


FORM OF ORDER SHEET

Court of _____

Appeal No. 508/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	04/04/2024	<p>The appeal of Mst. Majeeda Azhar resubmitted today by Mr. Yasir Saleem Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 08.04.2024. Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

Prayer in appeal:

On acceptance of this appeal the appellant may be allowed salary w.e.f 01.10.2023 till date and onwards in consideration of her duties with all back and consequential benefits

Respectfully Sheweth:-

1. *That the appellant has at her credit qualification B.Ed and MS in Economics. (Copy of Education documents are attached as annexure "A").*
2. *That the appellant has been initially appointed as SST BPS-16 on contract basis vide Notification dated: 25-11-2008. The appellant was also medically examined when found fit the appellant handed over charge of post and started performing duties. It is pertinent to mentioned that appellant's service book was also prepared for the purpose of pay and pension. (Copy of Notification dated: 25-11-2008 is attached as annexure "B").*
3. *That ever since appellant's appointment, the appellant performed her duties as assigned with zeal and devotion and there was no complaint whatsoever regarding her performance.*

4. *That keeping in view the above facts appellant's service was regularized vide Notification dated: 15-01-2010. (Copy of Notification dated: 15-01-2010 is attached as annexure "C").*
5. *That the appellant also been upgraded to BPS-17 vide Notification dated: 31-___-2021 and presently posted as Incharge Government Girls High School Thano Swabi. (Copy of Notification dated: 31-___-2021 is attached as annexure "D").*
6. *That despite the fact that appellant was performing her duties with zeal and devotion and there was no question of being absent from duty, salary of the appellant has been stopped from October 2023, communicated to the appellant via email. (Copy of Email is attached as annexure "E").*
7. *That feeling aggrieved the appellant preferred a departmental appeal dated: 20-11-2023; however the same has not been responded within the statutory period of 90 days hence the instant appeal. (Copy of Departmental Appeal alongwith TCS receipt is attached as annexure "F").*

8. That the stoppage of salary is illegal, unlawful, unconstitutional and ineffective upon the rights of the appellant, feeling aggrieved from the acts of the respondents having no other adequate and efficiency remedy approaches this honorable Tribunal inter alia on the following grounds;

Grounds:

- A. The appellant is peaceful and law abiding citizen of Islamic Republic of Pakistan and is not been treated in accordance with law, fully entitled to all the basic and fundamental rights as enshrined in the fundamental law of the state, interpreted and guaranteed by the law of the land.
- B. That the appellant has never been proceeded against nor any charge sheet or show cause notice has ever been served against the appellant, moreover services of the appellant been terminated without any reason thus the appellant is entitled for the release of salary.
- C. That the appellant has been denied of my livelihood which amounts to violation of Article 4 of the Constitution of Islamic Republic of Pakistan, 1973.
- D. That since appellant's services has not been terminated, therefore appellant on the strength of the department thus

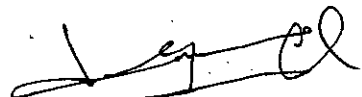
being civil servant appellant is entitled for the release of salary illegally withheld.

E. That the appellant was appointed by the competent authority and the appellant took over charge of the post and performed her duties for more than 15 years as such and have received salaries against the post thus valuable rights have been created in the appellant's favor and the same cannot be undone or snatched away from the appellant illegally.


F. That the fundamental right of the appellant has blatantly violated by the respondents and the appellant has been discriminated and has been denied her due right under the Islamic republic of Pakistan, 1973.

It is therefore most humbly prayed that on acceptance of this appeal, the salary of the appellant may please be released w.e.f its stoppage with further directions not to stop her salary in future in consideration of her services.

