

S.A No. 894/2015, Mst. Naheed Fazal

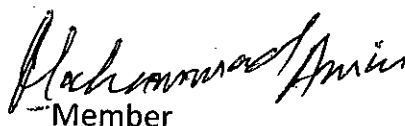
06.06.2018

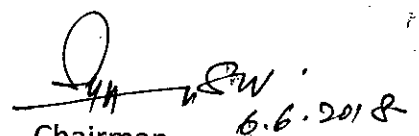
Mr. Abdul Salam, Advocate put appearance on behalf of the learned counsel for the appellant Mst. Naheed Fazal present. Mr. Usman Ghani, District Attorney for the respondents present. Arguments heard and available record perused.

At the very outset of arguments, the learned counsel for the appellant stated at the bar that the appellant has been promoted and thereafter posted as well and in this way, the impugned order is in-effective for all practical purpose and requested to allow him to withdraw the same. However, he made further request that the respondents have forfeited salary of the appellant for some days showing absent from duty whereas in fact, she had not absented and requested this Tribunal to order the payment of salary of the alleged absent days.

In view of the statement given by the learned counsel for the appellant at the bar, the appeal in hand stands disposed off being infructuous.

So far the second request of the payment of salary of the absent days is concerned, it was duly discussed and considered but neither this plea has been agitated in the grounds of appeal nor any such order has been impugned before this Tribunal. So in the humble view of this Tribunal, request of the appellant for payment of salary of the alleged absent days cannot be entertained, thus stands turned down. However, the appellant is at liberty to take up the matter with the concerned quarter for her relief. In the circumstances of the case, parties shall bear their own costs. File be consigned to the record room.


Member

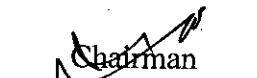

Chairman 6.6.2018
Camp Court, Swat

ANNOUNCED
06.06.2018

30.01.2018

Mr. Abdul Salam Khan, Advocate present and submitted fresh wakalat nama which is placed on file. Mr. Kabir Ullah Khattak, Addl: AG alongwith Barkat Ali, ADO for respondents present. Counsel for the appellant seeks adjournment. Granted. To come up for arguments on 03.04.2018 before D.B at Camp Court, Swat.



Member


Chairman
Camp Court, Swat

03:04.2018

Mr. Ehtisham, brother of the appellant, on behalf of the appellant and Mr. Usman Ghani, District Attorney for the respondents present. Brother of the appellant submitted application for adjournment on the ground that learned counsel for the appellant is not available today. Adjournment granted. To come up for arguments on 05.06.2018 before D.B at Camp Court, Swat.


Member


Chairman
Camp court, Swat

05.06.2018

Neither the appellant nor her counsel is present. Mr. Usman Ghani, District Attorney for the respondents present. Case to come up for further proceedings/arguments tomorrow i.e. on 06.06.2018 before the D.B at camp court, Swat.


Member



Chairman
Camp Court, Swat

894/15

06.12.2017

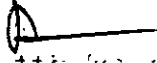
Clerk of counsel for the appellant and Mian Amir Qadar, District Attorney alongwith Muhammad Saeed, SS for the respondents present. Counsel for the appellant is not in attendance. Seeks adjournment. To come up for arguments on 30.01.2018 before the D.B at camp court, Swat.


Member


Chairman
Camp court, Swat

03.10.2016

None present for the parties due to notification of public holiday on the eve of first Moharram. The appeal is therefore, adjourned for final hearing before the D.B to 4.1.2017 at camp court, Swat.



Member


Chairman
Camp court, Swat

04.1.2017


Agent of counsel for the appellant and Mr. Muhammad Saeed, SS alongwith Mr. Muhammad Zubair, Senior Government Pleader for the respondents present. Requested for adjournment as counsel for the appellant is not in attendance. Adjourned for final hearing to 02.05.2017 before the D.B at camp court, Swat.


Member


Chairman
Camp court, Swat

02.05.2017


None present on behalf of the appellant. Mr. Muhammad Zubair, District Attorney for the respondents present. Notice be issued to appellant and his counsel for attendance and arguments for 05.09.2017 before D.B at Camp Court Swat.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER
Camp Court Swat.

05.09.2017

Appellant in person and Mr. Muhammad Zubair, District Attorney for the respondents present. Learned counsel for appellant is not in attendance. Requested for adjournment. To come up for arguments on 06.12.2017 before D.B at camp court, Swat.


Member


Chairman
Camp court, Swat.

09.03.2016

Mr. Ihtesham-ul-Amin on behalf of the appellant
and Mr. Sultan Nabi, Assistant for respondent No.1
alongwith Mr. Farooq Ahmad, AGP for respondents present.
Written reply submitted by respondent No.1, while
request for further adjournment made on behalf of
respondents No.2 & 3. Last opportunity is extended
subject to payment of cost of Rs.1000/- which shall be
borne by respondents No.2 and 3 from their own pockets.
To come up for written reply/comments and cost on
4.5.2016 before S.B at Camp Court Swat.


