

A.No. 927/2019
Shakeela Anjum vs Govt

31.07.2019

Nemo for the parties.

The respondents in the case could not be sent notices due to non-deposit of security and process fee.

It is already past 2:00 PM and despite repeated calls no one is in attendance on behalf of the appellant.

Dismiss^{ed} for non-prosecution. File be consigned to the record room.

Announced:
31.07.2019


Chairman

03.07.2019

Counsel for the appellant Ms. Shakeela Anjum present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Education Department as ASDEO (BPS-16). It was further contended the ^{meeting} meeting of Departmental Promotion Committee was held on 31.01.2019 wherein the name of the appellant was shown at serial no. 16 for promotion from the post of ASDEO (BPS-16) to the post of SDEO (BPS-17) regularly but the appellant was deferred by the respondent-department on the ground that she has earned leave with effect from 01.05.2017 to 30.09.2018. It was further contended that the appellant filed departmental appeal but the same was not responded hence, the present service appeal. It was further contended that earned leave was granted by the competent authority and the said earned leave was no ground for deferment of the appellant from promotion but the respondent-department has illegally deferred the appellant from promotion therefore, the same is illegal and liable to be set-aside.


The contentions raised by the learned counsel for the appellant need consideration. The appeal is admitted for regular hearing. The appellant is directed to deposit security and process fee within 10 days, thereafter, notice be issued to the respondents for written reply/comments for 31.07.2019 before S.B. Learned counsel for the appellant also submitted application for status-quo. Notice of the same be also issued to the respondents for the date fixed.


(Muhammad Amin Khan Kundi)
Member

Form-A
FORM OF ORDERSHEET

Court of _____

Case No. _____ /2019 _____


S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	02/07/2019	<p style="text-align: center;">As per direction of the Worthy Chairman this case is submitted to the S. Bench for decision on office objection. To be put up there on <u>03/07/19</u></p> <p style="text-align: right;"> REGISTRAR 2/7/19</p>

The appeal of Ms. Shakeela anjum d/o Mehrab khan Assistant District Education Officer Female Chitral received today i.e. on 03.06.2019 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Annexures of the appeal may be attested.
- 2- Annexures of the appeal may be flagged.
- 3- Affidavit may be got attested by the Oath Commissioner.
- 4- Appeal may be page marked according to the Index of the appeal.
- 5- Address of respondent no. 2 is incomplete which may be completed.
- 6- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 7- Copy of impugned order dated 31.01.2019 mentioned in the memo appeal is not attached with the appeal which may be placed on it.
- 8- Copy of Minutes of the meeting is illegible which may be replaced by legible/better one.

No. 1066 /S.T,

Dt. 11-4- /2019.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Shafiq Sultan Adv. Pesh.

Respected sir!

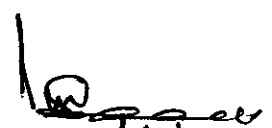
All other's objections are removed, and response regarding objection No-7 is as under.

Appellant is aggrieved by minutes of DPC dated 31-01-2019, whereby the Appellant was deferred from promotion and the said Defferment order/Impugned order is attached with Memo of Appeal, at page NO 10 to 14.

Sir,

The objection of the Forfeiture of Advance reply of counsel for the appellant is sub-itted for order please.

Be laid before S.B. in P.H. of
objections, 11/4/19


Hasmat Chaudhary

20/6/19

W

**BEFORE THE PROVINCIAL SERVICE TRIBUNAL,
KHYBER PAKHTUNKHAWA, PESHAWAR**

Appeal No. 927 (R) C.S./2019

Ms. Shakeela Anjum
Versus
Government of Khyber Pakhtunkhawa and others

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT 1973

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3	Copy of department appeal	B	15
4	Copy of appointment letter	C	16-17
5	Copy of leave order	D	18-20
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Shafiq Sultan
Advocate High Court,

**BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KHYBER
PAKHTUNKHAWA, PESHAWAR**

Appeal No. 927 (R) C.S./2019

Ms. Shakeela Anjum daughter of Mehrab Khan Assistant District
Education Officer (Female) Chitral.

...Appellant

Versus'

1. Government of Khyber Pakhtunkhawa, through Secretary
Elementary and Secondary Education Department,
Peshawar.
2. Departmental Promotion Committee (DPC) through its
Chairman held in Chitral on 31-01-2019.

...Respondents

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT 1973

Respectfully Sheweth:

CLAIM IN APPEAL

To accept the instant appeal, set
aside the impugned order dated
31.01.2019 and promote the
appellant to the post of SDEO
(Female) BPS-17 on regular basis
with all back benefits.

FACTS

1. That the Appellant was appointed as Assistant Sub-
divisional Education Officer (ASDEO) BS-16 (Female) in
Khyber Pakhtunkhawa Elementary and Secondary
Education Department on 31.03.2011. The appellant
comes under the definition of Civil Servant and this
Honourable Tribunal has ample jurisdiction to entertain
the instant appeal. Copy of appointment letter is
attached as **Annexure-C**

2. That the Appellant served education department whole
heartedly to the best of her abilities and she has an
unblemished service record to her credit because
neither any complaint has ever been made against her

Filed to-day

Registrar

3/6/19,

nor her superior ever showed any reservation or deprecation with regard to the work of the Appellant.

3. That the Appellant applied for grant of earned leave through proper channel which was duly approved by the department and earned leave was granted with effect from 01.04.2017 to 01.04.2019. Copy of leave order is enclosed as **Annexure-D**.
4. That the promotion of Appellant was due during the leave period and the Appellate requested for cancellation of her earned leave which was accepted by the competent authority and the Appellant rejoined the department on 01.10.2018. Copy of cancellation letter dated 08.10.2018 is enclosed as **Annexure-E**.
5. That on the direction of the Competent Authority, a Departmental Promotion Committee (DPC) was constituted for promotion of ASDEO BS-16 to ADEO BPS-17. The name of appellant stood at serial No.16 of the list. The DPC deferred the promotion of the appellant on the plea of earned leave from 01.05.2017 to 30.09.2018 vide order dated 31.01.2019. She was informed that her complete ACR was not available. Copy of impugned order dated 31.01.2019 is enclosed as **Annexure-A**.
6. That it may be submitted that copy of order of deferment in question despite requested by appellant was not supply to her. Appellant has however been able to obtained the minutes of the meetings from website of respondent.