Dated:- 18/03/2024


Appellant

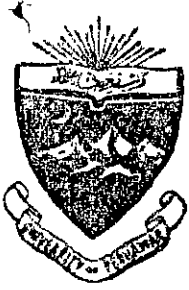
Through:-


YASIR SALEEM
Advocate Supreme Court
of Pakistan

N: 0002443

University of Peshawar

(A) (7)



Pakistan

Detailed Marks Certificate

Bachelor of Education

(B.Ed)

Annual Examination 2008

Institute of Muhammadan Education Nowshera



Name: MAJIDA GUL

Gender: Female

Roll No: 1013

Regular

Father's Name: TILAWAT KHAN

Registration No: 2001-NG-2500

Div: 1st

Papers	Max Marks	Marks Obtained	
		In Figures	In Words
Perspectives of Educ & Cont Social Issue	100	56	Fifty Six
School Org. & Classroom Management (N	100	69	Sixty Nine
Education Psychology, Guidance & Coun	100	64	Sixty Four
Evaluation Techniques	50	36	Thirty Six
Curriculum & Instruction	100	71	Seventy One
Islamiat/I.History(for non-muslim)(New)	100	77	Seventy Seven
Functional English	50	30	Thirty Only
Method of Teaching of English	100	56	Fifty Six
Method of Teaching of Urdu	100	62	Sixty Two
Elective: Foundation of Education	100	51	Fifty One
Practice of Teaching:	200	156	One Hundred and Fifty Six
	1100	728	Seven Hundred and Twenty Eight

Errors & omissions are subject to subsequent rectification

Chances Availed: 1

The Examination was taken As a Whole

Examination held From 07-Aug-2008 to 01-Sep-2008

Result Declared on Tuesday, January 6, 2009

Issue Date: 26-Feb-2009

11:47 am

Prepared by Computer Cell

(Dr. Mohammad Shafi)
 ADDITIONAL CONTROLLER OF EXAMINATIONS
 UNIVERSITY OF PESHAWAR

Computenized by RTC

Attested to be true
 [Signature]

الجامعة الإسلامية
Peshawar

University of Peshawar

(Pakistan)

Session ANNUAL 2006

NAVIDA GUL

Son/Daughter of

TILAWAT KHAN

and a

Student / private candidate of GOVERNMENT POSTGRADUATE COLLEGE, NOWSHERA

having passed the prescribed examination held in AUGUST, 2006
is this day admitted by the University of Peshawar to the Degree of

Master of Science

In FIRST Division

The Subject of examination being ECONOMICS

The Examination was taken as a whole / in parts

Serial No. 0014620

Registration No. 2001-16-2500

Roll No. 4585

Result declared on 28TH FEB, 2007



Registrar

Countersigned

Vice-Chancellor

Attested
Signature

University of Peshawar

پشاور یونیورسٹی

(Pakistan)

Session ANNUAL 2003

TI LAHAT KHAN
Sona / Daughter of MAJIDA GUL

GOVT. DEGREE COLLEGE FOR GIRLS BOWSHERA
and a student / private candidate of

having passed the prescribed examination held in
is this day admitted by the University of Peshawar to the Degree of

Bachelor of Arts

in SECOND Division

The examination was taken as a whole / in parts

Serial No 112151

Registration No. 2001-W-2500

Roll No. 23076

Result declared on OCTOBER 11, 2003



Vice-Chancellor

[Signature]

Countersigned

Registrar

[Signature]

[Signature]

Accepted Copy
[Signature]

S.No. 85568


Roll No. 65753

Group. Humanities



Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
INTERMEDIATE EXAMINATION
SESSION 2001-ANNUAL

This is to Certify that Majida Gul Daughter of Tilawat Khan
and a student of Govt: Girls Higher Sec. School Nowshera Kalan Registered No. 93-B/GGNK-99
has passed the Intermediate Examination of the Board of Intermediate & Secondary Education, Peshawar
held in May/June, 2001 as a Regular Candidate. She obtained 582 Marks out of 1100
and has been placed in Grade C Representing Good. She has been awarded Grade B on the
basis of internal assessment by the institution concerned. The Examination was taken as a whole.


Asstt Secretary


Secretary

This certificate is issued without alteration or erasure.

