


19.01.2024

Learned counsel for the petitioner present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.

Learned counsel for the petitioner stated that in the heading of the application, implementation of order dated 10.07.2023 has been sought, however in essence the petitioner is seeking the implementation of the judgment dated 02.10.2023. Necessary correction in the appeal be made accordingly. Respondents are directed to submit implementation report of the judgment dated 02.10.2023 on 12.02.2024 before the S.B. Parcha Peshi given to the parties.

SCANNED  
KPST  
Peshawar

\*Naeem Amin\*

  
(Salah-ud-Din)  
Member (J)


12.02.2024

1. Learned counsel for the petitioner present. Learned counsel for private respondent No. 1 present. Mr. Habib Anwar, Additional Advocate General alongwith Mr. Mehran, Assistant for respondents No. 2 & 3 present.

2. Implementation<sup>o</sup> report not submitted. Representative of the respondents requested for time to submit implementation report. Granted. To come for implementation report on 12.03.2024 before S.B. P.P given to the parties.


SCANNED  
KPST  
Peshawar

\*Kamranullah\*

  
(Muhammad Akbar Khan)  
Member (E)

03.01.2023 01. Learned counsel for the petitioner present. Mr. Asif Masood Ali Shah, Deputy District Attorney alongwith Mr. Faheem, Assistant for the respondents present.

02. Implementation report not submitted. Representative of the respondents requested for time to submit implementation report. Granted with direction to submit implementation report on the next date positively. Adjourned. To come up for implementation report on 18.01.2024 before S.B. P.P given to the parties.

  
(Muhammad Akbar Khan)  
Member (E)

18.01.2024

Clerk of learned counsel for the petitioner present.  
Clerk of learned counsel for private respondent No. 1 present.  
Mr. Muhammad Yasir, Junior Clerk alongwith Mr. Asad Ali Khan, Assistant Advocate General for official respondents present and stated that the petitioner has sought implementation of the order dated 10.07.2023, however the very appeal bearing No. 1/2022 has been decided vide order dated 02.10.2023. In this scenario, clerk of learned counsel for the petitioner stated that as learned counsel for the petitioner is unable to appear before the Tribunal today due to strike of lawyers, therefore, the matter may be fixed for tomorrow. To come up on 19.01.2024 before the S.B. Parcha Peshi given to the parties.

(Salah-ud-Din)  
Member (J)

## FORM OF ORDER SHEET

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

Implementation Petition No. 887/2023

S.No

Date of order  
proceedings

Order or other proceedings with signature of judge

1


2

3

28.11.2023

The implementation petition of Mst. Saima submitted today by Mr. Khaled Rehman Advocate. It is fixed for implementation report before Single Bench at Peshawar on 05-12-2023. Original file be requisitioned. AAG has noted the next date. Parcha peshi is given to counsel for the petitioner.

By the order of Chairman



REGISTRAR

05<sup>th</sup> Dec. 2023

**SCANNED**  
**KPST**  
**Peshawar**

01. Counsel for the petitioner present. Mr. Asad Ali Khan, Assistant A.G for the respondents present.

02. Notice be issued to the respondents through TCS, the expenses of which shall be deposited by the petitioner within

03 days. To come up for implementation report on 03.01.2024 before the S.B. Parcha Peshi given to the petitioner.

  
(FAREEHA PAUL)  
Member (E)

# **KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR**

## **CHECK LIST**

*Saima*

**Versus**

*Salma San*

..... Appellant

..... Respondents

S NO	CONTENTS	YES	NO
1.	This petition has been presented by: <u>Advocate</u> <u>Court</u>	√	
2.	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	√	
3.	Whether appeal is within time?	√	
4.	Whether the enactment under which the appeal is filed mentioned?	√	
5.	Whether the enactment under which the appeal is filed is correct?	√	
6.	Whether affidavit is appended?	√	
7.	Whether affidavit is duly attested by competent Oath Commissioner?	√	
8.	Whether appeal/annexures are properly paged?	√	
9.	Whether certificate regarding filing any earlier appeal on the subject, furnished?	√	
10.	Whether annexures are legible?	√	
11.	Whether annexures are attested?		
12.	Whether copies of annexures are readable/clear?	√	
13.	Whether copy of appeal is delivered to AG/DAG?	√	
14.	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	√	
15.	Whether numbers of referred cases given are correct?	√	
16.	Whether appeal contains cutting/overwriting?	x	
17.	Whether list of books has been provided at the end of the appeal?	√	
18.	Whether case relate to this court?	√	
19.	Whether requisite number of spare copies attached?	√	
20.	Whether complete spare copy is filed in separate file cover?	√	
21.	Whether addresses of parties given are complete?	√	
22.	Whether index filed?	√	
23.	Whether index is correct?	√	
24.	Whether Security and Process Fee deposited? On _____		
25.	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On _____	√	
26.	Whether copies of comments/reply/rejoinder submitted? On _____		
27.	Whether copies of comments/reply/rejoinder provided to opposite party? On _____		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:- *[Signature]*

Signature:- *[Signature]*

Dated:- 28-11-23

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. 887 /2023

IN

Service Appeal No. 01/2022

Mst. Saima ..... Petitioner

Versus

Dr. Salma Sami and others ..... Respondents

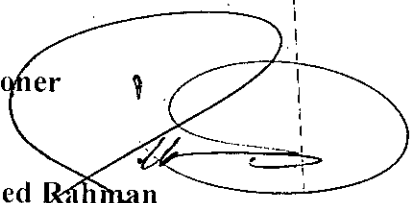
INDEX

S.No.	Description of Documents	Date	Annexure	Pages
1.	Memo of Application with Affidavit			1-5
2.	Notification of posting of Dr. Salma Sami as Principal GGHS Nodih, District Nowshera	13.07.2021	A	6-7
3.	Notification of transfer of Dr. Salma Sami as Principal to GGHS Gulabad Jamrud, District Khyber	14.12.2021	B	8
4.	Application of Mst. Noshaba	16.12.2021	C	9
5.	Notification/modification of transfer of Dr. Salma Sami to GGHS Matta Palangzai, District Charsadda	20.12.2021	D	10
6.	Order of relieving of Dr. Salma Sami from GGHS Irrigation Colony, Peshawar	09.02.2022	E	11
7.	Service Appeal No.01/2022 filed by Dr. Salma Sami		F	12-16
8.	Replies in 02 sets		G	17-21
9.	Notification of transfer of Mst. Saima to GGHS Malogo, Peshawar	12.08.2022	H	22
10.	Notification of general transfer whereby the post occupied by Petitioner Mst. Saima was not only shown vacant rather Dr. Salma Sami was transferred/posted to the same post	14.09.2022	I	23-26
11.	Application of Dr. Salma Sami that the post at GGHS Malogo, Peshawar is already occupied	15.09.2022	J	27
12.	Order disposing of Service Appeal No.01/2022	13.03.2023	K	28
13.	Notification in light of the Tribunal order whereby Mst. Saima was transferred from GGHS Malogo, Peshawar and Dr. Salma Sami was adjusted on it.	17.04.2023	L	29
14.	Arrival Report of Dr. Salma Sami	17.04.2023	M	30
15.	Relieving order of Petitioner Mst. Saima	19.04.2023	N	31
16.	Application under Section 12(2) CPC	19.04.2023	O	32
17.	Order of the Tribunal suspending the Notification dated 17.04.2023	04.05.2023	P	33
18.	Letter of Accountant General asking for advice of the Secretary E&SE, KP	09.05.2023	Q	34
19.	Letter of Secretary E&SE to	19.05.2023	R	35

S.No.	Description of Documents	Date	Annexure	Pages
	Accountant General, KPK to release the salary of Dr. Salma Sami			
20.	Order of the Tribunal allowing Application under Section-12(2) C.P.C	10.07.2023	S	36-37
21.	Amended Service Appeal No.01/2022 filed by Dr. Salma Sami		T	38-44
22.	Reply of Petitioner Mst. Saima		U	45-48
23.	Order of the Tribunal giving time to the Department to resolve the issue	22.09.2023	V	49
24.	Backdated Notification whereby on the basis of Tribunal order dated 04.05.2023 (incorrectly written as 05.05.2023), the Notification dated 17.04.2023 regarding the transfer of Dr. Salma Sami and Mst. Saima was held in abeyance	02.10.2023	W	50
25.	Judgment in Service Appeal No.01/2022 filed by Dr. Salma Sami	02.10.2023	X	51-53
26.	Application of Mst. Saima for implementation of the Judgment dated 02.10.2023	09.10.2023	Y	54-55
27.	Wakalat Nama			

Petitioner

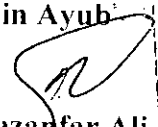
Through

  
Khaled Rahman  
Advocate, Supreme Court

&

  
Muhammad Amin Ayub

&

  
Muhammad Ghazanfar Ali  
Advocates, High Court  
4-B, Haroon Mansion  
Khyber Bazar, Peshawar  
Off: Tel: 091-2592458  
Cell # 0313-9040434

Dated: \_\_\_/11/2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. 887/2023

IN

Service Appeal No. 01/2022

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 9528

Dated 28-11-2023

Mst. Saima,

Principal, GGHSS Malogo, Peshawar.....

Petitioner

Versus

1. Dr. Salma Sami,  
Principal, GGHSS Irrigation Colony, Peshawar  
Presently GGHSS Malogo, Peshawar
2. The Government of Khyber Pakhtunkhwa  
through Chief Secretary,  
Civil Secretariat, Peshawar.
3. The Secretary,  
Govt. of Khyber Pakhtunkhwa  
Elementary & Secondary Education,  
Civil Secretariat, Peshawar. ....

Respondents.

---

Application for implementation of the order dated 10.07.2023 passed by the Service Tribunal in Service Appeal No.01/2022.

---

Respectfully Sheweth,

1. **That** the Respondent No.1 then appellant (namely Dr. Salma Sami) was appointed as Principal (BPS-18) vide Notification dated 08.02.2021 and was posted as Principal GGHSS Nodih, District Nowshera vide Notification dated 13.07.2021 (*Annex;-A*) for actualization against the vacant post and then is posted as Principal (BPS-19) GGHSS Irrigation Colony, Peshawar in own Pay Scale as stopgap arrangement.
2. **That** vide Notification dated 14.12.2021 (*Annex;-B*), Dr. Salma Sami was then transferred to GGHS Gulabad Jamrud, District Khyber whereas one Mst. Noshaba was transferred in place of Dr. Salma Sami to the post of Principal, GGHS Irrigation Colony, Warsak Road, Peshawar. However, Mst. Noshaba vide her application dated 16.12.2021 (*Annex;-C*) requested the Competent Authority that the post at GGHS Gulabad, Jamrud, Khyber is already occupied by Mrs. Tahira Naz, Principal (BPS-18) and therefore, she could not be handed over the charge at GGHS Irrigation Colony, Peshawar.

