


10.05.2017

Clerk to counsel for the appellant and Mr. Arshad Ali, ADO alongwith Addl. AG for the respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder and final hearing for 05.07.2017 before D.B.


Chairman

05.07.2017

Learned counsel for the appellant and Mr. Muhammad Jan, Deputy District Attorney for the respondents present, stated that in the instant appeal issue of up-gradation is involved and according^{to} the judgment of august Supreme Court of Pakistan titled "**Regional Commissioner of Income Tax Company Zone, Income Tax Officer, Peshawar Vs. Syed Manawar Ali and others**" (2016-SCMR-859) the service Tribunal has got no jurisdiction to entertain the appeal involving issue of up-gradation.

In view thereof the present appeal is returned for lack of jurisdiction. The appellant may seek her remedy in the proper forum, if so advised, subject to all just exceptions. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
05.07.2017


(Gul Zeb Khan)
Member


(Muhammad Hamid Mughal)
Member

522/16

01.02.2017

Counsel for the appellant and M/S Hameedur Rahman, AD and Raham Taj, ADO alongwith Asstt. AG for the respondents present. Requested for adjournment. To come up for written reply/comments on 07.03.2017 before S.B.


Chairman


08.03.2017

Counsel for the appellant and Addl. AG for the respondents present. Written reply not submitted. Requested for adjournment. Request accepted. To come up for written reply/comments on 06.04.2017 before S.B.


(MUHAMMAD AAMIR NAZIR)
MEMBER

06.04.2017

Counsel for the appellant and Asstt. AG for the respondents present. Written reply not submitted. Learned Asstt. AG requested for adjournment. Last opportunity granted. To come up for written reply/comments on 10.05.2017 before S.B.


Chairman

Restoration Application No. 200/2016
Miss Saigra vs Gort

29.11.2016

Counsel for the petitioner and Mr. Raham Taj, ADO alongwith Assistant AG for respondents present. Written reply to the restoration application on behalf of respondents submitted. Arguments on application heard. The appeal is restored. To come up for preliminary arguments on 27-12-16 before S.B.


MEMBER

27.12.2016

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as PST w.e.f her date of initial appointment i.e 26.10.1988. That the said posts were up-graded to BPS-14 w.e.f 01.07.2012 and the appellant and other employees became entitled to salary etc in the up-graded posts w.e.f the date of notification but the appellant was deprived of the said benefits constraining her to preferred departmental appeal on 29.12.2015 which was not responded and hence the instant service appeal on 13.05.2016.

That the issue pertains to financial matter and as such the appeal is not hit time limitation and that the appellant is entitled to the perks and privileges of the upgraded post w.e.f the date of the up-gradation of the said post.

Appellant Deposited
Security & Process Fee

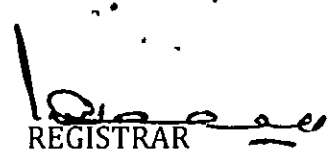

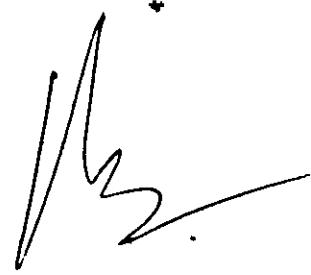
Points urged need consideration. Admit. Subject to deposit of security and process fee within 10 days, notices be issued to the respondents for written reply/comments for 01.02.2017 before S.B.


Chairman

Form- A
FORM OF ORDER SHEET

Court of _____

Appeal's Restoration application No. 200 /2016

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	28.10.2016	<p>The application for restoration of appeal No. 522/2016 submitted by Miss. Saiqa through Sophia Noureen Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2	31-10-2016	<p>This restoration application is entrusted to S. Bench to be put up there on <u>08-11-2016</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	08.11.2016	<p>Counsel for the petitioner and Addl. AG for respondents present. Notices be issued to the respondents. To come up for further proceedings on 29.11.2016 before S.B.</p> <p style="text-align: right;"> Member</p>

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,

PESHAWAR

Appeal's Restoration application no. 200/2016
Miss Saiqa

VERSUS

Secretary Elementary & Secondary Education etc

INDEX

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1.	Restoration petition		1-2
2.	Affidavit , addresses of parties		3-4
3.	Copy of order dated 25/08/2016	A	5
4.	Copies of passport	B	6-7
5.	Wakalat Nama		8

Petitioner

Through

S
SOPHIA NOUREEN,

Advocate, High Court Peshawar

Dated 28/10/16

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,
PESHAWAR

Appeal's Restoration application no 200/2016

Miss Saiqa wife of Irshad Ahmad Primary School Teacher,
 Peshawar.

... PETITIONERS

VERSUS

Khyber Pakhtunkhwa
 Khyber Pakhtunkhwa
 Tribunal

Diary No.

1071

Dated

28-10-16

1. Secretary Elementary & Secondary Education Department,
 Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Department,
 Peshawar.
3. District Education officer (Female), Peshawar.

... RESPONDENTS

APPLICATION FOR RESTORATION OF APPEAL
NO. 522/2016 TITLED ABOVE, WHICH WAS
DISMISSED IN DEFAULT ON 25/08/2016

Respectfully Sheweth,

1. That the above titled appeal was pending before this Honourable Court which was dismissed in default on 25/08/2016. (Copy of order dated 25/08/2016 is attached as annexure A).
2. That the petitioner went to perform her Hajj, along with her husband and was not available to attend this

Honourable Court on the date fixed. (Copies of passport are attached as annexure B)

3. That after performance of her Hajj the petitioner came back to Pakistan.
4. That after her arrival to Pakistan the petitioner inquired about her appeal and it came to her knowledge that her appeal was dismissed in default on 25/08/2016 for non appearance of the petitioner.
5. That not a single notice has been served upon the petitioner regarding her attendance before the court.
6. That the non appearance of the petitioner was beyond the control of the petitioner.
7. That the petitioner be given proper opportunity to pursue her appeal on merits.