Attested to be true
Copy

S.No. 53328

Roll No. 104153



**Board of Intermediate and Secondary Education
Peshawar N.W.F.P. Pakistan
Secondary School Certificate Examination**

SESSION 1999 – ANNUAL

(Science Group)

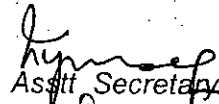
This is to Certify that Majida Gul Son / Daughter of Tilawat Khan
and a student of Govt. Girls High School No.1 Nowshera Kalan has passed the Secondary School Certificate
Examination of the Board of Intermediate and Secondary Education, Peshawar held in May/June 1999 as a Regular
candidate. He / She obtained 470 Marks out of 850 and has been placed in Grade C Representing Good


The Candidate passed in the following subjects:

- | | | | |
|------------|---------------------|----------------|--------------|
| 1. English | 3. Islamiyat | 5. Mathematics | 7. Chemistry |
| 2. Urdu | 4. Pakistan Studies | 6. Physics | 8. Biology |

He / She has been awarded Grade A on the basis of internal assessment by the Institution concerned.

Date of birth according to admission form June 1, 1985


Asst. Secretary


Secretary

This certificate is issued without alteration or erasure.

Attested to be true
C.S.D.M.

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION NWFP, PESHAWAR

NOTIFICATION

In pursuance of the powers conferred under section 25 of the NWFP Civil Servant Act, 1973 the competent authority is pleased to re-appoint the following Male/Female SST (B-16) on contract basis as a stop-gap appointments for a period of one year w.e.f. the date of assumption of charge or till the availability of selectees of the NWFP Public Service Commission / Departmental Selection Committee whichever is earlier:-

(12)

Sr.	Name	Father Name	Subject	Place of Posting
	Muhammad Gul	Tilawat Shah	General	GGHS Zaroqbal Swabi

Terms and Conditions

1. The appointment of the above candidates will be on contract basis for the period of one year from the date of assumption of charge till the arrival of the selectees of the NWFP Public Service Commission/Departmental Selection Committee, whichever is earlier.
2. They will draw Pay in BPS-16.
3. No TA/DA is allowed.
4. If they want to resign from the service before expiry of the contract, they will have to serve one month notice in advance failing which they will have to deposit prior notice to the appointing authority one month pay in lieu of such notice in the Government Treasury.
5. Their appointments have been made for specific schools, so shall not make any request for transfer from the School where they are posted. In case in case of such occurrence, their service shall stand terminated.
6. They should join their posts within 15-days of the issue of this notification. The Executive District Officer, Elementary & Secondary Education concerned, should furnish certificate to the effect that the candidates have joined the post or otherwise within 15-days of the issue of this Notification.
7. They shall execute an agreement with the Government before taking over charge, signed by the concerned Executive District Officer Elementary & Secondary Education NWFP, on behalf of the Government/Director (E&SE).
8. They will not be entitled for any pension or gratuity for the service rendered by them on contract basis and shall not claim regularization for their contract service.
9. Charge report in duplicate should be submitted to all concerned.
10. Their service shall be terminated if they violate any provision of the terms and conditions specified in the agreement Band/Dead.
11. They shall not be entitled to perform any examination duty of the BISEs/University/RDE, NWFP, during the current contract period.

Director,
Elementary & Secondary
Education, NWFP, Peshawar

Encls: No. 5131/117 /A-14/SST/M&F/Contract One Year/

Dated 25/11 /2008

1. Copy of the above is forwarded to..
2. Joint General, NWFP Peshawar
3. Director of Education, FATA, NWFP Peshawar
4. Distt. Accounts Officers concerned
5. Director Elementary & Secondary Education NWFP, Peshawar
6. Executive District Officers (E&SE) concerned
7. Principals/Head Masters/Head Mlstrs concerned
8. SST concerned
9. PS to the Minister for Education NWFP
10. PS to Secretary to Govt. of NWFP
11. All Chairman BISE/Registrars of University in NWFP with the request to comply with the above condition as at S No
12. PA to Director (E&SE) Local Office
13. Master File

