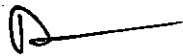


29.10.2015

Clerk to counsel for the appellant and Mr. Ziaullah, GP for respondents presents. Clerk to counsel for the appellant requested for adjournment. To come up for arguments on 4-5-16



Member



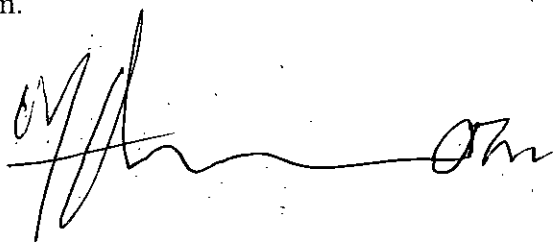
Member

*I want to withdraw  
the present appeal  
4/5/2016*

04.05.2016

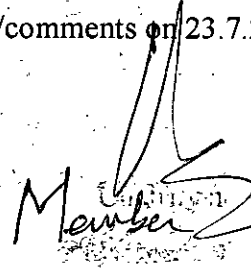
Counsel for the appellant and Mr. Ziaullah, GP for respondents present. Counsel for the appellant submitted an application for withdrawal of the instant appeal. In this respect his signature is also recorded in the margin of the order sheet. Application is allowed and the appeal is dismissed as withdrawn. File be consigned to the record room.

Announced  
04.05.2016

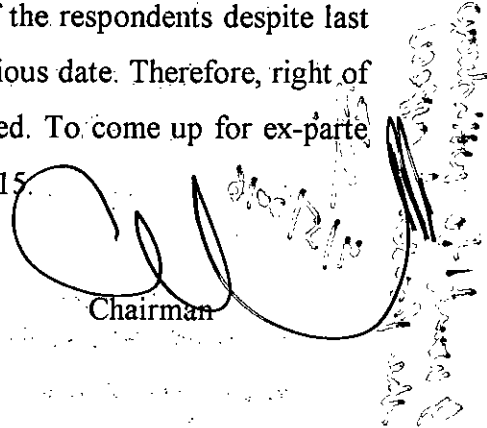


Member

29.4.2014 Mr. Imdad Hussain, Advocate on behalf of counsel for the appellant and Khurshid Khan, SO for official respondents No. 1 and 2 with AAG present. Written reply has not been received despite another chance given for the purpose on the previous date. A last chance is given for written reply/comments on 23.7.2014.

  
Member

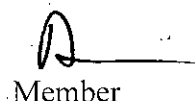
23.07.2014 Counsel for the appellant and Mr. Sajjad Rashid, AD for respondent No. 1 with AAG for the respondents present. Written reply has not been received on behalf of the respondents despite last chance given for the purpose on the previous date. Therefore, right of written reply of the respondent is forfeited. To come up for ex-parte arguments on available record on 12.1.2015.

  
Chairman

12.01.2015 Counsel for the appellant and Addl: AG present. Learned counsel for the appellant requested for adjournment. To come up ex-parte arguments on available record on 26.05.2015.

  
Chairman

26.05.2015 Clerk of counsel for the appellant and Addl: AG for the respondents present. Clerk of counsel for the appellant requested for adjournment due to general strike of the Bar. To come up for arguments on 29.10.2015 before D.B.

  
Member



Appeal No. 1038/2013,  
Mst. Bilei Hakeema

Counsel for the appellant present and heard on preliminary.

26.09.2013

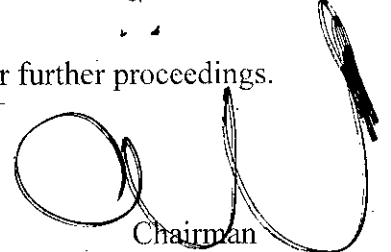
3. Appellant deposited  
security & process  
fee Rs 180/- Bank  
receipt is attached  
with file  
JMY  
7

Contended that the appellant has not been treated in accordance with the law/rules. She was appointed as PST in the Education Department at GGPS, Kodo(Hiroshah), District, Malakand vide order dated 22.12.2008. After serving for more than four years at GGPS, Kodo the appellant has requested the concerned authority for her transfer to her home station i.e GGPS Meherdai, District Malakand on the ground of medical. That in result the appellant was transferred to GGPS Meherdai vide order dated 21.02.2012. In Compliance the appellant took over the charge of the said post at GGPS meherdai on the very next day. He further contended that after serving for hardly one month at GGPS Meherdai she was transferred pre-maturely and with malafide manner vide order dated 19.03.2013 against which she filed departmental appeal on 27.03.2013 which has not been responded within the statutory period of 90 days, hence the present appeal on 21.06.2013. Points raised at the Bar need consideration. The appeal is admitted to regular hearing subject to all legal objections/limitation. The appellant is directed to deposit the security amount and process fee within 10 days. Thereafter, notice be issued to the respondents. Case adjourned to 07.11.2013 for submission of written reply.

  
Member.

26.09.2013

This case be put before the Final Bench 1 for further proceedings.



  
Chairman

4.

**Form- A**  
**FORM OF ORDER SHEET**

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

Case No. 1038 /2013


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	04/07/2013	<p style="text-align: center;">The appeal of Mst. Bibi Haleema resubmitted today by Mr. Noor Muhammad Khattak Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;">   <b>REGISTRAR</b> </p>
2	16-7-2013	<p style="text-align: center;">This case is entrusted Primary Bench for preliminary hearing to be put up there on <u>26-8-2013</u>.</p> <p style="text-align: right;">   <b>CHAIRMAN</b> </p>

This is an appeal filed by Mst. Bibi Haleema PST today on 21/06/2013 against the impugned order dated 19-03-2013 against which she preferred a departmental appeal on 27/03/2013 which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant/counsel. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies:

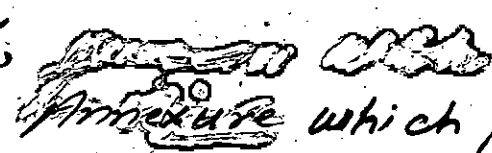
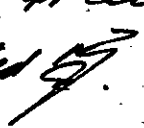
1-Copy of transfer order dated 21.02.2013 in respect of appellant mentioned in para-2 of the memo of appeal is not attached with the appeal which may be placed on it.