3. **That** accordingly, the order *ibid* was modified and the Dr. Salma Sami was transferred to GGHS Matta Palangzai, District Charsadda vide Notification dated 20.12.2021 (*Annex;-D*). Consequently, she was relieved vide Relieving order dated 09.02.2022 (*Annex;-E*). However, she was aggrieved of the same and challenged the same through Service Appeal No.01/2022 (*Annex;-F*) wherein the Department and private Respondent also filed Replies in two sets (*Annex;-G*).
4. **That** the Petitioner Mst. Saima being employee of the same Department was earlier posted at GGHS Mian Gujar vide Notification dated 15.02.2019 on OPS basis and subsequently appointed to the post of Principal (BPS-18) vide Notification dated 05.03.2019 and adjusted at the same School. After serving on the same post for about 04 years, Petitioner Mst. Saima was transferred to GGHSS Malogo, Peshawar vide Notification dated 12.08.2022 (*Annex;-H*) against a vacant post of Principal (BPS-18) with immediate effect, in the public interest. Applicant took over the charge and started performing her duty.
5. **That** during the pendency of the Service Appeal, another general transfer Notification dated 14.09.2022 (*Annex;-I*) was issued wherein quite incorrectly the post occupied by Petitioner Mst. Saima i.e. GGHSS Malogo, Peshawar was not only shown to be vacant rather Dr. Salma Sami was transferred to the same occupied post. Since the post was already occupied by Petitioner Mst. Saima, therefore, Dr. Salma Sami vide her application dated 15.09.2022 (*Annex;-J*) requested the Competent Authority that the subject post is occupied and that she be adjusted on it.
6. **That** in the meanwhile, the appeal pending before the Tribunal came for hearing on 13.03.2023 and disposed vide order of the even date (*Annex;-K*) of in the following terms:-

*“ The record reflects that one Mst. Sughra Sadaf had submitted an application for her impleadment in this appeal on the strength of transfer notification dated 14.09.2022 copy annexed with the application in the said Notification the appellant was shown to have been transferred against vacant post of Principal (BS-18) at GGHS Malogi, Peshawar. When confronted with the situation, learned counsel for the appellant submits that if a direction is given to the respondents that posting/Transfer Notification issued 14.09.2022 should be actualized, she would not press this appeal. Order accordingly. Consign”.*

In compliance with the order *ibid* a Notification dated 17.04.2023 (*Annex;-L*), was issued wherein the Petitioner Mst. Saima was prematurely transferred from GGHSS Malogo, Peshawar and reposted to GGHSS Mian Gujjar where she already passed about 04 years. Appellant Dr. Salma Sami also submitted Arrival



Report dated 17.04.2023 (*Annex:-M*) and the Petitioner Mst. Saima was thus relieved from the post vide relieving order dated 19.04.2023 (*Annex:-N*).

7. **That** since the Petitioner Mst. Samia was neither arrayed in the panel of Respondents in appeal *ibid.* nor this Hon'ble Tribunal was apprised of the fact that the post is not vacant so Petitioner Mst. Saima was having no other option but to file an application under Section 12(2) CPC (*Annex;-O*) on 19.04.2023 against the order of Tribunal dated 13.03.2023 *ibid.* which came for preliminary hearing on 04.05.2023, notice was issued to all concerned and in the meanwhile the Notification dated 17.04.2023 *ibid.* was suspended vide order 04.05.2023 (*Annex;-P*).
8. **That** in view of the suspension order *ibid.* Dr. Salma Sami was required to be relieved and the salary of the Petitioner Mst. Saima was to be released but that not done hence a confusion arose with regard to salary and the Accountant General, Khyber Pakhtunkhwa wrote letter dated 09.05.2023 (*Annex:-Q*) asking for the advice of the Secretary Elementary & Secondary Education, however, in utter defiance of the order of the Tribunal, the Secretary requested the Accountant General KPK vide letter dated 19.05.2023 (*Annex:-R*) to release the salary of the Dr. Salma Sami instead under the pretext that the Notification dated 17.04.2023 (already suspended) still holds the field.
9. **That** application of Petitioner under Section-12(2) C.P.C was later on allowed vide order dated 10.07.2023 (*Annex;-S*) and the Tribunal's order dated 13.03.2023 *ibid.* was set aside whereas amended appeal was directed to be filed by Dr. Salma Sami with Petitioner Mst. Saima as one of Respondents. At the end of the order the following observations were made;-

*The Learned counsel for the petitioner made a further request that till the disposal of appeal, the operation of orders shown to have been passed in compliance with the order dated 13.03.2023 might be suspended as there are anomalies created because of the order dated 14.09.2022. In this respect the respondent's representative present in the court is directed to resolve the matter and submit report on the next date".*

10. **That** afterwards amended Service Appeal No.01/2022 (*Annex;-T*) was filed by Dr. Salma Sami wherein a detailed reply (*Annex;-U*) was submitted by Petitioner Mst. Saima. Vide order dated 22.09.2023 (*Annex;-V*), the Department sought time from the Tribunal to resolve the issue between the parties and the case was adjourned to 02.10.2023 on which date, the Department produced a backdated Notification (*Annex;-W*) whereby on the basis of Tribunal order dated 04.05.2023 (incorrectly written as 05.05.2023), the Notification dated 17.04.2023

regarding the transfer of Dr. Salma Sami and Mst. Saima was held in abeyance.

11. That on the same date i.e. 02.10.2023 after hearing the parties, the Tribunal was pleased to dispose of the Appeal vide Judgment dated 02.10.2023 (*Annex;-X*) in the following terms:-

*“Therefore, it is always expected from the authorities by the civil servants that they would be allowed to complete their normal tenure. Not only in this case but in all other such cases, we have seen that against that, no one can be posted against the post of his/her choice, As stated above, the order last in line i.e. of 17.04.2023, though, discussed in the order sheet dated 04.05.2023 and suspended vide the said order, yet is still in field, therefore anybody feeling aggrieved, of the order under which the civil servant is holding the post for another reason also that was not under challenge before the Tribunal. We expect that in order to avoid further unnecessary litigation, the departmental authorities would honour the tenure provided in their own posting/transfer policy and none of the parties should suffer otherwise than due course of policy.*

4. *The appeal is disposed of in the above terms. Consign.”*

12. That after obtaining attested copy of the Judgment *ibid*, Petitioner Mst. Saima submitted the same to the Departments through application dated 09.10.2023 (*Annex:-Y*) for implementation in accordance with law but the Department failed to implement the same as per the directions of the Hon'ble Tribunal. Moreover, at the time of announcement of judgment, the Representatives of the Respondents were available and they were fully in the knowledge of the judgment but inspite of the same they failed to honor the above captioned judgment.

It is, therefore, humbly prayed that Respondents may graciously be directed to implement the Judgment of the Hon'ble Tribunal in letter and spirit and applicant be allowed to complete her tenure at GGHS Malogo, Peshawar.

S

**Petitioner**

(Mst. Saima Respondent No.7 in Appeal)

Through

**Khaled Rahman**  
Advocate, Supreme Court

&

**Muhammad Amin Ayub**

&

**Muhammad Ghazanfar Ali**  
Advocates, High Court

Dated 25/11/2023

## BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Execution Petition No. \_\_\_\_\_/2023

IN

Service Appeal No. 01/2022

Mst. Saima ..... Petitioner

Versus

Dr. Salma Sami and others ..... Respondents

**Affidavit**

I, Mst. Saima, Principal, GGHS Malogo, Peshawar, do hereby solemnly affirm and declare on oath that the contents of this Application are true and correct to the best of my knowledge, and nothing has been concealed from this Hon'ble Tribunal.

Deponent

MAJID AHMAD  
PUBLIC PROSECUTOR  
PESHAWAR  
28/11/2022

6  
Annex A  
BETTER COPY

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**Elementary and secondary education department**

**Dated Peshawar the July 13<sup>th</sup> 2021**

**Notification**

**No. SO(S/F)/E&SE/4-16/2021/Salma Sami:** consequent upon the appointment of Dr. Salma Sami (BS-18) vide notification of even number dated 08.02.2021. she is hereby posted as principal GGHSS Nodeh District Nowshera for actualization against the vacant post and subsequently posted/adjusted as principal (BS-19) GGHSS Irrigation Colony, Peshawar in her own pay and scale (as stop gap arrangement)

**i. No. TA/DA is allowed.**

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA**  
**E&SE DEPARTMENT**

Endst: of even NO. & Date:

Copy forwarded for information to the:

1. Accountant Genera, Khyber Pakhtunkhwa, Peshawar
2. Director E&SE Khyber Pakhtunkhwa, Peshawar
3. District Education Officers (Female) Nowshera
4. District Accounts Officer, Nowshera
5. Director EMIS, E&SE Department
6. PS to secretary, E&SE Department
7. Officer concerned.
8. Office order file.

**(Hafeez ur Rehman Shah)**

**Section Officer (S/F)**



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the 17<sup>th</sup> 2021

NOTIFICATION

NO. SD/S/E&SE/4-16/2021/Saima Sandi. Consequent upon the appointment of Saima Sandi (BS-18), vide notification of even number dated 08.02.2021. She is hereby appointed as Principal CGHSS Nodan District Nowshera for actualization against the vacant post and subsequently posted/adjusted as Principal (BS-19) CGHSS Irrigation Colony Peshawar (for 2021) on a scale (as stop gap arrangement).

No TA/DA is allowed.

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

List of even No. & date:

Copy forwarded for information to the:-

- Accountant General, Khyber Pakhtunkhwa, Peshawar.
- Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
- District Education Officers (Female) Nowshera
- District Accounts Officer, Nowshera
- Director EMIS, E&SE Department.
- PS to Secretary, E&SE Department.
- Officer concerned.
- Office order file.

ASSISTANT DIRECTOR  
Provincial Ombudsman  
Secretariate  
Khyber Pakhtunkhwa

ATTESTED

(Hafeez Ha Rehman Shah)  
SECTION OFFICER (S.E)

Handwritten mark

Handwritten mark



*B Amra B*

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No: 091-9223588



Dated Peshawar the December 14<sup>th</sup>, 2021

**NOTIFICATION**

**NO. SO(SF)E&SED/4-16/2021/POSTING/TRANSFER/TC:** The Competent Authority, in light of the Judgment of the Khyber Pakhtunkhwa Service Tribunal Peshawar dated 25-06-2021 in Service Appeal No-10297/2020, is pleased to order the following posting / transfer, with immediate effect, in the public interest: -

Sr. No	Name & designation	From	To
1.	Mst. Noshaba, Principal (BS-19)	GGHS Kernal Sher Khan, Swabi.	Principal GGHS, Irrigation Colony, Warsak Road Peshawar (Vice No-2)
2.	Dr. Salma Sami, Principal (BS-18)	GGHS, Irrigation Colony, Warsak-Road Peshawar	Principal GGHS Gulabad Jamrud, Khyber against the vacant post.

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
&SE DEPARTMENT**

**Endst: of even No. & date:**

Copy forwarded for information to the: -

1. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
2. Accountant General, Khyber Pakhtunkhwa, Peshawar.
3. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Female) Peshawar, Swabi & Khyber.
5. District Accounts Officer Swabi & Khyber.
6. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
7. Section Officer (Litigation-II), E&SE Department, Khyber Pakhtunkhwa.
8. PS to Minister for E&SE, Khyber Pakhtunkhwa.
9. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
10. Principal concerned.
10. Master file.

*[Signature]*  
14/12

(SAMIRA MEHSOOD)  
SECTION OFFICER (SCHOOLS FEMALE)

*[Signature]*  
**ATTESTED**

9. Annex C

13

13

To

The Honourable Secretary to Govt. of Khyber Pakhtunkhwa  
Elementary and Secondary Education Department.

Subject:- NON AVAILABILITY OF POST FOR SERIAL NO. 2 IN NOTIFICATION NO. SO(S/F)  
E&SED/4-16/2021/POSTING/TRANSFER/TC, DATED 14.12.2021

R/Sir,

It is submitted for your kind information that above mentioned post is already occupied  
by Mrs. Tahira Naz, Principal BS-18 by Notification No. SO(S/F)E&SED/4-  
16/2021/Posting/Transfer/TC, dated 14.12.2021.

Therefore, I cannot take over charge at GGHS Irrigation Colony Warsak Road  
Peshawar. As there are other vacant posts of Principal BS-19 in District Peshawar therefore I may  
kindly be adjusted to one of the following vacant posts:-

1. GGHS Dabgari Banat Peshawar (Principal BS-19) will be retired on 31.12.2021
2. RPDC (F) Peshawar (Senior Instructor BS-19)
3. GGHS Civil Colony Peshawar (Principal BS-19):

4. GGHS Lanchi Arbab Peshawar.  
I have no reservations on my adjustment.

Thanking you in anticipation.

