


FORM OF ORDER SHEET


Court of \_\_\_\_\_

Appeal No. 316/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	26/02/2024	<p>The appeal of Mst. Tabassum Gul received today by registered post through Mr. Saboor Khan Advocate. It is fixed for preliminary hearing before touring Single Bench at A.Abad on.</p> <p style="text-align: right;">By the order of Chairman</p> <p style="text-align: right;"> REGISTRAR</p>

**BEFORE THE SERVICE TRIBUNAL****K.P.K PESHAWAR**Service appeal No 316 of 2024Mst. Tabassum Gul. .... **Appellant****VERSUS**The Director Elementary and Secondary  
Education KPK Peshawar etc.. **Respondents****APPEAL****INDEX**

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**Dated 23.02.2024**
  
**Mst. Tabassum Gul**  
 (Appellant)

Through:-

  
**ABDUL SABOOR KHAN**  
**A.S.C**

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Khyber Pakhtukhwa  
Service Tribunal

Diary No. 11378

Dated 26-02-2024

Service appeal No 316 of 2024

Mst. Tabassum Gul, **Ex.PST Teacher**  
Government Girls Primary School, Shingial  
Dhar Dubair, Tehsil Pattan, District  
Kohistan Lower.....**Appellant**

**VERSUS**

- 1) The Director Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar.
- 2) The District Education officer (Female) District Kohistan lower at Pattan.

.....**Respondents**

Filed to-day

Registrar

**APPEAL UNDER SECTION 4 OF KPK**  
**SERVICE TRIBUNAL, ACT, 1974 AGAINST**  
**THE IMPUGNED ORDERS DATED**  
**22.01.2022 PASSED BY RESPONDENT NO.**  
**02 AND 26.01.2024 PASSED BY**  
**RESPONDENT NO. 01 WHEREBY MAJOR**  
**PENALTY OF REMOVAL FROM SERVICE**  
**WAS IMPOSED UPON THE APPELLANT**  
**AND MAINTAINED ON THE GROUND OF**  
**ALLEGED ABSENCE FROM DUTY.**

**Respectfully Sheweth:-**

1. That, appellant was appointed in a prescribed manner by competent authority against the post of Primary school Teacher vide appointment order dated **31.10.1997** after complying all the legal and codal formalities.

**(copies of appointment order dated 31.10.1997 annexed as annexure "A").**

2. That, since appointment, appellant kept on performing her duties regularly and with punctuality.

3. That, all of a sudden, respondent No 02 without citing any reason and intimation straightaway, with a single stroke of pen imposed Major penalty of removal from service upon the appellant on the ground of alleged absence from duty, vide impugned order bearing No. **107-115** dated **22.01.2022**.

**(copy of impugned order dated 22.01.2022 is annexed as Annexure "B").**

4. That, appellant filed a Departmental appeal before **respondent No 01** against the impugned order on **09.02.2022**.

**(Copy of Departmental appeal annexed as Annexure "C").**

5. That, the appellant was assured by respondent No. 01 that she was going to be reinstated into service after acceptance of the Departmental appeal and told her to wait.
6. That, respondent No. 01 vide impugned order bearing No. **7876-78** dated **26.01.2024** whereby, the Departmental appeal of the appellant has been dismissed without any lawful justification.

**(copy of impugned order dated 26.01.2024 annexed as annexure "D").**
7. That, feeling aggrieved from the impugned orders, appellant having no other remedy is filing the present service appeal before this Honourable Tribunal for interference inter alia, on the following amongst other legal and factual grounds.

### **GROUND:-**

- A) That, appellant never remained absent as alleged. The major penalty of removal from service has been imposed and upheld by respondents without any basis of documentary record or any other proof, what so ever.

- B) That, appellant never received any show cause notice as alleged in the impugned orders nor any show cause notice was issued to the appellant.
- C) That, no inquiry whatsoever, was ever conducted by the respondents for the purpose of proving the alleged charges against the appellant. She has been condemned unheard and without any solid and legal basis.
- D) That, ASDEO(F) Circle Bankad, District Kohistan (L) submitted two reports dated 04.11.2021 and 20.12.2021 to respondent No. 02 in respect of appellant. Perusal of the said reports reveal that, appellant never remained absent from duty as alleged in the impugned orders. Respondents over looked the said reports before imposing and upholding the impugned penalty which has resulted into miscarriage of justice.
- (copies of reports dated 04.11.2021 and 20.12.2021 are annexed as annexure "E").**
- E) That, ASDEO(F) Circle Bankhad District Kohistan (L) paid surprise visit of the school and found the appellant present at her duty. He recorded the

said fact in the log book of the school dated **17.12.2021** and **15.01.2022**.

**(copies of extracts of the log book annexed as annexure "F").**

- F) That, according to the attendance register, appellant remained present on duty in the months of October, November, December, 2021 and January, 2022. ASDEO(F) verified the attendance register till **15.01.2022**. this fact has also not been considered by the respondents before imposing and maintaining the major penalty awarded to the appellant.

**(copies of extracts of attendance register annexed as annexure "G").**

- G) That, respondent No. 02 vide order dated 13.08.2021 released the salaries of as many as twenty (20) primary school teachers after due deduction. The name of the appellant appears at serial No. 7 of the said order.

**Copies of order dated 13.08.2021 annexed as annexure "H").**

- H) That, the absence period mentioned in order dated 13.08.2021 has again been made the basis of the impugned orders dated 22.01.2022 and 26.01.2024

which is seemingly illegal, unjust and unjustified.

- I) That, appellant was never confronted with the alleged allegation at any point of time so, she has been condemned unheard, violating all the norms of service law, natural justice and fair play.
- J) That, before passing the impugned order dated 22.01.2022, appellant was not put on notice to present her view point/explanation under the Doctrine of **AUDI AULTEM PARTEM**, hence, the impugned order is not sustainable and maintainable under the law on the subject.
- K) That, appellant had a long unblemished service record at her credit. She has been removed from service with a single stroke of pen without observing due process of law and without any lawful justification.
- L) That, no complaint was ever filed by any one against the appellant for her being absent from duty as alleged on any working day with any authority.
- M) That, the impugned orders are illegal, unlawful, without lawful authority, without jurisdiction and of having no

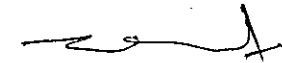


legal effect, hence, liable to be set aside.

**PRAYER:-**

On acceptance of the instant service appeal, the impugned orders dated **22.01.2022** and **26.01.2024** passed/ issued by respondents respectively may kindly be set-aside declaring them illegal, void and against the law on the subject and appellant be re-instated into service with all back benefits.

