

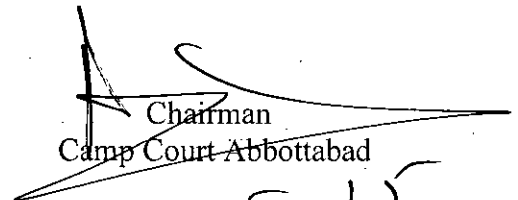
18.08.2015

Counsel for the appellant, Ms Saima Raza, ADO and Mr. Bashir Ahmad, Supdt alongwith Mr. Muhammad Tahir Aurangzeb, GP for the respondents present. Rejoinder submitted. Arguments heard and record perused.

Vide our detailed judgment of today in connected appeal No. 1563/2013 titled Robina Shaheen-vs-Secretary Education Government of KPK, Peshawar etc we are of the view that on the basis of the said audit para the respondents should have issued notice to the appellant and should have dealt with the matter in accordance with the prescribed procedure which was not adopted leaving us with no option but to accept the instant appeal and set aside the impugned orders and direct that no recovery be made from the appellant unless the audit para is looked into by the concerned authority in the prescribed manners and an opportunity of hearing is afforded to him where-after decision deemed appropriate ~~be~~ taken by the authority. The appeal is accepted in the above terms. Parties are left to bear their own costs. File be consigned to the record.


Member

ANNOUNCED
18.08.2015


Chairman
Camp Court Abbottabad
18.08.15

07.4.2015

Counsel for the appellant and Mr. Muhammad Jan, GP with Muhammad Bashir, Supdt. for the respondents present. Written replies have not been submitted despite the fact that last chance was given to the respondents. On assurance of the representative another last chance is given to the respondents for submission of written replies. In case the respondents failed to file written replies, no other chance will be given to them. To come up for written reply on main appeal as well as reply/arguments on stay application on 13.5.2015.


MEMBER

13.05.2015

Counsel for the appellant, M/S Javed Ahmed, Supdt. and Saima Raza, ADO alongwith Addl: A.G for respondents present. Written reply submitted. The appeal is assigned to D.B for rejoinder as well as final hearing at Camp Court Abbottabad for 18.8.2015 as the matter pertains to territorial limits of Hazara Division.


Chairman

12.11.2014

Clerk to counsel for the appellant and Mr. Muhammad Adeel Butt, AAG with Mr. Khursheed Khan, SO and Javed Ahmad, Supdt. for the respondents present. The Tribunal is incomplete. To come up for the same on 22.1.2015.


READER

22.1.2015

Counsel for the appellant present. Mr. Muhammad Adeel Butt, AAG with Muhammad Bashir, Supdt. for the respondents present and submitted before the court that written reply of the respondents is in process of completion and requested for adjournment. Therefore, case is adjourned to 18.2.2015. Till then status quo is extended.


MEMBER

19.2.2015

Counsel for the appellant and Mr. Muhammad Jan, GP with Muhammad Bashir Supdt. for the respondents present. Representative of the respondents submitted that written reply prepared and placed before the respondents for signature. Therefore, case to come up for written reply on 07.4.2015 without fail.


MEMBER

04.6.2014

Counsel for appellant and Mr. Muhammad Jan, GP with Mr. Muhammad Bashir, Supdt. and Mst. Saima ADO and Sajjad, AAO for the respondents present and requested for further time. To come up for written reply on main appeal as well as stay application on 17.7.2014. Status quo, as before, is extended till the date fixed.

MEMBER

MEMBER

17.07.2014.

Counsel for the appellant and Mr. Muhammad Jan, GP with Sajjad Rashid, AD for respondents No. 1 & 2 present and requested for time. The learned GP needs time to contact other respondents. To come up for written reply on main appeal as well as reply/arguments on stay application on 18.09.2014. Status quo, as before, is extended till the date fixed.

MEMBER

MEMBER

18.09.2014

Counsel for the appellant, and Mr. Kabeerullah, Asstt. A.G with Khursheed Khan, SO, Sajjad Rashid, AD, Mst. Azra Afridi, ASDEO(F) and Muhammad Sajjad AAO for the respondents present and requested for further time. To come up for written reply on main appeal as well as reply/arguments on stay application on 12.11.2014.

MEMBER

17.2.2014

Counsel for the appellant, and Mr. Muhammad Adeel Butt, AAG with Khursheed Khan, SO for respondent No.1, Sajjad Rashid, AD for respondent No. 2 and Muhammad Bashir, Supdt. for respondents No. 3 and 4 and Muhammad Sajjad, AAO for respondent No. 5 present and requested for time. To come up for written reply on main appeal as well as reply/arguments on stay application on 17.3.2014. The impugned order to the extent of recovery is suspended till the date fixed.


MEMBER


MEMBER

17.3.2014

Counsel for the appellant, and Mr. Muhammad Adeel Butt, AAG with Khursheed Khan, SO, Rehana Yasmeen, SDEO, Peer Muhammad, ADO and Muhammad Sajjad, AAO for the respondents present and requested for time to file joint parawise comments. To come up for written reply on main appeal as well as reply/arguments on stay application on 23.4.2014. Till then status quo is extended.