Dated 16.12.2021

Noushaba  
(Mst: Noushaba)  
Principal BS-19  
GGHS KSK Swabi

~~13~~

Recd  
AA sent

D:/Letter/ Application Noushaba

Page 1

1876  
17/12

13

C



-10 Annex D

(14)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT  
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar  
Phone No. 091-9223588

Dated Peshawar the December 20<sup>th</sup>, 2021

**NOTIFICATION**

**NO. SO(SF)E&SED/4-16/2021/POSTING/TRANSFER/TC:** In partial modification of this Department's Notification of even number dated 14-12-2021, the place of posting of Dr. Salma Sami Principal (BS-18) may be read as GGHS Matta Palangzai District Charsadda instead of GGHS Gulabad Jamrud District Khyber.

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT**

**Endst: of even No.& date:**

Copy forwarded for information to the: -

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Peshawar, Swabi & Khyber.
4. District Accounts Officer Swabi & Khyber.
5. Director EMIS, E&SE Department with the request to upload the same on the official website of the department.
6. Section Officer (Litigation-II), E&SE Department, Khyber Pakhtunkhwa.
7. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
8. Mst. Tahira Naz Afridi Principals, GGHS Gulabad Jamrud, Khyber.
9. Principals, GGHS Matta Palangzai District Charsadda.
10. Officer concerned.

(SAMIRA MEHSOOD)  
SECTION OFFICER (SCHOOLS FEMALE)

**ATTESTED**

Challenged id





**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Email: [sectionofficeraef@gmail.com](mailto:sectionofficeraef@gmail.com)

091-9223586

Dated Peshawar, February 9<sup>th</sup>, 2022

**RELIEVING ORDER**

**NO.SO(S/F)E&SED/4-16/2022/Posting/Transfer/:** Consequent upon the posting/transfer Notification dated 14.09.2022, Mst. Salma Sami Principal (BS-18) appearing at sr. No.44 is hereby relieved from GHSS Irrigation Colony Peshawar from the post of Principal (BS-19).

**SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA**  
**E&SE DEPARTMENT**

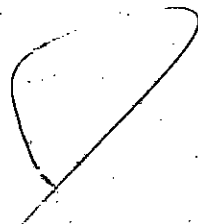
**Endst: of even No.& date:**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa for further necessary action.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Peshawar.
4. Director EMIS, E&SE Department for uploading at official website at the earliest.
5. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
6. PS to Secretary, E&SE Department.
7. Officers/Official Concerned.
8. Office order file.

  
(SHAWANA HALEEM)  
SECTION OFFICER (S/F)



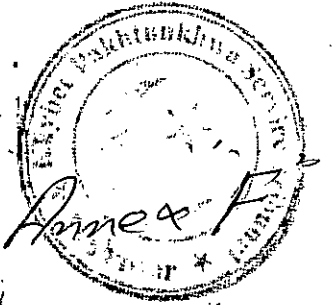


E

- 12

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL PESHAWAR**

Service Appeal No: 01/12021



Dr. Salma Sami principal GGHS, Irrigation Colony,  
Warsak Road, Peshawar

.....Appellant

**VERSUS**

1. The Government of Khyber Pakhtunkhwa through chief Secretary, Civil Secretariat, Peshawar
  2. The ~~Secretary Education~~ Section Officer (School Female) Khyber Pakhtunkhwa, Peshawar.
  3. The Elementary & Secondary Education through Secretary Education, Civil Secretariat, Peshawar.
  - ④ Principal GGHS Mst. Noshaba, Irrigation Colony, Warsak Road, Peshawar
  5. Principal Tahira Naz GGHS Guiabad Jamrud Khyber
- .....Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE  
KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL ACT, 1974 AGAINST THE  
TRANSFER ORDER OF THE APPELLANT,  
WHEREBY SHE HAS BEEN TRANSFERRED,  
POSTED ILLEGALLY AND UNLAWFULLY.

RESPECTFULLY SHEWETH:

Facts giving this present service appeal are as under;

1. That the appellant is appointed/posted against the vacant post (BPS-18) on dated 08.02.2021 as a principal GGHS Nodeh District Nowhsara vide notification NO SO. (S/F) E&SE 4-16-2021,

ATTESTED

*[Signature]*  
 Khyber Pakhtunkhwa Service Tribunal  
 Peshawar

**ATTESTED**

13

but the post was not available in District Nowshera subsequently posted/adjusted as principal (BPS-19) GGHS Irrigation Colony, Peshawar.

Copy of the dated 08.02.2021 order is attached as annexure "A"

2. That the respondent No. 1 to 3 vested too much time of the appellant in procedure for appointment in (BS-18) but the appellant continued her struggle for (BPS-18) and the respondent NO. 1 ignoring, but finally the appellant approached to provincial Mohtasib Khyber Pakhtunkhwa against the respondent No. 1 attitude, the then respondent No. 1 issue order of appointment to appellant against the vacant post (BS-18) vide notification NO. SO(S/F) E&SE 04.16.2021 in district Nowshera. (Application and order is attached as annexure B)
3. That the appellant taken over the charge against the vacant post as a principle (BPS-19) GGHS, irrigation Colony, Peshawar on dated 13<sup>th</sup> July 2021.
4. That the respondent No. 1 & 2 after five month issued another order dated 14<sup>th</sup> December 2021 vide notification No. SO(S/F) E&SED 04.16.2021 against the appellant to adjust respondent No. 4 and the appellant transfer/posted against the vacant post (BPS-18) as a principal GGHS Gulabad Jamrud Khyber, but the said post is yet not vacant because the said post is already

ATTESTED

ATTESTED

*[Signature]*  
 Director, Peshawar  
 Government of Khyber Pakhtunkhwa  
 Peshawar

occupied by Mst. Tahirnaz as a principal (BPS-18) in GGHS Gulabad Jamrud Khyber.

Copy of the order is attached as annexure "C"

5. That the respondent No. 4 moved an application to respondent No. 1 & 2 for non availability of post for serial No. 2 in notification No. SO(S/F) E&SED dated 04.16.2021 and the respondent No. 4 also mentioned vacant four posts in Peshawar which is already vacant for (BPS-19).  
(Copy of application is attached herewith as annexure "D")

6. That the respondent No. 1 & 2 illegally, wrongfully and unlawfully issued order against the appellant from District Peshawar to District Charsadda GGHS Matta Palangzai instead of GGHS Gulabad Jamrud District Khyber which is against the law and policy of service Act.  
Copies of order is attached as annexure "E")

7. That the appellant suit departmental appeal on dated 16.12.2021 but respondent ignored the application of the appellant and continue his order, the appellant also attached her husband posting/service certificate in Peshawar but in vain, then the appellant having no other remedy left, but to approach this Hon'ble court via instant service appeal, on the following grounds;

(Copy of Service Certificate & department Application are attached as annexure F & G)

**GROUND:**

A. That the appellant is permanent resident of Peshawar by domicile and her husband is also Professor of BPS-20 in IER Peshawar permanently, so the transfer of the appellant

ATTESTED  
ATTESTED  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

15  
 against the service rules and policy Act from district Peshawar to Charsadda.

- B. That the appellant did not fulfill/complete the tenure of the 3 years from the first appointment order in GGHS irrigation colony Peshawar, it is also against the law and rules of Service Act.
- C. That the respondent No. 4 give four option in her application of the vacant post in Peshawar which required for the eligibility of (BPS-19) and the said four mention posts are also vacant from long time in Peshawar without any posted and the respondent NO. 4 according to law should be transfer/posted in these vacant post instead of GGHS irrigation Colony, Peshawar.
- D. That the appellant is a female gender which not possible to travel in daily routine 60 km in public transport with so many problems like security, transport unavailability etc.
- E. That the respondent No. 1 & 2 bionomically transferring/posting the appellant from one place to another without any legally, lawfully reason which is clearly violation of the service Policy & Rules.
- F. That any other grounds will be furnished at the time of final arguments with the prior permission of this honorable tribunal

For the aforesaid reason, it is therefore, respectfully prayed, that on acceptance of this service appeal, this Hon'ble tribunal may kindly be please to declare the impugned

ATTESTED

ATTESTED

SECRETARY  
 SERVICE TRIBUNAL  
 PESHAWAR

- 16

order dated 20.12.2021 is illegal, unlawful coram-non iudice, malafide of no legal effect and also ineffective on the rights of the appellant, further the respondent No. 1 & 2 may be directed to act in the matter in accordance with law and allow the appellant to perform her duty in Peshawar.

Any other relief is deemed appropriate in the circumstances of case not specifically asked for may also be granted to appellant.

**INTERIM RELIEF:**

By way of interim relief, the operation of the impugned order dated 20.12.2021 may kindly be suspended, till the decision of the present petition.

*[Signature]*  
Appellant

Through

*[Signature]*  
**Muhammad Israr Khattak**  
Advocate High Court

Certified to be a true and correct copy  
*[Signature]*

Date of Receipt	21/11/23
Number of Pages	25 P
Copying Fee	5 P
Urgency	30 P
Name of Officer	
Date of Receipt	21/11/23
Date of Issue	21/11/23

*[Signature]*

17 Annex G

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER PAKHTOONKHA PESHAWAR.

S.A NO. 01/2022

DR.Salma Sami Principal GGHS, Irrigation Colony, Warsak Road, Peshawar... APPELLANT

VERSUS

The Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat,  
Peshawar & Others.

.....RESPONDENTS

PARAWISE COMMENTS FOR & ON BEHALF OF THE RECONDENTS 01 TO 03

RESPECTFULLY SHEWETH:

The respondents most humbly submits as under:

Preliminary objections:

1. That the appellant has got no cause of action to file the instant appeal.
2. That the instant appeal is filed with malafide intentions.
3. That the appellant has not come to this august tribunal with clean hands.
4. That the appellant has no locus standi to file the instant appeal.
5. That Appellant is estopped by his own conduct to approach this Hon'able Tribunal.
6. That no vested right of the appellant has been infringed nor any provisions of the Constitution have been violated, therefore, the instant Service Appeal is not maintainable in the circumstances.
7. That the instant appeal is based on mala-fide intention just to put pressure on the Respondents for the grant of illegal and even unauthorized service benefits.
8. The present appeal has been filed to entangle the Department unnecessarily in litigation and to waste the precious time of the respondents as well as of this Hon'able Tribunal.
9. That the present appeal is against the relevant provision of law and rules.
10. That in the instant Service Appeal the Appellant has suppressed material facts from this Honorable Tribunal which are sin-qua-non for the just and fair disposal of the case.
11. That this Honourable Tribunal has got no jurisdiction to entertain the present appeal.
12. The appeal of the appellant is time barred.

ON FACTS:

1. Relates to the Service record of the appellant.
2. Pertains to service record of the appellant.
3. Pertains to service record of the appellant.
4. That the transfer notification dated 14-12-2021 (Annex-A) was issued in compliance to the order of Honourable Khyber Pakhtunkhwa Service Tribunal, Peshawar announced on 25-06-2021 in Service Appeal No. 10297/2020. The operative part in said case judgment is as under:

"In light of the above, the respondents are directed to transfer the appellant

ATTACHED

G

18  
period of one week of receipt of copy of this order." (copy of the order is attached as Annex-B)

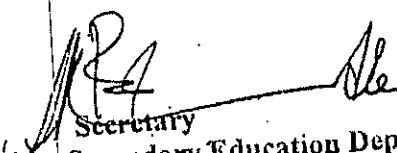
5. That consequent upon the notification dated: 14-12-2021 it was found that the post of Principal GGHS Gulababad Jamrud, Khyber to which the appellant was transferred, was already occupied by Respondent No. 5.
6. Incorrect, hence denied. The competent authority have the prerogative to place the services of civil servant anywhere in the province. That Respondent No. 5 who already occupied the post of Principal GGHS Gulababad Jamrud, Khyber to which the appellant was transferred vide notification dated 14-12-2021, Respondent No. 5 requested to clear the position on her original position which is not against law. Hence, the appellant was posted against the vacant post of Principal ( BS-18) GGHS Matta Palanzai District Charsadda vide notification dated: 20-12-2021 (Annex-C).
7. Pertains to record. However, detail reply is given I Para 4 to 6 above.