It is, therefore, most humbly prayed that on acceptance of this petition the appeal no. 522/2016 may kindly be restored.

Through

Petitioner



Sophia Noureen,

Advocate, High Court Peshawar

Dated 28/10/2016

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,
PESHAWAR

Miss Saiqa

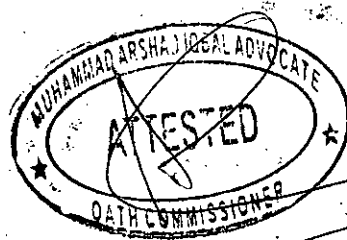
VERSUS

Secretary Elementary & Secondary Education etc

AFFIDAVIT

I, MISS SAIQA wife of Irshad Ahmad Primary School Teacher, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the instant petition for restoration are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

Saiqa
DEPONENT



28-10-16

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,
PESHAWAR.

Miss Saiqa

VERSUS

Secretary Elementary & Secondary Education etc

ADDRESSES OF PARTIES

Address of petitioner: -

Miss Saiqa wife of Irshad Ahmad, Primary School Teacher,
Peshawar.

Addresses of respondent; -

1. Secretary Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Department,
Peshawar.
3. Director Education officer (Female), Peshawar.

Through

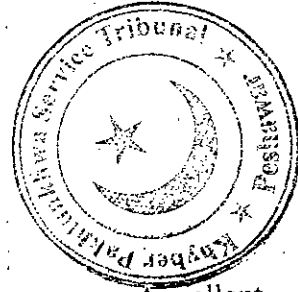
Petitioner



SOPHIA NOUREEN,

Advocate, High Court Peshawar

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR



Appeal No. 522 of 2016

Miss Saiqa
Primary School Teacher Peshawar..... Appellant

Versus

1. Secretary Elementary & Secondary Education Department KPK etc..... Respondents
2. Director Elementary & Secondary Education Department..... Respondant
3. District Education Officer (Female) Peshawar..... Respondant

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST NON PROVISION OF INCENTIVE OF HIGHER PAY SCALE W.E.F 01.07.2012 IN LIGHT OF NOTIFICATION DATED 11.07.2012 AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD.

25.08.2016

None present for the appellant. Called several times till last court of the court but none appeared on behalf of the appellant despite notice through registered post. As such the appeal is dismissed in default. File be consigned to the record room.

Self-Member

ANNOUNCED
25.08.2016


Certified to be true copy
Khyber Pakhtunkhwa Service Tribunal
Peshawar

Date of Presentation of Application 27-10-16
 Number of Words 450
 Copying Fee 4
 Urgent 2
 Total 6
 Name of Copyist AMD
 Date of Completion of 27-10-16
 Date of Delivery of 27-10-16


6



Page 15 of 37 1004

		2029941	1212161	رقم الحاج Haj ID
اسم الحاج :				
Haj Name		saiqa ahmad		
Nationality : Pakistan		الجنسية : الباكستان		
Establishment : asia countries est.		مؤسسة الطوافه: مؤسسة جنوب اسيا		
Haj company No. : 304		رقم المنظم : 304		
Hajj company : Pakistan		اسم المنظم : باكستان		
Service group: 2106		مجموعة الخدمة : 2106		
14391 رقم العدد: 851468 رقم تصريح السكن		سكن مكة: نافع ناصر عبدالعزيز السريع		
745 رقم العدد: 857675 رقم تصريح السكن		سكن المنينة: مركز الهيس السكني (1)		



		2010175	1212160	رقم الحاج Haj ID
اسم الحاج :				
Haj Name		Irshad ahmad		
Nationality : Pakistan		الجنسية : الباكستان		
Establishment : asia countries est.		مؤسسة الطوافه: مؤسسة جنوب اسيا		
Haj company No. : 304		رقم المنظم : 304		
Hajj company : Pakistan		اسم المنظم : باكستان		
Service group: 2106		مجموعة الخدمة : 2106		
14391 رقم العدد: 851468 رقم تصريح السكن		سكن مكة: نافع ناصر عبدالعزيز السريع		
745 رقم العدد: 857675 رقم تصريح السكن		سكن المنينة: مركز الهيس السكني (1)		

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Accepted

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وہ خط





28-10-16

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پیشگی اجازت	
 <p>www.khawarbar.org</p>	 <p>www.khawarbar.org</p>
	
	
	

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BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,

PESHAWAR

Appeals Restoration Apple no-200/16

Miss Saiqa

VERSUS

Secretary Elementary & Secondary Education etc

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Petitioner

Through

S
SOPHIA NOUREEN,

Advocate, High Court Peshawar

Dated 28/10/16

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,

PESHAWAR

Miss Saiqa wife of Irshad Ahmad Primary School Teacher,
Peshawar.

... PETITIONERS

VERSUS

1. Secretary Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Department,
Peshawar.
3. Director Education officer (Female), Peshawar.