MEMBER


MEMBER

23.4.2014

Junior to counsel for the appellant and Mr. Ziaullah, GP with Khursheed Khan, SO for respondent No.1, Sajjad Rashid, AD for respondent No.2 and Muhammad Bashir, Supdt. for respondents No. 3 and 4 and Muhammad Sajjad, AAO for respondent No. 5 present and requested for further time. To come up for written reply on main appeal as well as reply/arguments on stay application on 4.6.2014. Status quo, as before, is extended till the date fixed:


MEMBER


MEMBER

31.12.2013

Counsel for the appellant present. Preliminary arguments heard and case file perused. The appellant filed Departmental Appeal on 14.02.2013 against the original order dated 14.01.2013, which has been rejected on 04.11.2013, hence the present appeal on 03.12.2013. Counsel for the appellant contended that the appellant has not been treated in accordance with law/rules. The impugned order is not a speaking order and in violation of Rule-5 of the Civil Servant (Appeal) Rules-1986. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, Notice be issued to the respondents. Appellant has also filed an application for the suspension of recovery order dated 14.01.2013. Notice of application should also be issued to the respondents. To come up for written reply on main appeal on 06.03.2014 as well as reply arguments on stay application on 20.01.2014.

31.12.2013

This case be put before the Final Bench II for further proceedings.

Member

Chairman

20.1.2014

Counsel for the appellant and Muhammad Adeel Butt, AAG with Khursheed Khan, SO, Mosam Khan, AD for respondents No. 1 and 2 present and stated that notices have not been served upon them. None is available on behalf of respondents No. 3 to 5. Notices be issued to all the respondents. To come up for written reply on main appeal as well as reply/arguments on stay application on 17.2.2014. The impugned order to the extent of recovery from the appellant is suspended till the date fixed.

MEMBER

MEMBER


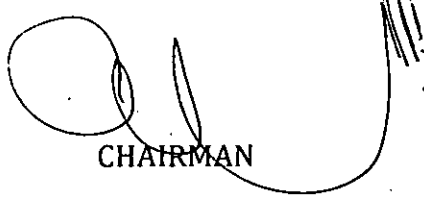
Form- A

FORM OF ORDER SHEET

Court of _____

Case No. _____

1567/2013

S.No	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	03/12/2013	The appeal of Mst. Nusrat Bibi presented today by Mr. M. Asif Yousafzai Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.  REGISTRAR
2	9-12-2013	This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>31-12-2013</u> .  CHAIRMAN

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.**

Appeal No. 1567 /2013

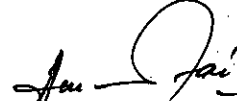
Mst: Nusrat Bibi V/S Education Department.

INDEX

S.No.	Documents	Annexure	Page No.
1.	Memo of Appeal	-----	01-03
2.	Stay Application & Affidavit	----	04-05
3.	Copy of Register & Report	- A to A-2-	6-15
4.	Copy of Order (14.01.2013)	- B -	16-
5.	Copy of Appeal	- C -	17
6.	Copy of Order (04.11.2013)	- D -	18
7.	Vakalat Nama	-----	19

APPELLANT

THROUGH:


(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.**

Appeal No. 1567 /2013

Mst. Nusrat Bibi, PST,
GGPS, Gul Doga, Haripur.

B.W.F. Peshawar
16/2
03/12/13

APPELLANT

VERSUS

1. The Secretary, Government of Khyber Pakhtunkhwa, Education (E&SE) Department, Civil Secretariat, Peshawar.
2. The Director of Education (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
3. The District Education Officer (Female) Haripur.
4. The Sub-Divisional Education Officer, (Female), Haripur.
5. The District Accounts Officer, Haripur.

RESPONDENTS

.....

APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA, SERVICE TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 04.11.2013 WHEREBY THE APPEAL AGAINST THE RECOVERY ORDER DATED 04.01.2013 HAS BEEN REJECTED FOR NO GOOD GROUND.

.....

PRAYER:

THAT ON ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 04.11.2013 AND 04.01.2013 MAY BE DECLARED AS ILLEGAL VOID ABINITIO AND MAY BE SET ASIDE. THE RESPONDENTS MAY FURTHER PLEASE BE DIRECTED TO REFUND THE RECOVERED AMOUNT MADE IN VIOLATION OF LAW AND RULES. ANY OTHER REMEDY, WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOUR OF APPELLANT.

3/12/13

RESPECTFULLY SHEWETH:

1. That the appellant is a regular employee of the Education Department has been performing her duty as PST at GGPS Gul Doga Haripur.
2. That the record shows that the appellant fully performed her duty at every station and not remained absent from duty. Copies of orders are attached as Annexure – A .
3. That up to the astonishment of the appellant, the recovery order was passed on 14.01.2013 for the reasons of so-called absence. In the said order the amount of Rs.268935/- was ordered to be recovered from the appellant. Copy of Order is attached as Annexure-B.
4. That the appellant filed an appeal against the said recovery order and the same was rejected for no good grounds on 4.11.2013. Copies of Appeal and Rejection Oder are attached as Annexure-C and D.
5. That now the appellant comes to this Honourable Tribunal on the following grounds amongst the others.