7. That in view of non supply of copy as requested for, the appellant seeks exemption in that behalf and respectfully place the copy available.
8. That order dated 03-01-2019 of the DPC of deferring the promotion of the Appellant as a ADEO is illegal, unlawful, malafide, arbitrary on the basis of pick and choose policy, favoritism, colorful exercise of office/authority, ineffective, inoperative, whimsical, void ab-initio, without lawful authority and therefore constitute an invasion over the rights of the Appellant.
9. That the Appellant preferred a departmental appeal against the said deferment before the Secretary of Khyber Pakhtunkhawa Elementary and Secondary Education on 04.02.2019 that has not been responded within the limitation of 90 days. Copy of department appeal is attached as **Annexure-B**.
10. That the appellant seeking her due promotion, on the following amongst other grounds:

GROUNDS

- a. That the impugned order of deferment of promotion of the Appellant as Sub divisional Education Officer (SDEO) BS-17 dated 31.01.2019 passed by the DPC (hereinafter referred to as the impugned order) of the Respondent is void ab-initio illegal, without jurisdiction or lawful authority, the Appellant is entitled to promotion, hence the said impugned order is liable to be set aside along with all the subsequent orders proceeding, actions, letters and memorandums, if any.

- b. That the Respondents failed to mention any specific reason for deferring the Appellant's promotion.
- c. That the Appellant has already completed 06 years of service before seeking the earned leave which fulfills the initial criteria for promotion.
- d. That the incomplete Annual Confidential report (ACR) is not at all relevant for promotion. No fault can be found with the Appellant for the same. In no case incomplete ACR can form basis for deferment of promotion.
- e. That the Appellant has availed earned leave through proper channel. Appellant was not on leave on the date of meetings of DPC.
- f. That during leave period appellant has a right to qualify for any kind of promotion and up gradation. The leave such as one availed by the Appellant has no effect on right of promotion.
- g. That the incomplete ACR was never communicated to the Appellant which is against the rules and law, the department was required to communicate the same before constitution of the DPC. They latter could call for the ACR. No fault can be found with the appellant in respect thereof.
- h. That impugned Order is in total violation of Constitution and principle of merits, seniority, fair-play and natural justice.

- i. That by depriving the Appellant from promotion the fundamental right to expect fair career progression has been violated as her juniors have been promoted while superseding the Appellant without any legal justification.
- j. That promotion relates to the right of life of a civil servant because depriving from the ultimate glory of service i.e. BPS-17 for which she has made sacrifices, would tantamount to scuttle her live in terms of Article-9 of the Constitution.
- k. That the Appellant is claiming rights granted by the constitution, Rules and regulation and policy of merit.
- l. That no adverse remarks or entries are made in the ACR of Appellant. Nothing adverse in the ACR was ever conveyed to the Appellant.
- m. That conduct of the Respondents to defer the promotion of the Appellant is arbitrary and prejudicial, which law does not favor.
- n. That the Appellant has been condemned unheard and rules of natural justice have been violated.
- o. That during the period of employment of the appellant, her performance has been satisfactory to the best of abilities without any complaint against her in any manner
- p. That the Respondents violated the law and deprived the Appellant from promotion.

- q. That the acts of the Respondents are against the law, facts and material on record, hence not tenable.
- r. That the impugned order is unlawful, unauthorized, unjust, contrary to the prescribed rules and against the facts and circumstances of the case, hence calling for interference of this Honourable Tribunal.
- s. That the Appellant has a recurring cause of action because of continuous wrong on the part of the Respondents.
- t. That public functionaries are required to be more reasonable and benevolent towards the employees/ countrymen.
- u. That action/omission on the part of the Respondents are violation of doctrine of good governance, transparency, fundamental rights guaranteed in the constitution, which clearly postulate that principle of equality, justice as enumerated by Islam would be fully observed.
- v. That it is fundamental right of the Appellant to be treated in accordance with law and to enjoy equal protection under the law as enshrined in Article 4 of the Constitution of Pakistan, but in present case, the conduct and actions of the respondent is violation of the fundamental rights guaranteed in the constitution.

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- w. That Pakistan is founded on the basis of Islamic Religion, respondents' authorities should make efforts to bring egalitarian society based on Islamic concept of fair play and social justice, they are expected to act fairly, justly and in manner, which should not give any complaint to the citizen.
 - x. That the Appellant is entitled to retain an maintained her seniority and promotion from the date her juniors were promoted i.e. 31-01-2019.
 - y. That the impugned order has caused a grave prejudice to the Appellant. She is entitled to indulgence of this honorable tribunal.
 - z. That the appellant seeks leave to add more grounds, law points, information and material at the time of arguments.

PRAYER

In the light of above submissions, it is most respectfully prayed that instant appeal may graciously be accepted the impugned order dated 31.01.2019 may kindly be set aside/quashed and the appellant may kindly be promoted with her seniority to as Sub-divisional Education Officer (SDEO) BS-17 with effect from the back date i.e. 31.01.2019 along with all consequential back benefits, salaries, perks, profits, allowances and seniority.

Any other relief, which this Honourable Tribunal may deem fit and proper, may also be awarded.

Through Counsel


Appellant


Shafiq Sultan
Advocate High Court

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BEFORE THE PROVINCIAL SERVICE TRIBUNAL,
KHYBER PAKHTUNKHAWA, PESHAWAR

Appeal No. _____ (R) C.S./2019

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APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT 1973

CERTIFICATE

Certified that this is the first appeal on behalf of the appellant before this Honourable Tribunal.