Chairman
Camp Court Swat

04.05.2016

Mr. Ihtisham, relative of the appellant and Mian Amir
Qadar, GP for the respondents present. However,
representatives of the respondents are not in attendance.
Written statement not submitted by respondents No. 2 & 3
despite repeated opportunities including last opportunity
which was also extended subject to cost of Rs. 1000/- as
such no such opportunity is extended to respondents No. 2 &
3 for written statement. Written statement by respondent No.
1 already submitted. The appeal is assigned to D.B for
rejoinder and final hearing for 03.10.2016 at camp court
Swat.


Chairman
Camp Court, Swat

13.08.2015

Counsel for the appellant present. Learned counsel for the appellant argued that the appellant was serving as AT and according to impugned order dated 4.4.2015 she was directed to report for duty in her original school immediately. That in compliance with the same, the appellant visited GGMS Sanguta but the Principal refused to accept her arrival. That the appellant preferred departmental appeal on 8.4.2015 which was not responded and hence the instant service appeal on 7.8.2015.

That the appellant is ready to perform duties in any of the schools but the respondents are reluctant to give her charge in any of the schools which attitude of the respondents is against facts and law.

Pre-admission notice be issued to the respondents for 5.10.2015 before S.B at Camp Court Swat as the matter pertains to the territorial limits of Malakand Division.


Chairman


5.10.2015

Mr. Ihtesham-ul-Amin on behalf of the appellant and Mr. Muhammad Ishaq, Senior Clerk alongwith Mr. Muhammad Zubair, Sr. GP for respondents present. Requested for adjournment. To come up for written reply/comments on 8.12.2015 before S.B at Camp Court Swat.


Chairman
Camp Court Swat

8.12.2015




Mr. Ihtesham-ul-Amin on behalf of the appellant and Mr. Muhammad Ishaq, Senior Clerk alongwith Mr. Amir Qadir, GP for respondents present. Written reply not submitted. Requested for further adjournment. Last opportunity granted. To come up for written reply/comments on 9.3.2016 before S.B at Camp Court Swat.


Chairman
Camp Court Swat

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 894/2015

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	07.08.2015	<p>The appeal of Mst. Naheed Fazal presented today by Mr. Fazal-e-Wahid Advocate may be entered in the Institution register and put up to the Worthy Chairman for proper order.</p> <p> REGISTRAR</p>
2	10-8-15	<p>This case is entrusted to S. Bench for preliminary hearing to be put up thereon <u>13-8-15</u>.</p> <p> CHAIRMAN</p> 

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 894 /2015

Mst. Naheed Fazal.....Appellant

VERSUS

District Education Officer, Swat & others.....Respondents

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S.No	Particulars	Annex	Pages
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3	Application for suspension of impugned order dated 04.04.2015.		5-6
4	Copy of the impugned order <u>dated 04-04-15</u>	A	⑦
5	Copies of the departmental appeal and reminders	B & C	8-11
6	Wakalat Nama		

Naheed Fazal
Appellant

Through

Fazal-e-Wahid
Fazal-e-Wahid

And

Nasir Naeem Umarchaili
Nasir Naeem Umarchaili

Asif Aman
Asif Aman
Advocates, Peshawar

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

A.W.F. Province
Service Tribunal
Slary No. 945
Dated 07-8-2015

Service Appeal No. 894 /2015

Mst. Naheed ^QFazal,
AT at Govt: Girls Middle School,
Afsarabad, District Swat.....Appellant

VERSUS

- 1. District Education Officer, Swat
- ② Director Education Khyber Pakhtunkhwa,
Dabgari Gardens, Peshawar.
- ③ Head Mistress, Govt: Girls High School,
Afsarabad, District Swat.....Respondents

No opportunity
for written
Reply of
Resp. No 2 & 3

SERVICE APPEAL AGAINST THE ORDER
OF RESPONDENT NO.2 WHEREBY HE DID
NOT BOTHER TO REPLY THE
DEPARTMENTAL APPEAL AND AGAINST
THE ORDER OF RESPONDENT NO.3 IN
THE LIGHT OF ORDER DATED 02.04.2015
OF RESPONDENT NO.1

=====

Respectfully Sheweth

- 1. That the appellant was initially appointed as AT at Maidan
District Dir Lower.
- 2. That the appellant after the marriage was transferred to hilly
areas in District Swat where she performed her duty to the
best of her ability, thereafter, the appellant was transferred to
Govt: Girls Middle School, Ala Abad Govt: Girls Middle
School Sanguta, respectively.