... RESPONDENTS

APPLICATION FOR RESTORATION OF APPEAL
NO. 522/2016 TITLED ABOVE, WHICH WAS
DISMISSED IN DEFAULT ON 25/08/2016

Respectfully Sheweth,

1. That the above titled appeal was pending before this Honourable Court which was dismissed in default on 25/08/2016. (Copy of order dated 25/08/2016 is attached as annexure A).
2. That the petitioner went to perform her Hajj, along with her husband and was not available to attend this

Honourable Court on the date fixed. (Copies of passport are attached as annexure B)

3. That after performance of her Hajj the petitioner came back to Pakistan.
4. That after her arrival to Pakistan the petitioner inquired about her appeal and it came to her knowledge that her appeal was dismissed in default on 25/08/2016 for non appearance of the petitioner.
5. That not a single notice has been served upon the petitioner regarding her attendance before the court.
6. That the non appearance of the petitioner was beyond the control of the petitioner.
7. That the petitioner be given proper opportunity to pursue her appeal on merits.

It is, therefore, most humbly prayed that on acceptance of this petition the appeal no. 522/2016 may kindly be restored.

Through

Petitioner



Sophia Noureen,

Advocate, High Court Peshawar

Dated 28/10/2016

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,

PESHAWAR

Miss Saiqa

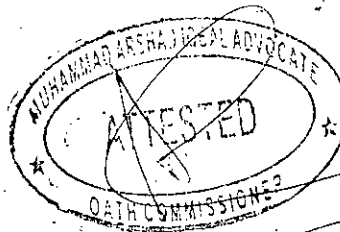
VERSUS

Secretary Elementary & Secondary Education etc

AFFIDAVIT

I, MISS SAIQA wife of Irshad Ahmad Primary School Teacher, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the instant petition for restoration are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Saiqa
DEPONENT



2-8-16-16

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,
PESHAWAR.

Miss Saiqa

VERSUS

Secretary Elementary & Secondary Education etc

ADDRESSES OF PARTIES

Address of petitioner: -

Miss Saiqa wife of Irshad Ahmad, Primary School Teacher,
Peshawar.

Addresses of respondent; -

1. Secretary Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Department,
Peshawar.
3. Director Education officer (Female), Peshawar.

Petitioner

Through



SOPHIA NOUREEN,

Advocate, High Court Peshawar

5

2

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR



Appeal No 522 of 2016

Miss Saiqa
Primary School Teacher Peshawar..... Appellant

Versus

- 1. Secretary Elementary & Secondary Education Department KPK etc..... Respondents
- 2. Director Elementary & Secondary Education Department..... Respondant
- 3. District Education Officer (Female) Peshawar..... Respondant

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST NON PROVISION OF INCENTIVE OF HIGHER PAY SCALE W.E.F 01.07.2012 IN LIGHT OF NOTIFICATION DATED 11.07.2012 AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD.

25.08.2016

None present for the appellant. Called several times till last court of the court but none appeared on behalf of the appellant despite notice through registered post. As such the appeal is dismissed in default. File be consigned to the record room

Self-Member

ANNOUNCED
25.08.2016

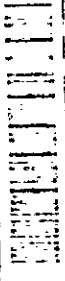
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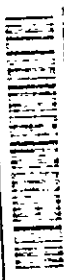
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1212161*1

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		2029941	1212161	رقم الحج Hajj ID
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Nationality : Pakistan		الجنسية : الباكستاني		
Establishment : asia countries est.		مؤسسة التأسيس : مؤسسة جنوب آسيا		
Hajj company No. : 304		رقم الشركة : 304		
Hajj company : Pakistan		شركة الحج : باكستان		
Service group : 2105		مجموعة الخدمة : 2105		
14391	رقم الحج : 851468	رقم الحج : 851468		
745	رقم الحج : 857675	رقم الحج : 857675		

6

		2010175	1212160	رقم الحج Hajj ID
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Nationality : Pakistan		الجنسية : الباكستاني		
Establishment : asia countries est.		مؤسسة التأسيس : مؤسسة جنوب آسيا		
Hajj company No. : 304		رقم الشركة : 304		
Hajj company : Pakistan		شركة الحج : باكستان		
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745	رقم الحج : 857675	رقم الحج : 857675		

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,

PESHAWAR

Appeals Restoration appli: 200/16

Miss Saiqa

VERSUS

Secretary Elementary & Secondary Education etc

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Through

petitioner

S
SOPHIA NOUREEN,

Advocate, High Court Peshawar

Dated 28/10/16

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,
PESHAWAR

Miss Saiqa wife of Irshad Ahmad Primary School Teacher,
Peshawar.

... PETITIONERS

VERSUS

1. Secretary Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Department,
Peshawar.
3. Director Education officer (Female), Peshawar.

... RESPONDENTS

APPLICATION FOR RESTORATION OF APPEAL
NO. 522/2016 TITLED ABOVE, WHICH WAS
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6. That the non appearance of the petitioner was beyond the control of the petitioner.
7. That the petitioner be given proper opportunity to pursue her appeal on merits.

It is, therefore, most humbly prayed that on acceptance of this petition the appeal no. 522/2016 may kindly be restored.

Through

Petitioner



Sophia Noureen,

Advocate, High Court Peshawar

Dated 28/10/2016

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,

PESHAWAR

Miss Saiqa

VERSUS

Secretary Elementary & Secondary Education etc

AFFIDAVIT

I, MISS SAIQA wife of Irshad Ahmad Primary School Teacher, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the instant petition for restoration are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Saiqa
DEPONENT



28-10-16

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,

PESHAWAR

Miss Saiqa

VERSUS

Secretary Elementary & Secondary Education etc

ADDRESSES OF PARTIES

Address of petitioner: -

Miss Saiqa wife of Irshad Ahmad, Primary School Teacher,
Peshawar.

Addresses of respondent; -

1. Secretary Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Department,
Peshawar.
3. Director Education officer (Female), Peshawar.