That no similar appeal of the appellant is decided in his favour by any forum.

That no other appeal or Writ Petition against the impugned orders is pending before this Honourable tribunal or any other forum.


Advocate

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BEFORE THE PROVINCIAL SERVICE TRIBUNAL,
KHYBER PAKHTUNKHAWA, PESHAWAR

Appeal No. _____ (R) C.S./2019

Ms. Shakeela Anjum
Versus

Government of Khyber Pakhtunkhawa and others

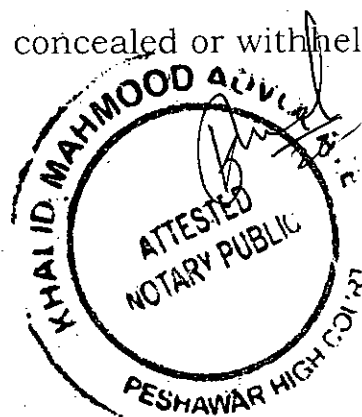
APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT 1973

AFFIDAVIT

I, Ms. Shakeela Anjum daughter of Mehrab Khan Assistant District Education Officer (Female) Chitral, do hereby solemnly affirm and declare that the contents of the titled appeal are true and correct to the best of my knowledge and belief.

It is further stated that no other appeal has been filed on the same cause of action or decided or pending before this Honourable Tribunal or any other branch of this Tribunal.

This declaration is correct to the best of my knowledge and belief and nothing has been concealed or withheld therein.



MINUTES OF THE MEETING OF THE DEPARTMENTAL PROMOTION COMMITTEE REGARDING PROMOTION OF ASDEO (M&F) BS-16 TO THE POST OF SDEO/ASSISTANT DIRECTOR (M&F) BS-17 ON REGULAR BASIS

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A meeting of the Departmental Promotion Committee was held on 21/02/2019 at 11:00 AM under the Chairmanship of Special Secretary Elementary & Secondary Education at the Head Office to discuss the promotion of ASDEO (M&F) BS-16 to the post of SDEO (M&F) BS-17 on regular basis. The following attended the meeting:

- | | |
|--|----------|
| Mr. Zahid Khan
Special Secretary, E&SE Department,
Khyber Pakhtunkhwa | Chairman |
| Mr. Jinnat Ull Din
Deputy Secretary (Admin),
E&SE Department,
Azad Jammu & Kashmir | Member |
| Section Officer (R-1)
Establishment Department,
Mr. Naeem Tabassum,
Section Officer,
Finance Department,
Mr. Dilshad Begum,
Deputy Director (E),
Directorate of E&SE,
Khyber Pakhtunkhwa | Member |
| Mr. Zahid Muhammad,
Deputy Director (Instab),
Directorate of E&SE,
Khyber Pakhtunkhwa/Peshawar | Member |
| Shabir Khan,
Section Officer (S/D),
E&SE Department,
Mr. Ruzluz Khan,
Section Officer (Primary),
E&SE Department | Member |

The meeting started with recitation from the Holy Quran. The Chair welcomed the participants. Thereafter the agenda items were taken up for discussion.

The Departmental Promotion Committee discussed Promotion of ASDEO (F/M) BS-16 and after thorough examination of the documents of all the candidates, the committee recommended the following ASDEOs BS-16 to the post of SDEO (F/M) Assistant Director BS-17 on regular basis -

Item 01: PROMOTION OF (FEMALE) ASDEO (F) BS-16 TO SDEO (F) BS-17 (REGULAR)

S.No	Snr. No.	Name and Qualification	Recommendations of DPC
1	1	Nizakat Tabassum MAM Ed	Recommended for promotion to the post of SDEO (F) BS-17 on regular basis
2	2	Meher Sani MAM Ed	Recommended for promotion to the post of SDEO (F) BS-17 on regular basis
3	3	Fahem A Khan B Ed/M Ed	Recommended for promotion to the post of SDEO (F) BS-17 on regular basis
4	4	Farhat Yasmeen MA/B Ed/M Ed	Recommended for promotion to the post of SDEO (F) BS-17 on regular basis

63	63	Zeenat Begum B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
62	62	Bibi Samam B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
61	61	Shahnaz Begum M.A/B.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
60	60	Shebnum Bibi B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
59	59	Bibi Anis B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
58	58	Najma Noor B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
57	57	Mubina Rasool M.A/B.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
56	56	Shaheen Bibi B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
55	55	Shazba Bibi B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
54	54	Nozima Shaheen M.ED/B.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
53	53	Maryam Aman B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
52	52	Anisa Jansheed B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
51	51	Nazia Anjum B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
50	50	Fozia Azam B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
49	49	Nahed Iqbal B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
48	48	Maryam Kashif B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
47	47	Elmasra Falook M.A/B.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
46	46	Shamim Akhtar B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
45	45	Sonni Kavaz Habib M.ED/B.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
44	44	Adela Rani M.ED/B.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
43	43	Nehum Noor B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
42	42	Amra Bibi M.ED/B.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
41	41	Mahar Latif B.ED/M.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
40	40	Mariam Yameen M.A/B.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
39	39	Mubina Latif M.A/B.ED	Recommended for promotion to the post of SDO (F) BS-17 on regular basis.
38	38		

She was on deputation with Federal Government, Islamabad. The Government recommended her for promotion to the post of SDO (F) BS-17 on regular basis. However, she may be asked to accept her promotion within their cadre. She is to stay and not be allowed to go to immediately after promotion. She shall be less than a minimum of 10 years. If she declines her actual promotion, she take place only when the vacancy in the present cadre. Her seniority in the cadre post shall, however, stand protected. Right of parity (iv) (d) of promotion from 28th January, 2009.