**REPLY ON GROUNDS:**

- A. Pertains to record. As explained in Para 6 ibid.
- B. Already discussed in Para No. 4. Further, as per Posting Transfer Policy (Annex-D) the tenure for posting is 02 years as under:  
"iv. The normal tenure of posting shall be three years subject to the condition that for the officers /officials posted in unattractive areas, the tenure shall be two years and for hard areas the tenure shall be one year. The unattractive and hard areas will be notified by the Government."
- C. Already explained in comments at Para No. 5.
- D. That being civil servant, the appellant is required to serve in the place of posting anywhere in the province. Detail reply is given above.
- E. Incorrect, hence denied. Already explained in facts.
- F. That the respondents be allowed to raise additional grounds during arguments.

**Prayer:**

In view of above, legal and factual position, it is humbly prayed that the subject appeal, being devoid of merits against law / facts & rules, may please be dismissed with cost throughout.

  
Secretary  
Elementary & Secondary Education Department  
Khyber Pakhtunkhwa

**ATTESTED**



9-19

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

SCANNED  
PESHAWAR

Service Appeal No. 1/2022

Dr. Salama Sami

VS

Govt of KP etc

.....

**REPLY ON BEHALF OF RESPONDENT NO.4**


.....

**RESPECTFULLY SHEWETH:**

**Preliminary Objections:**

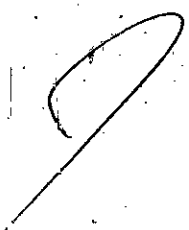
1. The appellant has no locus standi and cause of action.
2. The appellant has not come with clean hands.
3. The appeal is time barred.
4. The appeal is not maintainable.
5. The appeal is bad for non-joinder and misjoinder of parties.
6. That according to Section-10 of the Civil Servant Act 1973 the appellant is bound to do his duty anywhere in the Province.
7. That the appellant was transferred for the reason smooth running of the deptt: it is pertinent to mentioned here but the appellant agitate the transfer order for their ulterior motives.
8. That the appellant not facing any hardship on that transferred because the Charsadda and Peshawar are nearby district, so the appellant failed to make out any hardship case which is necessary in case of transferred.

**FACTS:**

1. Denied for want of knowledge.
  2. Denied for want of knowledge.
  3. Correct to the extent of taking charge. The appellant was posted against the post of Principal (BPs-19) in own pay scale for the purpose of stop gape arrangement. Posting transfer in own pay scale is also not permissible in the eye of law.
- 

- 2 - 20
4. Incorrect. The appellant was posted against the post of Principal (BPs-19) in own pay scale for the purpose of stop gape arrangement. Posting transfer in own pay scale is also not permissible in the eye of law. The appellant is not an aggrieved person but he want to do his duty on his own choice of station. Which is violation of Section-10 of the Civil Servant Act 1973. Moreover, the respondent no.4 was adjusted against the post on the direction of the Hon'able service Tribunal vide judgment dated 25.06.2021. copy attached as annexure-R.
  5. Incorrect and misconceived. The application filed by the respondent no.4 for the reason the salary of the respondent no.4 was stopped. Moreover the charge was handed over to the responded no.4 on 01.01.2022 properly and the salary of the respondent was released but thereafter the Hon'able Service Tribunal suspended the transfer order of the respondent no.4. due to which the salary of the appellant was again stopped. Copsy attached as annexure-R-1.
  6. Incorrect. The appellant was transferred from the post due to judgment of Hon'bie Service Tribunal Peshawar.
  7. Denied for want of knowledge.

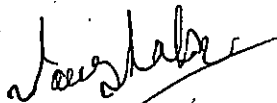
#### GROUND:

- A. Incorrect. The impugned order is according to law, facts, norms of justice and material on the record, hence not liable to be set aside.
  - B. Incorrect and misconceived. The appellant has been treated according to law and rules by the respondent Department on the subject and as such the respondent did not violated Article-4 and-25 of the Constitution of Pakistan as according Section-10 of the Civil Servant Act 1973 the appellant is bound to serve anywhere in Province in public interest. Moreover there is no legal right created against the post appellant adjusted because it is for the purpose of stop gape arrangement.
  - C. Incorrect. Hence denied. Already explained. Moreover the appellant being junior Bps-18 official has no right to adjusted against the post of BPs-19 in light of superior court judgment.
  - D. Incorrect. The order has been issued in public interest. Moreover according Section-10 of the Civil Servant Act
- 


1973 the appellant is bound to serve anywhere in Province.

- E. Incorrect. The appellant was transferred from the post due to judgment of Hon'ble Service Tribunal Peshawar.
- F. The respondent also requested to furnished any other ground at the time of arguments.

It is, therefore, most humbly prayed that the appeal in hand may be dismissed with cost through out merit less and devoid of any legal footing.

  
Respondent No.4

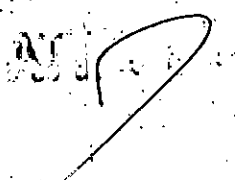
Through:

  
(SYED NOMAN ALI BUKHARI)  
ADVOCATE, PESHAWAR.

**AFFIDAVIT**

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

  
DEPONENT





22/ August H  
GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
BLOCK A OPPOSITE MPA.S.HOSTEL, CIVIL SECRETARIAT PESHAWAR  
PHONE NO 091-9223588

Dated Peshawar August 12<sup>th</sup>, 2022

**NOTIFICATION**

NO.SO(S/F)E&SED/4-15/2022/Posting/Transfer/36: Mst. Saima Principal (BS-18) is hereby transferred from GGHSS Mian Gujjar Peshawar and posted at GGHSS Mologo Peshawar, against the vacant post of Principal (BS-18) with immediate effect. in the public interest.

SECRETARY TO GOVT: OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT

Endst: of even No.& date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (Female) Peshawar.
3. District Account Office Peshawar.
4. Director EMIS, E&SE Department for uploading at official website at the earliest.
5. PS to Secretary, E&SE Department.
6. Officers concerned.
7. Office order file.

15/02  
17/11  
30/08

*Muhammad Faizan Zeb*  
(MUHAMMAD FAIZAN ZEB)  
SECTION OFFICER (S/F)

*Muhammad Faizan Zeb*  
**ATTESTED**

*Muhammad Faizan Zeb*

23

Annex 1

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
BLOCK A OPPOSITE MPAS HOSTEL, CIVIL SECRETARIAT PESHAWAR  
PHONE NO 091-9223588

Dated Peshawar, September 14<sup>th</sup>, 2022

NOTIFICATION

NO SO/S/FE&SED/4-16/2022/Posting/Transfer/51: Upon their promotion vide notification  
No SO/S/FE&SED/2-3/2022/Promotion dated: 20.04.2022 the following Teaching Cadre (BS-19)  
Officers are hereby posted against the post mentioned against each.

Sr. #	Name/ Designation	Present Posting	To	Remarks
1	Mst. Attia Bano	GGHSS Dhamtor Abbottabad	GGHSS Sherwan Abbottabad	AVP of Principal (BS-19)
2	Mst. Tahira Tabassum	GGHSS Shahdand Baba Mardan	GGHSS Jalala Mardan	AVP of Principal (BS-19)
3	Mst. Saiba Kalsoom	GGHSS Lahor Swabi	GGHS Panjpir Swabi	Vice Sr. No.12
4	Mst. Noreen Afzal	RPDC (Female) Peshawar	GGHS Prang Charsadda	AVP of Principal (BS-19)
5	Mst. Azra Begum	RPDC Malakand	RPDC Malakand	Against Sr. No.45
6	Mst. Gul F Rana	GGHSS Jogiwara Peshawar	GGHS KSK Swabi	AVP of Principal (BS-19)
7	Mst. Alia Iqbal	GGHSS Chankani Peshawar	Shakar Dara Kohat	AVP of Principal (BS-19)
8	Mst. Ambarcen Farma	GGHSS No.2 D.I Khan	GGHSS Jandola Tank	AVP of Principal (BS-19)
9	Mst. Nusrat Parveen	GGHSS No.6 D.I Khan	GGHSS Karak No.1	AVP of Principal (BS-19)
10	Mst. Salima	GGHSS Toru Mardan	GGHSS Palai Malakand	AVP of Principal (BS-19)
11	Mst. Shabana Rehman	GGHS No.1 Lakki Marwat	GGHSS No.1 Serai Nurang Lakki Marwat	Vice Sr. No. 42
12	Mst. Zubaida Bibi	GGHSS Panjpir Swabi	GGHS Zaida Swabi	AVP of Principal (BS-19)
13	Mst. Farceda Saheen	GGHSS University Town Peshawar	GGHSS Matta Palanzai Charsadda	AVP of Principal (BS-19)
14	Mst. Shaheen Shehriaz	GGHS Lakhi Nasrati Karak	GGHS Chokara Karak	AVP of Principal (BS-19)

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
BLOCK & DISTRICT OFFICES, CIVIL SECRETARIAT PESHAWAR  
PHONE NO. 091-9233588

-24

15	Mst. Gul F. Rana Siddiq	GGHSS Peshawar BSD	GGHSS No.1 Hanpa	AVP of Principal (BS-19)
16	Mst. Saeeda Tabassum	GGHSS Kotla Swabi	GGHSS Shewa Swabi	AVP of Principal (BS-19)
17	Mst. Bibi Amina	GGHSS Parkho Dheri Mardan	GGHSS Hathian Mardan	AVP of Principal (BS-19)
18	Mst. Banaras Begum	GGHSS Akora Khattak Nowshera	GGHSS Totakan Malakand	AVP of Principal (BS-19)
19	Mst. Yasmin Aia Bibi	GGHSS Shahdand Baba Mardan	GGHSS Rustam Mardan	AVP of Principal (BS-19)
20	Mst. Shamila Tabassum	GGHSS Naivala D.I Khan	GGHSS Ismaili Mama Khel Bannu	AVP of Principal (BS-19)
21	Mst. Jamila Begum	GGHSS Matkari Malakand	GGHSS Dheri Alpdand Malakand	AVP of Principal (BS-19)
22	Mst. Shaista Kanwal	GGHSS Jungle Khel Kohat	GGHSS Gumbat Kohat	AVP of Principal (BS-19)
23	Mst. Irshad Begum	GGHSS No.4 Bannu City	GGHSS Bilawar Khan Bannu	AVP of Principal (BS-19)
24	Mst. Farah Deba	GGHSS Lahore Swabi	GGHSS Kalukhan Swabi	AVP of Principal (BS-19)
25	Mst. Farzana Yasmin	GGHSS Jungle Khel Kohat	GGHSS Qamar Zaman Mandew Bannu	AVP of Principal (BS-19)
26	Mst. Shaista Gul	GGHSS University Town Peshawar	GGHSS Mandani Charsadda	AVP of Principal (BS-19)
27	Mst. Romaisa Sadia	GGHSS Sahibzada Umar Khan Shaheed Peshawar	GGHSS Tehkal Peshawar	AVP of Principal (BS-19)
28	Mst. Farhana	RPDC Swabi	GGHSS Kunda Swabi	AVP of Principal (BS-19)
29	Mst. Sadaf Rehana Malik	GGHSS Comprehensive Abbottabad	GGHSS Siri Kot Haripur	AVP of Principal (BS-19)
30	Mst. Syeda Fayyaba	GGHSS Comprehensive Abbottabad	GGHSS Kot NajibUllah Haripur	AVP of Principal (BS-19)
31	Mst. Shagufta Khanam	GGHSS Peshawar BSD	GGHSS Titter Khel Lukki Marwat	AVP of Principal (BS-19)
32	Mst. Iffat Begum	GGHSS Sahibzada Umar Khan Shaheed Peshawar	RPDC Peshawar	AVP of Principal (BS-19)

**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
 ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
 BLOCK A OPPOSITE MPAS HOSTEL, CIVIL SECRETARIAT PESHAWAR  
 PHONE NO 091-9223588