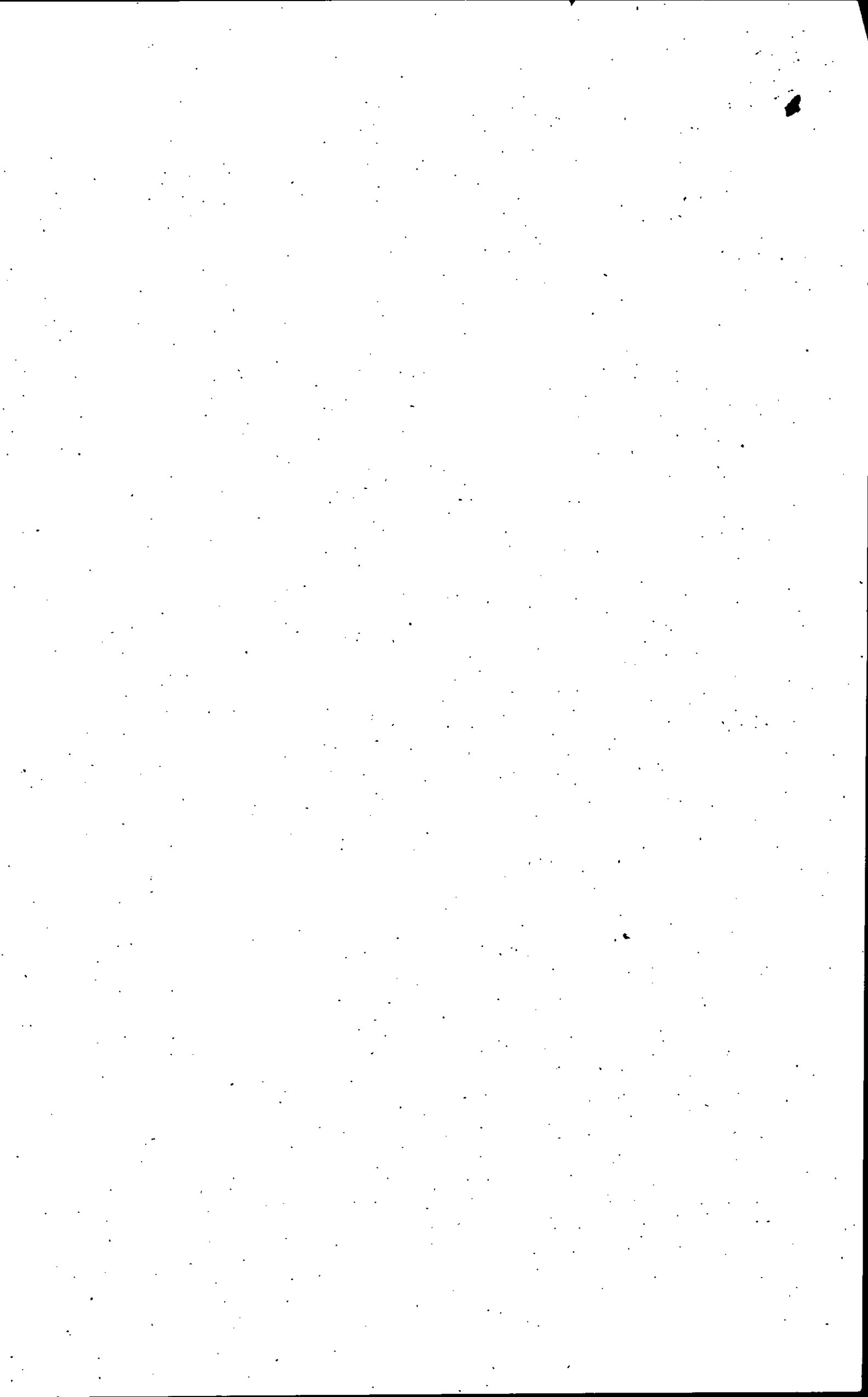
No. 947/ST,  
Dt. 21/6/2013

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Noor Muhammad Khattak adv. Pesh.

*Note*

*Sir,*  
  
*Amexure* which you have objected is  
already attached with the memo of appeal.  
That as the appeal of the appellant has  
matured hence resubmitted   
today dated- 3-7-2013.



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

APPEAL NO 1038 /2013

**BIBI HALEEMA                      VS                      EDUCATION DEPARTMENT**

**INDEX**

<b>S-NO</b>	<b>DOCUMENTS</b>	<b>ANNEXURE</b>	<b>PAGE</b>
1.	Memo of Appeal	.....	1-3
2.	Domicile Certificate	<b>A</b>	4.
3.	Application	<b>B</b>	5.
4.	Order	<b>C</b>	6-9
5.	Charge report	<b>D</b>	10.
6.	Relieving Chet.	<b>E</b>	11.
7.	Impugn Order	<b>F</b>	12.
8.	Departmental Appeal	<b>G</b>	13.
9.	Transfer/ Posting Policy	<b>H</b>	14-16.
<del>9.</del>	<del>ACE 201</del>	<del>D</del>	<del>(17-19)</del>
10.	Vakalat nama	.....	20.

**APPELLANT**

THROUGH:   
**NOOR MOHAMMAD KHATTAK**  
**ADVOCATE**



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

APPEAL NO 1038 /2013

M.V.J. Peshawar  
Case No. 1057  
Date 21-6-13

Mst: Bibi Haleema, PST (BPS-12),  
GGPS Meherdai, District Malakand ..... **Appellant**

**VERSUS**

- ① The Director of (E&SE) Department, Khyber Pakhtunkhwa, Peshawar.
- ② The District Education Officer (Female), District Malakand.
- ③ Mst: Nagina Bibi, PST, GGPS Kodo, District Malakand.

..... **Respondents**

**APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE ORDER DATED 19-3-2013 WHEREBY THE APPELLANT WAS TRANSFERRED TO GGCS ALIFI KALLAY FROM GGPS MEHERDAI PREMATURELY AND IN VIOLATION OF THE TRANSFER/POSTING REGULATORY ACT 2011 AND AGAINST NOT TAKING ACTION ON THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD OF NINETY DAYS**

**PRAYER:**

that on acceptance of this appeal the Impugned order dated 19-3-2013 may very kindly be set aside and the respondents may be directed that not to transfer the appellant from GGPS Meherdai till completion of her normal tenure. Any other remedy which this august service tribunal deems fit that may also be awarded in favor of the appellant

**R/SHEWETH:**

**ON FACTS:**

That appellant is the bonafide resident of Village Meherdai Tehsil Dargai District Malakand, and was appointed as PST in the respondent Department at GGPS kodo (Hiroshah) vide order dated 22-12-2008. (Copy of the Domicile Certificate is attached as Annexure ..... A).

*Appellant No. 3*  
*Respondent No. 3*  
*22-12-08*  
*vide order*  
*2.7.11.12*  
*Right at appeal*  
*No. 122 is*  
*restricted vide*  
*order dt. 23.7.14*  
*Recd*

Co-submitted to  
and filed.  
*21/6/13*

Handwritten notes in the top right corner, including a circled 'C' and several lines of illegible text.