Through

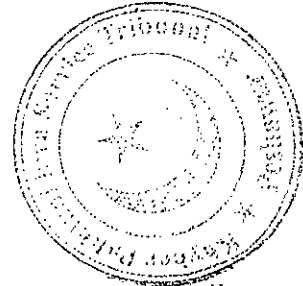
Petitioner



SOPHIA NOUREEN,

Advocate, High Court Peshawar

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR



Appeal No 522 of 2016

Miss Saiqa
Primary School Teacher Peshawar..... Appellant

Versus

- 1. Secretary Elementary & Secondary Education Department KPK etc..... Respondents
- 2. Director Elementary & Secondary Education Department..... Respondant
- 3. District Education Officer (Female) Peshawar..... Respondant

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST NON PROVISION OF INCENTIVE OF HIGHER PAY SCALE W.E.F 01.07.2012 IN LIGHT OF NOTIFICATION DATED 11.07.2012 AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD.

25.08.2016

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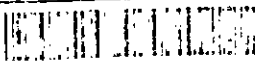
Self-Member

ANNOUNCED
25.08.2016

Carried to the copy
KPK Service Tribunal
Peshawar


Date of Presentation 27-10-16
 Number of copies 450
 Copying Fee 4
 Urgent 2
 Total 6
 Name of Copyist L.M.O.
 Date of Copying 27-10-16

6

		2029941	1212161	رقم الحاج Haj ID
Haj Name		salqa ahmad		
Nationality : Pakistan		الجنسية : باكستان		
Establishment : asia countries est.		مؤسسة التطواف: مؤسسة جنوب آسيا		
Haj company No. : 304		رقم المنظمة : 304		
Hajj company : Pakistan		اسم المنظمة : باكستان		
Service group: 2105		مجموعة الخدمة : 2106		
14391		سكن مكة : تقع ناصر عبدالعزيز السويح		
رقم تصريح السكن 851463		رقم العائدين: 851463 رقم تصريح السكن 14391		
745		رقم العائدين: 857675 رقم تصريح السكن 745		

1212161*1

1212161*1 Hajj ID

		2010175	1212160	رقم الحاج Haj ID
Haj Name		irshad ahmad		
Nationality : Pakistan		الجنسية : باكستان		
Establishment : asia countries est.		مؤسسة التطواف: مؤسسة جنوب آسيا		
Haj company No. : 304		رقم المنظمة : 304		
Hajj company : Pakistan		اسم المنظمة : باكستان		
Service group: 2105		مجموعة الخدمة : 2106		
14391		سكن مكة : تقع ناصر عبدالعزيز السويح		
رقم العائدين: 851463		رقم العائدين: 851463 رقم تصريح السكن 14391		
745		رقم العائدين: 857675 رقم تصريح السكن 745		

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL

PESHAWAR

Miss Saqia

VERSUS

Secretary Elementary & Secondary Education etc

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Petitioner

Through


SOPHIA NOUREEN,

Advocate, High Court Peshawar

Dated 28/10/16

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,
PESHAWAR

Miss Saiqa wife of Irshad Ahmad Primary School Teacher,
Peshawar.

... PETITIONERS

VERSUS

1. Secretary Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Department,
Peshawar.
3. Director Education officer (Female), Peshawar.

... RESPONDENTS

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DISMISSED IN DEFAULT ON 25/08/2016

Respectfully Sheweth,

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Honourable Court on the date fixed. (Copies of passport are attached as annexure B)

3. That after performance of her Hajj the petitioner came back to Pakistan.
4. That after her arrival to Pakistan the petitioner inquired about her appeal and it came to her knowledge that her appeal was dismissed in default on 25/08/2016 for non appearance of the petitioner.
5. That not a single notice has been served upon the petitioner regarding her attendance before the court.
6. That the non appearance of the petitioner was beyond the control of the petitioner.
7. That the petitioner be given proper opportunity to pursue her appeal on merits.

It is, therefore, most humbly prayed that on acceptance of this petition the appeal no. 522/2016 may kindly be restored.

Through

Petitioner



Sophia Noureen,

Advocate, High Court Peshawar

Dated 28/10/2016

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,
PESHAWAR

Miss Saiqa

VERSUS

Secretary Elementary & Secondary Education etc

AFFIDAVIT

I, MISS SAIQA wife of Irshad Ahmad Primary School Teacher, Peshawar, do hereby solemnly affirm and declare on oath that the contents of the instant petition for restoration are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.

Saiqa
DEPONENT



2-8-16-16

BEFORE THE KHYBER PAKHTUNKHWA, SERVICES TRIBUNAL,
PESHAWAR

Miss Saiqa

VERSUS :

Secretary Elementary & Secondary Education etc

ADDRESSES OF PARTIES

Address of petitioner: -

Miss Saiqa wife of Irshad Ahmad, Primary School Teacher,
Peshawar.

Addresses of respondent; -

1. Secretary Elementary & Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education Department,
Peshawar.
3. Director Education officer (Female), Peshawar.

Petitioner.

Through



SOPHIA NOUREEN,

Advocate, High Court Peshawar

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR



Appeal No 522 of 2016

Miss Saiqa
Primary School Teacher Peshawar..... Appellant

Versus

- 1. Secretary Elementary & Secondary Education Department KPK etc..... Respondents
- 2. Director Elementary & Secondary Education Department..... Respondant
- 3. District Education Officer (Female) Peshawar..... Respondant

APPEAL UNDER SECTION 4 OF THE SERVICE TRIBUNAL ACT, 1974 AGAINST NON PROVISION OF INCENTIVE OF HIGHER PAY SCALE W.E.F 01.07.2012 IN LIGHT OF NOTIFICATION DATED 11.07.2012 AND AGAINST NOT TAKING ANY ACTION ON THE DEPARTMENTAL APPEAL OF THE APPELLANT WITHIN STATUTORY PERIOD.