GROUND:

- A) That the order dated 14.01.2013 and 04.11.2013 are against the law, facts, material on record and norms of justice and liable to be set aside.
- B) That the recovery order has been passed in total violation of law and rules and even proper procedures was not adopted while passing the order.
- C) That the appellant was never remained absent from the duty and was present throughout as evident from the record.
- D) That the appellant has been condemned un-heard because the recovery is a punishment and while awarding such punishment, charge sheet, show

cause notice and enquiry are mandatory while in case of appellant no such procedures was adopted.

- E) That neither the regular enquiry was conducted nor the appellant was heard in person which amounts to **AUDI ALTERAM PARTEM.**
- F) That the whole action of the respondents is arbitrary in nature and not sustainable in the eyes of law.
- G) That not even final rejection order is not a speaking order which is also violation of Section-25(A) of the General Clauses Act and Judgment of the Supreme Court of Pakistan reported as 1991 SCMR Page-2330.
- H) That the appellant has not been treated according to law and rules.
- I) That the appellant seeks permission to advance others grounds and proofs at the time of hearing.

It is, therefore, most humbly prayed that the appeal of the appellant maybe accepted as prayed for.

APPELLANT
Nusrat Bibi *Nusrat Bibi*

THROUGH:

M. Asif Yousafzai
(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.**

Appeal No. _____/2013

Mst. Nusrat Bibi V/S Education Department.

**APPLICATION FOR SUSPENDING THE
OPERATION OF RECOVERY ORDER DATED
14.01.2013 TILL THE DISPOSAL OF MAIN
APPEAL.**

RESPECTFULLY SHEWETH:

1. That the appellant has filed an appeal along with this application which no date has been fixed so far.
2. That the appellant has a good prima facie case and all the ingredients are in favour of the appellant necessary for suspension of order dated 14.01.2013.
3. That the order dated 14.01.2013 has been passed in total violation of law and rules.
4. That the grounds of main appeal may also be integral part of application.
5. That as the recovery order has been passed without following proper procedure and law and if it not suspended then the appellant would be suffer a lot specially it will amount to penalizing the appellant for no fault.

6. That if the recovery order is not suspended then the main appeal would become infructuous due to completion of penalty.

It is, therefore, most humbly prayed that the operation of order dated 14.01.2013 may be suspended till the disposal of main appeal. Any other remedy with this august Tribunal deems fit may also be awarded in favour of appellant.

Appellant
Nusrat Bibi *Nusrat Bibi*

Through:

Asif Yousafzai
(M. ASIF YOUSAFZAI)
ADVOCATE, PESHAWAR.

AFFIDAVIT:

It is affirmed and declared that the contents of the above Application are true and correct to the best of my knowledge and belief.

Nusrat Bibi
Deponent

پیشتر حاضری مندرجہ ذیل گورنمنٹ گورنمنٹ کالج ایف ایس سکول گل ڈوگ

بابت ماہ اگست 2010ء

نام ناظرہ بی		تصرت بی بی		گورنمنٹ کالج ایف ایس سکول گل ڈوگ	
عہدہ اول ریٹائر					
تاریخ	آمد	دستخط	رواگی	آمد	دستخط
1	X	X	X	SUNDAY	X
2	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
3	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
4	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
5	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
6	7/-	Naz 11/-	Naz 11/-	7/-	N.B 11/-
7	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
8	X	X	X	SUNDAY	X
9	7/-	Naz 14/-	Naz 14/-	7/-	N.B 12/-
10		C/Leave			
11	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
12	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
13	7/-	Naz 11/-	Naz 11/-	7/-	N.B 11/-
14	X	X	X	Freedom Day	X
15	X	X	X	SUNDAY	X
16	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
17	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
18	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
19	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
20		C/Leave			
21	7/-	Naz 11/-	Naz 11/-	7/-	N.B 11/-
22	X	X	X	SUNDAY	X
23	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
24	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
25	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
26	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
27	7/-	Naz 11/-	Naz 11/-	7/-	N.B 11/-
28	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
29	X	X	X	SUNDAY	X
30	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-
31	7/-	Naz 12/-	Naz 12/-	7/-	N.B 12/-

تم اخذت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انفاقہ	2	2	(2)	2	2	2			
استحقاق									
بیماری									
میزان									

دستخط ہیڈ ماسٹر Nazim
 GGPS, Gul Doga
 31/8/2010

رجسٹر حاضری مدرسین گورنمنٹ کالج برائے نسوان سکول گلبرگ 3

2010ء

بابت ماہ

نام		عہدہ		گورنمنٹ کالج برائے نسوان سکول گلبرگ 3		PST		PST	
نام	عہدہ	نام	عہدہ	گورنمنٹ کالج برائے نسوان سکول گلبرگ 3	گورنمنٹ کالج برائے نسوان سکول گلبرگ 3	PST	PST	PST	PST
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12		SUNDAY							
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16	7:30	Nazim	12/45	Nazim	7:30	N.B	12/45	N.B	7:30
17	7:30	Nazim	11/20	Nazim	7:30	N.B	11/20	N.B	7:30
18	7:30	Nazim	12/45	Nazim	7:30	N.B	12/45	N.B	7:30
19		SUNDAY							
20	7:30	Nazim	12/45	Nazim	7:30	N.B	12/45	N.B	7:30
21	7:30	Nazim	12/45	Nazim	7:30	N.B	12/45	N.B	7:30
22	7:30	Nazim	12/45	Nazim	7:30	N.B	12/45	N.B	7:30
23		C-Leave							
24	7:30	Nazim	11/20	Nazim	7:30	N.B	11/20	N.B	7:30
25	7:30	Nazim	12/45	Nazim	7:30	N.B	12/45	N.B	7:30
26		SUNDAY							
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28		C-Leave							
29	7:30	Nazim	12/45	Nazim	7:30	N.B	12/45	N.B	7:30
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31									