12-

64	04	Nuslat Parveen B.Ed/M.Ed
65	05	Nayana Sultan M.Ed/B.Ed
66	06	Tahzeeb Khatun M.A/B.Ed
67	07	Sitchon N.L. MA/B.Ed
68	08	Rizwana Parul M.Sc/B.Ed

Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.

Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.

Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.

Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.

Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.


13-


Item# 02: PROMOTION OF (MALE) ASDEO/ASDEO (M) BS-16 TO SDEO/ASDEO (M) DIRECTOR (M) BS-17 (REGULAR)

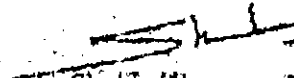
S.No.	Sr. No.	Name and Qualification	Recommendation of DPC
1.	61	Mr. Qaiser Khan M.A/M.Ed	Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.
2.	62	Mr. Sharafuddin M.A/B.Ed	Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.
3.	63	Mr. Imtiaz Khan M.A/M.Ed	Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.
4.	64	Muhammad Khitab M.A/M.Ed	Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.
5.	65	Mr. Bakhzada M.A/M.Ed	Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.
6.	66	Mr. Zia ur Rehman M.A/M.Ed	Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.
7.	67	Mr. Ihtisham ul Haq M.Phil(Education)	Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.
8.	68	Muhammad Saleem M.A/M.Ed	Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.
9.	69	Mr. Sikandar Irfan M.Sc/M.Ed	Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.
10.	70	Mr. Abdul Haliz M.Sc/M.Ed	Recommended for promotion to the post of SDEO/Assistant Director (M) BS-17 on regular basis.

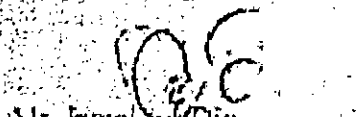
Promotion. The ASDEOs who could not submit their PERs in time, were not considered for promotion.

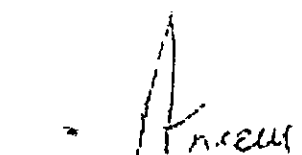
The meeting ended with a vote of thanks from and to the chair.

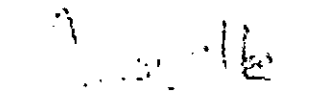

Abdul Ahid,
Section Officer (R-1)
Establishment Department



Ms. Dilshad Begum,
Deputy Director (F)
Directorate of E&SE
Khyber Pakhtunkhwa

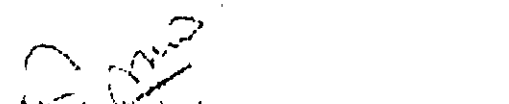

Mr. Shubir Khan,
Section Officer (S.F.),
E&SE Department


Mr. Jamal-ud-Din,
Deputy Secretary (Admin),
E&SE Department


Mr. Baqir Talib,
Section Officer (R-1)
Finance Department


Mr. Zahid Ahmad,
Deputy Director (Sub)
Department of E&SE
Khyber Pakhtunkhwa


Mr. Raza Raza,
Section Officer (S.F.),
E&SE Department


Mr. Waheed Khan,
Special Secretary, E&SE Department
Khyber Pakhtunkhwa

MINUTES OF THE MEETING OF THE DEPARTMENTAL PROMOTION COMMITTEE REGARDING PROMOTION OF ASDEO (M & F) BS -16 TO THE POST OF SDEO/ASSISTANT DIRECTOR (M&F) BS-17 ON REGULAR BASIS

A meeting of the Departmental Promotion committee was held on 13.01.2019 at 11:00 AM under the Chairmanship of Special Secretary Elementary & Secondary Education Khyber Pakhtunkhwa in order to discuss the promotion of ASDEO (Male&Female) BS-16 to the post of ASDEO BS-17 (regular). The following attended the meeting.

- | | |
|---|----------|
| 1. Mr. Arshad Khan
Special Secretary, E&SE Department
Khyber Pakhtunkhwa | Chairman |
| 2. Mr. Jamal ud Din
Deputy Secretary (Admn)
E&SE Department | Member |
| 3. Abdul Ahad,
Section officer (R-1)
Establishment Department | Member |
| 4. Mr. Naeem Tabassum,
Section Officer,
Finance Department. | Member |
| 5. Mst. Dilshad Begum,
Deputy Director (F)
Directorate of E&SE
Khyber Pakhtunkhwa. | Member |
| 6. Mr. Zahid Muhammad
Deputy Director (Estab)
Director of E&SE Khyber Pakhtunkhwa. | Member |
| 7. Shabir Khan,
Section Officer (S/F)
E&SE Department | Member |
| 8. Mr. Ruqiaz Khan,
Section Officer (Primary) E&SE Department. | Member |

2. The meeting started with recitation from the Holy Quran. The Chair welcomed the participants. Thereafter the agenda items were taken up for discussion.

3. The Departmental Promotion committee discussed Promotion of ASDEO (F/M)BS-16 and after thorough examination of the documents of all the candidates, the committee recommended the following ASDEOs BS-16 to the post of SDEO (F/M) Assistant Directors BS-17 on the regular basis:

Item # 01: PROMOTION OF (FEMALE) ASDEO (F) BS-16 TO SDEO (F) BS-17 (REGULAR)

S. No.	Snr; No.	Name and Qualification	Recommendation of DPC
1	1	Nizakat Tabassum MA/M.ED	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
2	2	Meher Sani MA/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
3	3	Faheem Afshan B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
4	4	Farhat Yasmeen MA/B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.