- 2- That after serving for more than four years at the above mentioned station the appellant has requested the concerned authority for her transfer to her home station i-e GGPS Meherdai on the ground of medical. That in result the appellant was transferred to GGPS Meherdai in place of respondent No. 3 vide order dated 21.2.2013. **(Copies of the Application and order are attached as Annexure ..... B & C).**
- 3- That in compliance the appellant took over the charge of the said post at GGPS Meherdai on the very next day and started/performing her duties quite efficiently and upto the entire satisfaction of her superiors. **(Copies of the Charge report and relieving Chet are attached as Annexure ..... D & E).**
- 4- That appellant after serving for hardly one month at GGPS Meherdai was transferred prematurely and with malafide manner vide order dated 19.3.2013. That feeling aggrieved appellant filed departmental appeal before the appellate authority against the impugned order dated 19.3.2013. **(Copies of the Impugn order and Departmental appeal are attached as Annexure ..... F & G).**
- 5- That having no other remedy appellant prefers this service appeal on the following grounds amongst the others.

**GROUND:**

- A- That the impugned order dated 19.3.2013 is against the law, facts, norms of natural justice and materials on the record hence not tenable and liable to be set aside.
- B- That the appellant has not been treated by the respondent Department in accordance with law and rules on the subject noted above and as such the respondents violated article 4 and 25 of the Constitution of Islamic Republic of Pakistan 1973.
- C- That the impugned transfer order dated 19.3.2013 is premature and against the transfer/posting policy of the Govt: of Khyber Pakhtunkhwa. **(Copy of the transfer posting policy is attached as Annexure ..... H).**
- D- That the impugned transfer order dated 19.3.2013 has not been issued in the interest of public service but to accommodate his blue eyed person.

- E- That the impugned transfer order dated 19.3.2013 against the transfer posting regulatory act 2011. ~~(Copy of the act as attached as Annexure~~
- F- That appellant seeks permission to advance other grounds and proofs at the time of hearing.

It is therefore humbly prayed that the appeal of the appellant may be accepted as prayed for.

**APPELLANT**

*Bibi Haleema*

**BIBI HALEEMA**

**THROUGH:**

*Noor Mohammad Khattak*

**NOOR MOHAMMAD KHATTAK  
ADVOCATE**

# DOMICILE CERTIFICATE

No. 1984

Dated Dargai the 22/8/1992

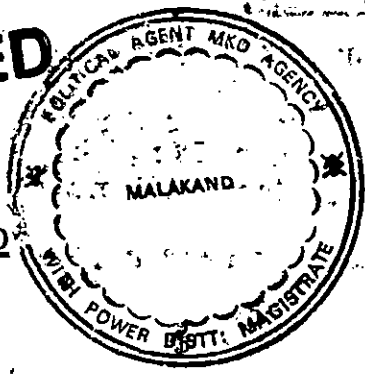
Certified that Mr/Miss BIHI BALOMA

Son/Daughter HAZRAT MOHAMMAD of belongs to a

recognized tribe of AFGHAN section KHATTAK

and his/her father is a permanent bonafide resident of the Tribal area of Malakand Agency Village MHERDAI and he/she is an eligible candidate to avail himself/herself of the seat reserved for the special area of Malakand backward area.

**ATTESTED**



**ATTESTED**

(COUNTERSIGNED)

*(Signature)*

(S. ABDUL WAKIL SHAH)  
POLITICAL AGENT MALAKAND  
MALAKAND AGENCY

ASSTT. POLITICAL AGENT  
DARGAI  
Asst. Political Agent

لہذا یہ سہرا نروہین پیم ونگ سہرا نروہین لہذا یہ سہرا نروہین پیم ونگ سہرا نروہین لہذا یہ سہرا نروہین پیم ونگ سہرا نروہین  
 موضع چڑھوہا، تحصیل سہرا نروہین، ڈی ایچ اے کٹرہ، ضلع کٹرہ، ایف ڈی ایف، پورٹلینڈ سٹریٹ، لاہور۔  
 سندھ میں ہے کہ سائہ قوم افغان قبیلہ ٹٹک سے تعلق رکھتی ہے اور سائہ عدوہ ہزارہ لفظ لفظ سے لہذا  
 کا تعلق ہے کہ سائہ عدوہ کا تعلق ہے کہ سائہ عدوہ ہزارہ لفظ لفظ سے لہذا  
 اصل میں کہ ہے کہ سائہ قوم افغان قبیلہ ٹٹک سے تعلق رکھتی ہے اور سائہ عدوہ ہزارہ لفظ لفظ سے لہذا  
 دیہات = لہذا یہ سہرا نروہین پیم ونگ سہرا نروہین لہذا یہ سہرا نروہین پیم ونگ سہرا نروہین

لہذا یہ سہرا نروہین پیم ونگ سہرا نروہین لہذا یہ سہرا نروہین پیم ونگ سہرا نروہین  
 محمد علی خان

20-8-92  
 لہذا یہ سہرا نروہین پیم ونگ سہرا نروہین لہذا یہ سہرا نروہین پیم ونگ سہرا نروہین  
 محمد علی خان

22.8.92  
 لہذا یہ سہرا نروہین پیم ونگ سہرا نروہین لہذا یہ سہرا نروہین پیم ونگ سہرا نروہین  
 محمد علی خان

محمد علی خان

**Reference Above**

The applicant Bibi Malina D/o Nasrat Mchamad of

Meherdai Malakand Agency requests for grant of domicile certificate  
 The elders of the area Ghar Khan, Mchamad Khan and P.C. Dargal  
 have verified that the applicant belongs to afghan tribe section  
 Khattak.

Submitted as recommended Phases

Political Tehsildar Dargal  
 Tehsil Malakand Agency

بخدمت جناب ڈسٹرکٹ کوارڈینیٹر آفیسر صاحب ملاکنڈ بمقام ملاکنڈ دام اقبالہ،

عنوان: اپیل بسلسلہ تبادلہ از جی جی پی ایس کوڈو، ہیروشاہ تا جی جی پی ایس مہر دے، درگئی

جناب عالی!