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2/8/15

3. That the appellant after spending some time in Govt: Girls Middle School Sanguta was again transferred to Govt: Girls Middle School, Jano.
4. That the appellant, with respect to the order No.209-10/G dated 04.04.2015 was again told to return to original school i.e. Govt: Girls Middle School, Sanguta.(Copy of the impugned order is attached as annexure 'A')
5. That the appellant with respect to the aforesaid order time and again went to the original school i.e. Govt: Girls Middle School Sanguta but the concerned Head Mistress (respondent No.3) did not permit her to take her charge and lastly the appellant was informed that there is no vacant post in the school.
6. That the appellant submitted departmental appeal to respondent No.2 but till date the same has not been responded. (Copies of the departmental appeal and reminders are attached as annexure 'B' & 'C' respectively)
7. That the appellant waited for the expiration of statutory period, therefore, now she prefers this service appeal for the following amongst other grounds:-

GROUND:

- A. That the impugned order of respondent is illegal as on one hand the appellant has repeatedly been transferred and on the other hand respondent No.3 is not allowing her to perform her duty at Govt: Girls Middle School....
- B. That the impugned transfer order of the appellant has been political motivated as the post, on which the appellant was

performing her duty, was made vacant just to adjust a blue eyes of the prominent political figure.

- C. That the impugned order of respondent is a clear violation of the prevalent policy of the respondent as the appellant has not been allowed to complete her tenure at any station and thus she was made a rolling stone.
- D. That the past record of appellant shows that she has been regular, punctual, committed and hardworking but now the appellant is seriously thinking to quit her job.
- E. That the impugned order is prima facie illegal, unlawful and is thus not sustainable in the eyes of law.
- F. That any other ground will be raised at the time of arguments with the prior permission of this Hon'ble Court.

It is, therefore, prayed that by accepting this appeal the impugned order of the respondent No.3 dated 04.04.2015 may please be set aside and consequently the appellant may be allowed to perform her duty at Govt: Girls High School Haji Baba or any other near school for her.

D. Ahmad Fazal
 Appellant
 Through *Fazal-e-Wahid*
 And *Nasir Naeem Umarkhaili*
Adnan Aman
 Advocates, Peshawar

Through
And

(4)

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

Service Appeal No. _____/2015

Mst. Naheed Fazal.....Appellant

VERSUS

District Education Officer, Swat & others.....Respondents

ADDRESSES OF PARTIES

APPELLANT

Mst. Naheed Fazal,
AT at Govt: Girls Middle School,
Afsarabad, District Swat.

RESPONDENTS

1. District Education Officer, Swat
2. Director Education Khyber Pakhtunkhwa,
Dabgari Gardens, Peshawar.
3. Head Mistress, Govt: Girls High School,
Afsarabad, District Swat.

Naheed Fazal
Appellant

Through

Fazal-e-Wahid

wahid

And

Nasir Naeem Umarkhaili

Adnan Aman

Advocates, Peshawar

Nasir Naeem Umarkhaili
Adnan Aman

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

Service Appeal No. _____/2015

Mst. Naheed Fazal.....Applicant/ Appellant

VERSUS

District Education Officer, Swat & others.....Respondents

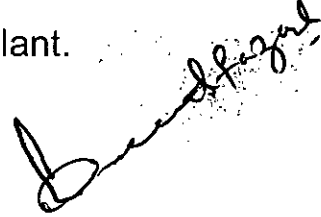
APPLICATION FOR SUSPENSION OF
IMPUGNED NOTIFICATION / ORDER
NO.209-10/G DATED 04.04.2015 AND
DIRECTION MAY BE GIVEN TO THE
RESPONDENTS TO RELEASE THE
SALARY OF THE APPLICANT/ APPELLANT
=====

Respectfully Sheweth

1. That the titled service appeal is pending before this Hon'ble Service Tribunal in which no date of hearing is yet been fixed.
2. That accompanied service appeal may be treated as integral part of instant application.
3. That the applicant/ appellant has a prima facie case and is quite sanguine of its success.
4. That if the impugned notification / order is not suspended, the applicant/ appellant will suffer an irreparable loss.
5. That the balance of convenience also lies in favour of the applicant/ appellant.

6

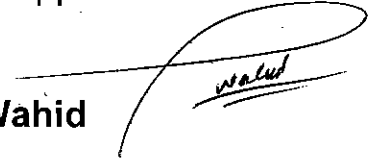
It is, therefore, prayed that by accepting this application, the impugned notification / order No.209-10/G dated 04.04.2015 may please be suspended till the final decision of the instant service appeal and respondents may be directed to release the salary of the applicant/ appellant.