25.08.2016 None present for the appellant. Called several times till last court of the court but none appeared on behalf of the appellant despite notice through registered post. As such the appeal is dismissed in default. File be consigned to the record room.

*Sd/-
Member*

ANNOUNCED
25.08.2016

Confirmed to be true copy
[Signature]
KPK Service Tribunal
Peshawar

Date of Presentation: _____

Number of Pages: 450 27-10-16

Copying Fee: 4

Urgent: 2

Total: 6

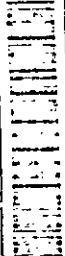
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Date of Copying: 27-10-16

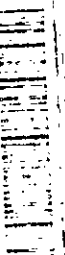
1212161*1

Page 15 of 37

11034

		2029941	1212161	رقم الحج Hajj ID
Hajj Name		saliqa ahmad		
Nationality : Pakistan		الجنسية : الباكستاني		
Establishment : asia countries est.		مؤسسة التوثيق: مؤسسة جنوب آسيا		
Hajj company No. : 304		رقم الشركة : 304		
Hajj company : Pakistan		اسم الشركة : باكستان		
Service group: 2103		مجموعة الخدمة : 2106		
14331 رقم الشركة رقم تصريح الحج		رقم الحج: 851468		
745 رقم الشركة رقم تصريح الحج		رقم الحج: 857675		

6

		2010175	1212160	رقم الحج Hajj ID
Hajj Name		irshad ahmad		
Nationality : Pakistan		الجنسية : الباكستاني		
Establishment : asia countries est.		مؤسسة التوثيق: مؤسسة جنوب آسيا		
Hajj company No. : 304		رقم الشركة : 304		
Hajj company : Pakistan		اسم الشركة : باكستان		
Service group: 2108		مجموعة الخدمة : 2106		
14331 رقم الشركة رقم تصريح الحج		رقم الحج: 851468		
745 رقم الشركة رقم تصريح الحج		رقم الحج: 857675		

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

RESTORATION APPEAL NO. 200/2016

Miss Saiqa

V/S

GOVT.

Reply on behalf of Respondents

Respectfully Sheweth:-

The Respondents submit below:-


Preliminary objections:-

- 1.** That the Applicant has got no cause of action/ locus standi.
- 2.** That the instant Restoration Appeal is badly time barred.
- 3.** That the instant Restoration Appeal is not maintainable in its present form.
- 4.** That the instant Restoration Appeal is bad for mis- joinder and non- joinder of the necessary parties.
- 5.** That the Applicant has not come with clean hands to this Hon, able Tribunal.
- 6.** That the instant Restoration Appeal is barred by law.

On Facts:-

1. That Para No.1 is correct.
2. That in reply to Para No. 2, it is submitted that the Applicant was not interested in her Service Appeal and did not inform the Hon, ble Tribunal.
3. That Para No.3 pertains to Applicant, hence no comments.
4. That Para No.4 also pertains to Applicant personal record, however, the Applicant filed the instant Restoration Application at a very late stage, hence the same is not maintainable.
5. That Para No.5 is incorrect and denied. The Applicant was not interested in pursuing her Service Appeal.
6. That Para No.6 is incorrect and denied.
7. That Para-7 is incorrect and denied. The instant Restoration Appeal is badly time barred.

It is therefore, very humbly prayed that on the acceptance of this reply, the instant Restoration Appeal may very kindly be dismissed.


District Education Officer
(Female) Peshawar

BEFORE THE SERVICE TRIBUNAL KPK, PESHAWAR

RESTORATION APPEAL NO. 200/2016

Miss Saiqa

V/S

GOVT.

Reply on behalf of Respondents

Respectfully Sheweth:-

The Respondents submit below:-

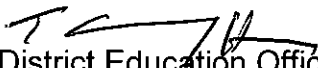
Preliminary objections:-

- 1.** That the Applicant has got no cause of action/ locus standi.
- 2.** That the instant Restoration Appeal is badly time barred.
- 3.** That the instant Restoration Appeal is not maintainable in its present form.
- 4.** That the instant Restoration Appeal is bad for mis- joinder and non- joinder of the necessary parties.
- 5.** That the Applicant has not come with clean hands to this Hon, able Tribunal.
- 6.** That the instant Restoration Appeal is barred by law.

On Facts:-

1. That Para No.1 is correct.
2. That in reply to Para No. 2, it is submitted that the Applicant was not interested in her Service Appeal and did not inform the Hon, ble Tribunal.
3. That Para No.3 pertains to Applicant, hence no comments.
4. That Para No.4 also pertains to Applicant personal record, however, the Applicant filed the instant Restoration Application at a very late stage, hence the same is not maintainable.
5. That Para No.5 is incorrect and denied. The Applicant was not interested in pursuing her Service Appeal.
6. That Para No.6 is incorrect and denied.
7. That Para-7 is incorrect and denied. The instant Restoration Appeal is badly time barred.

It is therefore, very humbly prayed that on the acceptance of this reply, the instant Restoration Appeal may very kindly be dismissed.