Attested to be true
[Signature]

[Signature]
Deputy Director (Estab.)
Elementary & Secondary


MEDICAL CERTIFICATE

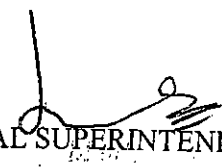
Name of Official MAJIDA GUL
 Caste or race AFGHAN
 Father's name TILAWAT SHAH
 Residence Nowshera Kala Teh and District
Nowshera
 Date of birth 01-06-1985
 Exact height by measurement 5'5"
 Personal mark of identification NIL
 Signature of the Official Majida Gul
 Signature of head office

Seal of Office

I do hereby certify that I have examined Mr. MAJIDA GUL candidate for
 employment in the Office of the Education Dept. S.E.T
 and can not discover that he had any disease communicable or other constitutional affection or bodily
 infirmity except nil

I do not consider this as disqualification for employment in the office of the educator
 His age according to his own statement 24 year and by
 appearance about Twenty four years.

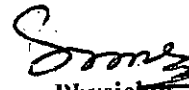

 Standing Medical Board
 Police Service Hospital
 Peshawar


 MEDICAL SUPERINTENDENT,
26-11-2008
 Peshawar
 Civil Hospital

LEFT HAND THUMB AND FINGER

IMPRESSION


 Attested to be true
 Copy


 Physician
 Standing Medical Board
 Police Service Hospital
 Peshawar

CERTIFICATE OF TRANSFER OF CHARGES

25-01-2010 (F.N)

I certified that we have on the fore/after noon of this day

Regularized respectively made over and received charge of the Office of the SST (S) Post
from contract basis vid, Director (E&SE) NWFP Peshawar
Enclust NO 1660-65/F.N.O.A-17/SET(E) Contract - Appoint - 2008 Dated 15/1

Particulars of each and important secret and confidential documents handed over are noted on the reverse:-

Signature of relived _____

Government Servant _____

Designation _____

Station _____

Signature of reliving _____

Government Servant _____

Designation _____

Mst. Majida Gul
Mst. Majida Gul
SST (G)

Dated No 66-70

Dated Tamo 25/01/2010

warded to the _____

P.T.O

Attested to be true
Copy

OFFICE OF THE DIRECTOR ELEMENTARY & SECONDARY EDUCATION NWFP PESHAWAR

NOTIFICATION

The competent authority has been pleased to regularize the services of the following Ad-hoc contract employees against the post of SST (Female) (BPS-16) with effect from 01-01-2009, under the NWFP Employees (Regularization of Services) Act, 2009 on the terms and conditions given at the end of this

Notification

S.No	Name of Candidate	Fathers Name	Present Station	Date of 1 st Appointment Order
1	Majida Gul	Tilawat Slah	GCHS Tiland Swabi	5130-5197 25-11-2008

TERMS & CONDITIONS OF HER APPOINTMENT

Their services will be considered as regular but without pension & gratuity in terms of section -19 of the NWFP Civil Servants Act, 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005. They will, however be entitled to contributory Provident Fund in such manner and at such rates as prescribed by the Government.

Their seniority will be determined according to Section-4 of the NWFP Employees (Regularization of Services) Act, 2009.

They will be required to furnish copies of all their certificates / degrees along with original receipts and Photostat copies thereof, pertaining to the verification fee of the concerned Examining body (Board & University) to the EDO (E&SE) concerned.

The EDO (E&SE) concerned are directed not to release their pay until the verification their documents.

DIRECTOR

Encl: No 1660-65 / F.No.A-175E1 (F) Contract-Appoint:2008 Dated Peshawar the 15 of 2010

- 1 PS Minister for Elementary & Secondary Education NWFP, Peshawar.
- 2 PS to Secretary to Govt. of NWFP, E&SE, Department Peshawar.
- 3 Executive District Office Elementary & Secondary Education concerned.
- 4 District Account Officer concerned.
- 5 Candidate concerned Mistress concerned.
- 6 PS to Director of Elementary & Secondary Education NWFP, Local Offices.