تقریبت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
	3	2	9	3	2	5	1	0	1			
اتفاقیہ												
استحقاق												
بیماری												
میزان												

Head Mistress
 Government Girls' High School
 Faisal Ghazi Distt. Havelock
 دستخط میزبانہ
 30/9/2010

رجسٹر حاضری مندرستین گورنمنٹ کالج دہرا داسی سہارن پور ضلع غازی پور

نام ناظم 3030		بابت ماہ		التوبہ		نمبر 3030		گورنمنٹ کالج		PST		PST	
عہدہ	PST	نام	بابت ماہ	التوبہ	نمبر 3030	گورنمنٹ کالج	PST	گورنمنٹ کالج	PST	PST	PST	PST	PST
تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد
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27	red	-	-	-	-	-	-	-	-	-	-	-	-
28	red	-	-	-	-	-	-	-	-	-	-	-	-
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30	red	-	-	-	-	-	-	-	-	-	-	-	-
31	X	X	X	X	SUNDAY	X	X	X	X	X	X	X	X

تفریضت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقیہ			2			5			7			0
انتظامی												0
بیاری												0
میزان												0

9

رجسٹر حاضری مدد سبب کوہستان گورنمنٹ ہائی اسکول گل دوجہ ضلع ہاری

بابت ماہ نومبر														
گورنمنٹ ہائی اسکول گل دوجہ					لضرت بی بی					نام مسرت محبت				
پست					پست					پست				
تاریخ	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط
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2				P 1.00				N.B 1.00					M.B 1.00	
3				P 1.00				N.B 1.00					M.B 1.00	
4				P 1.00				N.B 1.00					M.B 1.00	
5				P 11.30				N.B 11.30					M.B 11.30	
6				P 1.00				N.B 1.00					ON DUTY	
7				/				SUNDAY					/	
8				/				/					C/Leave	
9				/				/					Do	
10				P 1.00				N.B 1.00					M.B 1.00	
11				P 1.00				N.B 1.00					M.B 1.00	
12				P 11.30				N.B 11.30					M.B 11.30	
13				P 1.00				N.B 1.00					M.B 1.00	
14				/				SUNDAY					/	
15				P 1.00				N.B 1.00					M.B 1.00	
16				/				/					/	
17				/				/					/	
18				/				/					/	
19				/				/					/	
20								N.B 1.00					M.B 1.00	
21				/				SUNDAY					/	
22				P 1.00				N.B 1.00					M.B 1.00	
23				P 1.00				C/leave					M.B 1.00	
24				P 1.00				N.B 1.00					M.B 1.00	
25				P 1.00				N.B 1.00					C/leave	
26				P 1.00				C/leave					M.B 11.30	
27				P 1.00				N.B 1.00					M.B 1.00	
28				/				SUNDAY					/	
29				P 1.00				N.B 1.00					M.B 1.00	
30				P 1.00				N.B 1.00					M.B 1.00	
31														

تقریباً	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
3	0	3	2	7	9	0	1	1	0	3	0	3
اتفاقیہ												
استحقاق												
بیماری												
میزان												

M. B. Khatun
Blood Mischess
C/O S. Gul Doga
Dist: Haripur
دستخط ہیڈ ماسٹر
30/11/2010

سرکار گل دوجہ
سرکار گل دوجہ
سرکار گل دوجہ

رہنما حاضری مندرجہ ذیل کے لیے
 بابت ماہ دسمبر 2010ء

نام مسرت کنت
 عہدہ اول ٹیچر
 گورنمنٹ پرائمری سکول گل دہلی

تاریخ	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی	آمد	دستخط	روائی
1	8:30	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
2	8:45	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
3	8:30	M.B	11:30	M.B	8:00	N.B	11:30	N.B	10:30	N.B	8:00	M.B	11:30	M.B	8:00
4	8:00	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
5									SUNDAY						
6									ON DUTY						
7									C/Leave						
8	8:00	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
9	8:00	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
10	8:00	M.B	11:30	M.B	8:00	C/leave									
11	8:00	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
12									SUNDAY						
13	8:00	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
14	8:00	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
15	8:00	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
16	8:00	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
17															
18															
19									SUNDAY						
20	8:00	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
21	8:00	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
22	8:00	M.B	1:00	M.B	8:00	C/leave									
23	8:00	M.B	1:00	M.B	8:00	N.B	1:00	N.B	10:00	N.B	8:00	M.B	1:00	M.B	8:00
24	8:00	M.B	11:30	M.B	8:00	N.B	11:30	N.B	10:30	N.B	8:00	M.B	11:30	M.B	8:00
25															
26															
27															
28															
29															
30															
31															