**Dated 23.02.2024**



**Mst. Tabassum Gul**  
(Appellant)

Through:-



**ABDUL SABOOR KHAN**  
**A.S.C**

**VERIFICATION :**

I, Mst. Tabassum Gul, **Ex.PST Teacher** Government Girls Primary School, Shingial Dhar Dubair, Tehsil Pattan, District Kohistan Lower, do hereby solemnly affirm and declare that the contents of fore-going Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this Honorable Tribunal.



**TABASSUM GUL**  
**(DEPONENT)**

**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No \_\_\_\_ of 2024

Mst. Tabassum Gul. .... **Appellant**

**VERSUS**

The Director Elementary and Secondary  
Education KPK Peshawar etc. **Respondents**

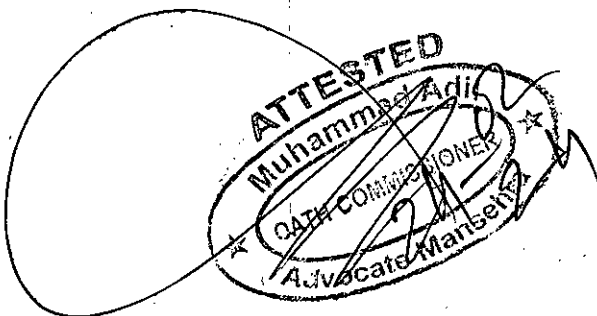
**APPEAL**

**AFFIDAVIT**

I, Mst. Tabassum Gul, **Ex.PST Teacher** Government Girls Primary School, Shingial Dhar Dubair, Tehsil Pattan, District Kohistan Lower, do hereby solemnly affirm and declare on oath that the no such subject matter appeal has ever been filed before this honorable court nor pending nor decided. Further affirms and declares on oath that the contents of fore-going service appeal are true and correct to the best of my knowledge and belief. Nothing has been concealed or suppressed from this Honourable tribunal.

**Dated 23.02.2024**

  
**Mst. Tabassum Gul**  
**(DEPONENT)**



**BEFORE THE SERVICE TRIBUNAL**  
**K.P.K PESHAWAR**

Service appeal No \_\_\_\_ of 2024

Mst. Tabassum Gul. .... **Appellant**

**VERSUS**

The Director Elementary and Secondary  
Education KPK Peshawar etc.. **Respondents**

**APPEAL**

**CORRECT ADDRESSES OF THE PARTIES**

**APPELLANT:**

Mst. Tabassum Gul, **Ex.PST Teacher**  
Government Girls Primary School, Shingial  
Dhar Dubair, Tehsil Pattan, District  
Kohistan Lower.

**RESPONDENTS:**

- 1) The Director Elementary and Secondary  
Education Khyber Pakhtunkhwa Peshawar.
- 2) The District Education officer (Female)  
District Kohistan lower at Pattan.

**Dated 23.02.2024**

  
**Mst. Tabassum Gul**  
(Appellant)

Through:-

  
**ABDUL SABOOR KHAN**  
**A.S.C**

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P-11  
A  
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OFFICER (MALE) PRIMARY KOHISTAN

NOTICE

Consequent upon the selection by the Departmental Selection Committee District Education Officer Pattan Kohistan has been pleased to appoint the following Un-Trained (Female) out District candidates in BPS-7 (1480-B1-2695) Rs. 1480/- PM (Fixed) plus usual allowances as admissible under the rule with effect from the date of their taking over charge against the vacant PTC Posts noted against each name with the following terms & conditions.

S.No.	Name & Father's Name	Residence	Place of Posting	Remarks
1. ✓	Saima Noor D/o Waris Khan	Manshra	GGPS, Taris	A.N.C. Post
2. ✓	Taslima Bibi D/o Abdul Ghani	- do -	GGPS, Pashot	A.V. Post
3. ✓	Bibi Kizwana D/o Hakim Khan	- do -	GGPS, Kuz Parwa	A.N.C. Post
4. ✓	Ghazala Bibi D/o Hakim Khan	- do -	GGPS, Kuz Parwa	A.N.C. Post
5.	Hamida D/o Mushlaqin	- do -	GGPS, Pashot	A.N.C. Post
6.	Nagina Bibi D/o Wali Rehman	- do -	GGPS, Bush	A.V. Post
7. ✓	Hadia Bibi D/o Raja M. Bano	- do -	GGPS, Pero Dala	A.N.C. Post
8. ✓	Sher Bano D/o Sacedad Khan	Shengla	GGPS, Pero Dala	A.N.C. Post
9.	Bibi Hadia D/o Noor Wali	Manshra	GGPS, Sagayun	A.N.C. Post
10.	Dure Showar D/o M. Qayum	Poshwar	GGPS, Sagayun	A.N.C. Post
11.	Nighat Shaheen D/o Rohmat	Manshra	GGPS, Karo Ser	A.N.C. Post
12.	Anisa Begum D/o Hidayatullah	Swat	GGPS, Karo Ser	A.N.C. Post
13. ✓	Asra Tabasum D/o M. Ashraf	Bafra	GGPS, Moreon	A.V. Post
14. ✓	Imtiaz Bibi D/o Maqbool Rehman	Manshra	GGPS, B.K. Ronolia	A.V. Post
15.	Robina Naz D/o Mohd. Razaq	Swat	GGPS, Samad Abad	A.V. Post
16. ✓	Nazak Bibi D/o M. Saleem	Pun	GGPS, Samad Abad	A.V. Post
17.	Husrat Bibi D/o Sultan Muhd.	Oghi	GGPS, Bari Shaha	A.V. Post
18.	Sajida Bibi D/o M. Ilyas	Alter Shesha	GGPS, Pashot	A.V. Post
19. ✓	Ghazala Parvin D/o Muzafar Khan	Baltal	GGPS, Shaha	A.V. Post
20. ✓	Snor Bano D/o Faridpon	Khaki	GGPS, Charo	A.V. Post
21. ✓	Sajda Rehman D/o Saliur Rehman	Bher Kund	GGPS, Maroon	A.N.C. Post
22.	Nighat D/o Katoor Khan	S. Sharif	GGPS, Maroon	A.N.C. Post
23. ✓	Sajida Rehman D/o Gohar Rehman	Oghi	GGPS, Bala Gadan	A.N.C. Post
24. ✓	Ghazala Shahin D/o Haroon Khan	Khaki	GGPS, Charo	A.V. Post
25. ✓	Saira Bibi D/o M. Yousif	Jagori	GGPS, Bala Gadan	A.N.C. Post
26. ✓	Shazia Bibi D/o Abdul Ghafar	Labar Kot	GGPS, Shreid	A.N.C. Post
27. ✓	Nelo Far D/o Mumtaz	Swat	GGPS, Kajo Abad	A.N.C. Post
28.	Gul Bano D/o Hazrat Bilal	Son	GGPS, Ban Sari	A.N.C. Post
29.	Shamim Akhtar D/o Majwar Gul	Swat	GGPS, Gall	A.V. Post
30. ✓	Kozar Bibi D/o M. Abdul Qayum	Manshra	GGPS, S. Jeshoi	A.V. Post
31.	Sadrin Nisa D/o M. Razaq	R. Pindl	GGPS, S. Deng	A.V. Post
32. ✓	Saima Bibi D/o Abdul Khaliq	Havnilan	GGPS, Taris	A.N.C. Post
33.	Tazini Bibi D/o Monboob Khan	Manshra	GGPS, Shaha	A.V. Post
34. ✓	Ishrat Begum D/o Nosirullah	Korik	GGPS, S. Joshi	A.V. Post

