O Lal Hussain	GGPS Karlu	20325-29 dated 01-10-2007	20/09/2007	
167	226	Amina Faiz D/O Faiz Ur Rahman	GGPS Jk Dhabari	20330-34 dated 01-10-2007	09/01/2006	
168	227	Safina Kanwal D/O Qayyum Nawaz	GGPS Musa Abad	20330-34 dated 01-10-2007	20/09/2007	U.T at the time of appointment

GGPS Wanda Mala Khel
GGPS Muga

20495-96 dated 01-10-2007

31/07/2003

Approved


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228	228	Humera Farid D/O Ghulam Farid	GGPS Mandra 1	20330-34 dated 01-10-2007	20/10/1998	
229	229	Maria Ashraf D/O Muhammad Ashraf	GGPS Babar Pakah	20330-34 dated 01-10-2007	01/09/2006	
230	230	Tahmeer Zahra D/O Muhammed Rashid	GGPS Wanda Ali	20334-38 dated 01-10-2007	23/10/2003	
231	231	Farzana Bibi D/O Abdur Rahman	GGPS Chah Jaggu Wala	20350-54 dated 01-10-2007	09/01/2006	
232	232	Saman Gul D/O Muhammad Aslam	GGPS Daraban Kuid	20355-59 dated 21-10-2007	19/01/2007	
233	233	Zulekhan Bibi D/O Muhammad Hakim	GGPS Khuddaka	20360-64 dated 01-10-2007	20/09/2007	U.T at the time of appointment
234	234	Rebia Bibi D/O Muhammad Ibrahim	GGPS Jahan Khani	20360-64 dated 01-10-2007	21/02/2005	
235	235	Saima Akhtar D/O Muhammad Nawaz	GGPS Shaikh Yousaf	20370-74 dated 01-10-2007	20/05/2000	
236	236	Sadia Rashid D/O Abdur Rashid	GGPS Nawab	20376-526 dated 01-10-2007	09/01/2006	
237	237	Farzana Kamal D/O Umer Hayat	GGPS Chah Mapal	20376-526 dated 01-10-2007	10/07/2004	
238	238	Shaguila Naz D/O Abdul Qayyum Khan	GGPS Mangal	20376-526 dated 01-10-2007	31/12/1996	
239	239	Saima Parveen D/O Habib Ullah	GGPS Jandar	20376-526 dated 01-10-2007	17/09/1988	
240	240	Sumira Latif D/O Abdul Latif	GGPS Khaki	20385-89 dated 01-10-2007		PTC Not available
241	241	Amina Bibi D/O Alta Muhammad	GGPS Kurar Shidi	20385-89 dated 01-10-2007	03/02/2005	
242	242	Fozia D/O Rab Nawaz	GGPS Kot Jai	20391-440 dated 01-10-2007	09/01/2006	
243	243	Zabun Nisa D/O Muhammad Hussain	GGPS Mathra Abad	20400-14 dated 01-10-2007	20/10/1998	
244	244	Amina Bibi D/O Soba Khan	GGPS Noon	20425-30 dated 01-10-2007	06/06/2003	
245	245	Sadia Mumtaz D/O Ghulam Rasool	GGPS Mian Wada	20440-44 dated 01-10-2007	21/02/2005	
246	246	Nasreen Akhtar D/O Ghulam Shabir	GGPS Zander Pahar Pur	20440-44 dated 01-10-2007	14/05/1997	
247	247	Ghazala Paveen D/O Manzoor Hussain	GGPS Bilot	20445-49 dated 01-10-2007	09/01/2006	
248	248	Shaheen Bibi D/O Mureed Hussain Shah	GGPS Saidallian	20455-60 dated 01-10-2007	07/07/2003	
249	249	Shaheen Bibi D/O Muhammad Yasin	GGPS Mandra Saidan	20455-59 dated 01-10-2007	31/07/1999	
250	250	Sahira Malik D/O Malik Ubaid Ullah	GGPS Khano Khel	20465-70 dated 01-10-2007	20/09/2007	
251	251	Shabana Azz D/O Ghulam Muhammad	GGPS Gara Tahir Khan	20481-84 dated 01-10-2007		PTC Not available
252	252	Razia Noreen D/O Muhammad Din	GGPS Wanda Naurk	20485-88 dated 01-10-2007	20/09/2007	
253	253	Tahmeena Gul D/O Kareem Bakhsh	GGPS Mandra Kalan	20489-93 dated 01-10-2007	06/03/2004	
254	254	Shahida Nasreen D/O Shaikh Riaz Ahmed	GGPS Chah Diyal	20491-96 dated 01-10-2007	31/12/1996	
255	255	Kasoom Bibi D/O Allah Bakhsh	GGPS Jhok Massu	20495-99 dated 01-10-2007		PTC Not available
256	256	Shaheen Akhtar D/O Ashiq Hussain Shah	Appointment order N.A	20501-05 dated 01-10-2007	31/07/2002	
257	257	Uzma Shaheen D/O Allah Dad	GGPS Banda Khani B/Korai	20506-10 dated 01-10-2007	31/07/2002	
258	258	Rehana Bibi D/O Alta Muhammad	GGPS Shero Kuhna	20535-39 dated 01-10-2007	25/05/1996	
259	259	Saira D/O Sanwal Khan	GGPS Saidallian	20536-40 dated 01-10-2007	20/07/2007	
260	260	Shahnaz Bibi D/O Muhammad Nawaz	GGPS Muqem Shah	20536-40 dated 01-10-2007	21/11/1992	
261	261	Shazia Gul D/O Mahmood Ul Hassan	GGPS Kot Jai	20545-49 dated 01-10-2007	09/06/2006	
262	262	Razia Bibi D/O Mureed Ahmad	GGPS Sara Gara	20545-49 dated 01-10-2007	02/02/1995	
263	263	Razia D/O Yaseen D/O Yaseen	GGPS Chura	20551-55 dated 01-10-2007	20/10/1998	
264	264	Asia Bibi D/O Bahaul Khan	GGPS Saidallian	20560-64 dated 01-10-2007	09/01/2006	