موضوع	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقية	1	3	4	2	7	9	1	1	1			
استحقاق												
بياری												
میزان												

دستخط پرنسپل
 Head, G.G.P.S. Gul Doga
 Tehsil Ghazi Distt. Haripur
 24/12/2010

رجسٹر حاضری مدرسہ کورنمنٹ انڈیا امرتسر سال ۱۹۲۱ء
بابت ماہ جنوری

نام														تاریخ	
عہدہ															
آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	تاریخ
															۲
															۳
															۴
															۵
															۶
															۷
															۸
															۹
															۱۰
															۱۱
															۱۲
															۱۳
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															۱۵
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															۱۸
															۱۹
															۲۰
															۲۱
															۲۲
															۲۳
															۲۴
															۲۵
															۲۶
															۲۷
															۲۸
															۲۹
															۳۰
															۳۱

Handwritten notes and signatures on the grid, including the word "ATTESTED" in a rectangular stamp.

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال

رجسٹر حاضری مدد ترمین گورنمنٹ اسکول پیرائون سکول مل ٹولہ ۱/۱۰/۲۰۱۱

۲۰۱۱ء

بابت ماہ مارچ

نام مسرت بخت		زصرت بی			گولبر الرحمن			عمدہ	
تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	دستخط	رواگی	دستخط
۱	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۲	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۳	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۴	۸:۳۰	MB	۱۱:۰۰	۸:۳۰	N.B	۱۱:۰۰	N.B	۱۱:۰۰	P
۵	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۶	/	/	/	SONDAY	/	/	/	/	/
۷	-	on duty	/	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۸	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۹	۸:۳۰	MB	۱:۰۰	C. leave	/	/	/	/	/
۱۰	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۱۱	/	/	/	C. leave	/	/	/	/	/
۱۲	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۱۳	/	/	/	SONDAY	/	/	/	/	/
۱۴	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۱۵	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۱۶	۸:۳۰	MB	۱:۰۰	C. leave	/	/	/	/	/
۱۷	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۱۸	۸:۳۰	MB	۱۱:۰۰	۸:۳۰	N.B	۱۱:۰۰	N.B	۱۱:۰۰	P
۱۹	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۲۰	/	/	/	SONDAY	/	/	/	/	/
۲۱	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۲۲	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۲۳	/	/	/	C. leave	/	/	/	/	/
۲۴	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۲۵	۸:۳۰	MB	۱۱:۰۰	۸:۳۰	N.B	۱۱:۰۰	N.B	۱۱:۰۰	P
۲۶	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۲۷	/	/	/	SONDAY	/	/	/	/	/
۲۸	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۲۹	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۳۰	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P
۳۱	۸:۳۰	MB	۱:۰۰	۸:۳۰	N.B	۱:۰۰	N.B	۱:۰۰	P

تفریخت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقية	2	3	5	2	7	9	-	+	+			
استحقاق			TESTED									
بیماری												
میزان												

رجسٹر حاضری مدد سہ ماہی گورنمنٹ ہائی اسکول، ڈولہ ہری پور

۲۰۱۱ء

بابت ماہ اپریل

نام مسرت بخت
عہدہ

گورنمنٹ ہائی اسکول

تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی	آمد	دستخط	رواگی
1	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
2	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
3	SUNDAY														
4	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
5	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
6	-			7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
7	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
8	7:15	M.B	10:50	7:15	N.B	10:50	7:15	N.B	10:50	7:15	M.B	10:50	7:15	M.B	10:50
9	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
10	SUNDAY														
11	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
12	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
13	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
14	-			7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
15	7:15	M.B	10:50	7:15	N.B	10:50	7:15	N.B	10:50	7:15	M.B	10:50	7:15	M.B	10:50
16	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
17	SUNDAY														
18	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
19	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
20	-			7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
21	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
22	7:15	M.B	10:50	7:15	N.B	10:50	7:15	N.B	10:50	7:15	M.B	10:50	7:15	M.B	10:50
23	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
24	SUNDAY														
25	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
26	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
27	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
28	7:15	M.B	12:30	7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
29	7:15	M.B	10:50	7:15	N.B	10:50	7:15	N.B	10:50	7:15	M.B	10:50	7:15	M.B	10:50
30	-			7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30
31	-			7:15	N.B	12:30	7:15	N.B	12:30	7:15	M.B	12:30	7:15	M.B	12:30

قمر خدمت	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
انفاقیہ	2	5	7	2	7	9	-	1	1			
استحقاقی												
بیماری												
میزان												