(Signature)
15/11/2010
Deputy Director (Establishment)
Elementary & Secondary Education NWFP, Peshawar

(Signature)
15/11/2010
Deputy Director (Establishment)
Elementary & Secondary Education NWFP, Peshawar

GOVERNMENT OF KHYBER PAKHTUNKHWA ELEMENTRY AND SECONDRY
EDUCATION AND DEPARTMENTT

NOTIFICATION DATED 31-05-2021

NO. SO (PE) 2-6 DPC / UPGRADATIONS FROM BS-16 TO BS 17
(personal) the company authority in the recommendation of
department provision committee and education with finance
department pleated to allow person upgradation from Bs-16 To Bs 17
in the following 71 female sets (SST) with Immediate effect, subject to
the completion that the post of SET shall be.

FIRST PLACE OF POSTING.		
Sr.No	Sen No.	
1.	1913	Delaab Khan S/O Esa Khan GGCMs Konda Mera Sawabi
2.	1521	Bibi mehtab D/O naimat ullah
3.	1901	Shahida yasim D/O muhammad saddiq dir lower
4.	1301	Seema D/O Khurshed Ur Rehman GGHS Malakand
5.	1704	Afsheen D/O Muhammad Fiaz GGMS Kudu Banda Mansehra
6.	1471	ROBEENA SHAH D/O SHER DAD khan GGMS NO 1 KARAK
7.	1437	Naila Gul D/O Sarfaraz Khan GGMS No 1 Karak
8	1753	Robina Begum D/O Jenat Gul GGHS Malakand
9	1552	Zainab D/O Ahmed Ali Khan GGMS Banda Sawabi
10	1608	Nadia Malik D/O Amana Ullah Malik GGMS Kachkook Kali Charsada
11	1436	Sumaira Bibi D/O Muhammad Pervaz GGHS Mansehra
12	1433	Samina Khattak D/O Muhammad Akbar GGHS Karak
13	1861	Sadia Anjum D/O Hashim Khan GGHS Kuram Khattak
14	1844	Ammarzia D/O Tehsin Ullah GGHS Kopar Mardan
15	1572	Mumtaz Begum D/O Qura Hassan GGHS Muti Banda Mardan
16	1730	Khunza Nisa D/O Afzal Aman GGHS Chitral

44	1697	Robeena Lajber D/O Lajbar Khan GGHS Sangu Ahmed Gul Mardan
45	1791	Tajulwara D/O Shaïr Muhammad GGHS Baja Sawabi
46	1674	Moeen Akhtar D/O Muhammad Akhter GGHS Khawallya Abbot Abad
47	1570	Tanzela Lodhi D/O Muhammad Saddique Loddhi GGHS Manglor Mansehra
48	1579	Asia D/O Sahib Zada GGHS Dagai Sawabi
49	1594	Shaista Gul D/O Sabir Shah GGHS Tofi Swabi
50	1563	BIBI FARZANA D/O MUHAMMAD NAZEER GGMS RAIHAR MANSEHRA
51	1425	Nazia khanum D/O Muhammad zarif GGHS NO. 1 KARAK
52	1891	Shabana Ayub D/O Muhammad Ayub GGHS Land sher shah d.i khan
53	1646	Haseena Mehwish D/O Fazal Khalid GGHS Dheri oulagram Malakand
54	1506	Kalsoom.D/O Miraj Khan GGMS Amnawar Bunir
55	1495	Azra Bibi D/O Amir ur Rehman GGHS Sheikh Dheri Swabi
56	1165	Nadia Shaukat D/O Shaukat GGHS yousafi Swabi
57	1299	Rozina gul D/O Sarfaraz Khan GGHS rashakai 1920 Nowshera
58	1520	Batool Fatima D/O Marif GGCMMS angra colony Haripur 1823
59	1527	Salma Begum D/O Dilroz Khan GGCMHSS Katling Mardan
60	1690	Nargis D/O Noorul wahab GGCMHSS Katling Mardan
61	1823	Rahida Shaahnaz D/O Muhammad Kamran GGCCMS DIR
62	1396	Rani rehmat D/O rehmat shah GGHS No 3 Dir
63	1701	Abida zaib D/O chanzeb GGHS
64	1615	Seema Gul D/O Mian Gul badshah GGMS Bhati Bunir
65	1535	Rizwana saleem D/O Muhammad saleem
66	1642 a	Seema bibi D/O Abdul aziz GGHS Harkhand
67	1817	Kalsoom D/O Asad ullah shah GGHS NO 4 bannu
68	1327	Ghazala Saeed D/O Khan saeed GGHS Jamrud Khyber
69	1182	Falak Naz D/O Hidayat ullah GGHS JAMRUD KHYBER AGENCY
70	1642	Asifa D/O Muhammad shah afridi GGHS JAMRUD KHYBER AGENCY
71	1627	Zinab ara D/O said badshah GGHS piran Malakand