7	7	Zahida Khanum B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
8	8	Zubaida Khanum B.Ed/M.Ed	Deferred due earned leave w.e.f 1/5/2017 to 30/9/2018
9	9	Naila Naz, MA/B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
10	10	Bibi Haleem Sadia B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
11	11	Safia Bano B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
12	12	Gul Farzana M.Ed/B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
13	13	Shagufta Jabeen MA/B.Ed.	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
14	14	Samia Ahmad, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
15	15	Tahira Jabeen B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
16	16	Shakila Anjum B.Ed/M.Ed	Deferred due earned leave w.e.f 1/5/2017 to 30/9/2018
17	17	Nadia begum MSc B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
18	18	Samia Bashir, MA/B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
19	19	Nasira Jabeen BA/B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
20	20	Shehnaz Akhtar, MA/B.Ed	Deferred due earned leave w.e.f 1/5/2017 to 30/9/2018
21	21	Fozia Perveen, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
22	22	Bibi Ayesha Naz, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
23	23	Sabira Ambreen, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
24	24	Saeeda Nasra Azam, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
25	25	Noor Rahat Yaseen, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
26	26	Asifa Amin, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
27	27	Naney Begum B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
28	28	Nasim Bukhari, M.A/B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
29	29	Gulraj Bibi, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
30	30	Shahida Perveen, BSc. /B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
31	31	Iffat Jabeen, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
32	32	Zahida Bibi B.Ed/M.Ed	Deferred for want of PERs for the ryear 2011 to 2017
33	33	Nagina Bibi B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
34	34	Surayya Taj, B.Ed/MSc/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
35	35	Sadia Shakil, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
36	36	Saeeda Bano B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.

39	39	Musarrat Jamal MA/B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
40	40	Farhat Yasmeen MA/B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
41	41	Mehek Raja B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
42	42	Arifa Bibi B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
43	43	Mehrun Nisa B.Ed/MA/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
44	44	Adeela Rani MSc/B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
45	45	Sonia Nawaz Baloch, M.Ed/B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
46	46	Shamim Akhtar, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
47	47	Hanifa Falooq, MA/B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
48	48	Maryam Rasheed, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
49	49	Naheed Fazal, B.Ed/M.Ed.	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
50	50	Fozia Azam, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
51	51	Nazia Anjum, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
52	52	Anisa Jamsheed, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
53	53	Mariam Aman, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
54	54	Nazma Shaheen, MSc. B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
55	55	Shazia Bibi, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
56	56	Shaheen Bibi, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
57	57	Muniba Rasool, MA/B.Ed	Deferred for want of PERs for the year 2011 to 2017
58	58	Najma Niaz, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
59	59	Bibi Arifa, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
60	60	Shabnum Bibi, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
61	61	Shehnaz Begum, MA/B.Ed	She was on deputation with Federal Government Islamabad, the Committee recommended her for the promotion of post of SDEO (Female) BS-17 on regular basis, however she may be asked to neutralize her promotion within their cadre. She has to stay and not to be allowed to go back immediately after promotion. Such stay shall be not less than a minimum of two years. If she declines her actual promotion will be taken place only when she returns to her present cadre. Her seniority in the higher posts shall however stand protected in light of para-1 (iv) (d) of promotion policy 28 th January 2009.
62	62	Bibi Sanam, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
63	63	Zeenat Begum, B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.

64	64	Nusrat Perveen, B.Ed/M.Ed.	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
65	65	Nayer Suleman B.Ed/M.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
66	66	Taskeen Kausar, MA/B.Ed	Deferred for want of PERs for the year 2011 to 2017
67	67	Shehla Naz, MA/B.Ed	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.
68	68	Rizwana Pari, MSc. B.Ed.	Recommendations for promotion to the post of SDEO(F) BS-17 on regular basis.

Item # 02: **PROMOTION OF (MALE) ASDEO (M) BS-16 TO SDEO (M) BS-17 (REGULAR)**

S. No.	Snr; No.	Name and Qualification	Recommendation of DPC
1	61	Mr. Qaiser Khan, MA/B.Ed	Recommendations for promotion to the post of SDEO(M) BS-17 on regular basis.
2	62	Mr. Sharif ud Din MA/B.Ed	Recommendations for promotion to the post of SDEO(M) BS-17 on regular basis.
3	63	Mr. Imtiaz Khan, MA/B.Ed	Recommendations for promotion to the post of SDEO(M) BS-17 on regular basis.
4	64	Muhammad Khitab, MA/B.Ed	Recommendations for promotion to the post of SDEO(M) BS-17 on regular basis.
5	65	Mr. Bakhzada, MA/B.Ed	Recommendations for promotion to the post of SDEO(M) BS-17 on regular basis.
6	66	Mr. Zia ur Rehman, MA/B.Ed	Recommendations for promotion to the post of SDEO(M) BS-17 on regular basis.
7	67	Mr. Ihtisham ul Haq M.Phil (Education)	Recommendations for promotion to the post of SDEO(M) BS-17 on regular basis.
8	68	Muhammad Saleem MA/B.Ed	Recommendations for promotion to the post of SDEO(M) BS-17 on regular basis.
9	69	Mr. Sikandar Irfan, MSc /B.Ed	Recommendations for promotion to the post of SDEO(M) BS-17 on regular basis.
10	70	Mr. Abdul Hafiz M.Sc /M.Ed.	Recommendations for promotion to the post of SDEO(M) BS-17 on regular basis.

The ASDEOs who could not submit their PERs in time, were not considered for promotion.

The meeting ended with a note of thanks from and to the Chair.

-sd-

Abdul Ahad,
Section officer (R-1)
Establishment Department

-sd-

Mr. Naeem Tabassum,
Section Officer,
Finance Department.

-sd-

Mst. Dilshad Begum,
Deputy Director (F)
Directorate of E&SE
Khyber Pakhtunkhwa.

-sd-

Mr. Zahid Muhammad
Deputy Director (Estab)
Director of E&SE Khyber Pakhtunkhwa.

-sd-

Shabir Khan,
Section Officer (S/F)
E&SE Department

-sd-

Mr. Ruqiaz Khan,
Section Officer (Primary) E&SE Department.