228 | 228 | Humera Farid D/O Ghulam Farid | GGPS Mandra 1 | 20330-34 dated 01-10-2007 | 20/10/1998 |

229 | 229 | Maria Ashraf D/O Muhammad Ashraf | GGPS Babar Pakah | 20330-34 dated 01-10-2007 | 01/09/2006 |

230 | 230 | Tahmeer Zahra D/O Muhammed Rashid | GGPS Wanda Ali | 20334-38 dated 01-10-2007 | 23/10/2003 |

231 | 231 | Farzana Bibi D/O Abdur Rahman | GGPS Chah Jaggu Wala | 20350-54 dated 01-10-2007 | 09/01/2006 |

232 | 232 | Saman Gul D/O Muhammad Aslam | GGPS Daraban Kuid | 20355-59 dated 21-10-2007 | 19/01/2007 |

233 | 233 | Zulekhan Bibi D/O Muhammad Hakim | GGPS Khuddaka | 20360-64 dated 01-10-2007 | 20/09/2007 | U.T at the time of appointment

234 | 234 | Rebia Bibi D/O Muhammad Ibrahim | GGPS Jahan Khani | 20360-64 dated 01-10-2007 | 21/02/2005 |

235 | 235 | Saima Akhtar D/O Muhammad Nawaz | GGPS Shaikh Yousaf | 20370-74 dated 01-10-2007 | 20/05/2000 |

236 | 236 | Sadia Rashid D/O Abdur Rashid | GGPS Nawab | 20376-526 dated 01-10-2007 | 09/01/2006 |

237 | 237 | Farzana Kamal D/O Umer Hayat | GGPS Chah Mapal | 20376-526 dated 01-10-2007 | 10/07/2004 |

238 | 238 | Shaguila Naz D/O Abdul Qayyum Khan | GGPS Mangal | 20376-526 dated 01-10-2007 | 31/12/1996 |

239 | 239 | Saima Parveen D/O Habib Ullah | GGPS Jandar | 20376-526 dated 01-10-2007 | 17/09/1988 |

240 | 240 | Sumira Latif D/O Abdul Latif | GGPS Khaki | 20385-89 dated 01-10-2007 | | PTC Not available

241 | 241 | Amina Bibi D/O Alta Muhammad | GGPS Kurar Shidi | 20385-89 dated 01-10-2007 | 03/02/2005 |

242 | 242 | Fozia D/O Rab Nawaz | GGPS Kot Jai | 20391-440 dated 01-10-2007 | 09/01/2006 |

243 | 243 | Zabun Nisa D/O Muhammad Hussain | GGPS Mathra Abad | 20400-14 dated 01-10-2007 | 20/10/1998 |

244 | 244 | Amina Bibi D/O Soba Khan | GGPS Noon | 20425-30 dated 01-10-2007 | 06/06/2003 |

245 | 245 | Sadia Mumtaz D/O Ghulam Rasool | GGPS Mian Wada | 20440-44 dated 01-10-2007 | 21/02/2005 |

246 | 246 | Nasreen Akhtar D/O Ghulam Shabir | GGPS Zander Pahar Pur | 20440-44 dated 01-10-2007 | 14/05/1997 |