Applicant/ Appellant

Through

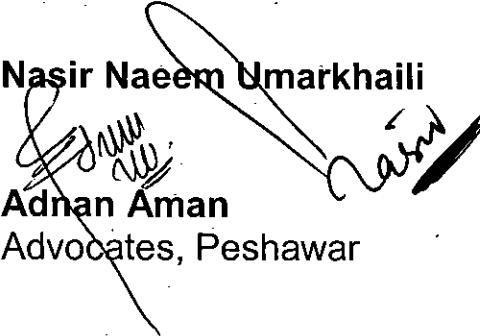
Fazal-e-Wahid



And

Nasir Naeem Umarkhaili

Adnan Aman
Advocates, Peshawar



(7)

Annex:- "A"



OFFICE OF THE HEADMISTRESS
GOVERNMENT GIRLS HIGH SCHOOL AFSAR ABAD
Phone. No. 0946-9240093

To,

No. 209-10 /G: File

Dated, 4/4 /2015


- 1). Mst: Naheed Fazal AT.
- 2). Mst: Amna Bibi AT.

Subject:- DETAINED MISTRESSES/ SUBMISSION OF MONTHLY STAFF STATEMENT.

Memo:-

Reference District Education Officer (Female) Swat No.1310-1407 dated, 2/4/2015 on the subject cited above.

You are hereby directed to report your original School immediately otherwise disciplinary action will be taken against you.


Headmistress
Govt: Girls High School
Afsar Abad Distt: Swat.

Endst: No. _____ /

Copy forwarded to the District Education Officer (Female) Swat with reference to her No. cited above.

Headmistress
Govt: Girls High School
Afsar Abad Distt: Swat.

(9)

(A) یہ کہ گورنمنٹ گزٹریں سکول صاحبہا میں بھی یہ اسامی ملے۔

لینڈالٹ دعا ہے کہ منظور کی درخواست عدد درانہ

محلہ نامہ ایسی منظور فرما کر من سائل کے حال پر جمع
فرما کر سائل کی تبادلہ منوبہ فرمایا جا کر کسی دوسری نزدیک
سکول میں تبادلہ کروایا جائے۔

سینئر دیگر دادرسی جو ٹوین الفنا بی بی

مرحمت فرمائی جاوے۔

مواضع 08/04/2015

عمر جمیل
محمد علی

ناصرہ فضل ولد فضل نعیم خان
عربی ٹیچر (AT) گورنمنٹ گزٹریں
پارٹی سکول آف آباد -

کثرت صا۔ ڈائریکٹر صاحب۔ چیف ایگزیکٹو آفیسر۔
قائم ڈائریکٹر ٹارگٹ سٹیڈی

دوبارہ درخواست ہے سہ ماہیہ درخواست الخوا
پر سیکرٹری درخواست / رسم فوقہ 54/8
2015

صا۔ علی ا۔ سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر
اب میں سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر
تیارم کہ منور / سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر
کہ کہ۔ سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر
گاہے۔ سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر

2: میں سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر
سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر
نہ میں سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر
تیارم کہ منور / سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر
کہ کہ۔ سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر
گاہے۔ سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر

3: میں سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر
تیارم کہ منور / سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر
کہ کہ۔ سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر
گاہے۔ سیکرٹری ڈپٹی چیف ایگزیکٹو آفیسر

1. اگم اگم دنگ دیال بر ایجا ہے یہ کہہ کے سے لکھ ادر
 کے ادر کو اگم میں جوڑا دیال ہی ہے رخصت ہی
 کی ہے
 4. یہ دفتر DEO میں ہے اور اس میں سٹار کی ادر
 مقرر ہے کہ ادر میں ہے

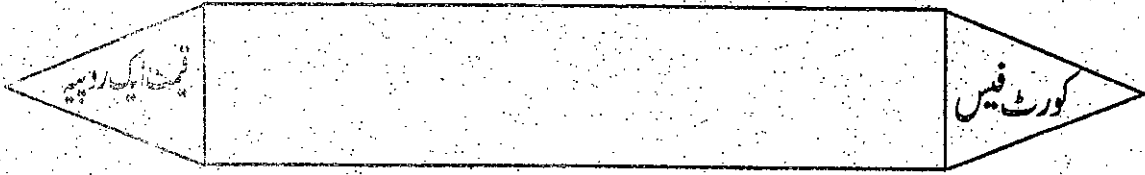
5. یہ ادر میں ہے اس میں سٹار کی ادر ہے
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6. یہ ادر DEO میں ہے اس میں سٹار کی ادر ہے
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7. یہ ادر میں ہے اس میں سٹار کی ادر ہے
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دستخط
 نام
 پتہ