7

- 25  
 37

35	Mst. Sughra Sadaf	DPD Peshawar	GGHSS Irrigation Colony Peshawar.	Vice Sr. 44
34	Mst. Noor-ul-Hussain	GGHSS Garhi Habibullah Manshra	GGHSS Thahli Khurd Manshra	Vice Sr. No. 41
35	Mst. Samia Danish	DCTE, Abbottabad	GGHSS Balakot	AVP of Principal (BS-19)
36	Mst. Roshan Ara	GGHSS Ningolai Swat	GGHSS Matta Swat	AVP of Principal (BS-19)
37	Mst. Ishrat Jabeen	GGHSS BSD Peshawar	GGHSS Jamrud Khyber	Vice Sr. No. 43
38	Mst. Robina Farooq	GGHSS Dhamtor Abbottabad	GGHSS KTS Sector No. 2 Haripur	AVP of Principal (BS-19)
39	Mst. Zehra Jehan	GGHSS Chamkani Peshawar	GGHSS Saidu No. 1 Swat	AVP of Principal (BS-19)
40	Mst. Sheila Nauman	GGHSS University Town Peshawar	GGHSS Koper Malakand	AVP of Principal (BS-19)

**CONSEQUENTIAL POSTING**

41	Mst. Tehmina Malik, Principal (BS-18) working against the post of (BS-19) in OPS	GGHSS Thahli Khurd Manshra	GGHSS Darband Manshra	AVP of Principal (BS-18)
42	Mst. Shahana Noreen, (BS-18)	GGHSS Semi Naurang Lakki Marwat	GGHSS No. 06 D.I Khan	Vice Sr. No. 09
43	Najma Noor, Principal (BS-18)	GGHSS Jamrud Khyber	DPD Peshawar	Vice Sr. No. 33
44	Dr. Salma Sami Principal (BS-18)	GGHSS Irrigation Colony	GGHSS Malogi, Peshawar	AVP of Principal (BS-18)
45	Dr. Dil Arif Begum Principal (BS-19)	Instructor (BS-19), RPDC Malakand (Female)	RPDC Malakand (BS-20) (Female)	Against Vacant Post of Principal (BS-20) in OPS.

*Not vacant*

*PA*

9

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT  
BLOCK A OPPOSITE NPA, S HOSTEL, CIVIL SECRETARIAT PESHAWAR  
PHONE NO 091-9223588

26

3

24

SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA,  
E&SE DEPARTMENT

Ends: of even No. & date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. CSO to Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
3. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Female) concerned.
5. District Account Officer, concerned.
6. Director EMIS, E&SE Department for uploading at official website at the earliest.
7. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
8. PS to Secretary, E&SE Department.
9. PA to Additional Secretary, E&SE Department.
10. Officers/Officials Concerned.
11. Office order file.

*Muhammad Faizan Zeb*  
(MUHAMMAD FAIZAN ZEB)  
SECTION OFFICER (S/O)

~~ATT~~

ATT



27

Amir J

Q

To

The Secretary  
Elementary and Secondary Education  
Department KPK



Subject:- Transfer Consequential/Posting.

Reference your good office order NO.SO(SF)E&SED/4-16/2022/Posting/Transfer/51: Dated Peshawar, September 14<sup>th</sup>, 2022

I have been transferred to GGHSS Malogo, Peshawar on the post of Principal (BS-18) I reported my arrival in the respective school here I have been aware that the post has already been occupied/ Filled by Mst, Saima Principal (BS-18 vide your notification NO.SO(SF)E&SED/4-16/2022/Posting/Transfer/ 36: Dated Peshawar August 12<sup>th</sup>, 2022: (her office order DDO Ship copy annexed as reference)

Therefore it is requested kindly adjust me on my present post i.e. in GGHSS Malogo Peshawar.

Yours Sincerely,

*Salma*  
15/9/22

Dr, Salma Sami (Principal)  
GGHS Irrigation Colony Peshawar

Encls  
As above :

*RA*

SECRETARY DIARY

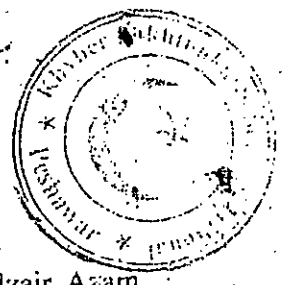
No. 2927

Dated 15.9.2022

9

J

28  
Ans K



08.02.2023 Learned counsel for the appellant present. Mr. Uzair Azam Khan, Additional Advocate General for the official respondents and Private Respondent No. 5 in person present.

SCANNED  
KFST  
Peshawar

Mrs. Rozina Rehman, Learned Member (J) is on leave today, therefore, case is adjourned to 13.03.2023 for arguments before the D.B.

(FAREEHA PAUL)  
Member (C)

13<sup>th</sup> March, 2023

Learned counsel for the appellant present. Mr. Faqar Shah Mohmand, Additional Advocate General for official respondents No. 1 to 3 and learned counsel for private respondent No. 4 present.

2. The record reflects that one Mst. Sughra Sadaf had submitted an application for her impleadment in this appeal on the strength of Transfer Notification dated 14.09.2022, copy annexed with the application. In the said Notification, the appellant was shown to have been transferred against vacant post of Principal (BPS-18) at GCHSS Malogi Peshawar. When confronted with the situation, learned counsel for the appellant submits that if a direction is given to the respondents that posting/transfer Notification issued 14.09.2022 should be actualized, he would not press this appeal. Order accordingly. Consign.

3. Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal on this 13<sup>th</sup> day of March, 2023.

Certified to be true copy  
Khalid Iqbal  
Secretary  
Peshawar

(Salah Ud Din)  
Member (Judicial)

ATTESTED

(Kalim Arshad Khan)  
Chairman

K



-29 'Amir L'

**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
Email: [sectionofficersf@gmail.com](mailto:sectionofficersf@gmail.com)

091-9223588

Dated Peshawar the April 17<sup>th</sup>, 2023

**NOTIFICATION**

**NO.SO(S/F)E&SED/4-16/2023/Posting/Transfer:** In compliance with Khyber Pakhtunkhwa Service Tribunal Peshawar's Judgment dated 14.09.2022, the following postings/transfers are hereby ordered, with immediate effect.

Sr. #	Name/ Designation	From	To	Remarks
1	Mst. Salma Sami Principal (BS-18)	Under transfer	GGHSS Malogo Peshawar	Vice sr. No. 01
2	Mst. Saima Principal (BS-18)	GGHSS Malogo Peshawar	GGHSS Mian Gujar Peshawar	Vice sr. No. 03
3	Mst. Seema Afridi Principal (BS-18)	GGHSS Mian Gujar Peshawar	GGHSS Sahibzada Umer Khan Peshawar	AVP of SSS Home- Economics (BS-18)

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA  
E&SE DEPARTMENT**

**Endst: of even No.& date:**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Peshawar.
4. Director EMIS, E&SE Department for uploading at official website at the earliest.
5. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
6. PS to Secretary, E&SE Department.
7. Officers/Official concerned.
8. Office order file.

(SHAWANA HALEEM)  
SECTION OFFICER (S/F)

INVESTED

R/S

L

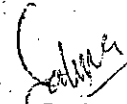
-30



Amir M

### ARRIVAL REPORT


In compliance of Elementary & Secondary Education notification NO.SO(S/F)E&SED/4-16/2023/Posting/Transfer dated 17.04.2023 I, Dr. Salma Sami arrived at GGHSS Malogo Peshawar on 17.04.2023.

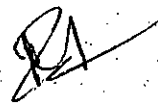
  
Dr. Salma Sami  
Principal (BS-18)

Copy forwarded to;

1. Secretary E&SE Department Khyber Pakhtunkhwa Peshawar.
2. Accountant General Khyber Pakhtunkhwa.
3. Director Elementary & Secondary Education Khyber Pakhtunkhwa.
4. District Education Officer (F) Peshawar.
5. School concerned.

I, Mst. Saima Principal GGHSS Malogo, received arrival report of Mst. Salma Sami according to notification NO.SO(S/F)E&SED/4-16/2023/Posting/Transfer dated 17.04.2023.

  
PRINCIPAL  
(M.A. Eng. M.Ed.)  
G.H.S.S. Malogo Peshawar.  
17/04/2023





M



**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Email: [eeos@pk.gov.pk](mailto:eeos@pk.gov.pk)

001-0223500

Dated Peshawar, April 10<sup>th</sup>, 2023

**RELIEVING ORDER**

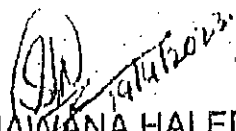
**NO. SO(S/F)E&SED/4-10/2022/Posting/Transfer/:** Consequent upon the posting/transfer Notification dated 17.04.2023, Mat. Salma Pirnolpa (BS-10) is hereby relieved from GGHSS Malogo Peshawar from the post of Principal (BS-18).

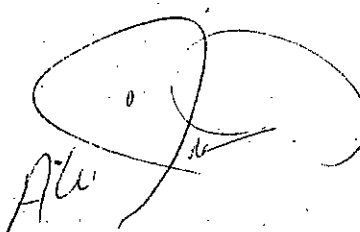
**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA**  
**E&SE DEPARTMENT**

Endat: of even No. & date:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa for further necessary action.
2. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Peshawar.
4. Director EMIS, E&SE Department for uploading at official website at the earliest.
5. PS to Minister for E&SE Department, Khyber Pakhtunkhwa.
6. PS to Secretary, E&SE Department.
7. Officers/Official Concerned.
8. Office order file.

  
(SHAWANA HALEEM)  
SECTION OFFICER (S/F)



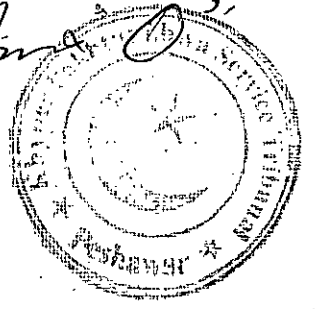
  
TESTED



dit  
N

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

MISC: APPLICATION No. 257 /2023  
IN  
S.A No. 01/2022



MstSaima,  
Principal, GGHS, Mologo Peshawar..... Applicant

VERSUS

1. Dr. Salma, Sami  
Principal GGHS, Irrigation Colony,  
Warsak Road, Peshawar.

2. The Chief Secretary  
Govt. of Khyber Pakhtunkhwa  
Civil Secretariat, Peshawar.

3. The Secretary  
Education Officer (Female)  
Khyber Pakhtunkhwa, Peshawar

4. The Secretary  
Elementary & Secondary Education  
Civil Secretariat, Peshawar.

5. Ms. Noshaba  
Principal GGHS Irrigation Colony,  
Warsak Road, Peshawar.

6. Ms. Tahira Naz  
Principal GGHS, Gulabda,  
Jumrud Khyber.....

Respondent

Application U/S 12(2) CPC for setting aside the Judgment/Order of this Hon'ble Tribunal dated 13.03.2023 passed in Service Appeal No.01/2022 being procured by Respondent on the basis of misrepresentation and fraud.

Respectfully Sheweth,

Facts giving rise to the present application are as under:-

1. That Respondent No.1 had filed Service Appeal No.01/2022 (Annex:-A) before this Hon'ble Tribunal by assailing the posting/transfer order dated 20.12.2021 (Annex:-B) which was admitted to full hearing. Replies were sought from the Respondents, which were accordingly submitted (Annex:-C).

ATTESTED

32A

2. That applicant is the senior-most Officer of the Department in Grade-18, who vide Notification dated 12.08.2022 (*Annex:-D*) was transferred from GGHS Mian Gujjar Peshawar to GGHS Malogo Peshawar, against the vacant post of Principal (BPS-18) with immediate effect, in the public interest. Applicant complied with the order and submitted Charge Report.
3. That during pendency of Service Appeal No.01.2022 of Respondent No.1 before this Hon'ble Tribunal she was inadvertently/mistakenly transferred from GGHS Irrigation Colony to GGHS Malogo/at the place of applicant, vide Notification dated 14.09.2022 (*Annex:-E*), where Respondent No.1 approached for charge assumption but she was apprised that the subject post had already been occupied/filled by applicant.
4. That the Respondent No.1 deliberately failed to bring material facts into the Notice of the Hon'ble Tribunal in that the applicant being necessary party was not arrayed in the panel of Respondents. Respondent No.1 knew that the post has already been filled by the applicant vide applications (*Annex:-F*) and obtained the impugned judgment/order dated 13.03.2023 (*Annex:-G*) of this Hon'ble Tribunal and took unlawful directions by suppressing the material facts to actualize the transfer order dated 14.09.2022 and place Respondent No.1 at the place of posting of applicant.
5. That the element of misrepresentation and fraud on the part Respondent No.1 is quite apparent on the face of the record and she was supposed to bring into the notice of the Hon'ble Tribunal the updated position on the subject matter but failed to do so. Moreover, requirements of Rule-6 of the Khyber Pakhtunkhwa Service Tribunal Rules, 1974 have not been complied with.