17	1677	Seemab Halim D/O Abdul Haleem GGHS Dubandai Malakan
18	1902	Sunoober Gul D/O Mir Qadir Khan GGHS Ismail Khel Bannu
19	1380	Chaman Ara D/O Maqbool Ur Rehman GGHS Monga Machi Pol Mansehra
20	1478	Shamim D/O Said Azam Khan GGMS
21	1815	Jamshida Bangash D/O Muhammad Khan Bangash GGMS Tsd Darra Kohat
22	1481	Ulfat ayub D/O ayub khan GGHS no. 1 karak
23	1649 a	Shahnaz kasoor D/O rehmat ullah GGHS rashakai Nowshera
24	1553b	Nighat shahana D/O Muhammad saddique Farooq GGHS dughha mansehra
25	1719	Gul bibi D/O ali akbar GGMS mansehra
26	1568	Nazia D/O ikram ullah GGHS karak malakan
27	1810	Javeria sahi D/O sahi Muhammad Mansehra
28	7240	Nayyer Tanver D/O said ali shah GGMSs no. 6 di khan
29	1808	Sameena mukhtiyar D/O Dost Muhammad shah di khan
30	1484	Noshcen jamsheed D/O jamshee ali GGHS amir court
31	1790	Maimona malik D/O malik Muhammad zubar GGHS Mansehra
32	2468	Majeeda gul D/O tilawat khan GGHS tano sawabi
33	1373	Samena aman D/O malik aman GGMS ghareeb abad buner
34	1744	Nargas begum D/O said ur rehman GGMS khair abad dir lower
35	1511	LALA RUKH D/O AFZAL SHAH GGHS MULDEH CHITRRAL
36	1220	SYEDA ZEESHAN D/O SAID AWAN ALI SHAH GGHS KHADOZAI ALIZAI KOHAT
37	1659	Umai Saleem D/O Faqir Saeed GGHS Court Malakand
38	1375	Zeenat Bibi D/O Malak Aman GGMS Agarai Buner
39	1501	Fozia Bibi D/O Muhammad younes GGHS no. 2 mansehra
40	1618	Nagená D/O Gul Zaman GGHS Meheridi Maladan
41	1840	
42	1605	Munazza Ikram D/O Ikram Ullah GGHS Baghwani Shumali Di Khan
43	1782	Shakeela D/O Sharen Muhammad GGHS Wartair Malakand

CHANGES ALERT - SU6257

Dated 24.10.2023 Inbox



Employee S... Oct 24



to me v



Translate to English



00456821 MAJIDA GUL

00456821 LEAVING ACTION PERFORMED (SALARY STOPPED) with effect from 01.10.2023

00456821 DESIGNATION CHANGED to 99999999 - SECONDARY SCHOOL TEACHER

00895114 SAJIDA RAFIQ

00895114 4027 (GPF Temp. Advance) One time off-cycle payment started PKR 145000.00 Date : 23.10.2023