Contd...../2

*Signature*  
SDEO (F)  
Pattan Kohistan (L)

36.	Bandi Sadiq D/o Abdur Rahim	Postwar	GGPS, S. Durg	A.V. Post
37.	Nazli Begum D/o Darvesh Khan	Abbottabad	GGPS, Kanori	A.V. Post
38.	Anis Bibi D/o Manwar Khan	Abbottabad	GGPS, Kanori	A.V. Post
39.	Dil Shad Begum D/o Taj Muhammad	Swat	GGPS, Jawan	A.N.C. Post
40.	Hayat Begum D/o Saman Khan	Swat	GGPS, Kuch Ban	A.V. Post
41.	Sadro Nahid D/o Murlaza Khan	Swat	GGPS, Yanjool	A.V. Post
42.	Dallar Bibi D/o M. Ibrahim	Swat	GGPS, Yanjool	A.V. Post
43.	Shahista Zeb D/o Jehan Faraz	Swat	GGPS, Pari	A.N.C. Post
44.	Saeeda Bibi D/o Adam Saz Khan	Baltagram	GGPS, Tarken	A.V. Post
45.	Nighat Sultana D/o M. Iqbal	Baltagram	GGPS, Tarken	A.V. Post
46.	Bakhat Qasim D/o Sardar Gul	Dubair	GGPS, Agro	A.N.C. Post
47.	Kashida Bibi D/o Muntahad	Shahpur	GGPS, Eal	A.N.C. Post
48.	Talcof Begum D/o Fazal Mehmood	Swat	GGPS, Nal	A.N.C. Post
49.	Khalida Habib D/o Habibur Rehman	Dargi	GGPS, Hari	A.N.C. Post
50.	Nusrat Begum D/o Ghafoor Khan	Chakisar	GGPS, Hari	A.N.C. Post
51.	Shazia D/o Mobeen	Bandi Sadiq	GGPS, Domi Sair	A.N.C. Post
52.	Nusrat Bibi D/o S. Wazir Khan	Alooch	GGPS, K. Banda	A.N.C. Post
53.	Aisha D/o Abdur Rahim	Baltara	GGPS, K. Banda	A.N.C. Post
54.	Zakia Begum D/o Fazal Ahmad	Dagi	GGPS, Sari Dara	A.V. Post
55.	Shazia Gulzar D/o Gulzar Khan	Oghi	GGPS, Bar Bak	A.V. Post
56.	Zainab Bibi D/o Abdur Munaf	Swat	GGPS, Amba Sair	A.N.C. Post
57.	Badshah Gul D/o Zabit Khan	Baltagram	GGPS, Amba Sair	A.N.C. Post
58.	Shakila Naz D/o Nowsherwan	Baltagram	GGPS, Darich	A.N.C. Post
59.	Bibi Ikhtaj D/o Abdur Razaq	Bandi Sadiq	GGPS, Seo Vill	A.V. Post
60.	Farda D/o Khalil-ur-Rahman	Dargi	GGPS, Haider Abad	A.N.C. Post
61.	Taslim Akhtar D/o Anwar Zeb	Tanya	GGPS, Tarkan	A.V. Post
62.	Rehmina Bibi D/o Ajmeen Khan	Alpun	GGPS, Tarkan	A.V. Post
63.	Khatuna Bibi D/o Hasan Rehman	Swat	GGPS, Rn rka	A.V. Post
64.	Shahida Bibi D/o Juwahir	Swat	GGPS, Kazika	A.V. Post
65.	Zakia Bibi D/o M. Yousif	Han Pur	GGPS, Bush	A.V. Post
66.	Munaza Sultana D/o Abdul Ahad	Darband	GGPS, Bush	A.V. Post
67.	Bibi Jamshad D/o Gul Zaman	Khaki	GGPS, Domi Ser	A.N.C. Post
68.	Khalida Parvin D/o Sair Durrani	Oghi	GGPS, G. Ronolia	A.V. Post
69.	Shahcen Begum D/o Gul Munir	Swat	GGPS, Segloo	A.V. Post
70.	Tabsum Gul D/o Ajab Khan	Oghi	GGPS, Segloo	A.V. Post
71.	Asia Khatoon D/o M. Sultan	H. Pindi	GGPS, Bar Dahar	A.V. Post
72.	Nabeed Begum D/o M. Rahman	Shangla	GGPS, Bar Dahar	A.V. Post
73.	Shamim Ara D/o Gul Shahzada	Pado	GGPS, Kuloabad	A.N.C. Post
74.	Amrikal D/o Chaman	Swat	GGPS, Kuloabad	A.N.C. Post
75.	Dilshad Bibi D/o Shams-ur-Rehman	Swat	GGPS, Mujwarabad	A.V. Post
76.	Anis Fatima D/o Abdul Razaq	Oghi	GGPS, Jaakh	A.V. Post
77.	Zubarda Parveen D/o Taj Muhammad	Swat	GGPS, Mardan Kolai	A.V. Post

Shaista Khan  
SDEO (F)  
Pattan Kohistan (L)