For the aforesaid reasons, it is therefore respectfully prayed, that on acceptance of this application, this Hon'ble Tribunal may kindly be pleased to recall the impugned judgment/order dated 13.03.2023 and by restoring Appeal of Respondent No.1 and decide the same on merits after adverting the stance of the applicant and providing her opportunity of defence.


ATTESTED

ATTESTED

- 32B

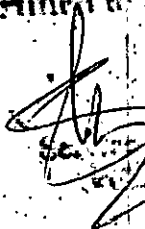
Any other relief as deemed appropriate in the circumstances of case not specifically asked for, may also be granted to applicant.

Through

Applicant  
  
 Khaled Rahman  
 Advocate,  
 Supreme Court of Pakistan

Dated: 19/04/2023

Certified to be true copy



INCR  
 Tribunal

Date of Pre

Number

Case No

U

To

No

Date

Date

21-11-23

3-P  
15/

21-11-23

21-11-23

ATTESTED



33

Amr P



4<sup>th</sup> May, 2023

1. Learned counsel for the petitioner submits that while misrepresenting the facts by the parties in appeal No. 01/2022 titled "Dr. Salma Sami vs. Government of Khyber Pakhtunkhwa" a notification dated 14.09.2022 was produced before the Tribunal constraining it to pass an order in view thereof and in the said notification the appellant of the said appeal named Dr. Salma Sami was shown to have been posted at GGHSS Malogo Peshawar against the post of Principal which too was shown to be lying vacant whereas in compliance with an earlier notification No. SO(S/F)E&SED/4-16/2022/posting/Transfer/36 dated 12.08.2022 the petitioner Mst. Saima had already been working on the post of Principal GGHSS Malogo Peshawar and thus the post was not vacant but even then it was shown to be vacant in the notification of 14.09.2022 which fact was also evident from a letter at page-28 addressed to the Secretary (E&SE) Peshawar wherein respondent No.1 Dr. Salma Sami had informed the Secretary that the post was already occupied by Mst. Saima. Learned counsel for the petitioner further referred to the Civil Miscellaneous application for suspending the operation of notification dated 17.04.2023 vide which some transfers were made but with the statement that the transfer order was being made in compliance with the judgment of this Tribunal dated 14.09.2022 and the petitioner Mst. Saima was transferred from GGHSS Malogo Peshawar to GGHSS Mian Gujjar while respondent No.1 was posted at GGHSS Malogo Peshawar. The subsequent notification of 17.04.2023 prima facie supports the contention of the learned counsel for the petitioner that the order dated 14.09.2022 passed by this Tribunal was a result of some misrepresentation made by the parties. Therefore, we would like to issue notice to the respondents to submit a detailed reply on 18.05.2023 before S.B. In the mean time operation of notification dated 17.04.2023 is suspended. P.P given to the petitioner. The respondents be summoned through TCS, the expenses of which be deposited by the petitioner within two days failing which the interim order shall cease to have affected.

*[Signature]*  
 (Kalim Arshad Khan)  
 Chairman

*Ati*  
*[Signature]*  
 \*Adnan Shah, P.A.\*  
 Certified true copy  
 Khyber Pakhtunkhwa  
 Service Tribunal  
 Peshawar

Date of Presentation of Application  
 Number of page 2  
 Charging Fee 10/-  
 Urgent 15/5/23  
 Date  
 Date of Delivery of Copy 05-05-23  
 05-05-23  
**ATTESTED**



- 34  
- 13

Amna Q

Office of the  
**Accountant General**  
Khyber Pakhtunkhwa  
Fort Road Peshawar

No. AG-KP/PR-02/P. Fil/Sughra Sadaf)  
To

Dated: 09.05.2023

The Secretary to Government of KP  
E&SE Deptt,  
Peshawar.

Subject: **RELEASE OF PAY FOR THE MONTH OF FEBRUARY, 2023**

I am directed to refer to your office Notification No.SO(S/F)E&SED/4-16/2023/ Dated 17.04.2023 and relieving order No.SO(S/F)E&SED/4-16/2023/posting transfer Dated 19.04.2023 regarding relieving of Mst Saima from GGHSS Malogo Peshawar and posting of Mst Salma Sami as Principal.

In this regard the Principal concern submitted an application along with Service Tribunal Order copy in appeal No 257/2023 order Dated 04/05.2023 (copy attached ) in which the referred order dated 17.04.2023 is suspended (Copy attached).

Being an administrative Department, it is requested to look into the matter/ court order and this office may please be guide for allowing salary to one of the officer (as there is only one post of principal ) and also declaration of DDO Ship of the School.

Currently the salary of Mst Saima has not been stopped and the case of Mst Salma Sami has been submitted to this office for starting of pay for the month of May, 2023.

Copy to the

- ✓ 1) DEO (F) Peshawar.
- 2) Principal GGHSS Malogo Peshawar.
- 3) Dr. Salma Sami.

ACCOUNTS OFFICER-(PR-02)

ACCOUNTS OFFICER (PR-02)

ATTESTED

DEO = F

017

Q

-35  
-17  
"Anwar"



**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
Email: [esd@kpk.gov.pk](mailto:esd@kpk.gov.pk)

091-9223588

Dated Peshawar the May 19<sup>th</sup>, 2023 ✓

No. SO(SF) E&SED/4-16/PT/2023

To ✓

Accountant General  
Khyber Pakhtunkhwa,  
2-Fort Road Peshawar.

May

**SUBJECT: RELEASE OF PAY FOR THE MONTH OF FEBRUARY, 2023**

I am directed to refer to your letter No. AG-KP/PR-02/P, Fil/Sughra Sadaf dated 09.05.2023 on the subject noted above and to state that this Department vide Notification dated 17.04.2023 have posted Mst. Salma Sami at GGHS Malogo Peshawar and Mst. Saima at GGHS Mian Gujar Peshawar and the same notification is intact yet.

Therefore, it is requested that salary of the Principals may be processed accordingly till further order, please.

(SHAWANA HALEEM)  
SECTION OFFICER (S/F)

Encls: of even No. & Date:

Copy forwarded for information to: PS to Secretary E&SE Department.

SECTION OFFICER (S/F)

Handwritten signature

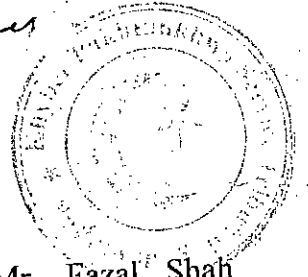
ATTESTED

Handwritten mark

R/R R  
Er

Appeal No. 1/2022, Salma Sami

- 36  
Ana S



Petition No. 257/2023U/S 12(2) CPC

10<sup>th</sup> July, 2023

1. Learned counsel for the petitioner present. Mr. Fazal Shah Mohmand, Additional Advocate General alongwith Mr. Fahim Khan, Assistant for official respondents No. 2, 3 and 4 and counsel for private respondent No. 1 present while private respondent No.5 and 6 have already been placed ex-parte.

2. When confronted with the situation that the order dated 14.09.2022 produced before the Tribunal on 13.03.2023, the learned counsel for the appellant in the main appeal had submitted that if a direction was given to the respondents to actualize posting/transfer notification dated 14.09.2022, he would not press the appeal and the appeal was accordingly decided. While the notification dated 14.09.2022, showed the post of Principal, GGHSS Malogo Peshawar as vacant and Dr. Salma Sami was posted there-against but the petitioner, Mst. Saima, contended that she had already been occupying the post of the Principal, GGHSS Malogo Peshawar vide notification dated 12.08.2022 and that was not vacant as wrongly shown by the department, to which learned counsel for private respondent has very fairly and frankly submitted that the notification of the petitioner Mst. Saima was already on the file and the factum of her posting was also brought in the notice of Tribunal at that time but that was not somehow or the other properly taken notice of at that time. The learned counsel for private respondent has further informed that there was another lady named Sughra Sadaf whose impleadment application was on the file and the mention of such fact was also found in the order sheet dated 13.03.2023 but she has not been made party so far. He submitted that if the

Application under 12(2) of the CPC was accepted and order dated 13.3.2023 was set aside then Sughra Sadaf also needed to be impleaded.

CO-1/2023/12(2) CPC

AD

9

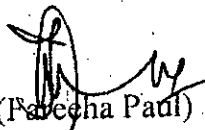
2/3

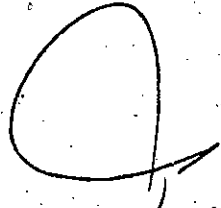
5

8-37


3. As the factum of the order dated 12.08.2022 pertaining to posting of the petitioner Mst. Saima against the post of Principal, GGHSS Malogo, Peshawar could not be discussed or taken notice by the Tribunal at the relevant point of time i.e. on 13.03.2023 and because of that some disturbance has been created, compelling the petitioner to file this petition, therefore, let the appeal be decided on merits and while allowing this application we set aside the order 13.03.2023 direct the appellant of the main appeal to array the petitioner as party, similarly the applicant Sughra Sadaf, whose right may also be affected because of the transfer orders, shall also be arrayed as respondent. To come up on 14.07.2023 before D.B. Notice be issued to Sughra Sadaf. The appellant Salma Sami shall file amended appeal within two days. P.P given to the parties. The learned counsel for the petitioner made a further request that till


the disposal of appeal, the operation of orders shown to have been passed in compliance with the order dated 13.03.2023 might be suspended as there are anomalies created because of the order dated 14.09.2022. In this respect the respondents representative present in the court is directed to resolve the matter and submit report on the next date.

  
(Parveen Paul)  
Member (Executive)

  
(Kalim Arshad Khan)  
Chairman

\*Adnan Shah\*

  
11/7/23

Date of: 11/7/23  
No. of: 2-1  
C: 10/-  
15/-  
  
Shahzad  
11/7/23  
11/7/23

38

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Annex "T"

Amended Service Appeal No. 1 /2022

**Dr.Salma Sami**

Principal GGHS, Malogi, Peshawar..... Appellant

**Versus**

- 1) Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
- 2) Section Officer (School Female) Khyber Pakhtunkhwa, Peshawar.
- 3) Elementary and Secondary Education through Secretary Education, Civil Secretariat, Peshawar.
- 4) Mst.Noshaba, Ex.Principal GGHS, Irrigation Colony, Warsak Road, Peshawar.
- 5) Mst.Tahira Naz, Principal GGHS Gul Abad, Khyber.
- 6) Mst.Sughra Sadaf, GGHS Irrigation Colony, Peshawar.
- 7) Mst.Saima, GGHS Mian Gujar Peshawar..... Respondents

**AMENDED** Appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the impugned transfer order dated 20.12.2021 of the appellant, whereby she has been illegally and unlawfully transfer and posted.

**Respectfully Sheweth;**

Brief facts giving rise to the instant amended service appeal are as under:-

- 1) That the appellant is a naturally born bonafide citizen of Islamic Republic of Pakistan and hails from a respectable family of District Peshawar.