247 | 247 | Ghazala Paveen D/O Manzoor Hussain | GGPS Bilot | 20445-49 dated 01-10-2007 | 09/01/2006 |

248 | 248 | Shaheen Bibi D/O Mureed Hussain Shah | GGPS Saidallian | 20455-60 dated 01-10-2007 | 07/07/2003 |

249 | 249 | Shaheen Bibi D/O Muhammad Yasin | GGPS Mandra Saidan | 20455-59 dated 01-10-2007 | 31/07/1999 |

250 | 250 | Sahira Malik D/O Malik Ubaid Ullah | GGPS Khano Khel | 20465-70 dated 01-10-2007 | 20/09/2007 |

251 | 251 | Shabana Azz D/O Ghulam Muhammad | GGPS Gara Tahir Khan | 20481-84 dated 01-10-2007 | | PTC Not available

252 | 252 | Razia Noreen D/O Muhammad Din | GGPS Wanda Naurk | 20485-88 dated 01-10-2007 | 20/09/2007 |

253 | 253 | Tahmeena Gul D/O Kareem Bakhsh | GGPS Mandra Kalan | 20489-93 dated 01-10-2007 | 06/03/2004 |

254 | 254 | Shahida Nasreen D/O Shaikh Riaz Ahmed | GGPS Chah Diyal | 20491-96 dated 01-10-2007 | 31/12/1996 |

255 | 255 | Kasoom Bibi D/O Allah Bakhsh | GGPS Jhok Massu | 20495-99 dated 01-10-2007 | | PTC Not available

256 | 256 | Shaheen Akhtar D/O Ashiq Hussain Shah | Appointment order N.A | 20501-05 dated 01-10-2007 | 31/07/2002 |

257 | 257 | Uzma Shaheen D/O Allah Dad | GGPS Banda Khani B/Korai | 20506-10 dated 01-10-2007 | 31/07/2002 |

258 | 258 | Rehana Bibi D/O Alta Muhammad | GGPS Shero Kuhna | 20535-39 dated 01-10-2007 | 25/05/1996 |

259 | 259 | Saira D/O Sanwal Khan | GGPS Saidallian | 20536-40 dated 01-10-2007 | 20/07/2007 |

260 | 260 | Shahnaz Bibi D/O Muhammad Nawaz | GGPS Muqem Shah | 20536-40 dated 01-10-2007 | 21/11/1992 |

261 | 261 | Shazia Gul D/O Mahmood Ul Hassan | GGPS Kot Jai | 20545-49 dated 01-10-2007 | 09/06/2006 |

262 | 262 | Razia Bibi D/O Mureed Ahmad | GGPS Sara Gara | 20545-49 dated 01-10-2007 | 02/02/1995 |

263 | 263 | Razia D/O Yaseen D/O Yaseen | GGPS Chura | 20551-55 dated 01-10-2007 | 20/10/1998 |

264 | 264 | Asia Bibi D/O Bahaul Khan | GGPS Saidallian | 20560-64 dated 01-10-2007 | 09/01/2006 |