76. Farhat Begum D/o Hakim Khan	Mansehra	GGPS, Maidan Kolai	A.V. Post
77. Farhat Begum D/o Hayat-ul-Haq	Swat	GGPS, Dall	A.V. Post
79. Gul Was D/o Syed Badshah	Swat	GGPS, Paraghari	A.V. Post
80. Shakira D/o Afsar Khan	Battagram	GGPS, Shokisor	A.V. Post
81. Taj Mehal D/o Aultan Ahmad	Swat	GGPS, Shokiser	A.V. Post
82. Sharifa D/o Abdullah Khan	Swat	GGPS, Behramabad	A.V. Post

**TERMS & CONDITIONS:-**

1. She will be governed by such rules and regulations as may prescribed by the Government from time to time for the category of the Govt. servant which they belong.
2. Her service will be liable to termination on one month notice from either side in case of resignation without notice one month pay will be forfeited in lieu thereof.
3. She should join the post within one month of the issue of this Notification.
4. Her seniority will be determined in accordance with the merit of Departmental Selection Committee.
5. Charge should be submitted to all concerned especially to DEO(M) Primary Kohistan. Charge should be taken from a reliable person of the concerned school.
6. She shall be on probation for a period of two years have to pass Departmental Exams. In case of candidate fail to qualifying Departmental Examination and will be given one more chance. If she fail again then her service will be terminated on arrival/availability of trained teacher.
7. Her Original certificate should be checked & verified from the concerned Board/College before handing over charge.
8. Service Book of the teacher must be prepared completed in all respect before handing over charge. The SDEO(F) take care of it.
9. The declaration of assets should be obtained from her immediately and placed on record.
10. She is required to produce her Health and Age Certificate from medical authority concerned before taking over charge.
11. Charge should not be given to the over age candidate. Her case for upper age relaxation should not be sent to the concerned quarter.
12. Efforts for transfer before the completion of tenure will disqualify from the service.
13. No. TA/DA etc. is allowed to any one.
14. An undertaking shall be obtained from Master A. Degree Holder P.T.C. that they will be served the Department for at least five years.
15. In case of person appointed as an untrained teacher will have to pass the requisite training Examination within a period of 4 years failing which service will be terminated.
16. The SDEO(F) is here by directed to draw pay of untrained teacher after clearance of observation on the newly sanctioned posts from the F.G./Govt. of NWFP Education Department.

(SAEED AHMAD)  
DISTRICT EDUCATION OFFICER  
(MALE) PRIMARY KOHISTAN

Dated Kohistan the 27-10-1997.

Encl: No. 486/2030/1

- Copy of the above is forwarded to the:
1. P/S to Secretary to Government of NWFP Education Deptt: Peshawar.
  2. Director Primary Education NWFP, Peshawar.
  3. District Accounts Officer Kohistan.
  4. Sub Divisional Education officer (Female) Kohistan at Patton.
  5. Candidate Concerned.
  6. O.O. File.

Shaistehar  
SDEO(F)  
Patton Kohistan (L)

DISTRICT EDUCATION OFFICER  
(MALE) PRIMARY KOHISTAN.

OFFICE OF

District Education Officer (Female)  
Kohistan Lower

OFFICE ORDER

Whereas, You Mst: Tabassum Gul PST GGPS Shaungial Dhar Dubair has been appointed as PST Vide No. 984-1080 Dated 31/10/1997.

Whereas, you were reported absent in 5<sup>th</sup> PD days from PD day No,1 to PD day No, 3 and PD day No 5<sup>th</sup> and 6<sup>th</sup> continuously, for the year 2020 but you were absent.

Whereas, the ASDEO (F) Circle visited your school on 09/10/2020, school was found closed, and according to your school teacher attendance register will full absent w-e-f 30/09/2020 to 09/10/2020 in the competent authority issued suspension order vide Endstt; No, 94 dated 29/10/2020.

Whereas, the competent authority issued direction of inquiry to this office and the inquiry officer submitted his report that the above absent report is genuine and correct.

Whereas, ASDEO (F) circle visited your School on 13/02/2021, and as per school record (TAR) teacher attendance register you were found absent w-e-f 11/01/2021 to 13/02/2021. Showcause notices issued vide Endstt; No 1389-89 dated 05/03/2021 but your reply not received to this office.

Whereas, you were reported absent in PD days 06/03/2021, show cause issued vide Endstt; No, 1438-43 dated 10/03/2021. No reply received in this matter.

Whereas, absent report of DCMA /IMU/EMA/ for the Months of 03/2021.

Whereas, you have submitted an affidavit that you will not be absent and will be careful in future but again you showed your previous attitude.

Whereas, after submission a affidavit your pay has been released absent period w-e-f 30/9/2020 to 28/02/2021 (150) days treated as EOL without pay and stoppage of two annual increment vide Notification No,1041-45 dated 13/08/2021 but you were found absent again.

Whereas, absent report of DCMA /IMU/EMA/ for the Months of 08/2021,09/2021 and 10/2021 the school was found closed continuously Showcause notices were issued vide No,7445 dated 02/11/2021 but your reply is not accepted due to non-satisfaction.

Whereas, ASDEO (F) Circle were appointed as inquiry Officer vide this office Endstt; No. 7661-66 dated 22/11/2021. The inquiry officer submitted her detail report that the school found closed.

Whereas, habitual absent teachers list received from the office of DMO/IMU/EMA Kohistan lower in which you were found absent on 18/03/2019, 23/9/2019,29/3/2021,18/8/2021,15/9/2021 and 15/10/2021.

And whereas final showcase notice was issued through News paper i.e "Daily Ajj" News Paper Peshawar dated 26-12-2021, in which you were directed to assume your duty and submit reasons of your willful absence but neither you attended your school nor submit convincing replies before the committee within the stipulated period mentioned in the newspaper. now in view of the above fact I, **Zubaida Khattak DEO (F) Kohistan Lower** being a competent authority is fully satisfied to impose the major penalty of **REMOVAL FROM SERVICE** from 01/05/2021 under the rule 4b (iii) of E&D rules 2011 with immediate effect.

**NOTE:**

If the teacher is found involved in any embezzlement of fund/PTC/ conditional grant, she will be preceded for FIR/ Anti-corruption proceeding as and when reported at any stage. Concerned DDO is directed to recover the payment (if any) made for absence period out of her GPF etc.