مودبانہ التماس مکتورہ پوریہ ہے، کہ من سالکہ مسماة بی بی حلیمہ بختیت پرائمری ٹیچر

مورخہ: 22/12/2008 سے بحوالہ آرڈر نمبر: 3132-55 تعینات ہو کر گورنمنٹ گرلز پرائمری سکول کوڈو، ہیروشاہ میں

اپنے فرائض منصبی انجام دے رہی ہوں، یہ کہ من سالکہ کا سروس دورانہ بھی سکول ہذا میں پوری ہو چکی ہے۔ یہ کہ من سالکہ عورت ذات ہونے کی نسبت اپنے فرائض کے انجام دہی میں مختلف نوعیت کے مشکلات کا سامنا کرنا پڑ رہا ہے،

مزید برآں اس من سالکہ جوڑوں اور پٹھوں کے عارضے مبتلا ہوئی سبب کافی مشکلات سے دوچار ہونا پڑ رہا ہے، اور بیماری کی انہی حالات میں روزانہ تقریباً 70، 75 کلومیٹر آنے جانے کا فاصلہ طے کرنا پڑ رہا ہے۔ جس کی وجہ سے من سالکہ کو اپنے فرائض کے بجا آوری میں دشواری کا سامنا کرنا پڑ رہا ہے،

مزید یہ کہ من سالکہ اس قبل مورخہ: 26/01/2012 ڈائری نمبر 246 بمورخہ: 16/04/2012 بحوالہ ڈائری نمبر: 3315

بمورخہ: 16/06/2012 بحوالہ ڈائری نمبر 9767 بمورخہ: 27/07/2012 اور مورخہ: 01/11/2012 کو مختلف نوعیت

کے تحریری عرض داشتوں کے ذریعے اپنے گذارشات دفتر جناب ایگزیکٹو ڈسٹرکٹ آفیسر (ایجوکیشن) ملاکنڈ بمقام بیٹ حیلہ جمع کرائے ہیں تاہم کسی قسم کی دادرسی اور شیوائی نہ ہو سکی،

یونکہ متعلقہ سکول میں کئی ایسے استائیاں موجود ہیں، جن کا دورانہ عرصہ بیس سال سے زائد پر محیط ہے،

لہذا بذریعہ اپیل ہذا انتہائی عاجزی و انکساری سے خواست گار ہوں، کہ انصاف کے تقاضوں کو پورا کرتے ہوئے من سالکہ کو بھی اپنے ہی سٹیشن پر کچھ عرصہ کیلئے رہنے کا موقع دیا جائے۔ تاکہ من سالکہ اپنے فرائض منصبی بطریق احسن نبھاسکیں۔

من سالکہ آنجناب کے مزید اقبال مندی اور سرفرازی کیلئے دعا گور ہوں گی۔ عین نوازش ہوگی، فقط زیادہ آداب۔

مستطابہ

آپ کی تابع فرمان

العارض:

من سالکہ مسماة بی بی حلیمہ (پی ایس ٹی)

جی جی پی ایس کوڈو، (ہیروشاہ) تحصیل درگئی ضلع ملاکنڈ

P.S

ATTESTED

M

Call comments from

EDDO

in 3-days

- Her service  
- stay at the present  
station.  
Liaison

7/12

C-615

**OFFICE OF THE DISTRICT EDUCATION OFFICER (F), MALAKAND AT BATKHELA.**

**OFFICE ORDER/**

Consequent upon the recommendation of the Departmental Promotion Committee and in pursuance of the Government of Khyber Pakhtunkhwa Elementary and Secondary Education Notification No. SO(B&A)/1-18/E&SE/2012 dated 11.7.2012 the following Senior Primary School Teachers PST-B-14 are hereby promoted to the post of Primary School Headteachers PSHT-B-15 (8500-700-29500) plus usual allowances, as admissible under the rules on regular basis under the existing policy of the Provincial Government, in Teaching Cadre on the terms and condition given below with immediate effect and further posted in the schools noted against each:

S.No	Sr.No	Name	Father's Name	Present Place of Posting	School Where posted as P.School H/Teacher	Remarks
1	2	HAMIDA BEGUM	FAQIR KHAN	GGPS BATKHELA NO 1	GGPS BATKHELA-1	Already occupied post
2	7	RAZIA BEGUM	MUKHTIAR MOHAMMAD	GGPS MAIZARA BATKHELA	GGPS MAIZARA BATKHELA	Already occupied post
3	14	Zuhra Zareen	Muhammad Zareen	GGCMS AMI KAH	GGPS DARAKAT SHAH KOROONA	Vice Nihar Begum
4	15A	Jamila Johanzeb	Johan Zeb	GGPS Zangal P.	GGPS ZANGAL PATAI	Already occupied post
5	18	TASLEEM BIBI	IHSANUR RAHIM	GGPS DHERI	GGPS DHERI	Already occupied post
6	20	Zubaida Bibi	Abdul wahid	GGPS Yousaf Abad	GGPS Yousaf Abad	Already occupied post
7	21	TASLEEM BEGUM	DERA WADAN	GGPS MAIZARA THANA	GGPS MAIZARA THANA	Already occupied post
8	24	SHAHI SULTAN	FEROZ SAID	GGCMS AMINABAD	GGPS Kalia BUK	Vice Tauheeda
9	25	KULSOOM BEGUM	DERA WADAN	GGPS NALL NO 1	GGPS NALL NO 1	Already occupied post
10	30	Zarshoo Begum	Sakhi Sarwar	GGPS Robar Shah	GGPS Robar Shah	Already occupied post
11	31	ZAKIA BEGUM	ISSA KHAN	MAIZARA BATKHELA	GGPS Gulingus	Vice Nasim
12	32	Nasim Akhtar	Fazal wahid	GGPS Mohrdal	GGPS Mohrdal	Already occupied post
13	33	SAEEDA BEGUM	MOHAMMAD YAGOOB	GGCMS GUNYAR	GGPS Gandero Shari	Against vacant post
14	34	Jamila Begum	Mehmud Khan	GGPS Paw Dubandi	GGPS Paw Dubandi	Already occupied post
15	35	SARWAT ARA	ABDUL SAJJAR	GGPS JALALA	GGPS JALALA	Already occupied post
16	36	NASIM AKHTAR	BAKHTYAR KHAN	GGCMS Said Abad	GGPS Bagh Dara	Vice Nasim Akhtar
17	43	Nasheed Begum	Haq Nawaz	GGPS DARGAI	GGPS DARGAI	Already occupied post
18	44	Zenat Begum	Juma Khan	GGPS Prangai	GGPS KHADU	VICE SHAGUFTA NISAR
19	53	Rasheeda Bibi	Khan Gul	GGPS Badragga	GGPS Badragga	Already occupied post
20	54	Yasmeen Begum	Nazar Hussain	GGPS Sakhakot No1	GGPS Sakhakot No1	Already occupied post
21	55	Asmat Ara	Muhabat Khan	GGGPS IVShah No1	GGGPS IVShah No1	Already occupied post
22	57A	Naseem begum	Raz khan	GGPS SIKot No2	GGPS GULO SHAH	VICE NIZAKAT
23	58A	Jouhar begum	Aqal mand	GGPS dargai	GGPS MUSTAHAB KOROONA	VICE FARKHANDA
24	59A	Sherien Baha	Noor Gul	GGPS wazir Abad	GGPS wazir Abad	Already occupied post
25	62A	Ayisha Bibi	Said Mohammad	GGPS Sakhakot No1	GGPS MALAK ABAD SHINGHAI	VICE SHAHIDA RAHIM
26	62	Nizakat	Khan Badshah	GGPS H. M. M. Koroona	GGPS I. K. Koroona	Already occupied post
27	64	Smt. Jofa Karim	MIAN KARIM SHAH	GGPS AMINABAD	GGPS AKHAI ABAD	Already occupied post
28	65	TASNEED BEGUM	SARDAR ALI	GGPS JAI ALA	GGPS PIK MULI MOHAMMAD BANDA	A.V.P
29	67	ROBINA SHAHEEN	AMANATULLAH	GGPS THANA NO 1	GGPS THANA NO 1	Already occupied post
30	69	Husnat bano	Abdul Aziz	GGPS Dargai	GGPS Dargai P.HOUSE	VICE ZAHIDA
32	71	Nasim Bibi	GHULAM AKBAR	GGPS KHAR KOTKAI	GGPS KHAR KOTKAI	Already occupied post
33	74	Shahi Raz	Azeem khan	GGPS Ashakai	GGPS Ashakai	Already occupied post
34	75	KISHIWAR SULTAN	Umar Zaman	GGPS SIKot No2	GGPS BAMA KANDA	VICE SURAYA
35	76	Nihayat Begum	MOHAMMAD SALLI	GGPS AKBAR ABAD	GGPS Tolakan No.2	Vice Azra Naz
36	77	Nasreen begum	Rushan Khan	GGPS khakai No.1	GGPS khakai No.1	Already occupied post
37	78	RASHIDA BEGUM	SHER MOHAMMAD	GGPS Kharki Dherai	GGPS Kharki Dherai	Already occupied post
38	82	NAHEED BEGUM	FAZLI WAHID	GGPS MALAKAND	GGPS MALAKAND	Already occupied post
				GGPS CC THANA	GGPS CC THANA	Already occupied post