H. Bhatt
Head, Mistress
GPS, Gul Doga
Sheik Ghazi Distt. Haripur
30/4/2011

گورنمنٹ ہائی اسکول، ڈولہ ہری پور
30/4/2011

رجسٹر حاضر کی مدد سے سیدین کو زینت لکھنؤ اور افسرین سکول اراکلی ڈولہ ہر پور

۲۰۱۱ء

بابت ماہ مئی											
زینت لکھنؤ						افسرین سکول اراکلی ڈولہ ہر پور					
نام سرت پزنت		عہدہ اول معلم		PST		PST		نام سرت پزنت		عہدہ اول معلم	
تاریخ	آمد	دستخط	رواگی	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط
SUNDAY											
1											
2	7:00	M/B	12:30	7:00	N.B	12:30	N.B	7:00	M/B	12:30	M/B
3	7:00	M/B	12:30	7:00	N.B	12:30	N.B	7:00	M/B	12:30	M/B
4	7:00	M/B	12:30	7:00	N.B	12:30	N.B	7:00	M/B	12:30	M/B
5	7:00	M/B	12:30	7:00	N.B	10:50	N.B	7:00	M/B	10:50	M/B
6	7:00	M/B	12:30	7:00	N.B	12:30	N.B	7:00	M/B	12:30	M/B
SUNDAY											
8											
9	7:00	M/B	12:30	7:00	N.B	12:30	N.B	7:00	M/B	12:30	M/B
10	7:00	M/B	12:30	7:00	N.B	12:30	N.B	7:00	M/B	12:30	M/B
11	7:00	M/B	12:30	7:00	N.B	12:30	N.B	7:00	M/B	12:30	M/B
12	7:00	M/B	12:30	7:00	N.B	10/50	N.B	7:00	M/B	10/50	M/B
13	7:00	M/B	10/50	7:00	N.B	12/30	N.B	7:00	M/B	12/30	M/B
14	7:00	M/B	12/30	7:00	N.B	12/30	N.B	7:00	M/B	12/30	M/B
SUNDAY											
15											
16	7:00	M/B	12:30	7:00	N.B	12:30	N.B	7:00	M/B	12:30	M/B
17	7:00	M/B	12:30	7:00	N.B	12:30	N.B	7:00	M/B	12:30	M/B
18	C. Leave			7:00	N.B	12:30	N.B	7:00	C. Leave		
19	7:00	M/B	12:30	7:00	N.B	12/30	N.B	7:00	M/B	12:30	M/B
20	7:00	M/B	10:50	7:00	N.B	12/30	N.B	7:00	M/B	10:50	M/B
21	7:00	M/B	12/30	7:00	N.B	12/30	N.B	7:00	M/B	12/30	M/B
SUNDAY											
22											
23	7:00	M/B	12/30	7:00	N.B	12/30	N.B	7:00	M/B	12/30	M/B
24	7:00	M/B	12/30	7:00	N.B	C. Leave		7:00	M/B	12/30	M/B
25	7:00	M/B	12/30	7:00	N.B	12/30	N.B	7:00	M/B	12/30	M/B
26	7:00	M/B	12/30	7:00	N.B	12/30	N.B	7:00	M/B	12/30	M/B
27	7:00	M/B	10/50	7:00	N.B	12/20	N.B	7:00	M/B	10/50	M/B
28	7:00	M/B	12/30	7:00	N.B	12/20	N.B	7:00	M/B	12/30	M/B
SUNDAY											
29											
30	7:00	M/B	12/30	7:00	N.B	12/30	N.B	7:00	M/B	12/30	M/B
31	7:00	M/B	12/30	7:00	N.B	12/30	N.B	7:00	M/B	12/30	M/B

میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال	میزان	سابقہ	حال
			2	1	1	11	9	2	5	3	2			

دستخط ہیڈ ماسٹر
 G.G.P.S. Gul Baga
 Haripur
 31/5/2019

رہنما حاضری نمڈر سسٹن گورنمنٹ لکڑی ہر المشرن سسٹن لکڑی ہر المشرن سسٹن

بابت ماہ جون

2011ء

نام و رتبت	اول معلم				دوسرے برائے				تیسرے برائے				تاریخ	
	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط		
1	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	1
2	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	2
3	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	3
4	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	4
5	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	5
SUNDAY														
6	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	6
7	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	7
8	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	8
9	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	9
10	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	10
11	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	11
12	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	12
SUNDAY														
13	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	13
14	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	14
15	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	15
16	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	16
17	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	17
18	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	18
19	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	19
SUNDAY														
20	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	20
21	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	21
22	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	22
23	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	23
24	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	24
25	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	25
26	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	26
27	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	27
28	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	28
29	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	29
30	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	30
31	7:00	M/R	12:00	M/R	7:00	N/B	12:00	N/B	7:00	P	12:00	P	12:00	31

مقررہ دست	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اتفاقیہ	2	5	7	2	9	11	3	2	2
استحقاقی									
بیماری									
میزان									

N. B. ...
 Head Mistress
 30/6/2011



B (16)

**OFFICE OF THE SUB DIVISIONAL EDUCATION
OFFICER (FEMALE) HARIPUR**

No. 63-78 / 1

Dated Haripur the 14 / 01 / 2013

To

1. Tahira Bibi PST GGPS Shingri Amazai	2010-11	227569/-	
2. Shazia Rasheed PST GGPS Kupri Amazai	2010-11	176667/-	Handlak
3. Safia Razaq PST GGPS Kupri Amazai	2010-11	228486/-	
4. Anisa Bano PST GGPS Kupri Amazai	2010-11	176667/-	CT
5. Nazia Bibi PST GGPS Blanda	2010-11	154120	
6. Robina Shaheen PST GGPS Zahida Amazai	2010-11	246184/-	mmastuband
7. Ghazala Shaheen PST Degra Amazai	2010-11	220497/-	
8. Neelam Bano PST GGPS Kangrucha	2010-11	149573/-	Kalhs
9. Mussrat Bakht PST GGPS Gul Doga	2010-11	275776/-	Qprastuband - 2
✓ 10. Bibi Saira PST GGPS Gul Doga	2010-11	265906/-	
11. Nussrat Bibi PST GGPS Gul Doga	2010-11	268935/-	Nsastuband
12. Gul Rehman Chow: GGPS Gul Doga	2010-11	124608/-	
13. Asia Bibi PST GGPS Gul Doga	2010-11	251827/-	