بعدالت جناب سروس ٹریڈیونل ضہر پختونخواہ کبٹاور -



مورخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی رکل کارروائی متعلقہ آن مقام کبٹاور سے فاضل و احد / نام لغیم عمر خلی / عدنان آمان ایڈووکیٹس مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی رکل کارروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دی اور اقبال دعویٰ اور درخواست ہر قسم کی تصدیق زرا اور اس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمد ہوگی اور منسوخ نہ کر کے نسل یا بزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنی ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقررہ شدہ کو بھی جملہ مذکورہ بالا اختیارات حاصل ہونگے اور اس کا ساختہ برواختہ منظور و قبول ہوگا۔ اور دوران مقدمہ میں جو خرچہ ہو جائے ان تمام مقدمات کے سبب سے ہوگا اسکے مستحق وکیل صاحب ہونگے۔ نیز بقایا و خرچہ کی وصولی کرنے وقت کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقام دورہ ہر ہو یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہونگے کی پیروی مقدمہ مذکور لہذا وکالت نامہ لکھ دیا کہ سند ہے

۲۰۱۵

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المقوم

Accepted

Fazal-e-wahid
Adv. High Court
Peshawar

۴/۸/۲۰۱۵

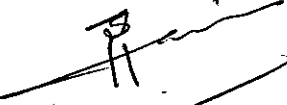
PESHAWAR.

Adnan Aman
Adv. Pesh.
4/8/2015

Accepted
Fazal-e-wahid
Adv. High Court
Peshawar
4/8/2015

AUTHORITY LETTER

Certified that Mr. Sultan Nabi representative of this office is hereby authorized to attend the Honorable Khyber Pakhtunkhwa Service Tribunal Peshawar at Camp Court Swat on 09-03-2016 in connection with court case Service Appeal No 894/2015 Titled Mst: Naheed Fazal V/s DEO (Female) Swat of Khyber Pakhtunkhwa on behalf of the undersigned and Education Department.


DISTRICT EDUCATION OFFICER (F)
SWAT AT SAIDU SHARIF

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No.894/2015

1. Mst: Naheed Fazal ATAppellant

Versus

1. District Education officer (Male) Swat.
2. Director elementary and secondary education Khyber pakhtun khwa Peshawar;
3. Head Mistress GGHS Afsar Abad Swat.....Respondents.

Parawise Comments on Behalf of the Respondents

Respectfully shewith

Preliminary objections

1. That the Appellant has no cause of action / locus standi.
2. That the Appellant has not come to this honourable Service Tribunal with clean hands.
3. That the Appellant has filled this instant Service Appeal just to pressurize the respondents.
4. That the instant Service Appeal is against the prevailing law and rules.
5. That the Appellant has filled this instant Service Appeal on malafide motives.
6. That the instant Service Appeal is not maintainable in the present form and above in the present circumstances of the issue.
7. That the petitioners have concealed the material facts from this honourable Service Tribunal.

FACTS

1. That the Para No.1 is correct.
2. That the Para No.2 first part pertains to the personal matters of the appellant hence needs no comments; however the rest of the Para is correct.
3. That the Para No.3 is incorrect and not admitted. The appellant was transferred to Swat and was adjusted by the then EDO Swat to GGMS Shin. **(Charge report as Annexure A)**. Then she was transferred to GGMS Alabad Swat. Afterwards she was transferred to GGMS Sangota Swat on mutual basis. **(Order as Annexure B)**. However the same order was cancelled by the DCO Swat being competent authority and the appellant was directed to report for her duty at GGMS Shin, which was her original school.
4. That the Para No.4 is incorrect and not admitted. The appellant was transferred from GGMS Shin to GGMS Alabad vide Order No 3243-53 dated 17-11-2014, but she did not taken over charge and did not obeyed the order and was working at GGMS Afsar Abad on detained basis. While one AT teacher was already working in the said school on her original post. And no other vacancy of the same cadre was available in the said school. Respondent No 1 ordered her to attend her original school i.e GGMS Alabad not GGMS Sangota, but she willfully remained absent since her transfer order and did not obeyed the order **(Order as Annexure C)**
5. That the Para No.5 is incorrect and not admitted. The appellant was directed to report at GGMS Alabad (Her original school) not GGMS Sangota.
6. That the Para No.6 is the repetition of the above Paras. As stated above she was directed by the DEO (Female) Swat to report at her original School but she failed to do so, then the Headmistress GGMS Alabad reported that she has not obeyed her transfer order and has not taken over charge. **(Report as Annexure D)**. The DEO (Female) Swat issued call notices (Under Registered Cover) time and again to the appellant to join her duty but she failed to join her duty station. **(Notices as Annexure E)**.

7. That the instant appeal of the appellant is bereft of any merit, hence liable to be dismissed inter-alia following grounds.