**ATTESTED**

*[Handwritten signature]*



39	83	ZAKIA BIBI	SHAL MOHAMMAD	GGPS KANDAKO KASS	GGPS KANDAKO KASS	Already occupied post
40	86	Bibi Benazir	Hassan Gul	GGPS Prangal	GGPS SJKKORONA	VICE RABIA
41	87	Falak Naz	Mohd Shoub	GGPS wazir Abad	GGPS MAKHNAWALA	VICE SAEEDA BEGUM
42	88	Yasmeen Begum	Said Gul	GGPS Ghwar Kali	GGPS Ghwar Kali	Already occupied post
43	89	Abida Azem	Sahib Mehd	GGPS Lala	GGPS Lala	Already occupied post
44	91	Nasreena	Abdullah Zaman	GGPS Ghwar Kali	GGPS DAJAWIND KILU	VICE SHAZIA
45	93	DILSHAD BEGUM	Ghulam Mehmood	GGPS KASINAT	GGPS Dagardara	Vice Tehira Parvoon
46	94	Shaheda Parveen	Mohd Usman	GGPS Sharif Abad	GGPS Sharif Abad	Already occupied post
47	95	Noor Jehan	Farid Khan	GGPS Mohrdal	GGPS SAROGAN	Already occupied post
48	96	Zuhra Begum	Abdul Wahid	GGPS Musa Maina	GGPS Musa Maina	Already occupied post
49	99	Asmat Begum	FAZLI KARIM	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
50	100	Ahmadal Bibi	Amal Allah Khan	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
51	101	Naheed Akhtar	Abdul Azem	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
52	102	Saeeda Begum	Fazal Mohd	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
53	103	Naseem begum	Mir Ahmad	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
54	104	NISHAT BEGUM	SHER AFZAL	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
55	105	Kalsoom Begum	Rawat Khan	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
56	107	Meher Sheida	HAJI QASIM	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
57	113	Rasheeda Bibi	Jalat Khan	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
58	118	BALGEES BEGUM	MOHAMMAD SALIH	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
59	122	SHEHNAZ ARA	SHER ZAMAN	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
60	123	Rubeena Shaheen	Said karim	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
61	124	ADILA NAWAZ	HAQ NAWAZ	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
62	125	MARGAS BEGUM	AMIR AHMAD	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
63	129	HUSSAN NISA	USMAN ALI	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
64	130	RABIA BIBI	FAZAL MANAN	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
65	131	Shaheen Bibi	Zareen Khan	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
66	132	MIRAJ BEGUM	NAJK JAN	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
67	134	FARKHANDA NAZ	MOHAMMAD AKRAM	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
68	135	MUSARAT BEGUM	NEK MOHAMMAD	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
69	136	SHABINA	MOHAMMAD AKBAR KHAN	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
70	137	Shahmem Begum	Azhar Khan	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
71	139	LEMON ARA	NOOR MUHAMMAD	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
72	140	SHANIM BEGUM	GUL MOHAMMAD	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
73	142	Naheed begum	Alif Shah	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
74	143	Tanzeer Samar	Samar Khan	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
75	144	BIBI MARYAM	IHSAN ULLAH	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
76	146	Nihayat Begum	Umar Shah	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
77	148	AJAB SULTAN	SHARIF ULLAH	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
78	149	Bibi Mahla	S. Juhar bacha	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
79	150	Alia begum	Main Gul	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
80	151	Harnida Begum	Khlaska rehman	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
81	152	Bibi Abida	Fateh Rehman	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
82	154	Shahgulta Shaheen	Abdur rehman	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
83	155	MUSARAT BEGUM	AMAN ULLAH KHAN	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
84	156	Shahi Sultan	S. Mehbob Shah	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
85	161	HADIA BEGUM	KAMRAN KHAN	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
86	164	JEHAN ARA	IZAT GUL	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
87	167	SHAHEEN	ABDUL HAKIM	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
88	169	NHAYAT BEGUM	LAL BADSHAH	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
89	171	NIZAKAT BEGUM	SHUJA GUL	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
90	174	HADAYAT BEGUM	MOHAMMAD RAZIQ	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
91	175	SALMA BEGUM	SADBAR KHAN	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post
92	176	SHANZAD BEGUM	MUHAMMAD SADIQ KHAN	GGPS HAIBAT GRAM	GGPS HAIBAT GRAM	Already occupied post