Subject:- RECOVERY OF OVERPAYMENT BY THE AUDIT PARTY ON THE REPORT OF ADO

Memo:-

It is stated to inform you that on report of Mst, Nagina Bibi regarding unauthorised absent for the period noted against the name of each, the advance paras were developed by District Audit team and the same were discussed in the Meetint of DAC held on 27-28/11/2012, it has been decided that the over payment pointed out by the circle officer for absent period should be recovered from the concerned staff.

Therefore the period and amount recoverable from you is recorded against the name of each a/w absent period as pointed out by the circle ADO to the audit party for your information with the remarks the same may be deposited in Govt. treasury through office within 30 days in case of non deposited the overpayment in question will be recovered from your salary in instalment from February, 2013.

ATTESTED

SDEO (F)
SUB DIVISIONAL EDUCATION
OFFICER (FEMALE) HARIPUR

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر زنانہ مدارس ضلع ہری پور
مضمون:- اپیل بابت مراسلہ نمبر 62-49 مورخہ 14-1-2013

ع
17

برائے منسوخی آرڈر ریکوری۔

جناب عالیہ۔

گزارشات درج ذیل ہیں۔

- (1) یہ کہ فدویہ کی تقرری بطور پی ٹی سی معلمہ محکمہ تعلیم میں مورخہ 01-06-1996 قرار پائی۔
- (2) یہ کہ فدویہ نے چارج حاصل کرنے کے بعد تاریخ تقرری سے اب تک اپنے فرائض منصبی بطریق احسن سرانجام دے رہی ہے۔
- (3) یہ کہ فدویہ کو بابت غیر حاضری کوئی محکمہ کی طرف سے نہ تو نوٹس ملا اور نہ ہی میں کبھی غیر حاضر رہی۔ اپنے فرائض بطریق احسن ہمیشہ سرانجام دیئے اور محکمہ کو مجھ سے کبھی کوئی شکایت نہیں ہوئی۔
- (4) یہ کہ اچانک مجھے یہ نوٹس موصول ہوا جس میں میرے ذمے غیر حاضری کے پیر یڈ کی 268935 روپے ریکوری ظاہر کی گئی ہے۔ جس سے مجھے انتہائی صدمہ ہوا۔ اس لئے کہ محکمہ نے میرے ساتھ اس ضمن میں نہ تو کبھی کوئی خط و کتابت کی ہے اور نہ ہی میں ڈیوٹی سے غیر حاضر ہوئی۔
- (5) یہ کہ میرے علم میں یہ بات بھی ابھی تک نہیں ہے کہ یہ مجھ سے کس پیر یڈ کی ریکوری کر رہے ہیں اور کیوں کر رہے ہیں۔ لہذا بذریعہ اپیل ملتمس ہوں کہ اس مراسلہ نمبر 62-49 مورخہ 14-1-2013 کو میری اپیل منظور کرتے ہوئے منسوخ کیا جائے بصورت دیگر فدویہ یہ حق محفوظ رکھتی ہے کہ اس ضمن میں عدالت عالیہ یا دیگر کسی اتھارٹی سے انصاف کے لئے رجوع کرے

العارض

Nusrat Bibi

نصرت بی بی پی ایس ٹی گورنمنٹ گرلز پرائمری سکول گل ڈوگہ حال نور پور

۱۴/۲/۱۳

ATTESTED



Office of the District Education Officer Female

D
18

Haripur

Tel No: 0995-613244 Fax: 0995-615140

No. 8749 /

Dated: 4 / 11 / 2013.

- Safia Razzaq, PST GGPS Kupri (Amazai) Haripur
- Nazia Bibi, PST GGPS Balanda Haripur
- Ghazala Shaheen, PST GGPS Degra (Amazai) Haripur
- Neelam Bano, PST GGPS Kingrach Haripur
- Musarat Bakhat, PST GGPS Gul Doga Haripur
- Samina Shaheen, PST GGPS Kakotari Haripur
- Musarat Bibi, PST GGPS Kingar Hamgah Haripur
- Asia Bibi, PST GGPS Guldoga Haripur
- Munir Khan, Chowkidar GGPS Kingar Amagah Haripur
- Muhammad Siddique, Chowkidar GGPS Kakotari Haripur
- Gul Rehman, Chowkidar GGPS Doga Haripur
- Aneesa Bano, PST GGPS Kupri (Amazai) Haripur
- Tahira Bibi, PST GGPS Shingri (Amazai) Haripur
- Nusrat Bibi, PST GGPS Gul Doga Haripur
- Shafqat Zohra, PST GGPS Pharhala Haripur
- Rashid Mehmood, Chowkidar GGPS Pharhala Haripur
- Robina Shaheen, PST GGPS Zahida (Amazai) Haripur
- Shazia Rasheed, PST GGPS Kupri (Amazai) Haripur
- Gul Naz, PST GGPS Pharhala Haripur.
- Asmat Ara, PST GGPS Pharhala, Haripur
- Sabira Siddique, PST GGPS Kinger Amagah
- Mehnaz Zeb, PST GGPS Kakotari Haripur
- Riaz Bibi, PST GGPS Pharhala Haripur
- Sahdia Mahfooz, PST GGPS Kahaka Haripur
- Haseena Shaheen, PST GGPS Kahaka Haripur
- Raheela Begum, PST GGPS Pharhala
- Jameela Bibi, PST GGPS Pharhala
- Rizwana Siddique, PST GGPS Kahaka
- Saira Bibi, PST GGPS Gul Doga