GROUND

- A. That the Para No. A is incorrect and not admitted. The act of the Respondent Department is not illegal.
- B. That the Para No. B is baseless incorrect and on malafide intentions, hence denied.
- C. That the Para No. C is the repetition of the above Paras hence needs no comments.
- D. That the Para No. D is incorrect and not admitted. The appellant remained absent from her duty since her transfer order in November 2014 till 13-10-2015.
- E. That the Para No. E is again the repetition of the above Paras hence needs no comments.
- F. That the Para No F is irrelevant hence needs no comments.

It is therefore very humbly prayed that the instant Service Appeal of the Appellant may be dismissed with cost in favour of the respondents.

For Respondent

No. 01 / 02

[Signature]
DISTRICT EDUCATION OFFICER (F)
SWAT AT SAIDU SHARIF

Verified.

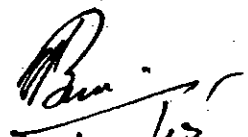
[Signature]
Senior Government Pleader
Swat at Gulkada.

It is certified that Naheed Fazal AIT
took over charge on 14th of October 2015 in
GGMS Allabad in the morning.



Nargis Ghaffar
GGMS, Allabad, Swat.
Code No: 37935

Mr. M. Ghani's


11/12/15

رجسٹر حاضر و مدرسین گورنمنٹ کالج برائے نسوان لاہور

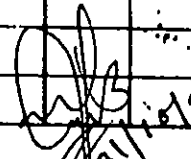
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October 2017
 Naheed Fazal Rahimi Shah Jehankana
 AT N.A. Suiyees
 48

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 دستخط ہیڈ ماسٹر
 31/10/15

رجسٹر حاضر مدنی
 Gold Pixels Middle School Alabat
 2015 November

(101)

Rahim Shah, Jehan Kana, Naheed Jagan
 N.O. Sweepers A.T. ٢٤

تاریخ	آن	دقیقہ	رہائی	آن	دقیقہ	رہائی	آن	دقیقہ	رہائی	آن	دقیقہ	رہائی	آن	دقیقہ	رہائی	آن	دقیقہ	رہائی
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Signature: *[Handwritten Signature]*
 Date: 11/11/2015
 Address: Gold Pixels Middle School, Alabat, Sindh, Pakistan

میزان	ساعت	مال	میزان	ساعت	مال	میزان	ساعت	مال	میزان	ساعت	مال	میزان	ساعت	مال	میزان	ساعت	مال
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Code No: 37505
 دستخط ہیڈ ماسٹر

Vertical notes on the right margin, including dates and names, possibly indicating shifts or assignments.

Lyfms Allabad رجسٹر حاضر و مدرسین

(478) (60)

2015 December

بابت ماہ

Rahim Shah
N/A

Jehan Rana
Sweeper

Nabeed Fozal
N/A

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درجہ	آمد	دستخط	روزگاری	آمد	دستخط	روزگاری	آمد	دستخط	روزگاری	آمد	دستخط	روزگاری	آمد	دستخط	روزگاری	آمد	دستخط	روزگاری
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دستخط ہیڈ ماسٹر

Lyfms

دستخط
Lyfms
N/A

میزان

Annex

B

~~1/20~~ (D)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER (SCHOOLS & LITERACY) SWAT.

OFFICE ORDER

Mutual exchange of post between Mst: Zainab Bibi, AT, GGMS Sangota, Swat and Mst: Naheed Fazal, AT, GGMS Ala Abad, Swat is hereby ordered on their own pay and scale from the date of their taking over charge in the interest of public service.

- NOTE:-
1. No TA/DA is allowed.
 2. Charge reports should be submitted to all concerned.

(SHER AZEAL KHAN)
EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY SWAT.

Order No. 2725-80 / F.No. 2/Estb/F/S

Dated. 28/2/108

Copy to the:-

1. District Accounts Officer, Swat.
2. Budget & Accounts Officer Local Office.
3. Headmistress concerned.
4. Teacher Concerned.
5. P.A to EDC(S&L) Local Office.
6. Supdt: Local Office.

UFG"

[Signature]
SUPERKINJENJEN
DISTRICT EDUCATION OFFICE
DISTRICT SWAT

[Signature]
EXECUTIVE DISTRICT OFFICER
SCHOOLS & LITERACY, SWAT.

Annexure C

63

OFFICE OF THE EXECUTIVE DISTRICT OFFICER(SCHOOLS & LITERACY),SWAT.

OFFICE ORDER.

Consequent upon the approval of District Coordination officer,Swat being competent authority.The transfer of the following A.T Mistress^{es} is hereby ordered to the schools noted against each their names on their own pay and scale with effect from the date of their taking over charge in the interest of public service.