FD

- 39

- 2) That the respondents No.1 to 3 vested too much time of the appellant in procedure for appointment in (BS-18) but the appellant continued her struggle for (BS-18) and the respondent No.1 ignoring, but finally the appellant approached to provincial Mohtasib Khyber Pakhtunkhwa against the respondent No.1 attitude, the then respondent No.1 issued order of appointment to appellant against the vacant post (BS-18) vide notification No.SO (S/F) E&SE 04.16.2021 in District Nowshera. (Application and order are attached as Annexure "A").
- 3) That the appellant is appointed/ posted against the vacant post (BPS-18) on dated 08.02.2021 as a principal GGHS Nodeh District Nowshera vide notification No.SO (S/F) E&SE 4-16-2021, but the post was not available in District Nowshera subsequently posted/ adjusted as principal (BPS-19) GGHS irrigation colony, Peshawar in her own pay and scale (as stopgap arrangement and the appellant taken over the charge against the vacant post as a principal (BPS-19) GGHS, irrigation colony, Peshawar on dated 13<sup>th</sup> July, 2021. (Copy of the order dated 08.02.2021 is attached as Annexure "B").
- 4) That the respondents No.1 and 2 after five months issued another order dated 14.12.2021 vide notification No.SO (S/F) E&SE 04.16.2021 against the appellant to adjust respondent No.4 and the appellant was transferred/ posted against the vacant post (BPS-18) as a principal GGHS Gulabad Jamrud, District Khyber, but the said post is yet not vacant because the said post is already occupied by Mst.Tahira Naz as a principal (BPS-18) in GGHS Gulabad, Jamrud, District Khyber. (Copy of order is attached as Annexure "C").
- 5) That after information to appellant through respondent No.5 the said post is not vacant but accepted by me from

- 40

dated 08.05.2021 vide order of No.SO(SF) E&SED (4.16.2021 posting/ transfer/ TC dated 07.05.2021 then the appellant moved application along with respondent No.5 posted order to respondents No.1,3 and requested for cancellation the transfer order of appellant against this occupied post. Meanwhile the respondent No.4 moved an application to respondents No.1 and 2 for non-availability of vacant post for serial No.2 in notification No.SO (S/F) E&SED 04.16.2021 and the respondent No.4 also mentioned vacant four posts in Peshawar, which is already vacant for (BPS-19). (Copy of application is attached herewith as Annexure "D").

6) That the respondents No.1 to 3 illegally, wrongfully and unlawfully issued another order against the appellant from District Peshawar to District Charsadda GGHS Matta Palangzai instead of GGHS Gulabad Jamrud District Khyber which is against the law is challenged by appellant. (Copy of order is attached as Annexure "E").

7) That during the pendency of this amended service appeal respondents No.1 to 3 issued order dated 14.09.2022 and transferred the appellant from irrigation colony to Malogi Peshawar against the vacant post but actually the post was already occupied by respondent No.6 so the transfer of appellant by respondents No.1 to 3 was clearly base upon dishonesty and malafide because respondents No.1 to 3 issued order dated 12.08.2022 in favour of respondent No.6 before one mother from the general order dated 14.09.2022. (Copy of order is attached as Annexure "F").

8) That after the arrival of appellant to Malogi Peshawar, respondent No.6 denied to give charge over this post then appellant again informed the respondents No.1 to 3 through application that the said transfer post is not vacant and appellant submitted application along with



- 41

arrival report to respondents No.1 to 3 and the arrival report also received by appellant from respondent No.6 but respondent No.6 never challenged this general order in any form. (Copy of application and arrival report is Annexure "G").

- 9) That respondents No.1 to 3 not resolved the matter of appellant rather issued another relieving order dated 09.02.2022 and the appellant forcibly relieved from irrigation colony and not forced/ compel respondent No.6 to give charge over the transferred post to appellant but the respondent remained silent and the appellant hanging in the air. (Copy of relieving order is Annexure "H").

10) That finally this Service Tribunal order dated 13.03.2023 and directed the respondents to actualize the general order dated 14.09.2022 when they acted upon an order of hon'ble Tribunal and respondents actualized the order and transferred the respondent No.6 from Malogi Peshawar to Mian Gujar Peshawar then respondent No.6 in the result of this order filed 12(2) against the appellant, after the acceptance of 12(2) application of the respondent No.6, this hon'ble Service Tribunal ordered and directed the appellant to amend the service appeal and implead the respondent No.6 and 7 which is impleaded in the instant service appeal. (Copy of order dated 10.07.2023 is attached as Annexure "I").

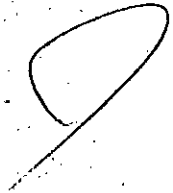
- 11) That before amendment the appellant filed departmental appeal on 16.12.2021 but respondent ignored the application of the appellant and continue his order, the appellant also attached her husband posting/ service certificate in Peshawar each and every things but in vain, then the appellant having no other remedy left, but to

- 42

approach this Hon'ble Court via instant amended appeal, on the following grounds. (Copies of service certificate and departmental appeal are attached as Annexure "J and K").

GROUNDS FOR APPEAL:

- a) That the appellant is permanent resident of Peshawar by domicile and her husband is also professor of BPS-20 in IER Peshawar permanently, so the transfer of the appellant is against the service rules and policy Act from District Peshawar to Charsadda.
- b) That the appellant did not fulfill/ complete the tenure of 3 years from the first appointment order in GGHS Irrigation Colony, Peshawar, it is also against the law and rules of Service Act.
- c) That the respondent No.4 gave four options in her application of the vacant post in Peshawar which were BPS-19 and the said four mentioned posts are also vacant from long time in Peshawar without any posted and the respondent No.4 according to law and requirement be transferred/ posted in these vacant post.
- d) That the appellant is a female gender which not possible to travel in daily routine 60 km in public transport with so many problems like security, transport unavailability etc.
- e) That the respondents No.1 to 3 bionomically transferring/ posting the appellant from one place to another without any legal and lawful reasons, which is clearly violation of the Service Policy and Rules.
- f) That any other grounds will be furnished at the time of final arguments with the prior permission of this Hon'ble Court.



43

For the aforesaid reasons, it is therefore, respectfully prayed that on acceptance of this Amended Service Appeal, this Hon'ble Tribunal may be pleased to kindly set aside the impugned order dated 20.12.2021, which is illegal, unlawful, coram-non-judice, malafide and of no legal effect and also ineffective on the rights of appellant, further the respondents No.1 to 3 may be directed to actualized the order dated 14.09.2022 accordance with law and allow the appellant to perform her duty in Peshawar.

Any other relief, which has not been specifically asked for and to whom the appellant is found entitled may also be granted.

Appellant

Through

**Muhammad Israr Khattak**  
Advocate High Court

*original Appeal.*

*INCORRECT general order which I was advised by order of ST*

- 44

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.Amended Service Appeal No. \_\_\_\_\_/2023  
IN

S.A.No. \_\_\_\_\_/2021

**Dr.Salma Sami** ..... Appellant**Versus**

Govt. of K.P through Chief Secretary &amp; others..... Respondents

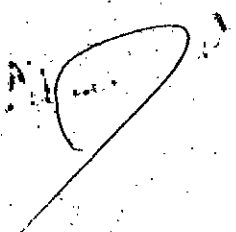
**AFFIDAVIT**

I, **Dr.Salma Sami** w/o Hafiz Muhammad Inamullah r/o Lahori Gate, Flat No.85, Mohallah Umar Farooq, Sheikh Abad, Peshawar, Principal GGHS, Malogi, Peshawar (appellant) do hereby affirm and declare on oath that the contents of the **Amended Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Deponent

CNIC No.16202-6959804-6



TPD - 450 1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 01/2022

Ama U

Dr. Salma Sami.....Appellant

Versus

The Govt. of Khyber Pakhtunkhwa and others.....Respondents

---

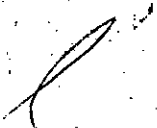
**REPLY ON BEHALF OF RESPONDENT NO.7 (MST. SAIMA)**

---

Respectfully Sheweth,

**Preliminary Objections:**

- I. That the appellant has got no cause of action and locus standi to file the appeal in hand.
- II. That the appellant is estopped by his own conduct to file the instant appeal.
- III. That the appeal in hand is time barred.
- V. That the appellant has not approached the Hon'ble Tribunal with clean hands. As a matter of facts he has concealed material facts from the Hon'ble tribunal rendering the appeal in hand not maintainable.
- VII. That every Civil Servant is liable to be transferred anywhere within the Province as per the mandate of Section 10 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 and the policies being subservient to the parent statute cannot override the same.
- VIII. That the Answering Respondent was appointed as Principal on 05.03.2019 and posted to GGHS Mian Gujar vide order dated 15.02.2019. Mian Gujar as far-flung area from the home of the Answering Respondent. After remaining there for almost double tenure she was transferred vide Notification dated 12.08.2022.



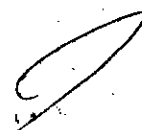
-BPS

U

46

(Annex:Reply/1) to GGHSS Mologo, Peshawar after 4 years duration. During the pendency of the instant appeal a General Notification dated 14.09.2022 (Page-18 of the Service Appeal) was issued whereby the post of Answering Respondent was shown to be vacant and thus the appellant was transferred to it. As the post was not vacant therefore, when the appellant came to know she filed an application (Page-22 of the Appeal) before the Respondent No.02 mentioning the fact that the post is not vacant. The appellant by misrepresenting before the Tribunal got order of the Tribunal on 13.03.2023 (Annex:Reply/2) whereby it was ordered that the Notification dated 14.09.2022 be actualized. It was never brought into the notice of the Court that the Answering Respondent was holding the post and thus application under Section 12(2) CPC was filed which was later on allowed vide order dated 10.07.2023 (Annex:Reply/3) and the order dated 13.03.2023 was set aside. On the basis of the Tribunal Order *ibid* vide order dated 17.04.2023 the Answering Respondent (Annex:Reply/4). The Answering Respondent was illegally relieved from the post vide relieving order dated 10.04.2023 (Annex:Reply/5) but in the meanwhile the Tribunal vide order dated 04.05.2023 (Annex:Reply/6) suspended the order dated 17.04.2023 *ibid*. Since both the Answering Respondent and the appellant stood attached to the same post therefore, the issue of salary arose between them. The Accountant General Khyber Pakhtunkhwa vide letter dated 09.05.2023 (Annex:Reply/7) ask for the advice of Respondent No.2. bringing in his notice the issue raised in circumstances of the case, however, in utter defiance of the order of the Tribunal Respondent No.2 requested the Accountant General Khyber Pakhtunkhwa vide letter dated 19.05.2023 (Annex:Reply/8) to release the salary of the appellant instead under the pretext that the Notification dated 17.04.2023 *ibid* still holds the field while in fact the same was suspended by the Tribunal.

Reply to Facts:

1. Needs no reply.
  2. Correct to the extent of appointment of the appellant as Principal BPS-18 08.02.2021 and her posting to GGHSS Nodeh District Nowshera and adjusted against the post of Principal BPS-19 GGHSS irrigation Colony, Peshawar as a stop gap arrangement in on pay scale vide Notification dated 13.07.2021
  3. Needs no reply.
- 

47

4. Not relating to the Answering Respondents. However, neither post at irrigation Colony was found vacant nor that of Gul abad, Jamrud Khyber and interestingly the post of the appellant was also not vacant where she was transferred.
5. Not relating to the answering Respondent hence not replied.
6. Correct to the extent of transfer of the appellant to GGHSS Mata Palangzai District Charsadda but the appellant also failed to comply with the order due to her insubordinate nature.
7. Correctly admitted that the appellant was transferred to the post of the appellant vide Notification dated 14.09.2022 whereas the post was not vacant and wrongly mentioned as vacant in the order.
8. Not relating to the Answering Respondent hence no reply.
9. Not relating to the Answering Respondent hence no reply needed.
10. Correct to the extent of acceptance of 12(2) CPC application of the Answering Respondent.
11. Needs no reply.

**Reply to Grounds:**

- A. Not relevant to the Answering Respondent in as much as she has already served for 4 years at GGHSS Mian Gujar and then transferred to GGHSS Malogo, Peshawar.
- B. Not concerning the Answering Respondent, However, the Answering Respondent has also not completed her tenure at GGHSS Malogo as she was transferred there to on 12.08.2022.
- C. Not concerning the Answering Respondent hence needs no reply.
- D. Not admitted. The Answering Respondent is also female and has served for 4 years in a distant place that is GGHSS Mian Gujar. Being Civil Servant she is liable to be transferred anywhere within District Peshawar, the station of her spouse.