Endstt: No. 107-N/S

Copy of the above for information to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar
2. Deputy Commissioner Kohistan Lower
3. District Monitoring Officer (IMU) Kohistan Lower
4. District Account Officer Kohistan Lower
5. SDEO (F) Pattan/ Bankad
6. ASDEO (F) Pattan/Bankad
7. Teachers concerned
8. Master file

Reside  
1-02-2022

District Education Officer (F)  
Kohistan Lower

Dated 22/01/2022

District Education Officer (F)  
Kohistan Lower

P. 14  
Awaraz  
B



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C

بخدمت جناب ڈائریکٹر صاحب ایلمینٹری اینڈ سیکنڈری ایجوکیشن پشاور

عنوان: ڈیپارٹمنٹل ایپل بر خلاف حکم محررہ 22.01.2022 جس کی رو سے سائلہ کو جناب ڈسٹرکٹ ایجوکیشن آفیسر (فی میل) کوہستان لوئر نے ملازمت سے فارغ کیا۔

جناب عالی! ایپل ذیل پیش ہے۔

- (۱) یہ کہ سائلہ بطور PST محکمہ ایجوکیشن ضلع کوہستان لوئر میں مورخہ 31.10.1997 کو تعینات ہوئی اور ملازمت سے فارغ کرنے تک اپنے فرائض منصبی بطریق احسن سرانجام دیتی رہی۔
- (۲) یہ کہ سائلہ کو ڈسٹرکٹ ایجوکیشن آفیسر (فی میل) کوہستان لوئر نے مورخہ 22.01.2022 کو بلا کسی وجہ کے ملازمت سے فارغ کر دیا ہے اور اپنے حکم میں مبینہ طور پر سائلہ کی غیر حاضریاں ظاہر کی ہیں، حالانکہ سائلہ باقاعدگی کے ساتھ ڈیوٹی سرانجام دیتی رہی ہے۔ (نقل حکم محررہ 22.01.2022 لف ہے)۔
- (۳) یہ کہ دوران سروس کئی مرتبہ (F) ASDEO نے سائلہ کے سکول کا وزٹ بھی کیا اور سائلہ کی حاضری رجسٹر بھی چیک کیا اور اپنی رپورٹ بھی لاگ بک محررہ 17.12.2021 اور 15.01.2022 میں تحریر کی۔ (نقولات لف ہیں)۔
- (۴) یہ کہ سائلہ کو نہ تو کوئی شو کا ز نوٹس جاری کیا گیا اور نہ ہی سائلہ کو موصول ہوا ہے اور نہ ہی سائلہ کو کسی انکوائری میں طلب کیا گیا ہے اور نہ ہی شامل کیا گیا ہے۔ اور نہ ہی سائلہ کے سامنے کوئی انکوائری عمل میں لائی گئی ہے۔

Attest

16

- (۵)۔ یہ کہ ڈسٹرکٹ ایجوکیشن آفیسر (فی میل) لوئر کوہستان نے مورخہ 13.08.2021 کو سائلہ اور دیگر اساتذہ کی تنخواہ بعد از کٹوتی جاری کرنے کا حکم صادر کیا، مبینہ حکم محرزہ 22.01.2022 میں پہلے والی غیر حاضری دوبارہ ظاہر کر کے سائلہ کو بلا جواز ملازمت سے فارغ کیا گیا ہے۔
- (۶)۔ یہ کہ سائلہ نے اپنی زندگی کا ایک بڑا عرصہ محکمہ میں گزار رکھا ہے اور سائلہ کا سابقہ سروس ریکارڈ کلیئر اور بے باق ہے۔ سائلہ کو یوں ملازمت سے فارغ کرنا سائلہ کے ساتھ انتہائی زیادتی اور ظلم ہے۔

لہذا استدعا ہے کہ بمنظوری حکمانہ اپیل حکم محرزہ 22.01.2022 کو کالعدم و منسوخ فرمایا جا کر سائلہ کو جملہ سابقہ مراعات / واجبات ملازمت پر بحال کیئے جانے کا حکم صادر کیا جائے۔

المترقوم 09.02.2022

العارض

تبسم گل سابقہ پرائمری سکول ٹیچر

گورنمنٹ گرلز پرائمری سکول شکیال دھار دوپیر ضلع لوئر کوہستان

*Abstract*

*Director D?*

*P. (17)*  
*Awara (D)*



**DIRECTORATE OF ELEMENTARY AND SECONDARY EDUCATION  
KHYBER PAKHTUNKHWA PESHAWAR.**

**NOTIFICATION**

1. WHEREAS, the District Education Officer (F) Kohistan Lower proceeded Mst: Tabssum Gul PST GGPS Shaungial Dhar Dubair Kohistan Lower under Efficiency and Discipline Rules-2011 and imposed the major penalty of removal from Service vide order No. 107-115 Dated: 22-01-2022 on account of willful absenteeism.
  2. AND WHEREAS, being aggrieved, Mst: Tabssum Gul PST of District Kohistan Lower submitted her appeal on 09-2-2022 to the Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar, being Appellate Authority.
  3. AND WHEREAS, this office asked detail report from DEO (F) Concerned vide this office letter No. 5079 Dated: 25-02-2022 and DEO Concerned submitted reply/detail report vide her office No. 2498 Dated: 26-11-22.
  4. AND WHEREAS, this office granted an opportunity of personal hearing to appellant vide letter No: 136 dated: 28-11-2023, which was scheduled on 05-12-21023. The DEO (F) concerned and appellant attends this office on the schedule date and time in person.
  5. AND WHEREAS, the Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar, being Appellate Authority, under the (17) of (Efficiency & Discipline) Rules-2011, examined the whole available record, face to face discussion and states of the DEO (F) Kohistan Lower and appellant concerned, the Appellate authority is of the considered view that the charges against her has been proved.
- NOW THEREFORE, In exercise of powers conferred upon the Director (Elementary and Secondary Education Khyber Pakhtunkhwa, Peshawar), the Director Elementary and Secondary Education, being Appellate Authority, regretted the appeal of the appellant concerned under Rule 17 (2)(a) of the E & D Rules 2011, In the Interest of public service.

**DIRECTOR**

Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar

Endst: No: *7976-78* /F.No. 322/vol;1/appeal Kohistan

Dated Pesh: the *26/01* /2024

Copy forwarded for information to the:-

1. District Education Officer (Female) Kohistan Lower
2. Teacher Concerned.
3. P.A, to Director Elementary & Secondary Education, Local Directorate, Peshawar.

*[Signature]*  
Assistant Director (Estab-1)  
Directorate of Elementary & Secondary Education  
Khyber Pakhtunkhwa, Peshawar  
*25/01/24*

*Handwritten signature*

**INQUIRY REPORT REGARDING GOVERNMENT  
SHUNGYAL DHA**

Reference to your letter No:7493-97 Dated 3/11/2021, regarding complaint lodged by local community. Whereas I personally visited the school on 16/11/2021, during the visit of school Chowkidar Muhammad Anwar and Teacher namely Tabassum Gul were found present at the school. The Students strength were not satisfactory.