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93	177	NAGINA SARWAT	SAID KARIM	GGCMS MALANG ABAD	GGPS NARAY TANGI NO1	VICE NABILA
94	178	JAMILA BEGUM	MOHAMMAD ALI	GGPS KANDAKC	GGPS KANDAKO	Already occupied post
95	181	SHAHI BEGUM	SHER BAZ	GGPS FAISAL ABAD	GGPS FAISAL ABAD	Already occupied post
96	183	Nargas Parveen	Gulab Khan	GGPS Dargal Pattak	GGPS Dargal Pattak	Already occupied post
97	184	HIGHAT BEGUM	MOHAMMAD YACOOB	GGPS COIGRAM	GGPS Jehangir Abad	Vice Saima Nawab
98	185	ZAHSEENA BEGUM	NIGAR MUHAMMAD	GGPS TOTAKAN NO 1	GGPS BARAWAL	VICE SHAKILA
99	186A	WAZIR BEGUM	AMIR HATAM	GGPS SHAH DHERI	GGPS SHAH DHERI	Already occupied post
100	187	FARAH DEEBA	SHER BAO SHAH	GGPS CC THANA	GGPS Palai No.1	Vice Dilshad Begum
101	189	Fahmida Begum	Khan Mohd	GGPS Dargal	GGPS ZANGAL BANDA	VICE SHAZIA
102	190	Mirha Bibi	Gul Mohd	GGPS S/Kot No2	GGPS QADAR KILLI	VICE FARIDA BEGUM
103	192	HIGHAT HADILA	DAKHT RAWATI	GGPS OTHMANI ALIAD OTK	GGPS Qharib Abad OTK	Already occupied post
104	194	NEELUM ZIA	ROOHUL AMIN	GGPS JULAUFUWA NO 1	GGPS Dosa	Vice Shonaz Gul
105	195	FAZIA BIBI	HAKIM KHAN	GGPS HADAT GIRAM	GGPS GHAKHOT	AVP
106	199	Rozeena	Rahim Shah	GGPS Sakhatkot No1	GGPS KACHI KOPAR	VICE NADIA BEGUM
107	200	Shameem Ara	Mohd Sarwar	GGPS Ghundo Bala	GGPS Ghundo Bala	Already occupied post
108	202	Shaghufa Begum	Habib Khan	GGPS Palo Tal	GGPS Palo Tal	Already occupied post
109	203	Nargas Begum	Mohdullah Khan	GGPS, Khattak, Korona	GGPS, Khattak, Korona	Already occupied post
110	204A	Mujhedda	Mohd Hussain	GGPS Khakal Chhuri	GGPS KHANORI NO.1	VICE RAHIMA
111	205	Ambreen	Mohd Sabir	GGPS JABAN NO.2	GGPS JABAN NO.2	Already occupied post
112	206A	SHAUKAT BIBI	ILYAS MUHAMMAD	GGPS RUSTAM BANDA	GGPS RUSTAM BANDA	Already occupied post
113	206	Anjuman Begum	Fazal karim	GGPS Khan Ga:	GGPS M.A.K.KILLI	VICE HAJIRA RAHMAN
114	207	Sadqa	Ghulam Hidar	GGCMS Alif Ka:	GGPS MASHAM ZAI	VICE ROHANIA
115	209	Suhail Arab	Abdul Wahab	GGPS G.U.Khol	GGPS BEGHUM BANDA	VICE MURSAHA
116	211	Tasleem Begum	Alif Khan	GGPS G.U.Khol	GGPS NAZIF BANDA	VICE SHABINA BEGUM
117	214	Jamila Begum	Fazal Illahi	GGCMS Alif Ka:	GGPS MANZARI BABA	VICE MUHSINA
118	215	Nageena Bibi	Azizur Rehman	GGPS Mehndal	GGPS Kodo	VICE Bibi Haleema
119	216A	Faiza Rahim	Said Rahim	GGPS Kharkoll	GGPS KHARKI BANDA	VICE RUKHSANA SARWAT
120	217A	KHALIDA	AMIN KHAN	GGPS SINDANO	GGPS SINDANO	Already occupied post
121	217	Shaheeda Nazly	Ayub Khan	GGPS brah Shah	GGPS brah Shah	Already occupied post
122	218	Sabeena	Mumber Khan	GGPS Dargal	GGPS GUL MUQAM	VICE SHAMIM BEGUM
123	220	Bibi Zenab	Fazal Rehman	GGCMS Wartair	GGPS WARTAIR BANDA	VICE NEELAM
124	222	Shan Bibi	Gulzada	GGPS G.R. Korona	GGPS SOR AZGHAI	VICE ZUBEDA
125	221	Musrat Bibi	Makhlooq Shah	GGPS G.U.Khol	GGPS NARO UBO	VICE FOZIA BEGUM
126	225	Yasmeen begum	Syed Umar	GGCMS Wartair	GGPS SORANA	VICE LUBRA
127	226	Perveen	Muhabat Khan	GGPS Sakhatkot No1	GGPS BARI	VICE JAVIDA
128	227	Mukhtar Begum	Fazal Mehmud	GGPS MUSA MINA	GGPS NASHORO KANDAW	VICE FOZIA AKHTAR
129	234	SHAMIM AKHTAR	FAZLI MALIK	GGPS GHARIB ABAD AGRA	GGPS GHARIB ABAD AGRA	Already occupied post
130	246	BACHA IRAQ	MOHAMMAD SALIH	GGPS TOTAKAN NO 1	GGPS TOTAKAN NO 1	Already occupied post
131	247	SHAHEEN WAQAR	HAIDER KHAN	GGPS NALL NO 2	GGPS NALL NO 2	Already occupied post
132	248	Shazia Shorin	Mohad Shorin	GGPS Ghundo Bala	GGPS SARKAI	VICE MAHI TILLAT
133	249	SHEHLA BEGUM	BADSHAH MOHAMMAD	GGPS BANO ABAD	GGPS Hal Dara	Vice Shahnallo
134	256	SHAMIM BEGUM	WALI REHMAN	GGPS HUNIMAD AGRA	GGPS GUMBAD AGRA	Already occupied post
135	258	Khalida	Mohd Alzal	GGPS Ghari (Gali)	GGPS ABAS KILLI	VICE AMBAREEN
136	260	Rozia Bibi	Mohd hussan	GGPS Toll Ghahad	GGPS Toll Shahod	Already occupied post
137	261	NOREEN BANO	GUL GHANI	GGPS GHARIB ABAD BATHKHELA	GGPS NO.2 BATHKHELA	VICE DILSHAD BEGUM
138	269A	Naraj Begum	Khan Nawab	GGPS Rutam Banda	GGPS PALAI SHAH	VICE ZAKIA NAZ
139	269	Gamar Seema	IZAT GUL	GGCMS KASINAT	GGPS Jarbat	Vice Zubaida
140	271	SHAKILA BEGUM	FAZAL AZIM	GGPS HADAT GIRAM	GGPS LC THANA	VICE NASREEN AKHTAR
141	272	TAHIRA PERVEEN	ABDUL MANAF	GGPS GAT KOTO	GGPS GAT KOTO	Already occupied post
142	273	ROOSIA SHAMS	ABDUL WAHAB KHAN	GGCMS SAIDABAD	GGPS NARAY TANGI NO.2	VICE RUKHSANA ISHAQ
143	274	NAHID BEGUM	ROHAN GUL	GGPS TOTAKAN NO.1	GGPS Shagal Pattak	Vice Khallim