District Education Officer
(Female) Peshawar



80140

ایڈووکیٹ / محکمہ تعلیم
بار کونسل ابار ایسوسی ایشن نمبر: bc-13-4429
رابطہ نمبر: 03339607175

پشاور بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: Before Honible Chairman Service Tribunal KPK
Peshawar

Appellant Miss Saigja Elementary & Secondary Education Department KPK and Others	منجانب:	Service appeal دعویٰ: علت نمبر: تاریخ: 27/12/16 جرم: تھانہ:
----------------------------------------------------------------------------------------------	---------	-------------------------------------------------------------------------------

بابت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دی کاروائی متعلقہ
آن مقام پشاور کے محکمہ تعلیم ایڈووکیٹ کو وکیل مقرر
کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو
راضی نامہ کرنے و تقریر حالت و فیصلہ برطاعت دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
زریں مدد تخطا کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہو گا اور صاحب
مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہو گا دوران مقدمہ
میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہو گا وہ وکیل موصوف وصول کرنے کا اختیار ہوگا کوئی تاریخ پیشی مقام
دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ مندر ہے۔

المرقوم: 27/12/16

العبد _____ واہ شد _____
مقام پشاور کے لئے منظور ہے۔

Saigja

نوٹ: اس جملہ نامہ کی ذمہ داری قابل قبول ہوگی۔

attested &
received
Asim
M. Asim Advocate

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL No. 522/2016

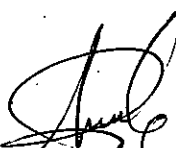
Miss Saiqa

Vs

Govt.

Index Sheet

S.No.	Description of Documents	Annexure	Page No.
1	Para wise Comments	----	1-2
2	Recruitment & Promotion Policy 2012	A	3-4
3	Up-gradation Order dated 26-01-2017	B	5-6
4	Affidavit		7


DISTRICT EDUCATION OFFICER
PESHAWAR

①

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL NO. 522/2016

Miss Saiqa

V/S

GOVT.

Reply on behalf of the Respondents No. 1,2&3

Respectfully Sheweth:-

The Respondents submit below:-

Preliminary objections:-

1. That the Appellant has got no cause of action/ locus standi.
2. That the instant appeal is badly time barred.
3. That the instant Appeal is not maintainable in its present form.
4. That the instant Appeal is bad for mis- joinder and non- joinder of the necessary parties.
5. That the Appellant has not come with clean hands to this Hon, able Tribunal.
6. That the instant appeal is barred by law.
7. That this Hon, able Tribunal has got no jurisdiction to adjudicate upon the instant Service Appeal.
8. That the Appellant has been estopped by his own conduct.
9. That the Appellant has never challenged any promotion order.
10. That the grievances of the Appellant have been resolved by the Respondents.

ON FACTS:-

1. That Para No.1 is pertains to record.
2. That Para No.2 is pertains to record.
3. That Para No.3 is pertains to record.
4. That Para No.4 is pertains to record.

Moreover the Government of KPK (E&SE) vide Notification No. SO(B&A)/1-18/E&SE/2012 Dated Peshawar 11-07-2012 the Primary school teachers were up-graded to BPS-12 while those who had F.A/ F.Sc & ten(10) years service were given BPS-14 &15.

Moreover, the appellánt had Matric qualification, therefore, the appellant was not entitled to be promoted to BPS-14 under the promotion policy.

Furthermore, recently on dated 26-01-2017, the appellant has been once again one step up-graded to BPS-13.

That as the appellant had no cause of action, therefore, the appellant was not entitled to present any Departmental Appeal nor there is any Departmental Appeal of the appellant on the official record of the respondents.


(Recruitment & Promotion Policy 2012 and Up-gradation Order dated 26-01-2017 are attached as Annex: A&B)

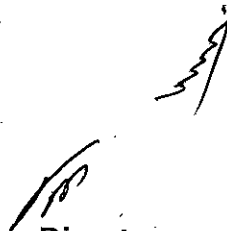
GROUNDS.

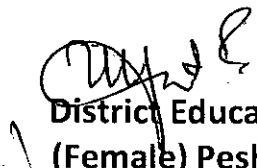
- A. That Ground -A is incorrect and denied. The respondents have acted according to the law, rules and policy.
- B. That Ground-B is also incorrect and denied. The respondents have acted according to the law, rules and policy.
- C. That Ground-C is incorrect and misleading. The appellant did not fall within the ambit of the Promotion Policy.

Moreover, that the Respondents also seek leave of this Hon, able Tribunal to present case law and raise additional grounds at the time of arguments.

It is therefore, very humbly prayed that on the acceptance of this reply, the instant appeal may very kindly be dismissed with cost.


 Secretary,
 (E & SE) KPK Peshawar


 Director,
 (E & SE) KPK Peshawar


 District Education Officer
 (Female) Peshawar.



SO(P.E)-
Units (App
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Appendix

Ist. No. & Da

Copy ion

- 1. The S
- 2. The S
- 3. The S
- 4. The S
- 5. The A
- 6. The D
- 7. The D

By initial recruitment
 By initial recruitment on merit at Union Council level provided that if no suitable candidate is available within the Union Council is available, then from the adjacent Union Councils on merit.
 Recruitment of Primary School Teacher.
 With at least five years service as such and having qualification prescribed for initial

24	Rasheeda Tabassum	PST	12	GGPS New Karimpura Peshawar.
25	Faheema Gul	PST	12	GGPS New Karimpura Peshawar.
26	Farhat Shaheen	PST	12	GGPS New Karimpura Peshawar.
27	Hameeda Begum	PST	12	GGPS New Karimpura Peshawar.
28	Roheeda Naheed	PST	12	GGPS Faisal Colony Peshawar.
29	Saira Amin	PST	12	GGPS Faisal Colony Peshawar.
30	Shahida Bano	PST	12	GGPS Sarki Gate Peshawar
			12	GGPS Gul Bahar Peshawar.