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255	265	Saima Bibi D/O Qayyum Nawaz	GGPS Khano Khel			
257	266	Asia Bibi D/O Abdul Sattar	GGPS Kirri Pawanda	20561-65 daled 01-10-2007	20/09/2007	
258	267	Farzana Bibi D/O Shah Nawaz	GGPS Kirri Pawanda	20565-69 daled 01-10-2007	09/01/2006	
259	268	Shomaila Malik D/O Khuda Bakhsh	GGPS Wanda Dost Ali	20570-74 daled 01-10-2007	09/01/2006	
250	269	Shahnaz Bibi D/O Allah Bakhsh	GGPS G/Ahmad	20582-86 daled 01-10-2007	09/01/2006	
261	270	Saida Shereen Bibi D/O Sharaf Hussain	GGPS Jk Chandna	20582-86 daled 02-10-2007	09/01/2006	
262	273	Jamshid Bibi D/O Shadi Khan	GGPS Wanda Khaliq Shah	20610-14 daled 01-10-2007		PTC Not available
263	274	Hajra Gul D/O Iftikhar Ahmad	GGPS Aman Abad	21138-42 daled 10-10-2007	20/09/2007	
264	275	Salma Hussain D/O Qayyum Nawaz	GGPS Sagu Janubi	21973-76 daled 23-10-2007	25/05/1995	
265	276	Farzana Iqbal D/O Muhammad Iqbal	GGPS Khaki	2244-48 daled 01-10-2007		PTC Not available
266	277	Asmat Nahid D/O Muhammad Sultan	GGPS Thathal Balouchan	2330-34 daled 01-10-2007		PTC Not available
267	278	Rozina Shaheen D/O Muhammad Hashim	GGPS Chah Jaggu Wala	2345-49 daled 01-10-2007	13/05/1997	
268	279	Uzma Bibi D/O Muhammad Khalid	GGPS Teekan	23682-84 daled 12-11-2007	09/01/2006	
269	280	Sumaira Rani S/O Muazim Hussain	GGPS Jhok Sokhani	24794-96 daled 04-12-2007	20/09/2007	UT at the time of appointment
270	281	Safina Shad D/O Shadi Khan	GGPS Ikhtiar Khel JK	25250-84 daled 01-12-2007	02/02/2006	
271	282	Asia Bibi D/O Elahi Bakhsh	GGPS Civil Rock Band Korai	25336-39 daled 01-10-2007	20/09/2007	
272	283	Kalsoon Bibi D/O Muhammad Bakhsh	GGPS Juma Sharif	2610-14 daled 01-10-2007	09/01/2006	
273	284	Iram Gul D/O Shams Uddin	Not readable	2669-72 daled 01-02-2007	25/12/1993	
274	285	Aneela Parveen D/O Muhammad Iqbal	GGPS G/Bakhtiar	274-78 daled 02-02-2008	26/01/2004	
275	286	Deeba Rani D/O Ahmad Jan	GGPS Haji Abad	2881-85 daled 06-02-2007	20/09/2007	U.T at the time of appointment
276	287	Tahira Yasmin D/O Ghulam Fand	GGPS Kirri Pawanda	2905-09 daled 06-02-2007	20/10/1998	
277	288	Shabana D/O Muhammad Ismail	GGPS Malthra Abad	30400-5 daled 01-10-200	09/01/2006	
278	289	Zahida Iqbal D/O M. Iqbal	GGPS Civil Rock Band Korai	3593-97 daled 15-02-2007	05/03/2003	
279	290	Zakia Yasmin D/O Moula Dad	GGPS Ada Khiara	3860-86 daled 21-02-2007	31/08/2002	
280	291	Naseem Akhtar D/O Muhammad Suleman	GGPS Rohella	40967-71 daled 01-10-2007	26/04/2000	
281	292	Kiran Mehnaz D/O Rafeeq Ahmad	GGPS Raghu Khalil	4553-57 daled 02-03-2007	19/01/2002	
282	293	Safurain Bibi D/O Ghulam Akbar	GGPS New Shinki	4558-62 daled 02-03-2007	20/10/1998	
283	294	Asia Mughal D/O Muhammad Ramzan	GGPS Athog	4573-77 daled 02-03-2007	09/01/2006	
284	295	Naureen Akhtar D/O Qazi Abdur Rashid	GGPS Saidalian	5977-81 daled 12-03-2007	06/06/2003	
285	296	Zahida Gul D/O Nabi Bakhsh	GGPS Panjan Shah	6440-44 daled 22-03-2007	07/07/2005	
286	297	Iram Bibi D/O Muhammad Nawaz	GGPS Muqem Shah	7109-13 daled 02-07-2007	07/07/2003	
287	298	Rehana Bibi D/O Ghulam Yasin	GGPS Jarra	7150-54 daled 30-03-2007	20/09/2007	UT at the time of appointment
288	299	Samina Bibi D/O Ihsan Ullah	GGPS Jh Karlu	7314-19 daled 03-03-2007	09/01/2006	
289	300	Rukhsana Bibi D/O Shamshad Khan	GGPS Polah Dasel Zai	962-66 daled 19-01-2007	25/05/1996	
290	301	Tahira Qasim D/O Ghulam Qasim	GGPS Mandra Saidan	Not readable	21/02/2005	
291	302	Kalsoon Jahan D/O Ghulam Rabani	Appointment order N.A		28/04/2000	
292	303	Robina Bibi D/O Abdul Kareem	Appointment order N.A		09/01/2006	
					21/02/2005	
					21/02/2005	