ATTESTED

9

144	275A	Kausar Begum	S. M. Iqbal	GGPSS Kot No 2	GGPS MAINA KOT	VICE SHAKILA
145	277	Hoorul Haram	Hussain Khan	GGPS Ghani Dheral Lama	GGPS Ghani Dheral Lama	Already occupied post
146	269	Ihsana	Amal Dad Khan	GGPS H/Kot No 1	GGPS H/Kot No 2	Vice JEHANARA
147	280A	Munirah Shaheen	Four Dil	GGPS Mayar	GGPS H.C. KOT	VICE NARGUS
148	281A	Shaheen Begum	Sakhi Sarwar	GGPS MAJHARICHAND	GGPS MAJHARICHAND	Already occupied post
149	284	SHAKIRA BIBI	KHADIM MOHAMMAD	GPS DRY SERAI	GPS DRY SERAI	Already occupied post
150	285	SHABNAM ARA	KHADIM MOHAMMAD	GGPS AMANDARA	GGPS AMANDARA	Already occupied post
151	287	NAHEED BEGUM	MUHAMMAD SADIQ	GGCMS HISAR BABA	GGPS GHARIB A.MATKANI	VICE JEHAN SULTAN
152	288	MUSARAT BEGUM	MAJEED KHAN	GGPS FAISAL ABAD	GGPS Sra Shah	Vice Afsana
153	293	Zenat Begum	Hassan Gul	GGPS H. Shah (Kalan)	GGPS Z. SHAH BABA	VICE HABSHAH SALIM
154	294	Nasreen begum	Amir Hawab	GGPS Yousaf Abed	GGPS SALGARO	VICE MUSLIMA
155	295	MUSARAT RAZIQ	MOHAMMAD RAZIQ	GGPS JALAL KOT No.1.	GGPS JALAL KOT No.1.	Already occupied post
156	296	FARIDA KHANAM	Muhammad Shah	GGPS AJLAI BANDA	GGPS AJLAI BANDA	Already occupied post
157	297	SAUDIA BEGUM	NAIK JAN	GGCMS KHARKI PIRKHEL	GGPS Makband	Vice Saudia
158	298	SHAMAM BEGUM	ESSA KHAN	GGPS HISAR KALI	GGPS HISAR KALI	Already occupied post
159	299	NEELAM BIBI	MIAN AKBAR	GGPS PAINDA KANDARO	GGPS PAINDA KANDARO	Already occupied post
160	301	FATIMA BIBI	GUL SHAHZADA	GGPS ZALAM KOT	GGPS ZALAM KOT	Already occupied post
161	302	Kalsum Sacir	Mohd Sabir	GGPS Dargal	GGPS PLANDARA	VICE SALMA NAZ
162	303	Shahida Parveen	Zarif Khan	GGPS G.C. Hoi	GGPS AGHI GARH	VICE SAFIA

Terms and Conditions:

- 1 They would be on probation for a period of one year extendable for another one year.
- 2 They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- 3 Their services can be terminated at any time, in case her performance is found unsatisfactory during probationary period. in case of misconduct, she shall be proceeded under the rules framed from time to time.
- 4 Charge report should be submitted to all concerned.
- 5 Their Inter-Se-seniority on lower post will remain intact.
- 6 No TA/DA is allowed for joining his duty.
- 7 They will give an undertaking to this effect to be recorded in their service books.

(MUSHTAQ AHMAD)  
DISTRICT EDUCATION OFFICER (FEMALE)  
MALAKAND AT BATKHELA

Endst: No. 229-2464

Dated the 21-2-2013

Copy forwarded for information and necessary action to the:

- 1- A to the Director (E&SE) Khyber Pakhtunkhwa, Peshawar.
- 2- District Account Officer, Malakand.
- 3- Sub Divisional Education Officer (Female) Sama Ranizal, Dargal.
- 4- Sub Divisional Education Officer (Female) Swat Ranizal at Batkhela.
- 5-235 Heat Teachers of the concerned schools.
- 236- The Assistant Programmer DEMIS Cell Local Office.

**ATTESTED**

DISTRICT EDUCATION OFFICER (FEMALE)  
MALAKAND AT BATKHELA

S.No. 118 # 215 - چارج رپورٹ سکل 12

میں آج بطور غنہ 22 فروری 2013ء کو بطور لائق ڈسٹرکٹ ایجوکیشن آفیسر (زبان) مولانا اور ڈار عمر 464-229 بطور کہہ 2013/02/01 گورنمنٹ گرلز پرائمری سکول میرٹھ میں قبیلہ از دہلیہ ایسے طلبہ کے چارج سہ ماہی مندرجہ کارروائی کے لیے چارج رپورٹ پیش خدمت ہے۔

چارج دہندہ  
صدر مدرسہ میں نسیم اختر  
سی جی بی ایس میرٹھ

**NASEEM AKHTAR**  
Head Teacher  
Govt. Girls Primary School  
Mehardl Mkd: Agency.

P. H. Tah  
چارج لٹر دہندہ  
سی جی بی ایس  
سی جی بی ایس میرٹھ

Received  
L. S. A.