-sd-

Mr. Jamal ud Din
Deputy Secretary (Admn)
E&SE Department

-sd-

Mr. Arshad Khan
Special Secretary, E&SE Department
Khyber Pakhtunkhwa

To

The Secretary to Govt of Khyber Pakhtunkhwa,
Elementary & secondary Education Department
Peshawar.

SUBJECT: - APPEAL FOR RE-CONSIDERATION FOR PROMOTION FROM ASDEO TO SDEO

Sir,

I have the honor to submit the following lines for consideration please.

1. we have appointed as ASDEO "F" on 27-3-2011 and 31-3-2011 respectively.
2. Both the undersigned's, availed long leave (with half pay) w-e-f 1-5-2017 to 1-10-2018 and joined our parent department & serving there for the last five months with full devotion & dedication.
3. On 31-1-2019 departmental promotion committee considered promotion cases from ASDEO to SDEO "F" but unfortunately both the undersigned have been deprived from our basic right of promotion owing that you have not submitted one year ACR after availing long leave.
4. in light of the above situation it is requested that the promotion cases of undersigned's may please be re-examined & promotion being our fundamental right may be granted and oblige please.

Yours faithfully,

1. Zubaida Khanum ASDEO(F) Chitral

4/02/19

2. Shakila Anjum ASDEO(F) Chitral

4/02/19

Consequent upon the recommendation of the Nhyber Pakhtunkhwa Public Service Commission, the Competent authority is pleased to appoint the following candidates against the post of Assistant District Officer (Female) in G.P.S-16 (Rs.6060-47020160) plus usual allowances as admissible under the rules on regular basis under the existing policy of the Provincial Government, in management cadre on the terms and conditions given below with immediate effect.

NOTIFICATION

S.No	Name & Father's name	Address	District/zone	Services placed at the disposal of EDO (ERSE)
1.	Nageena Bibi D/O	Syed Abbas Shah Quarter No. G-265 POF Estate Havelian Cantt-Havelian	Harpur/5	Harpur for further posting.
2	Nadia Begum D/O	Street Nail Gram, H.No. 341/A Near New Tanchei Bazaar Bannu City.	Bannu/4	Bannu
3.	Noor Kohat Yasreen D/O	Village Khawaja Abad P/O Ashiq Colony Bannu Road Teh: & Dist: Kohat	Kohat/4	Kohat
4.	Shazia Bibi D/O	Village Sanda Sar P/O Chitta Bannu Teh: & Dist: Mansehra.	Mansehra/5	Mansehra
5.	Almira Bibi D/O - Now at GCHS Rawal	CT GOMS Maini Muhammad Ashraf	Chitral	Sher Nawaz Chitral
6.	Shakela Arjum D/O	Village & P/O Aladkashi Teh: & Dist: Chitral	Chitral/3	Chitral
7.	Sobia Tabassum D/O	H.# C/3247, inside Daar Street D.I.Khan	D.I.Khan/4	Tank
8.	Sabri Amreen D/O	C/O Ghulam Zakaria Khan B.P.O Maliana D.I.Khan.	D.I.Khan/4	Tank
9.	Naila Naz D/O	House No. D-40 Mehran Colony, P.O Main Colony Tarbela Dam Teh: Chitral District Haripur.	Mardan/2	Swabi
10	Rizwan Pariz D/O	Mohallah Ilyas Abad Village Tappi P/O Teh: & District Karak.	Karak/4	Karak in place of Bibi Zahida who has been placed at the disposal of the EDO Nowshera
11.	Gul Farzana D/O (F&SE) Circle Booni ADO(F) O/O EDO Shah Nawaz	Open University Chitral office. C/O Hayat, Allama Iqbal Chitral/3	Chitral/3	Chitral

Terms and conditions:-

1. Their services will be considered regular but without pension & Gratuity in terms of section-19 of the NWFP civil servant Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will however be entitled to contributory provident fund in such a manner and at such rates as prescribed by the Govt.

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(32)

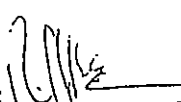
In case, she is already in Govt. service and working against pensionable post on regular basis before 1st day of July 2001, without any service break, on application to Khyber Pakhtunkhwa public service Commission through proper channel and selection by the commission, is appointed and allowed choice of option either to retain benefit of pension & gratuity as allowed to her under her previous terms of appointment or to avail the benefit of Contributory provident Fund allowed to her under new appointment.

3. Their services are liable to termination on one month's prior notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government.
4. They should join their posts within 30 days of the issuance of this notification, in case of failure to join their posts within one month of the issuance of this notification, their candidature will expire automatically and no subsequent appeal etc shall be entertained.
5. They would be on probation for a period of one year extendable for another one year.
6. They shall be governed by such rules and regulations as may be issued from time to time by the Govt. Khyber Pakhtunkhwa.
7. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded against under the NWFP Removal from service (Special Powers) Ordinance, 2000 and rules framed from time to time.
8. Charge report should be submitted to all concerned.
9. The EDOs concerned would furnish a certificate to the effect that the candidate have joined the post or otherwise after one month of the issue of their posting orders.
10. No TA/DA will be allowed to the appointees for joining their duties.

Syeda Sarwat Jehan
Directress Elementary & Secondary
Education Khyber Pakhtunkhwa, Peshawar

Endst: No.4610-55/F.No.A-17/ADOs(F)/Appointment/ Dated Peshawar the 31-03-2011.

1. Copy forwarded for information and necessary action to the:-
2. Accountant General Khyber Pakhtunkhwa, Peshawar
3. Secretary Khyber Pakhtunkhwa Public Service Commission Peshawar.
4. All Executive District Officers (E&SE) concerned.
5. District Accounts Officers concerned.
6. All Deputy District Officers (F) concerned.
7. PS to Minister for Elementary & Secondary Education Department Khyber Pakhtunkhwa.
8. PS to Secretary to Govt. of Khyber Pakhtunkhwa (E&SE) Department.
9. PA to Directress (E&SE) Khyber Pakhtunkhwa, Peshawar.
10. All candidates concerned.
11. Seniority list Dealing Assistant local Directorate.
12. ACR Dealing Assistant local Directorate.
13. Personal files.