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21 July 2007

293	304	Fehmida Naz D/O Ghazi Khan	Appointment order N.A		11/05/1999	
294	305	Nawara Rashid D/O Haji Abdur Rashid	Appointment order N.A		19/01/2002	
295	307	Shabana Bibi D/O Malik Muhammad Jan.	Appointment order N.A		11/05/1999	
296	309	Samina Naz D/O Bashir Ahmad	Appointment order N.A		19/05/1997	PTC Not available
297	310	Sayeda Zakia Batol D/O Syed Manzoor Shah	Appointment order N.A		14/05/1997	
298	312	Razia Bibi D/O Hadi Hussain	Appointment order N.A		20/10/1998	
299	313	Shazia Tabassum D/O Muhammad Ashiq	Appointment order N.A		19/01/2007	
300	314	Taskin Bibi D/O Haq Nawaz	Appointment order N.A			PTC Not available
301	315	Khair Gul Bibi D/O Sultan Mahmood	GGPS Shah Ajmal			PTC Not available
302	316	Nausheen Bibi D/O Muhammad Ramzan	Appointment order N.A		20/05/1995	
303	317	Sajida Batol D/O Syed Ghulam Abbas	Appointment order N.A		20/10/1998	
304	318	Shakila Bibi D/O Khuda Bakhsh	GGPS Zari Jan	20220-24 dated 01-10-2007	20/10/1998	
305	319	Dilnasheen D/O Muhammad Jahangir	GGPS Naurang Uthra	12976-13116 dated 02-07-2007	09/01/2006	

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ANNEX-1-D
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**BEFORE THE HONOURABLE PESHAWAR HIGH COURT,
DERA ISMAIL KHAN BENCH.**

Writ Petition No. 755-D of 2015

Rabia Tabbasum daughter of Ziamud Din resident of Muhammad
Wakelanwala, City Dera Ismail Khan.

Petitioner

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Education Govt. of K.P.K, Peshawar.
2. Secretary Elementary & Secondary Education Govt. of K.P.K, Peshawar.
3. Director Education (Elementary & Secondary), Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Male); Dera Ismail Khan.
5. District Education Officer (Female), Dera Ismail Khan.
6. Deputy Commissioner, Dera Ismail Khan.
7. District Account officer, Dera Ismail Khan.

Respondents

**WRIT PETITION UNDER ARTICLE 199 OF THE CONSTITUTION OF
ISLAMIC REPUBLIC OF PAKISTAN, 1973.**

Filed by 3396

Addl. 3

14/11/15

Respectfully Sheweth:

- i. That the addresses of the parties as given above are correct and sufficient for the purpose of service.
- ii. That the brief facts of the case are that she passed PTC exam in the year 1998 from Allama Iqbal Open University. The petitioner also got the decree of B.A, B.Ed and M.A) Islamyat from Gomal University Dera Ismail Khan. Copies of petitioner's testimonials are enclosed as Mark-A.

WP.755-D of 2015 (Rabia Tabassam.Vs.Govt of KPK) (Grounds)

ATTESIED
EXAMINOR
Peshawar High Court
D.I. Ismail Khan



- iii. That in the year 2007, the respondent advertised the posts of different categories of teachers for District Dera Ismail Khan and being qualified candidate, the present petitioner applied for the post "PST/PTC", and appeared in the Interview for the said post. The process of recruitment was completed, and the petitioner is appointed against the said vacant post vide appointment order Endst: No. 7203-04 dated 31-03-2007. Copy of the appointment order is enclosed as Mark-B.
- iv. That after getting the medical fitness certificate, the petitioner submitted the arrival report and started her official duty. Copies of medical certificate and arrival report are enclosed as Mark-C & D respectively.
- v. That later-on, on the basis of political victimization the standing committee 26, Provincial Assembly in the year 2009 conducted the inquiry against the appointments made during Jan-2007 to June-2008 in education department Dera Ismail Khan. The committee also made some recommendation to education department for termination of illegal appointments. Copy of minutes of standing committee is enclosed as Mark-E.
- vi. That the District Education officer Dera Ismail Khan on the instruction of government issued the termination order of 1613 irregular appointee. Therefore, the petitioner was also terminated without any notice, although she performed her duties for three years and her salary was also stopped w.e.f. May-2010. Moreover, no list of irregular appointee was given by respondents nor any termination letter was given. The petitioner also filed the departments appeal but the same was turned a deaf ear, therefore, the petitioner approached to the service tribunal for redressal of her grievance alongwith other affectees, but respondents promised that her grievance would be redressed as the petitioner was appointed with due process and the name of the petitioner is not mentioned in the said list. Copy of letter and list is enclosed as Mark-F & G respectively.

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Add: Registrar.

14/11/2015

WP.755-D of 2015 (Rabia Tabassam.Vs.Govt of KPK) (Grounds)

ATTESTED
EXAMINOR
Eshwar Hing, Coun
D.I. Khan Bench

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(24)

- vii. That the petitioner approached the respondents time and again, but till date the grievances of the petitioner is not redressed till date. Copy of departmental appeal is enclosed as Mark-H.