31	Naseem Akhtar	PST	12	GGPS Gul Bahar Peshawar.
32	Fozia Naheed	PST	12	GGPS Gul Bahar Peshawar.
33	Mamoona Yasmeen	PST	12	GGPS Gul Bahar Peshawar.
34	Nagina Ghani	PST	12	GGPS Gul Bahar Peshawar.
35	Sajida Begum	PST	12	GGPS Fidaabad Peshawar.
36	Tehmeena Roohi	PST	12	GGPS Fidaabad Peshawar.
37	Abida Nasreen	PST	12	GGPS Fidaabad Peshawar.
38	Zahida Jabeen	PST	12	GGPS Fidaabad Peshawar.
39	Nasreen Begum	PST	12	GGPS Fidaabad Peshawar.
40	Shaheen Tara	PST	12	GGPS Fidaabad Peshawar.
41	Sajida Qureshi	PST	12	GGPS Shahjee Abad Peshawar.
42	Abida Nasreen	PST	12	GGPS Shahjee Abad Peshawar.
43	Rukhsana Begum	PST	12	GGPS Kakshal No.1 Peshawar.
44	Lubna Ahmad	PST	12	GGPS Postal Colony Peshawar
45	Musarrat Jabeen	PST	12	GGPS Mohmand Abad Peshawar.
46	Noor us Saba	PST	12	GGPS Mohmand Abad Peshawar.
47	Shahnaz Gul	PST	12	GGPS Gul Badshah Jee Peshawar.
48	Nargis Khuda Bakhsh	PST	12	GGPS Jogiwara Peshawar.
49	Shaheen Akhtar	PST	12	GGPS Jogiwara Peshawar.
50	Saiqa	PST	12	GGPS Jogiwara Peshawar.
51	Rizwana Shafat	PST	12	GGPS Quaidabad Peshawar.
52	Naseem Akhtar	PST	12	GGPS Quaidabad Peshawar.
53	Irfana Shaheen	PST	12	GGPS Quaidabad Peshawar.
54	Nasira Shaheen	PST	12	GGPS Zargar Abad Peshawar.
55	Bibi Farzana	PST	12	GGPS Hazar Khawani Peshawar.
56	Yasmeen Begum	PST	12	GGPS Asi Park Peshawar
57	Shagufta	PST	12	GGPS Hajizai Peshawar.
58	Sumera	PST	12	GGPS Hajizai Peshawar.
59	Musarrat Begum	PST	12	GGPS Civil Colony Peshawar.
60	Shamim Ara	PST	12	GGPS Gor Gathri Peshawar.
61	Shaista Tabassum	PST	12	GGPS Wazir Bagh Peshawar.
62	Noor Jehan Yasmeen	PST	12	GGPS Wazir Bagh Peshawar.
63	Rasheeda Bano	PST	12	GGPS Wazir Bagh Peshawar.
64	Fouzia Tabassum	PST	12	GGPS Shah Dhand Peshawar
65	Samina Yasmeen	PST	12	GGPS Shah Dhand Peshawar
66	Rozeena	PST	12	GGPS Sarki Gate Peshawar.
67	Zakira Parveen	PST	12	GGPS Dhakki Munawar Shah Peshawar.
68	Rukhsana Nazli	PST	12	GGPS Dhakki Munawar Shah Peshawar.
69	Shehnaz Begum	PST	12	GGPS Sheikhabad Peshawar.
70	Fatima Bibi	PST	12	GGPS Sheikhabad Peshawar.
71	Sherazi	PST	12	GGPS Sheikhabad Peshawar.
72	Mehnaz Durrani	PST	12	GGPS Rasheedabad Peshawar.

4

C



GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

NOTIFICATION

Peshawar, dated the November 13, 2012.

13/11/2012

SO(PE)4-5/SSRC/Meeting/2012/Teaching Cadre:- In pursuance of the provisions contained in sub rule (2) of rule 3 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer)-Rules, 1989 and in supersession of all Notifications issued in this behalf, the Elementary and Secondary Education Department in consultation with the Establishment Department and the Finance Department hereby lays down the method of recruitment, qualification and other conditions specified in the Appendix to this Notification which shall be applicable to all the posts specified in Column No. 2 of the Appendix and the schedule therewith.

SECRETARY TO GOVERNMENT OF THE KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT.

1st. No. & Date as above.

Copy forwarded to:-

1. The Secretary to Govt. of Khyber Pakhtunkhwa, Establishment Department.
2. The Secretary to Govt. of Khyber Pakhtunkhwa, Finance Department.
3. The Secretary to Govt. of Khyber Pakhtunkhwa, Law Department.
4. The Secretary Khyber Pakhtunkhwa, Public Service Commission Peshawar.
5. The Accountant General, Khyber Pakhtunkhwa Peshawar.
6. The Director (E&SE) Khyber Pakhtunkhwa Peshawar.
7. The Director Education (FATA), Peshawar.

24	Rasheeda Tabassum	PST	12	
25				

15

					(iv) one per cent from amongst the Instructional Material Specialists, with atleast five years service as such and having qualification mentioned in column No. 3; and (v) one per cent from amongst the Arabic Teachers with at least five years service as such and having qualification mentioned in column No.3; and
2.	Senior Arabic Teacher (SAT) (BPS-16)				(b) fifty per cent by initial recruitment. By promotion, on the basis of seniority-cum-fitness, from amongst Arabic Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Arabic Teacher.
3.	Senior Theology Teacher (STT) (B-16).				By promotion, on the basis of seniority-cum-fitness, from amongst Theology Teachers, with at least five years service as such and having qualification as prescribed for initial recruitment of Theology Teacher.
4.	Senior Certified Teacher (SCT)(General) (BPS-16).				By promotion, on the basis of seniority-cum-fitness, from amongst Certified Teachers (General), with at least five years service as such and having qualification as prescribed for initial recruitment of Certified Teacher (General).