Deputy Directress (Establishment)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar



**DIRECTORATE OF ELEMENARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

NOTIFICATION

Sanction is hereby accorded to the grant of Earned Leave in respect of Mst. Shakila Anjum ADEO(Female) Establishment Primary Chitral, with effect from 01-04-2017 to 01-04-2019 two years (480-days on half pay) and 240-days without pay as due and admissible to her under the Revised Leave Rules 1981.

**Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar**

Endst.No. 573-76 /A-17/SST/F/Leave cases/Chitral

Dated Peshawar the 4/4 /2017

Copy of the above is forwarded to the:-

- 1- District Educ: Officer(F) Chitral w/r to her No.1145 dated 01-03-2017
- 2- District Accounts Officer Chitral
- 3- Mst. Shakila Anjum ADEO(Female) Establishment Primary Chitral
- 4- PA to Director (E&SE) Local Office.
- 5- Master file.

/Noor/17

[Signature]
**Deputy Director Establishment(F)
(E&SE) Khyber Pakhtunkhwa,**



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To,

The Director Elementary & Secondary Education
Khyber Pakhtunkhwa

Through: The District Education Officer
Female Chitral

Subject: - **APPLICATION FOR HALF PAY & WITHOUT PAY LEAVE**

Memo,

Most respectfully it is stated that due to Un-avoidable Circumstances I need two years leave with half pay & without pay from the date and period mentioned in the attached proper application duly verified by the District Accounts Officer Chitral in the leave admissibility report attached. Further details are as under:

Name: Shakila Anjum D/O Mehrab Khan
Date of 1st Appointment: March 31, 2011
Total leave available in Credits: 240
Total leave required: 720 Days (2 Years) (w.e.f. 1/04/2017 to 1/04/2019)
L.H.P : 480 Days
L.W.P : 240 Days

Therefore, you are requested to kindly allow me the said leave and obliged, please

Thanking you in anticipation.

Obediently Yours,



(Shakila Anjum)

ADEO (Estt) Primary Local Office Chitral

Date: 01 / 03 / 2017

APPLICATION FOR LEAVE

Note:—Item No. 1 to 9 must be filled in by all the applicants.
Item No. 12 applies in the case of Government servants of grade 16 and above.

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- 1. Name of applicant Shakila Anjum
- 2. Leave rules applicable 1981
- 3. Post held Assistant District Education Officer
- 4. Department or Office District Education Office (Female) Chitral
- 5. Pay RS= 23560/-
- 6. House Rent Allowance, Conveyance Allowance or other Compensatory Allowance drawn in the present post RS= 17816/-
- 7. (a) Nature of leave applied for Leave on half pay & Leave without pay
(b) Period of leave in days 920 Days (2 Years)
(c) Date of commencement 01-04-2017
- 8. Particulars of Rules/Rules under which leave is admissible Leave Rules 1981
- 9. (a) Date of return from last leave 20-03-2014
(b) Nature of leave EX-Pakistan Leave
(c) Period of leave in days 48 Days

Dated 03-03-2017 Signature of applicant [Signature]

10. Remarks and recommendation of the controlling officer
Recommended as per Rules

11. Certified that leave applied for is admissible under rule _____ and necessary conditions are fulfilled.

Dated 01-03-2017 Signature _____ Designation DEO (F) Chitral

12. Report of Audit Officer Certified that the officer is entitled for 480 days leave on half pay & 240 days leave without pay under revised leave rule 1981.

Dated _____ Signature _____ Designation District Accounts Officer Chitral

13. Orders of the sanctioning authority certifying that on the expiry of leave the applicant is likely to return to the same post or another post carrying the compensatory allowance being drawn by him.

Dated _____ Signature _____ Designation _____

To,

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The Deputy Director (Female)

Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Through: District Education Officer (Female) Chitral

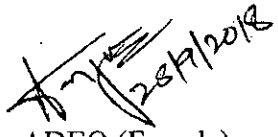
Date: 28/09/2018

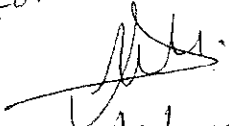
Subject: Cancellation of Leave

With due respect it is stated that due to personal compulsion I have applied for leave with half pay for 480 days (w.e.f 01-04-2017 to 01-8-18) and leave without pay for 240 days with effect from 01-9-2018 to 01-05-2019) duly verified by District Account Office. The Honorable Director Elementary & Secondary Education approved the application based on the recommendation of DEO(F) Chitral under the revised Leave rules 1981 vide # 573-76 dated Peshawar the 04/04/2017.

Now, through reliable sources I came to know that during the current cycle of promotions of ADEOs Management Cadre as per merit list I am qualifying for promotion to the next level (SDEO.BPS-17). Despite being in service, the department did not ask me whether I was willing to continue my leave or opt for promotion. In this regard no official letter, email, or communication of any sort was done. This is an important step of my career development. As I am at the top of the merit list, therefore I do not want to lose this golden opportunity to go in vain.

Therefore, in order to avail the opportunity of my career growth I request you to forward my application for the cancellation of long leave as per rules with immediate effect so that I can resume charge in my respective office.


Shakila Anjum ADEO (Female)
Education Department DEO (F) Office, Chitral

E/B
For m.l.a.

29/9/2018

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**DIRECTORATE OF ELEMENARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

NOTIFICATION

The un availed portion of Earned Leave in respect of Mst. Shakila Anjum ADEO(F) O/O DEO(Female) Chitral with effect from 01-10-2018 to 01-04-2019 issued vide Notification No.573-76 dated 04-04-2017 and Mst.Zubaida Khanum ADEO(Female) Chitral with effect from 01-10-2018 to 01-05-2019 issued vide Notification No.2778-80 dated 17-04-2017 is hereby cancelled.

Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst.No. 3377-80

/A-17/SST/F/Leave cases/Chitral

Dated Peshawar the 8/10/2018

Copy of the above is forwarded to the:-

- 1- District Education Officer (F) Chitral w/r to her No.9524 dated 29-09-2018 and with the remarks to adjust the ADEO(F) concerned against the vacant posts as proposed vide your letter No.9525 dated 29-09-2018
- 2- District Accounts Officer Chitral
- 3- ADEO(F) concerned
- 4- PA to Director (E&SE) Local Office.
- 5- Master file.

Deputy Director Establishment(F)
(E&SE) Khyber Pakhtunkhwa,

/Noor/18/

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BEFORE THE PROVINCIAL SERVICE TRIBUNAL,
KHYBER PAKHTUNKHAWA, PESHAWAR

Appeal No. 927 (R) C.S./2019

Ms. Shakeela Anjum
Versus
Government of Khyber Pakhtunkhawa and others

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT 1973

STAY APPLICATION

Respectfully Sheweth:

1. That the applicant filed in the above mentioned appeal in this Honourable Tribunal, the contents thereto may kindly be read as an integral part of this application.
2. That the applicant has good prima facie case in appeal and has fair chances of success in the same.
3. That balance of convenience and inconvenience also lies in favour of the applicant.
4. That if the respondents are not restrained from appointing, promoting or transferring anybody else at the post vacated by the applicant, she will suffer irreparable loss.

Prayer

In these circumstances, it is, therefore, most humbly prayed that the application may kindly be accepted and the respondents may be restrained from filling any vacant post of SDEO by appointing, transferring or promoting anybody else except the applicant, or taking any adverse action against the applicant till filing disposal of the instant appeal and the instant application in the interest of justice.


Applicant

Through


Shafiq Sultan

Advocate High Court

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BEFORE THE PROVINCIAL SERVICE TRIBUNAL,
KHYBER PAKHTUNKHAWA, PESHAWAR

Appeal No. _____ (R) C.S./2019

Ms. Shakeela Anjum
Versus
Government of Khyber Pakhtunkhawa and others

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT 1973

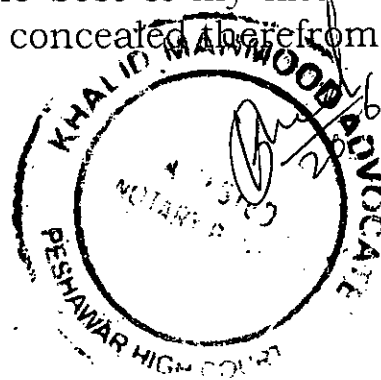
STAY APPLICATION

AFFIDAVIT

I, Ms. Shakeela Anjum daughter of Mehrab Khan Assistant District Education Officer (Female) Chitral, do hereby solemnly affirm and declare on oath as under:

That the contents of the above captioned application are true and correct to the best of my knowledge and belief and nothing has been concealed.

Further affirmed that the contents of this affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed therefrom.



DEPONENT

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BEFORE THE PROVINCIAL SERVICE TRIBUNAL,
KHYBER PAKHTUNKHAWA, PESHAWAR

Appeal No. _____ (R) C.S./2019

Ms. Shakeela Anjum
Versus
Government of Khyber Pakhtunkhawa and others

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT 1973

APPLICATION FOR EXEMPTION FROM FILING THE
CERTIFIED COPIES OF THE DOCUMENTS

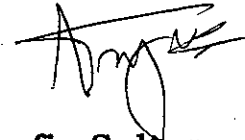
Respectfully Sheweth:

1. That the applicant filed the above mentioned appeal in this Honourable Tribunal, the contents thereto may kindly be read as an integral part of this application.
2. That the applicant couldn't file the certified copies of certain documents.
3. That the applicant seeks that this Honourable Tribunal may exempt the applicant from filing the certified copies before this Honourable Tribunal .

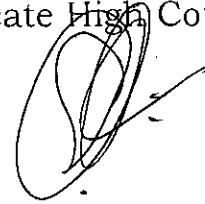
In these circumstances, it is, therefore, most humbly prayed that the application may kindly be accepted, the applicant may be exempted from filing the certified copies of the documents in the interest of justice.

Through Counsel

Appellant



Shafiq Sultan
Advocate High Court,



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BEFORE THE PROVINCIAL SERVICE TRIBUNAL,
KHYBER PAKHTUNKHAWA, PESHAWAR

Appeal No. _____ (R) C.S./2019

Ms. Shakeela Anjum

Versus

Government of Khyber Pakhtunkhawa and others

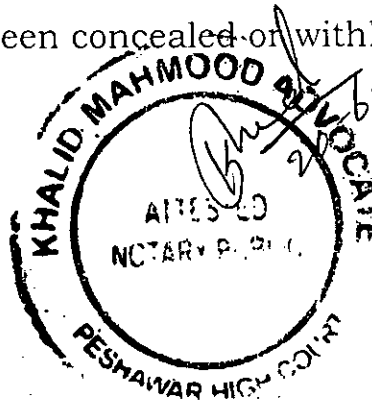
APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT 1973

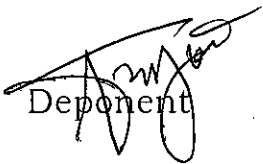
APPLICATION FOR EXEMPTION FROM FILING THE
CERTIFIED COPIES OF THE DOCUMENTS

AFFIDAVIT

I, Ms. Shakeela Anjum daughter of Mehrab Khan Assistant District Education Officer (Female) Chitral, do hereby solemnly affirm and declare that the contents of the titled application are true and correct to the best of my knowledge and belief.

This declaration is correct to the best of my knowledge and belief and nothing has been concealed or withheld therein.




Deponent

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