That being aggrieved, the petitioner approaches this Honourable Court to direct the respondents to reinstate the petitioner on the said post along with all back benefits, having no other alternative remedy but to invoke the constitutional jurisdiction of this Honourable court, inter alia, on the following grounds:

GROUND:

1. That the act of the respondents is illegal, against the natural justice, ulterior motives, based on malafide and ineffective upon the rights of the petitioner.
2. That the interviews of candidates of different categories of teachers had been conducted in accordance with the policy and merit list is also prepared and, thereafter, the petitioner was appointed with due process. It is also very much clear that the appointment of the petitioner was not irregular, as the name of the petitioner is not mentioned in the illegal appointees list. But the respondents illegally and without any reason terminated the petitioner.
3. That the standing committee conducted the inquiry against the irregular appointments in education department Dera Ismail Khan, and the recommendation was made to terminate those appointees who were appointed irregularly, but the respondents terminated all those appointees who were appointed during that period. Thus the act of the respondents while terminate the petitioner is illegal, as the appointment of the petitioner was made through due process.
4. That the Constitution of Islamic Republic of Pakistan, 1973 protected the rights of every citizen and provides the equality amongst the citizen, but the respondents clearly violated the

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14/11/2015

WP.755-D of 2015 (Rabia Tabassam.Vs.Govt of KPK) (Grounds)

ATTESTED
EXAMINOR
-eshawar High Court
D.I.Khian Bench

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fundamental right of the petitioner protected by the Constitution of Islamic Republic of Pakistan.

5. That the petitioner was eligible candidate for the appointment against the subject post and qualified in the recruitment process, but the respondents clearly ignored the same and terminated the petitioner along with all irregular appointees.
6. That the petitioner is the victim of unlawful and illegal act of the respondents and such a malafide act on the part of respondents is against the law and rules, without jurisdiction and lawful authority, against the natural justice, misuse of official powers and is the outcome of victimization known by the respondents and it has caused an immense mental torture and agony to the petitioners.
7. That the counsel for the petitioner may kindly be allowed to raise the additional grounds at the time of arguments.

It is therefore, humbly prayed by accepting the instant writ petition, the respondents may please be directed to re-instate the petitioner on the subject post along with all back benefits up till now or any other relief may be deemed fit by this Honorable court in the interest of the petitioner.

Filed today 3396

Add: Registrar.

14/11/2015

Your Humble Petitioner

Rabia

Rabia Tabbasum
Through Counsel

Muhammad Mohsin Ali

Muhammad Mohsin Ali
Advocate High Court, D.I.Khan.

Dated: ___/11/2015

ATTESTED

13-12-15

EXAMINOR
Peshawar High Court
D.I.Khan Bench

JUDGMENT SHEET
IN THE PESHAWAR HIGH COURT, D.I.KHAR BENCH
(Judicial Department)

W.P No. 755-D/2015

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Rabia Tabbusum

Vs

Government of KPK and 6 others



JUDGMENT

Date of hearing **21.3.2018**

Appellant-petitioner By Muhammad Mohsin Ali, Advocate

Respondents: By Mr. Kamran Hayat Khan Miankhel,
Additional Advocate General.

IJAZ ANWAR, J.- Through the instant constitutional petition filed under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 the petitioner Rabia Tabbasum has sought the following relief:-

It is therefore, humbly prayed by accepting the instant writ petition, the respondents may please be directed to re-instant the petition on the subject post alongwith all back benefits up till now or any other relief may being deem fit by this Hon'ble Court in the interest of the petitioner

2. Precisely stated the facts as enumerated in the writ petition are that the petitioner having the degree of B.Ed and M.A, applied for PST/PTC teacher in view of advertisement issued by respondents for the post of different teaching faculty. After qualifying the recruitment process, she was

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ATTESTED
EXAMINOR
Peshawar High Court
D.I. Khari Bench

appointed vide appointment order dated 31.03.2007. Upon the recommendation of the Standing Committee 26 Provincial Assembly in the year 2009 conducted inquiry against the appointment made during Jan-2007 to Jun-2008 in Education Office, D.I.Khan and under the instruction of Government, the District Education Officer, D.I.Khan issued termination order of 1613 irregular teachers and the petitioner was also terminated from service. Despite resorting departmental appeal, no desire goal was achieved, hence, this constitutional petition.

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3. After service of sammon, the respondents put appearance and submitted their para-wise reply.