[Handwritten initials]

Physical Education Teacher (BPS-15).	Bachelor's Degree from a recognized University with one year junior Diploma in Physical Education course or Army equivalency or other equivalent qualification.	18 to 35 years.	<p>(a) Eighty per cent by initial recruitment; and</p> <p>(b) twenty per cent by promotion, on the basis of seniority-cum-fitness, from amongst the Primary School Head Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p>Provided that, if no suitable candidate is available for promotion then on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least five years service and having qualification prescribed for initial recruitment of Physical Education Teacher.</p> <p><u>Note:</u> In case of non-availability of suitable candidate for promotion, then by initial recruitment.</p>
19. Primary School Head Teacher (PSHT) (BPS-15).			By promotion, on the basis of seniority-cum-fitness, from amongst Senior Primary School Teachers with at least ten years service and having qualification prescribed for initial recruitment of Primary School Teacher.
20. Senior Primary School Teacher (BPS-14).			By promotion, on the basis of seniority-cum-fitness, from amongst Primary School Teachers

[Handwritten initials]

66

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<p>Primary School Teacher (BPS-12)</p>	<p>(i) Intermediate or equivalent qualification from a recognized Board with Primary School Teacher Certificate/ Diploma in Education from a recognized institution or (ii) Secondary School Certificate from a recognized Board or Associate Division with two years Associate Degree in Education from a recognized University.</p>	<p>18 to 35 years.</p>	<p>with at least five years service as such and having qualification prescribed for initial recruitment of Primary School Teacher. By initial recruitment on merit at Union Council level; provided that if no suitable candidate is within the Union Council is available, then from the adjacent Union Councils on merit.</p>
<p>Qari (BPS-12)</p>	<p>Intermediate with Hifz-e-Quran and Qirat Sanad from a recognized institution.</p>	<p>18 to 35 years.</p>	<p>By initial recruitment.</p>

F

	Naveed Begum	PST	12	GGPS Sardar Colony Peshawar.
74	Mukhtiar Begum	PST	12	GGPS Hazar Khawni No.1 Peshawar.
75	Nusrat Jehan	PST	12	GGPS Kohati Gate Peshawar.
76	Ishrat Naz Gul	PST	12	GGPS Zaryab Colony Peshawar.
77	Shamim Ara	PST	12	GGPS Zaryab Colony Peshawar.
78	Rehana Bibi	PST	12	GGPS Zargarabad Peshawar.
79	Naheed Mehboob	PST	12	GGPS Sardar Colony Peshawar.
80	Farzana Mehboob	PST	12	GGPS Sardar Colony Peshawar.
81	Sumera Anwar	PST	12	GGPS Khyber Colony Peshawar.
82	Tehmina Begum	PST	12	GGPS Khyber Colony Peshawar.
83	Amina Yasmeen	PST	12	GGPS Khyber Colony Peshawar.
84	Nasreen Gul	PST	12	GGPS Khyber Colony Peshawar.
85	Mumtaz Jehan	PST	12	GGPS Old Karimpura Peshawar.
86	Sarwat Jabeen	PST	12	GGPS Old Karimpura Peshawar.
87	Nasra Tabassum	PST	12	GGPS Old Karimpura Peshawar.
88	Tasleem Bibi	PST	12	GGPS Dabgari Banat Peshawar.
89	Zill-e-Huma	PST	12	GGPS Dabgari Banat Peshawar.
90	Surraya Begum	PST	12	GGPS Ijazabad Peshawar.

Note:-


1. The drawing and disbursing officer should once again check the service book of the above named teachers and ensure that they are not been upgraded after 01/07/2010.
2. An under taking to this effect should be obtained from the above named teachers that in case of incorrect/wrong up gradation/fixation of pay or over payment made to them will be recovered from their pay, pension etc.
3. Necessary entry to this effect should be made in their service book.

(ULFAT BEGUM)
 DISTRICT EDUCATION OFFICER
 (FEMALE) PESHAWAR

Endst: No. 1756-57 /One Step up gradation/2016 dated 26 / 01 2017.

Copy of the above is forwarded:-

1. Accountant General Khyber Pakhtunkhwa Peshawar.
2. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
3. Budget and Account Officer local office.
4. SDEO (F) Town-1, II, III & IV Peshawar.
5. Principal/Head Mistress concerned.
6. Teachers concerned.
7. Cashier local office.
8. EMIS local office.


 DISTRICT EDUCATION OFFICER
 (FEMALE) PESHAWAR

7

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

SERVICE APPEAL No. 522/2016

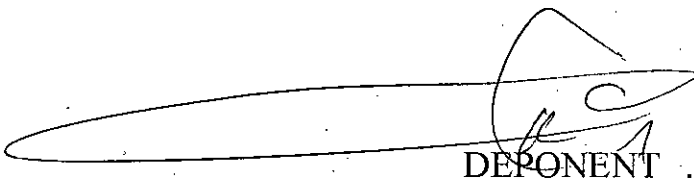
Miss Saiqa

Vs

Govt.

Affidavit

I Arshad Ali, ADEO (Litigation) O/O DEO (Male) Peshawar do hereby solemnly affirm and declare on oath that the contents of the Para wise reply on behalf of Respondents is correct to the best of my knowledge and nothing has been concealed from this Honorable court.


DEPONENT

17301-1351487-7