After taking the details information from local community and chowkidar, I observed that the school is running with low enrollments and I further observed that in a month once or two time the said teacher is reported absent from the school because of she is a single teacher in school.

So it is stated that the teacher is not habitual absent and perform their duties in school.

*Annex (F)*

**PRIMARY SCHOOL**

*Annex (E)*

Annex (E)

*Handwritten signature*  
Circle Bankad  
Distt: Kohistan(L)  
4-11-21

ASDEO(F) Circle Bankad  
Distt: Kohistan(L)

*Received*  
*Handwritten signature*  
16/11/2021

**DEO (F) BKAD-L**  
D.No. 1237  
Dated 16-11-2021

*M. Aslam*

*P*

*19*

OFFICE OF THE ASSISTANT SUB-DIVISIONAL EDUCATION OFFICER (F)  
CIRCLE DUBAIR DISTT: KOHISTAN LOWER

*(E)*

To,

The DEO Female  
Kohistan Lower

Subject: REPORT REGARDING GOVERNMENT GIRLS PRIMARY SCHOOL SHUNGYAL DHAR

Reference to the direction of DEO (F) It is Stated that I personally paid surprise visit to GGPS Shungyal Dhar on 17/12/2021. When I reached the school, I found Tabassum Gul (PSHT) present in the school, the school chowkidar Muhammad Anwar were also present in the school. The school attendance rate was low only few students are present in the school on the day of my visit, The basic facilities of school is not provided to the school. Floor of the school is totally damaged, Student are suffering from the learning activities, According to Head teacher recently conditional Grant fund has been released on account of additional room in the school but the construction work not started yet. Teacher had also main concern about her pay which is stopped from last 6 months.

Further I inquired about the status of the school from locals, their response was positive and they were also concern about lack of basic facilities. I warned the Head Teacher to utilize the conditional grant fund as soon as possible.

*Reint*  
*21/12/2021*

*Meh-3*  
ASDEO(F) Circle Bankad  
Distt: Kohistan(L)  
ASDEO(F)  
Circle Bankad  
Kohistan

DEO (F) KHL-L  
D.No. 1325  
Dated 20/12/2021

شاہنشاہی دھارہ  
G.G.P.S لاہور  
لاگ بک (حصہ دوم)

January 17

20

رپورٹ کی روشنی میں لکھا گیا  
اقتاری کے جواز پر مبنی ہے

رائے / رپورٹ معائنہ

17- کو معائنہ کیا گیا

س شدگان

میزان

17/12/2021

آج مورہ 17/12/2021 کو G.G.P.S  
شاہنشاہی دھارہ معائنہ کے  
تہم کے تحت G.G.P.S کو معائنہ کیا  
اور جو کچھ اس کو بھی حاضر کیا  
ہو گا اس کی مدد سے اس کی تہم کی  
حاضری کی یقینی بنائیں اور  
SOPS کے مطابق کروائیں

Mohammad  
G.G.P.S  
17/12/2021

جن کی تدریس مدرس کے ذمہ

لاگ بک (حصہ دوم) P-91

Handwritten signature and notes in the top left corner.

رپورٹ کی روشنی میں سیکول  
اقتاری نے جو کارروائی کی

رائے / رپورٹ معائنہ

(F)

آج مورخہ 2022/11/15 کو  
GGPS سٹیشن دھار کاؤنٹ  
ایا۔ صدر ڈیپارٹمنٹ کو حاضر پایا۔  
اور ڈیپارٹمنٹ بھی حاضر تھا  
اور یہاں ہی کہہ دیجئے گی  
حاضر ہی تھیں بنائیں۔

Mehar  
ASDEO(F)  
Circle Bankad  
Dist: Kohistan(Li)  
15-11-2022

محمد الوند چوکیدار

ANNA

P.S. 1

روزگار	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	روزگار	روزگار	
P	11.30	P	8.30					T.G	11.30		1	
P	1.30	P	8.30					T.G	1.30		2	
التوبہ												
P	1.30	P	8.30					T.G	1.30	T.G	8.30	4
P	1.30	P	8.30					T.G	1.30		8.30	5
P	1.30	P	8.30					T.G	1.30	T.G	8.30	6
P	1.30	P	8.30					T.G	1.30	T.G	8.30	7
P	11.30	P	8.30					T.G	11.30	T.G	8.30	8
P	1.30	P	8.30					T.G	1.30	T.G	8.30	9
X												
P	1.30	P	8.30					T.G	1.30	T.G	8.30	11
P	1.30	P	8.30					T.G	1.30	T.G	8.30	12
P	1.30	P	8.30					T.G	1.30	T.G	8.30	13
P	1.30	P	8.30					T.G	1.30	T.G	8.30	14
P	11.30	P	8.30					T.G	11.30	T.G	8.30	15
P	1.30	P	8.30					T.G	1.30	T.G	8.30	16
X												
P	1.30	P	8.30					T.G	1.30	T.G	8.30	18
X												
P	1.30	P	8.30					T.G	1.30	T.G	8.30	20
P	1.30	P	8.30					T.G	1.30	T.G	8.30	21
P	11.30	P	8.30					T.G	11.30	T.G	8.30	22
P	1.30	P	8.30					T.G	1.30	T.G	8.30	23
X												
P	1.30	P	8.30					T.G	1.30	T.G	8.30	25
P	1.30	P	8.30					T.G	1.30	T.G	8.30	26
P	1.30	P	8.30					T.G	1.30	T.G	8.30	27
P	1.30	P	8.30					T.G	1.30	T.G	8.30	28
P	11.30	P	8.30					T.G	11.30	T.G	8.30	29
X												
PD day التوبہ 30												
X												

موضوع	حال	سابقہ	میزان	حال	سابقہ	میزان	حال	سابقہ	میزان
اقتیاری									
اشتیاقیاری									
بیاری									
میزان									