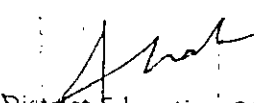
Subject:

APPEAL

Memo,

Reference your appeal for non-recovery of over payments.

It is stated to inform you that the recovery of over payment is under process by implementing the audit observation, therefore, this office is unable to accept your appeal at this stage, hence rejected.


District Education Officer (F)
Haripur

ATTESTED

9

VAKALAT NAMA

NO. _____/20

IN THE COURT OF Service Tribunal Peshawar

Nusrat Bibi (Appellant)
(Petitioner)
(Plaintiff)

VERSUS

Education Deptt: (Respondent)
(Defendant)

I/We Nusrat Bibi (Appellant)

Do hereby appoint and constitute **M.Asif Yousafzai, Advocate, Peshawar,** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate/Counsel on my/our costs.

I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter. The Advocate/Counsel is also at liberty to leave my/our case at any stage of the proceedings, if his any fee left unpaid or is outstanding against me/us.

Dated _____/20

Nusrat Bibi
(CLIENT)

ACCEPTED

M. Asif Yousafzai
M. ASIF YOUSAFZAI
Advocate

M. ASIF YOUSAFZAI
Advocate High Court,
Peshawar.

OFFICE:

Room No.1, Upper Floor,
Islamia Club Building,
Khyber Bazar Peshawar.
Ph.091-2211391-
0333-9103240

BEFORE THE SERVICE TRIBUNAL PESHAWAR KPK

SERVICE APPEAL NO
1575/2013

Mst Nusrat Bibi ,PST GGPS Gul Doga District Haripur

(Petitioner)

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary E&SE Department , Peshawar.
2. Director Elementary & Secondary Education ,Peshawar .
3. District Education Officer (F) Haripur
4. Sub Divisional Education Officer (F)Haripur
5. District Accounts Officer Haripur

(Respondent)

Respectfully Sheweth:-

Preliminary Objections

1. That the appellant has got no locus standi to file the instant appeal.
2. That appellant applicant has concealed the material facts from this honorable Tribunal, hence liable to be dismissed.
3. That the appellant has filed the instant appeal just to pressurize the respondents.
4. That the appeal is time barred.
5. That the petition is bad for nonjoinder /misjoinder necessary parties.

Reply /Comments on facts.

1. Pertain to the record.
2. That statement of appellant is subject to proof.
3. As per report of Circle Adeo before the audit party , the said teacher has been remained absent on her duty on surprise visit , and school was closed long time . The minutes of the departments accounts committee meeting held on 27-11-2012 and 28-11-2012 , in which the committee decided that the recovery of the appellant may be started in the light of the reply /decision of the DAC and issue the letter regarding recovery on 14-01-2013 meanwhile ,the departmental inquiry suggested that the salary may be deducted from her salary and deposited to the Govt treasury .
4. DEO(F) Haripur passed remarks that the recovery of said Petitioner is under process by implementation of audit party observation , Therefore

DEO(F)Haripur has no authority to accept her appeal at that stage hence rejected.

Grounds.

- A. The action of the department is legal lawful and according to the rules moreover neither discriminatory nor arbitrary.
- B. Incorrect and not admitted.
- C. Enquiry Committee has given findings that said appellant was absent salary of Miss Nusrat bibi may be deducted and submitted to Government Treasury
- D. Enquiry Committee has already given finding .After fulfilling the codel formalities (Copy of Report is attached as Annexure (B).
- E. Incorrect and not admitted the statement of the appellant is against the fact and official .
- F. Incorrect and not admitted the action of the department was not arbitrary and discriminatory hence whole Para is denied.
- G. Incorrect .There is no illegality in the impugned order.
- H. Incorrect.
- I. That the Respondents Seek Permission to advance others grounds and proofs at the time of hearing

Prayer:

In the view of the above submission it is required that this Honorable Tribunal may be graciously be pleased to dismissed the petition of petitioner with cost please.

Respondents.

1. The Secretary : E&SE Department KPK
Peshawar Respondent No: 1
2. The Director Elementary &Secondary
Education Peshawar Respondent No: 2
3. ~~Executive~~ District Officer Elementary
& Secondary Education Haripur
Respondent No :3 Re designated as D.E.O (F)

Secretary to Govt
Khyber Pakhtunkhwa
E&SE Department

S. Khan

Abdul
D.E.O (F)
Haripur

JJ
SUB DIVISIONAL
EDUCATION OFFICER
FEMALE HARIPUR