باجی سید باجو  
02/03/2013

**ATTESTED**  
[Signature]

(دریافت شد)

E-11

کہ آئین آرڈر نمبر 464 - 229 جو 2013-2-21 تک ڈسٹرکٹ ایجوکیشن آفس (زمانہ) بمقام بک علی  
کے مطابق سائلم بی بی صلیب Pst گورنمنٹ ٹرنز ہیراڑی سکول کوڈو بانڈہ سے گورنمنٹ ٹرنز ہیراڑی سکول  
میردے کو ٹرانسفر ہو چکا ہے۔ اسلئے آج 21-2-2013 کے بعد گورنمنٹ ٹرنز ہیراڑی  
سکول کوڈو بانڈہ کے تمام ترا قور اور ترا قور کی عمل نگرانی اور اخراج صدر سے جیسے بیگ  
(PST) پر صورت دیا ہوں۔ خدمت کارو الی اسکول ایجوکیشن آفس صدر سے

منسلک

جیسے بی بی صلیب Pst

بی بی الی  
کوڈو بانڈہ

صدر سے جیسے بی بی صلیب Pst  
بی بی الی کوڈو بانڈہ

Head Mistress  
G E P School  
Kodo (M. Agency)

ATTESTED

*(Signature)*

F-(12)

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) MALAKAND AT BATKHELA.**

**OFFICE ORDER.**

Consequent upon the recommendation of the review committee held on 14.3.2013 and in pursuance of this office order issued under Endst.No. 229-464 dated 21.2.2013, the amendment/corrigendum of the following PSTs SPSTs PSHTs are hereby ordered to the schools noted against each on their own pay grade in the interest of public service with immediate effect.

S. No.	Srty: No.	Name and Designation	Present School	School Where posted/Corrected.	Remarks.
1.	269 A	Mst.Israj Begum	GGPS Rustam Banda	GGCMS Saidra Jewar	School corrected
2.	83977	Mst.Falak Naz PSHT	GGPS Wazir Abad	GGPS Wazir Abad	Already Occupied post
3.	207	Mst.Sadiqa PSHT	GGCMS Alify Kalli	GGPS Kodo	Vice Bibi Halima S/No.734.
4.		Mst.Farzana Gul PST	GGPS Khadu	GGPS Prangal	Farzana Gul be substituted of Zeenat Begum S/No.44 and Shagufta Nisar is hereby cancelled.
5.	58A	Mst.Jauhari Begum PSHT	GGPS Dargai	GGPS Dargai P.House.	Vice Zahida Ara
6.		Mst.Hussan Bano PSHT	GGPS Dargai	GGPS Gul Muqam	Vice Musarat
7.		Mst.Sabeena PSHT	GGPS Dargai	GGPS Mustahab Korona	Vice Nargus
8.	226	Mst.Parveen Bibi PSHT	GGPS Sakhakot No.1	GGPS Bajawro Kalli	Vice Shazia
9.		Mst.Khursheda Begum	GGPS Arab Dhanda	GGPS Sakhakot No.1	Mst.Rang Mahal will retained at Arab Dhanda.
10	224	Mst.Musarat Begum PSHT	GGPS G.U.Khel	GGPS Quaid Abad	Vice Nodia
11	159	Mst.Husna	GGPS No.2.BatkheLa	GGPS Gharib Abad(BatkheLa)	Vice Noreen Bano the order of Dilshad Begum is cancelled a senior one.

Note:- No TA/DA is allowed.  
Charge Report should be submitted to all concerned.

( MUSHTAQ AHMAD )  
DISTRICT EDUCATION OFFICER(FEMALE)  
MALAKAND AT BATKHELA.


Endst:No. 1419-23

Dated 19-3- /2013.

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

1. The Director, E&SE Department Khyber Pakhtunkhwa Peshawar.
- 2-3. The Sub Divisional Education Officer (Female) Batkhela and Dargai.
4. The District Accounts Officer Malakand.
5. The Headteachers of the concerned schools.

**ATTESTED**

  
DISTRICT EDUCATION OFFICER(FEMALE)  
MALAKAND AT BATKHELA.

1051  
27-3-17

G (13)

To,

The District Education Officer (M),  
Malakand at Batkhela.

Subject:- **DEPARTMENTAL APPEAL AGAINST THE ORDER DATED 19/3/2013 WHEREBY THE APPELLANT HAS BEEN TRANSFERRED TO GGCMS ALIFI KALLAY FROM GGPS MEHERDAI PRE-MATURELY AND INVIOATION OF THE EXISTING POLICY.**

SIR,

Most humbly it is submitted before your kind authority that appellant is serving the Education Deptt: as PST for the last 5 years till date quite efficiently and upto the entire satisfactory of her Superiors that lastly the appellant was transferred to GGPS Meherdai from GGPS Kodo after serving for more than 4 years at GGPS Kodo vide order dated 21.2.2013 that in compliance the appellant took over the charge of the said post on the very next day, that astonishingly after serving for one month at GGPS Meherdai (Appellant Home union Council / station) the appellant was again pre-maturely transferred from GGPS Meherdai to GGCMS Alifi Kallay vide order dated 19.3.2013 that the said station to which the appellant has been transferred is not her own Union Council.

That the transfer order dated at 19.3.2013 is issued in violation of the transfer/posting policy as well as in violation of the transfer posting regulatory Act of 2011.

It is therefore, humbly prayed that on acceptance of this Departmental Appeal the impugned order dated 19.3.2013 may very kindly be set-aside and the appellant may not be transfer from GGPS Meherdai till completion of her normal tenure i.e three years.

Thanks

Your obediently,

*Bibi Haleema*

Bibi Haleema (PST)

GGPS Meherdai Tehsil Dargai

Malakand

**ATTESTED**

*5/*

**VAKALATNAMA**

IN THE COURT OF KPK Service Tribunal Peshawar  
OF 2013

Bibi Haleema

(APPELLANT)  
(PLAINTIFF)  
(PETITIONER)

**VERSUS**

Education Deptt

(RESPONDENT)  
(DEFENDANT)

I/We Bibi Haleema

Do hereby appoint and constitute **NOOR MOHAMMAD KHATTAK, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated: 15 / 6 / 2013

Bibi Haleema

CLIENT

57  
ACCEPTED

**NOOR MOHAMMAD KHATTAK  
(ADVOCATE)**

**OFFICE:**

Room No.1, Upper Floor,  
Islamia Club Building, Khyber Bazaar,  
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Before the Khyber Pakhtunkhwa Service Tribunal  
Peshawar

Appeal No. 1038/2013

Bibi Haleema VS Education Deptt:


Application for withdrawal  
of the above mentioned appeal

R/Sheweth:

- 1- That the above mentioned appeal is pending adjudication before this august Tribunal which is fixed for hearing today dated 4-5-2016.
- 2- That appellant filed the above mentioned appeal against the impugned transfer order dated 19-3-2013.
- 3- That after the said transfer appellant has been transferred many times to other stations during the pendency of this appeal and due to the above mentioned reasons the pending appeal has become infructuous.

It is therefore, most humbly prayed that on acceptance of this application the above mentioned appeal may kindly be withdrawn.

Dated: 4/5/2016

Appellant  
Through:   
Neor Mohammad Khattak  
Advocate