<u>S.No</u>	<u>Name & Designation</u>	<u>From</u>	<u>TO</u>	<u>Remarks.</u>
1.	Mst:Zainab Bibi AT	GGMS:Sangota	GGMS: Ala Abad	V.S.No.03.
2.	Mst:Safia,AT	GGMS: Sijbanr	GGMS: Sangta,	VSE:No.1.
3.	Mst:Naheed Fazal,AT	GGMS:Ala Abad	GGMS: Shin	A:V.A.NoPost

(SHER AFZAL KHAN),
EXECUTIVE DISTRICT OFFICER,
SCHOOLS AND LITERACY,SWAT.

Endstt:No. 1806-10

dated 18/4/08 008.

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

1. The District Coordination Officer,Swat w/r to his approval No.3440 dated 14.04.2008.
2. The District Account Officer,Swat.
3. The Headmistress GGMS:Concerned.
4. The Official concerneds.
5. P.A to EDO(S:L),Local office.

EXECUTIVE DISTRICT OFFICER,
SCHOOLS AND LITERACY,SWAT.

Received by kana
for Naheed fazal, AT
[Signature]

[Signature]
SUPERINTENDENT
DISTRICT EDUCATION OFFICE
DISTRICT SWAT

Annexure

D

Imman Ghani

14-5-2015

(14)

(9)


The DO 8/L
Secondary Education,
Saidu Sharif Swat.

Madam,


It is stated with great honour that Miss Naheed-
Fazal that has been transferred to our school i.e
GMS Allabad has not taken charge in this school yet
So it is brought in your honour that action
should be taken as soon as possible because
there isn't any Arabic teacher in our school
to teach the basic subject.

Your co-operation in this regard is
requested.

Dated: 13/05/2015.


SUPERINTENDENT
DISTRICT EDUCATION OFFICE
DISTRICT SWAT

Regards


Nargis Chaffar
GGMS, Allabad, Swat
Code No. 277/2015
SET/HM
GMS Allabad.

Annex v E

~~12~~
11

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SWAT AT SAIDU SHARIF

No. 4929 / Naheed Fazal/AT

Dated. 28/07 2015

To

Mrs. Naheed Fazal, AT, GGMS, Alabad.
College, Colony Saidu Sharif.

Subject: - CALL NOTICE NO.1/ABSENT FROM DUTY

Memo:-

As reported by the Headmistress, GGMS Alabad, that you are absent from duty since ~~long~~ without sanction/permission of the competent authority.

You are therefore, directed to join your duty immediately and sent report to this office; otherwise strict disciplinary action will be taken against you under the rules.

[Signature]
DISTRICT EDUCATION OFFICER
(FEMALE) SWAT AT SAIDU SHARIF

Endst: No. 4930 ✓

Copy to the:-

- 1. Headmistress, GGMS Alabad,swat.
- 2. P.A. to DEO (M) Local.

UG.

[Signature]
SUPERINTENDENT
DISTRICT EDUCATION OFFICE
DISTRICT SWAT

[Signature]
DISTRICT EDUCATION OFFICER
(FEMALE) SWAT AT SAIDU SHARIF

(E)

~~13~~
12

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SWAT AT SAIDU SHARIF

No. 6947 Naheed Fazal/AT /REGD

Dated. 7/8/15 2015

To


Mrs. Naheed Fazal, AT,
Bangla No. B-28,
College, Colony Saidu Sharif.

Subject: - CALL NOTICE NO. 1/ABSENT FROM DUTY

Memo:-

Reference this office Memo: No. 4929/dated 28/03/2015, on the subject noted above.

You are once again directed to join your duty at GGMS Alabad immediately and sent report to this office; otherwise strict disciplinary action will be taken against you under the rules.

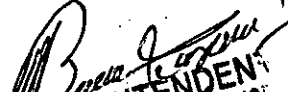

DISTRICT EDUCATION OFFICER
(FEMALE) SWAT AT SAIDU SHARIF


Endst: No. 6948

Copy to the:-

1. Headmistress, GGMS Alabad,swat.
2. P.A. to DEO (Female) Local.

UG.


SUPERINTENDENT
DISTRICT EDUCATION OFFICER
DISTRICT SWAT


DISTRICT EDUCATION OFFICER
(FEMALE) SWAT AT SAIDU SHARIF

E

308

13

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) SWAT AT SAIDU SHARIF

No. 623 /Naheed Fazal/AT/REGD

Dated. 19/10 /2015.

To

Mst: Naheed Fazal, A.T,
Bangla No. 28,
College colony Saidu Sharif, Swat.

Subject: - CALL NOTICE NO. 03/ABSENT FROM DUTY

Memo:-

Reference this office Memo: No. 4929/dated 28/5/2015, No. 6947/dated 7/8/2015 on the subject noted above.

You are finally directed to join your duty at GGMS Alabad immediately and sent report to this office; otherwise strict disciplinary action will be taken against you under the rules.