ریجنل مدرسہ



تبصیح گل

P.S.H.T

نمبر

محلہ اولہ و کھیدار				تبصیح گل				P.S.H.T				نمبر		
دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	رواگی	دستخط	آمد	دستخط	آمد	نمبر
P	1.30	P	8.30					T.G	1.30	T.G	8.30			1
P	1.30	P	8.30					T.G	1.30	T.G	8.30			2
P	11.30	P	8.30					T.G	1.30	T.G	8.30			3
P	1.30	P	8.30					T.G	11.30	T.G	8.30			4
P	1.30	P	8.30					T.G	1.30	T.G	8.30			5
P	1.30	P	8.30					T.G	1.30	T.G	8.30			6
														7
P	1.30	P	8.30					T.G	1.30	T.G	8.30			8
P	1.30	P	8.30					T.G	1.30	T.G	8.30			9
P	1.30	P	8.30					T.G	1.30	T.G	8.30			10
P	1.30	P	8.30					T.G	1.30	T.G	8.30			11
P	11.30	P	8.30					T.G	11.30	T.G	8.30			12
P	1.30	P	8.30					T.G	1.30	T.G	8.30			13
														14
P	1.30	P	8.30					T.G	1.30	T.G	8.30			15
P	1.30	P	8.30					T.G	1.30	T.G	8.30			16
P	1.30	P	8.30					T.G	1.30	T.G	8.30			17
P	1.30	P	8.30					T.G	1.30	T.G	8.30			18
P	11.30	P	8.30					T.G	11.30	T.G	8.30			19
P	1.30	P	8.30					T.G	1.30	T.G	8.30			20
														21
P	1.30	P	8.30					T.G	1.30	T.G	8.30			22
P	1.30	P	8.30					T.G	1.30	T.G	8.30			23
P	1.30	P	8.30					T.G	1.30	T.G	8.30			24
P	1.30	P	8.30					T.G	1.30	T.G	8.30			25
P	11.30	P	8.30					T.G	11.30	T.G	8.30			26
P	1.30	P	8.30					T.G	1.30	T.G	8.30			27
														28
P	1.30	P	8.30					T.G	1.30	T.G	8.30			29
P	1.30	P	8.30					T.G	1.30	T.G	8.30			30
														31
میزان				میزان				میزان				میزان		
S.E.P. NO. 20												آفتاب		
ASDEO(F)												اشفاق		
Circle Bankad												پاری		
Dist: Kohistan(L)												میزان		
4-11-2021														

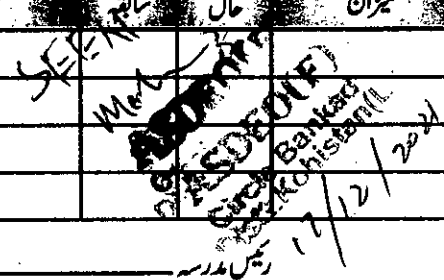
الله

# شنگيال دفار G.G.P.S

رجسٹر حاضر مدرسین 24

بابت ماہ دسمبر 2021

شنگيال دفار				شنگيال دفار				نمبر
P.S.H.T				P.S.H.T				
آدم	دستخط	رواگی	دستخط	آدم	دستخط	رواگی	دستخط	نمبر
P.D. day 1-12-2021								
P	1.30	P	8.30	T.G	1.30	T.G	8.30	2
P	1.30	P	8.30	T.G	1.30	T.G	8.30	3
P	1.30	P	8.30	T.G	1.30	T.G	8.30	4
/ / / /				/ / / /				5
P	1.30	P	8.30	T.G	1.30	T.G	8.30	6
P	1.30	P	8.30	T.G	1.30	T.G	8.30	7
P	1.30	P	8.30	T.G	1.30	T.G	8.30	8
P	1.30	P	8.30	T.G	1.30	T.G	8.30	9
P	1.30	P	8.30	T.G	1.30	T.G	8.30	10
P	1.30	P	8.30	T.G	1.30	T.G	8.30	11
/ / / /				/ / / /				12
P	1.30	P	8.30	T.G	1.30	T.G	8.30	13
P	1.30	P	8.30	T.G	1.30	T.G	8.30	14
P	1.30	P	8.30	T.G	1.30	T.G	8.30	15
P	1.30	P	8.30	T.G	1.30	T.G	8.30	16
P	1.30	P	8.30	T.G	1.30	T.G	8.30	17
P	1.30	P	8.30	T.G	1.30	T.G	8.30	18
/ / / /				/ / / /				19
P	1.30	P	8.30	T.G	1.30	T.G	8.30	20
P	1.30	P	8.30	T.G	1.30	T.G	8.30	21
P	1.30	P	8.30	T.G	1.30	T.G	8.30	22
P	1.30	P	8.30	T.G	1.30	T.G	8.30	23
P	12.30	P	8.30	T.G	12.30	T.G	8.30	24
P	1.30	P	8.30	T.G	1.30	T.G	8.30	25
/ / / /				/ / / /				26
P	1.30	P	8.30	T.G	1.30	T.G	8.30	27
P	1.30	P	8.30	T.G	1.30	T.G	8.30	28
P	1.30	P	8.30	T.G	1.30	T.G	8.30	29
P	1.30	P	8.30	T.G	1.30	T.G	8.30	30
P	12.30	P	8.30	T.G	12.30	T.G	8.30	31
میزان	سابقہ	مال	میزان	سابقہ	مال	میزان	سابقہ	میزان


 THE STATE BANK OF PAKISTAN  
 KARACHI BRANCH  
 17/12/2021

رقم  
 اتقا  
 استقا  
 شمار  
 مبرا

مرفت  
 اتقا  
 استقا  
 شمار  
 مبرا



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)  
KOHISTAN LOWER

ORDER  
With reference to the recommendation of the personal hearing committee regarding action taken on IMU report & ASDEO circle visits report for the month of 06 2021; held on 06-07-2021 under the chairmanship of DEO (F) Kohistan-Lower action recommended by the committee and their meeting submitted to the undersigned in the light of recommendation committee the following action are hereby taken and deduction made w.e.f 01-09-2021.