4. Perusal of the record reveals that initially the petitioner was appointed vide office order dated 31.3.2007 as P.T.C Teacher. Vide general order dated 04.9.2009, the appointments of 1613 teachers allegedly irregularly appointed, were terminated from services. In the first instance, the petitioner alongwith many other candidates approached the Service Tribunal, the Service Tribunal allowed the appeal to the extent of scrutinizing the individual appointment order and to pass appropriate order after discrete inquiry. Again vide office order dated 02.2.2012, the female teachers were terminated from service and termination order was displayed upon the main notice board of the District Education Office, D.I.Khan.

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ATTESTED
13-12-18
EXAMINOR
Peshawar High Court
D.I.Khan Bench

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5. The learned counsel for the petitioner was asked that when he in first instance has approached the Service Tribunal against the order of termination, what prevailed upon him now that he has filed this writ petition, he only replied that his name was not included in the recent order of termination. We observed that this explanation given is not plausible, the jurisdiction of this Court is barred under Article 212 of the Constitution of Islamic Republic of Pakistan, 1973. The matter in hand purely relates to the terms and condition of service and the Tribunal established under the provision of the Service Tribunal Act, 1974 is the proper forum for adjudication of such matters.

6. In view of the above discussion, this writ petition is not maintainable, is accordingly disposed of with permission to the petitioner to approach the Service Tribunal for redressal of her grievances if she is so advised subject to all just and legal objections.

Announced
Dt.21.3.2018
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JUDGE


JUDGE

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(D.B)

Hon'ble Mr. Justice Ijaz Anwar
Hon'ble Mr. Justice Shakeel Ahmad

G.R.No. 4739
Application received on 11-12-18
Copying charges deposited Rs. 07000
No of Pages 04
Copying per 04
Urgent Fee 000
Total Fee 000
Copy ready for delivery 13-12-18
Copy delivered on 13-12-18
Signature of Examiner [Signature]

Certified to be true Copy
[Signature]
13-12-18
EXAMINOR
Peshawar High Court Bench D.I. Khan
Authorized Under Section 47 of
Gandhara Shikhar Act

[Signature]
13-12-18

To

The Director
Education, Khyber Pakhtunkhawa,
Peshawar.

Subject: **Departmental Appeal**

ANNEX- E
page: (29)

Attested
by D. I. Khan
D. I. Khan

Respected Sir:

- i. That the brief facts of the case are that she passed PTC exam in the year 1998 from Allama Iqbal Open University. The petitioner also got the decree of B.A, B.Ed and M.A) Islamyat from Gomal University Dera Ismail Khan.
- ii. That in the year 2007, the respondent advertised the posts of different categories of teachers for District Dera Ismail Khan and being qualified candidate, the present petitioner applied for the post "PST/PTC", and appeared in the Interview for the said post. The process of recruitment was completed, and the petitioner is appointed against the said vacant post vide appointment order Endst: No. 7203-04 dated 31-03-2007.
- iii. That after getting the medical fitness certificate, the petitioner submitted the arrival report and started her official duty.
- iv. That later-on, on the basis of political victimization the standing committee 26, Provincial Assembly in the year 2009 conducted the inquiry against the appointments made during Jan-2007 to June-2008 in education department Dera Ismail Khan. The committee also made some recommendation to education department for termination of illegal appointments.
- v. That the District Education officer Dera Ismail Khan on the instruction of government issued the termination order of 1613 irregular appointee. Therefore, the petitioner was also terminated without any notice, although she performed her duties for three years and her salary was also stopped w.e.f. May-2010. Moreover, no list of irregular appointee was given by respondents nor any termination letter was given. The petitioner also filed the departments appeal but the same was turned a deaf ear, therefore, the petitioner approached to the service tribunal for redressal of her grievance alongwith other affectees, but respondents promised that her

(30)

Aggrieved
Majid
etc

grievance would be redressed as the petitioner was appointed with due process and the name of the petitioner is not mentioned in the said list. Copy of letter and list is enclosed.

- vi. That being aggrieved, the present petitioner filed the writ petition No. 755-D/2015 before Honourable Peshawar High Court Dera Ismail Khan and vide judgment dated 21-03-2018 the writ petition was dismissed being not maintainable on the ground that the petitioner was a civil servant. Therefore, the present petitioner filing the instant appeal on the following grounds;

GROUND:

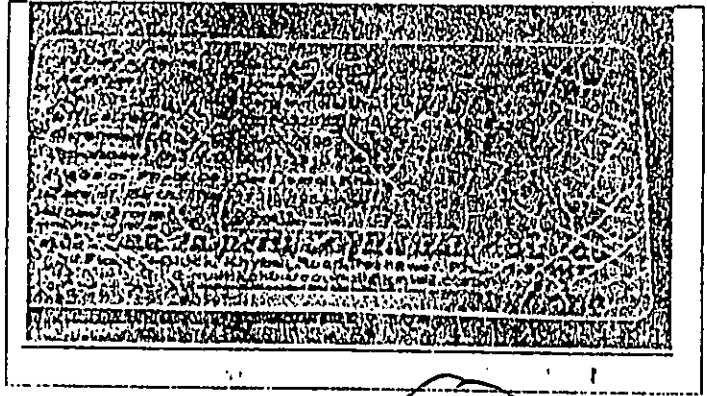
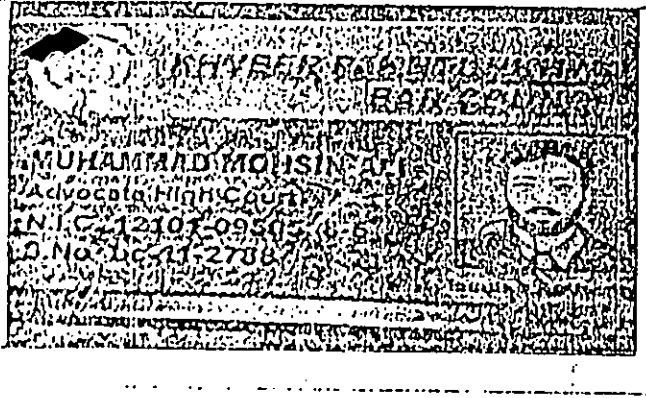
1. That the interviews of candidates of different categories of teachers had been conducted in accordance with the policy and merit list was also prepared and, thereafter, the petitioner was appointed with due process. It is also very much clear that the appointment of the petitioner was not irregular, as the name of the petitioner is not mentioned in the said list.
2. That the standing committee conducted the inquiry against the irregular appointments in education department Dera Ismail Khan, and the recommendation was made to terminate those appointees who were appointed irregularly, but the respondents terminated all those appointees who were appointed during that period. Thus the act of the respondents while terminate the petitioner is illegal, as the appointment of the petitioner was made through due process.
3. That the petitioner was eligible candidate for the appointment against the subject post and qualified in the recruitment process, but the respondents clearly ignored the same and terminated the petitioner alongwith all irregular appointees.

Dated: 28 / 11 / 2018

Your's Sincerely,

Rabia

Rabia Tabbasum D/o
Ziamuddin R/o Muhallah Wakelanwala,
City Dera Ismail Khan.



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VAKALATNAMA

IN THE COURT OF S. T. Peshawari ^{Advocate} ISMAIL KHAN
Rabia Tabbasum
Govt of KPK Sothars vs Defendant / Respondent / Complainant / Witness

I/We APPELLANT do hereby appoint Muhammad Mohsin Ali Advocate High Court (herein after called the advocate/s) to be my/our Advocate in the above noted case authorise him:-

- To act, appear and plead in the above-noted case in this Court or in any other Court in which the same may be tried or heard and also in the appellate Court including High Court subject to payment of fees separately for each Court by me/us.
 - To sign, file, verify and present pleadings, appeals, cross-objections or petitions for executions, revision, withdrawal, compromise or other petitions or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages subject to payment of fees for each stage.
 - To file and file back documents, to admit and/or deny the documents of opposite party.
 - To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.
 - To take execution proceedings.
 - To deposit or receive monthly cheques, cash and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and in the course of the prosecution of the said case.
 - To appoint and instruct any other Legal Practitioner authorizing him to exercise the powers and authority hereby conferred upon the Advocate whenever he may think fit to do so and the power of attorney on our behalf.
 - And I/We the undersigned do hereby agree to rectify and return all sums due to the Advocate or to substitute in the matter as my/our own acts as if done by me/us in the said proceedings.
 - And I/We undertake that I/We or my/our duly authorized agent would appear in Court for all hearings and will inform the Advocate for appearance when the case is called.
 - And I/We the undersigned do hereby agree not to herd the advocate or his agents responsible for the result of the said case.
 - The attorney fees costs whenever debited by the Court shall be paid by the Advocate and obtain for himself.
 - And I/We the undersigned to hereby agree that in the event of the whole or part of the fees agreed by me/us to be paid to the advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the said fees are paid up. The fee agreed is only for the above case and above Court. I/We hereby agree that once fee is paid, I/We will not be granted for the return of the same in any case, whatsoever and if the case proceeds for more than 1 year, the original fee shall be paid again by me/us.
- WITNESSETH I/We do herewith set my/our hand to these presents the contents of which are understood and by me/us on this 4 day of 3 2019

Accepted
Muhammad Mohsin Ali
Advocate High Court
S. T. Peshawari, Ismail Khan.
8336716933

Rabia