- 48

- E. Needs no reply.
- F. The Answering Respondent will also add some additional Grounds.

The prayer of the appellant is incorrect and she has illegal added a prayer not taken in the initial prayer that the appointment Notification dated 14.09.2022 may be actualized. With regard to the posting of the Answering Respondent at GGHSS Malogo, Peshawar the appellant has got not cause of action and her appeal to that extent is not sustainable.

Through

Respondent No.07  
(Mst. Saima)

Khaled Rahman,  
&  
Muhammad Amin  
&  
Muhammad Ghazanfar Ali  
Advocates, Peshawar.

Dated: 29/08/2023

Counter Affidavit

I, Khaled Rahman, Advocate, as per instruction of my client, do hereby affirm and declare on oath that the contents of this reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

Deponent

29/8/23



Appeal No. 02/2022  
Salma Sami vs - Amna V - 49

22.09.2023



Learned counsel for the appellant present. Mr. Faheem Ullah, Assistant alongwith Mr. Asif Masood Ali Shah, Deputy District Attorney for official respondents No. 1 to 3 present. Mr. Mir Zaman Safi, Advocate for private respondent No. 6 present. Mr. Khalid Rahman, Advocate for private respondent No. 7 also present.

Representative of official respondents stated at the bar that a week time may be granted for resolving of the issue in question. Adjourned. To come up for arguments on 02.10.2023 before the D.B. Parcha Peshi given to the parties.

(Fareeha Paul)  
Member (E)

(Salah-ud-Din)  
Member (J)

\*Naeem Amin\*

Certified to be true copy

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

Date of Presentation of Application

Number of Words

Copying Fee

Urgent

Total

Name of Copyies

Date of Completion of

Date of Delivery of

26/9/23

26/9/23  
26/9/23

ATTENDED

✓



- 50

Amir W

**GOVT. OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

Email: [sectionofficersf@gmail.com](mailto:sectionofficersf@gmail.com)

091-9223588

Dated Peshawar May 17<sup>th</sup>, 2023

**NOTIFICATION**

**NO.SO(S/F)E&SED/4-16/2023/Posting/Transfer/:** Consequent upon Khyber Pakhtunkhwa Service Tribunal order dated 05.05.2023 this Department's notification of even no. dated 17.04.2023 in respect of Mst. Salma Sami and Mst. Saima Principal is hereby held in abeyance, with immediate effect.

**SECRETARY TO GOVT. OF KHYBER PAKHTUNKHWA**  
**E&SE DEPARTMENT.**

**Endst: of even No. & date:**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Khyber Pakhtunkhwa Service Tribunal Peshawar.
3. Director, E&SE, Khyber Pakhtunkhwa, Peshawar.
4. District Education Officers (Female), Peshawar.
5. Director EMIS, E&SE Department for uploading at official website at the earliest.
6. PS to Secretary, E&SE Department.
7. Principals concerned.
8. Office order file.

  
(SHAWANA HALEEM)  
SECTION OFFICER (S/F)

**ATTESTED**

Sal. of also received to CS date by Dr. Salma Sami / produced on 2/10/23 W is sent on date of receipt by Deputy Secretary to Govt SO(S) HED.



FORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

Service Appeal No.01/2022 - 5/

Dr. Salma Sami Vs. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil  
Secretariat, Peshawar and 6 others

Amara X

**ORDER**

2<sup>nd</sup> Oct. 2023.

**Kalim Arshad Khan, Chairman:** Learned counsel for the appellant, Mr. Asad

Ali Khan, Assistant Advocate General for the official respondents and private respondents No.6 & 7 present through their counsel and have been heard.

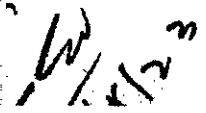
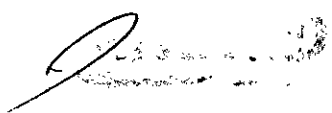
2. According to the memo and grounds of appeal, the appellant was transferred and posted against the post of Principal GGHS Gul Abad Jamrud, District Khyber but that post was already stated to be occupied by one Mst. Tahira Naz, where-after, the transfer order was modified and vide impugned order dated 20.12.2021, the appellant was transferred to GGHS Matta Palangzai, District Charsadda instead of GGHS Gul Abad Jamrud, District Khyber. Aggrieved of the said order, the appellant had initially filed representation and then this appeal. During the pendency of appeal, one Mst. Sughra Sadaf submitted an application for impleadment in the appeal on the strength of another transfer Notification dated 14.09.2022, wherein, the appellant Dr. Salma Sami was shown to have been transferred against the vacant post of Principal GGHSS Malogi. The learned counsel for the appellant did not press the appeal saying that a direction might be given to the respondents to actualize transfer Notification dated 14.09.2022, whereby appellant was shown to have been transferred against the vacant post at of Principal at GGHSS Malogi. On such development, the appeal was decided. Where-after, Mst. Saima submitted application under section-12(2) of the CPC,

N.

X

1908 with the contention that although, the order of transfer dated 14.09.2022 showed the post of Principal GGHSS Malogi as vacant but actually that was not vacant and was already occupied by the applicant Mst. Saima, who was posted there vide Notification dated 12.08.2022. Notice of the application was given to the other side and after hearing parties, the application U/S 12(2) CPC, 1908 was accepted, thereby setting aside the order dated 13.03.2023, whereby, appeal of Dr. Salma Sami was disposed of with the direction that her posting against the post of Principal Malogi be actualized. What the department did was that it issued another Notification dated 17.04.2023, which was shown to have been passed in compliance with the judgment of this Tribunal and date of the judgment was shown in Notification to be 14.09.2022. We observe with very serious concern that neither the Tribunal had given any direction to issue a notification nor there is any order of 14.09.2022 passed by the Tribunal in this regard. Once before, we had directed the Education Department not to use the name of the Tribunal while issuing any order when no such direction is given by the Tribunal. Be that as it may, the Notification dated 17.04.2023 was issued and is said to be still in the filed. On the previous date, i.e. 22.09.2023, representative of the official respondents sought time for resolution of the issue but today, a copy of letter dated 28.09.2023 was produced with a statement at the bar that the matter was negotiated between the parties but Mst. Saima, Principal had requested that the case was in the Tribunal, therefore, the Court should decide that.


3. Postings and transfers is the sole prerogative of the authority under Section-10 of the Khyber Pakhtunkhwa Civil Servants Act, 1973 and the Tribunal least interferes in such discretion of the authority unless there is some deviation from



- 53

the rules, policies, Act/or some malice or political motivation. In this case, both the ladies i.e. Dr. Salma Sami and Mst. Saima are aggrieved from their transfers on the sole ground of premature transfers. The Government has notified a posting/transfer policy, wherein a specific tenure has been given for service of a civil servant at a particular post. Therefore, it is always expected from the authorities by the civil servants that they would be allowed to complete their normal tenure. Not only in this case but in all other such cases, we have seen that the concerned authorities are not honoring their own posting/transfer policy. As against that, no one can be posted against the post of his/her choice. As stated above, the order last in line i.e. of 17.04.2023, though, discussed in the order sheet dated 04.05.2023 and suspended vide the said order, yet is still in the field, therefore, anybody feeling aggrieved, of the order dated 17.04.2023, may trace his/her steps to proper course against the order under which the civil servant is holding the post for another reason also that that was not under challenge before the tribunal. We expect that in order to avoid further unnecessary litigation, the departmental authorities would honour the tenure provided in their own posting/transfer Policy and none of the parties should suffer otherwise than due course of policy.

4. The appeal is disposed of in the above terms. Consign.
5. *Pronounced in open court at Peshawar and given under our hands and seal of the Tribunal on this 2<sup>nd</sup> day of October, 2023.*

  
(Muhammad Akbar Khan)  
Member(Executive)

  
(Kalim Arshad Khan)  
Chairman

The Secretary,  
Elementary & Secondary Education,  
K.P. Secretariate, Peshawar, KPK.

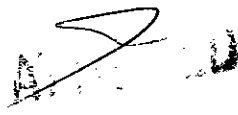
56  
Amir Y<sup>2</sup>

Subject: APPLICATION FOR APPROPRIATE ORDERS IN VIEW OF  
OBSERVATIONS PASSED BY K.P. SERVICE TRIBUNAL,  
PESHAWAR DATED 02-10-2023.

Respected Sir,

The applicant submits as under:

1. That I have been serving as Principal, GGHSS Malogo Peshawar since 12<sup>th</sup> August, 2022.
2. That I was transferred from GGHSS Malogo to GGHSS Mian Gujar, Peshawar on 17<sup>th</sup> April, 2023 whereas in the said transfer order, there was a reference of K.P. Service Tribunal's order dated 14-09-2022.
3. That when I approached Service Tribunal, it revealed to me that Ms. Salma Sami concealed material facts from the court and got order in her favor.
4. That I immediately filled an application U/s 12(2) CPC, for setting aside wrongful orders obtained by Salma Sami and my application was accepted by the Service Tribunal.
5. That the court also suspended the aforesaid posting transfer order dated 17<sup>th</sup> April, 2023. In the meantime, the Education Department issued notification on 17-05-2023 to held in abeyance the said transfer, posting order dated 17<sup>th</sup> April, 2023 (Copy attached).
6. That the service tribunal on 2<sup>nd</sup> Oct, 2023 finally disposed off appeal with following observations:



- 55 -

**"The Govt has notified a posting / transfer policy, wherein a specific tenure has been given for service of a civil servant at a particular post. Therefore, it is always expected from the authorities by the civil servants that they would be allowed to complete their normal tenure."**

In view of the vide supra observation passed by service tribunal coupled with statutory provision of posting and transfer in terms of Section 10 of the N.W.F.P. Civil Servants Act, 1973, existing tenure, of my posting is at least 02 years, but I am being discriminated here which is against the law and entitles me to approach the court of law on this count at least.

Over and above, the court also observed that in order to avoid unnecessary litigation, the departmental authorities would honor the tenure, provided in their own posting / transfer policy of none of the above parties should suffer otherwise than due course of policy.

**Prayer:**

In attending circumstances and in light of courts observations, it is requested that I may be let to complete my tenure as principal in GGHS Malogi and as a consequence Ms. Salma Sami may be posted out.

Kind regards.

  
Ms.Saima

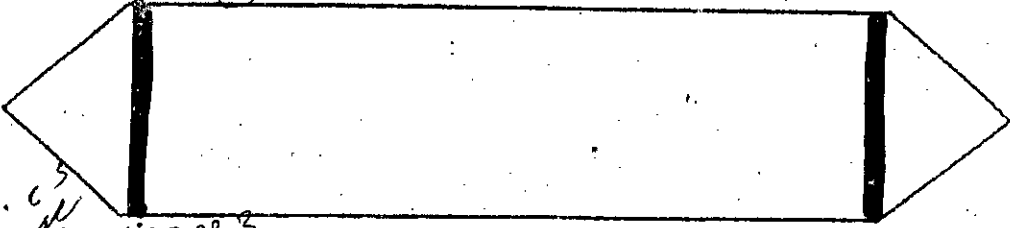
Principal GGHSS

Malogo, Peshawar.

Cell No: 0333-5928623

**ATTESTED**

# بعدالت کارگی کا سرورس سرورس لکھنؤ



2023ء منجانب ( )  
 بی نام ( )  
 صیغہ ( )

موزتہ  
 مقدمہ  
 دعویٰ  
 جرم

## باعث تحریر آئیکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ  
 آن مقام کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز  
 وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور  
 بسورت ڈگری کرنے اجراء اور صولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق  
 زراں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخ  
 نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
 کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
 ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساخت  
 پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔  
 کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی  
 مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

المرقوم  
 ماہ 23 20

Handwritten signature and stamp area.

بمقام کے لئے منظور ہے۔