Sr	Name of Official	Name of School	Absent Date	Absent Days	Remarks
1	Zakir Bibi PST	GGPS Bazar Ranolia	22-04-2021 to 06-07-2021	74 days	Seventy four (74) days deduction w.e.f 22-04-2021 to 06-07-2021 along with stoppage of two increment as per rule 4(a) and absent period treated as EOL.
2	Jamila Bibi PST	GGPS Bazar Ranolia	01-03-2021 to 31-07-2021	152 days	After deduction 152 days w.e.f 01-03-2021 to 31-07-2021 along with stoppage of two increment as per rule 4(a) and absent period treated as EOL.
3	Mahajabeen PST	GGPS Dhoop Shomal	01-02-2021 to 30-04-2021	90 days	3 Months deduction w.e.f 01-02-2021 to 30-04-2021 along with stoppage of two increment and pay release absent period treated as EOL.
4	Romina Bibi	GGPS Zargai	01-05-2021 to 15-05-2021	15 days	After deduction 15 days w.e.f 01-05-2021 to 15-05-2021 stoppage of 2 increment and her pay may be release.
5	Khush Niaz SPST	GGPS Bar Dhar	01-02-2021 to 31-3-2021	58 days	Deduction 2 month and 02 increment stop for 2 year and release her salary absent period treated as EOL.
6	Saiqa Rahman	GGPS Said Abad Dhar Dubair	30-09-2020 to 25-10-2020	150 Days	After deduction (150) days & stoppage of two(2) increment her pay release absent period treated as EOL.
7	Tabassum Gul	GGPS Shongial-Dhar	30-09-2020 to 23-02-2021	150 Days	After deduction of (150) days and stoppage of 2 increment and get Affidavit from her and release pay absent period treated as EOL.
8	Sonia Bibi	GGPS Kuz Saprona Kayal	01-03-2021 to 30-06-2021	121 days	After deduction of 121 days and stoppage of 2 increment and her pay release absent period treated as EOL.
9	Sadaf Ali Akbar	GGPS Dachi	22-04-2021 to 01-05-2021	9 days	After deduction of 09 days and get Affidavit her pay may be release absent period treated as EOL.
10	Nahida Azhar	GGPS Dustam Abad	01-04-2021 to 31-05-2021	60 days	After deduction of 60 days and stoppage of 2 increment and pay may be release absent period treated as EOL.
11	Gu. Bano	GGPS Sharail	22-04-2021 to 24-04-2021	03 days	After of deduction of 03 days her pay may be release absent period treated as EOL.
12	Kulsoom SPST	GGPS Dar Killay	01-04-2021 to 25-04-2021	25 days	Her pay may be stop till further inquiry decision.

Approved  
[Signature]

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*Alles*

*P*

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GGPS Madian Kayi	01-04-2021 to 30-06-2021	90 days	After deduction of 90 days her pay release absent period treated as EOL
GGPS Keru	01-05-2021 to 30-06-2021	60 days	After deduction 60 day and stoppage of 1 increment and her pay may be release absent period treated as EOL
Far Fatima	22-04-2021 to 24-04-2021	04 days	After deduction 04 days her pay may be release absent period treated as EOL
Noreen Akhtar	01-03-2021 to 31-07-2021	152 days	After deduction of 152 day and stoppage of 2 increment, after getting affidavit and her pay release absent period treated as EOL
Shaheen Akhtar	22-04-2021 to 26-04-2021	5 days	05 days deduction along with CENSURE as per rule 4(a) and absent period treated as EOL and pay release
Rabia Haq	01-05-2021 to 31-05-2021	90 days	After deduction of 90 days and stoppage of 3 increment and release her pay absent period treated as EOL
Shagufta Aziz	22-04-2021 to 02-05-2021	10 days	After deduction 10 days her pay may be release absent period treated as EOL
Bibi Hanifa	22-04-2021 to 23-05-2021	31 days	After deduction of 30 days her pay may be release absent period treated as EOL

*P*  
 DISTRICT EDUCATION OFFICER (F)  
 KOHISTAN LOWER

Endst: No 1041-45 /DEO (F) KH-L Dated 13/08/2021

- Copy for information & necessary action to:
1. Director E&SE Khyber Pakhtunkhwa Peshawar.
  2. Deputy Commissioner Kohistan Lower
  3. District Monitoring Officer (EMA) Kohistan Lower.
  4. SDEO (F) Pattan/SDEO (F) Bankad Kohistan Lower.
  5. Office copy.

*P*  
 DISTRICT EDUCATION OFFICER (F)  
 KOHISTAN LOWER

# وکالت نامہ

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بعدالت جناب KPK سروس ٹریبونل پشاور کیمپ کورٹ ایبٹ آباد

ڈائریکٹر انٹیمپٹری اینڈ سیکنڈری ایجوکیشن وغیرہ

نام

مسماۃ تبسم گل

سروس اپیل

اپیلانٹ

باعث تحریر آئنگہ!

منجانب:

## عبدالصبور خان ایڈووکیٹ سپریم کورٹ آف پاکستان

اندریں مقدمہ عنوان بالا اپنی طرف سے برائے بیرونی وجوہ دی بمقام سروس ٹریبونل پشاور

کو بدیں شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رُو و بعدالت حاضر ہوتا ہوں گا اور بوقت پکارے جانے وکیل صاحب موصوف کو اطلاع دیکر حاضر کروں گا۔ اگر کسی پیشی پر مظہر حاضر نہ ہوا اور غیر حاضری کی وجہ سے کسی طور پر مقدمہ میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر مقام پشاور کے علاوہ کسی اور جگہ پشوری کے مقررہ اوقات سے پہلے یا بروز تعطیل بیرونی کرنے کے مجاز نہ ہونگے اگر مقدمہ مقام پشوری کے آگے یا پیچھے ساعت ہونے پر مظہر کو کوئی نقصان پہنچے تو صاحب موصوف ذمہ دار نہ ہوں گے اور صاحب موصوف کو عرضی دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی، اپیل نگرانی دائر کرنے نیز ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کے اجراء کرانے اور ہر قسم کارروپیہ وصول کرنے اور رسید دینے اور داخل کرنے کا، ہر قسم کا بیان دینے اور سپردگاشی و راضی نامہ و دستبرداری و اقبال دعویٰ کا اختیار ہوگا اور بصورت اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم اتناعی یا فیصلہ ڈگری و اجراءے ڈگری بھی صاحب موصوف کو بشرط ادائیگی علیحدہ فیس کرنے کا مجاز ہوگا۔ بصورت ضرورت بدوران مقدمہ یا اپیل و نگرانی کسی دوسرے وکیل یا ایڈووکیٹ کو بجائے خود یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانونی کو بھی اس امر میں وہی اختیارات حاصل ہوں گے جیسے صاحب موصوف کو، پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی حالت میں میرا مطالبہ صاحب موصوف کے برخلاف نہیں ہوگا۔ مجھے کل ساختہ پر ساختہ مثل ذات خود منظور و قبول ہوگا۔ لہذا وکالت نامہ لکھ دیا ہے تاکہ سند رہے۔ مضمون وکالت نامہ سن لیا اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔

مورخہ 23.01.2024

مسماۃ تبسم گل سابقہ پرائمری سکول ٹیچر گورنمنٹ گرلز پرائمری سکول شکیال، دھار دیو ضلع کوہستان لوئر..... اپیلانٹ

Attested & Accepted

Abdul Saboor Khan

ASC