[Signature]
DISTRICT EDUCATION OFFICER
(F) SWAT AT SAIDU SHARIF

Endst: No. 624 /

Copy to the:-

- 1. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
- 2. Headmistress, GGMS Alabad, Swat..
- 4. PA to DEO (F) local office.

UG


[Signature]
SUPERINTENDENT
DISTRICT EDUCATION OFFICE
DISTRICT SWAT

[Signature]
DISTRICT EDUCATION OFFICER
(F) SWAT AT SAIDU SHARIF

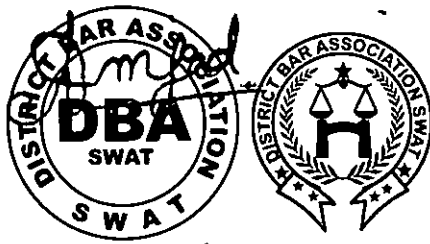
Rs: 10/-

نوٹ: اس وکالت نامی نوٹ کا نام قابل قبول ہوگی۔

بار کونسل نمبر: 2785
 بار ایسوسی ایشن نمبر: 423
 رابطہ نمبر: 03339479863



29592
 ڈسٹرکٹ بار ایسوسی ایشن سوات



بعدالت جناب: سر سید شہباز علی شہر کتون فواہ کیمپ کورٹ سوات

دعویٰ اور خواست: سر سید شہباز علی

علت نمبر: 13

مورخہ: 20/12/2018

جرم: 13

تھانہ: 13

منجانب: ایڈووکیٹ
 سہیلہ نامہ شہباز علی شہر کتون فواہ کیمپ کورٹ سوات

بابت تحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے برائے پیروی مقدمہ

آن مقام سر سید شہباز علی عبداللہ خان ڈسٹرکٹ سوات کو مقرر کر کے
 اقرار کیا جاتا ہے، کہ صاحب موصوف کو مقدمہ کی کل کارروائی کو کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ
 کرنے و تقرر ثالث کرنے، دعویٰ جوابت دعویٰ، اقبال دعویٰ، اور درخواست برائے سرسبزگی مقدمہ، منسوخی ڈگری
 یکطرفہ، اجراء و پیروی کرنے کا مختار ہوگا نیز دائر کرنے اپین نگرانی، نظر ثانی و پیروی کرنے کا مختار ہوگا۔ اور مقدمہ
 مذکورہ کیلئے کل وقتی یا جزوی کارروائی کیلئے کسی دیگر وکیل یا مختار قانون کو اپنے ہزارہ یا اپنے بجائے تقریر کا اختیار ہوگا
 اور صاحب مقرر شدہ کو بھی جملہ مذکورہ اختیارات حاصل ہوں گے، اور اس کا ساختہ و پرداختہ منظور قبول ہوگا، بدوران
 مقدمہ جو خرچہ و ہرجانہ کسی بھی سبب سے حاصل ہوگا، وہ وکیل موصوف وصول کرنے کا حقدار ہوگا، کوئی تاریخ پیشی
 مقام مذکورہ بالا سے باہر ہو، تو وکیل صاحب پیروی مقدمہ کرنے کے پابند نہ ہوں گے، مقدمہ کسی عدالت میں بعدم
 پیروی خارج ہونے یا ڈگری یکطرفہ ہونے کے صورت میں وکیل صاحب ذمہ دار نہیں ہوں گے،
 لہذا وکالت نامہ لکھ دیا کہ سدر ہے

سہیلہ نامہ شہباز علی شہر کتون فواہ کیمپ کورٹ سوات

مقام سر سید شہباز علی
 ایڈووکیٹ دستخط: A. Majid
 المرقوم: 30-01-2018

کہد گت جناب سرورس ٹریبونل شاہد و سید کور و سید و سید لوف سورت

سماة ناہیدہ فضل بناک ایجوکیشن ویزہ

اپیل

درخواست براد تبدیل تاراخ و سٹیٹ بجتد عنوان بالا

جناب عالی! درخواست حسب ذیل عرض ہے۔
 یہ کہ مقدمہ عنوان بالا عدالت حضور میں از تہ سہ ماہت ہے
 جس میں آج حصدہ $\frac{04}{018}$ 03 تاراخ حقدہ ہے
 یہ کہ مقدمہ عنوان بالا میں وکیل پیدلانٹ ڈسٹریکٹ
 کورٹس سورت میں موجود نہیں ہے اسلئے عدالت
 حضور میں پیش ہونے سے قائل ہے

گنتہ استدعا ہے کہ بمنظوری درخواست حقدہ
 مقدمہ عنوان بالا میں تاراخ و سٹیٹ تبدیل کرنے کا
 حکم صادر فرمایا جائے حصدہ $\frac{04}{018}$ 03

۱۰

سماة ناہیدہ فضل بندریہ احتشام برادر پیدلانٹ سورت