یہ ای میل خودکار نظام کے تحت بھیجی جا رہی ہے جس کا مقصد
ذی ذی او کو ملازمین کی چینجز سے متعلق ہر وقت مطلع کرنا ہے
۔ اگر اس ای-میل میں شامل ملازمین کی چینجز میں کوئی غلطی
پائی جا رہی ہو، تو جلد از جلد اپنے متعلقہ اکاؤنٹ آفس سے رابطہ
کر کے درستگی کروا لیں

Best Copy to be true
Copy

To,

Director,
Elementary and Secondary Education
Khyber Pakhtunkhwa
Peshawar

(1/4)

Subject: Departmental appeal for the release of salary of the applicant illegally withheld w.e.f. October 2023.

Prayer in Appeal:

On the acceptance of this appeal the salary of the applicant may please be released w.e.f. October 2023 with further direction not to stop release of her in future in consideration of her services.

Respected Sir,

I very humbly submit the following few lines for your kind and sympathetic consideration:

1. That the applicant has at her credit qualification B.Ed. and MS in Economics.
2. That the applicant has been initially appointed as SST BPS-16 on contract basis vide Notification dated 25.11.2008. I was also medically examined when found fit I was handed over charge of my post and started performing my duties. It is pertinent to mention that my service book was also prepared for the purpose of pay and pension.
3. That ever since my appointment I had performed my duties as assigned with zeal and devotion and there was no complaint want so ever regarding my performance.
4. That keeping in view my services have been regularized with Notification dated 15.01.2010.
5. That I have also been upgraded to BPS-17 vide notification dated 31-0-2021 and presently posted as incharge at CGHS Thana Swabi.
6. That despite the fact that I am continuously performing my duties with zeal and devotion and there is no question of being absent from duty, salary has been stopped from October 2023 communicated to me, via mail.

to be true
Copy

That the stoppage of salary is illegal, unlawful, unconstitutional and ineffective upon the rights of the applicant inter-alia on the following grounds:

GROUND OF DEPARTMENTAL APPEAL

A. That I have not been treated in accordance with law, hence my rights secured and guaranteed under the law are badly violated.

B. That I have never been proceeded against, nor any charge sheet or show cause notice has never been served against me, moreover my services have not been terminated thus I am entitled for the release for my salary.

C. That withholding of salary amounts to punishment albeit without any charge sheet or show cause notice the salary of the applicant has been.

D. That I have been denied of my livelihood which amounts to violation of article 4 of the constitution of Islamic Republic of Pakistan, 1974.

E. That since my services have not been terminated, therefore I am on the strength of the department thus being civil servant I am entitled for the release of my salary illegally withheld.

F. That I was appointed by the competent authority I duly took over charge of my post and performed my duties for more than 15 years as such and have received salaries against my post thus valuable rights have been created in my favor the same cannot be undone or snatched away from me illegally.

It is therefore humbly prayed that on acceptance of this appeal the salary of the appellant may please be released w.o.f its stoppage with further directions not to stop her salary in future in consideration of her services.

Your's obediently

dt: 20-11-23

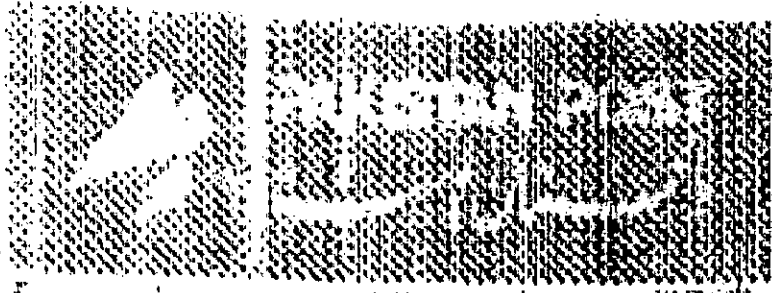
Majeeda Azhar

SST BPS-17

GGHS Thano Swabi

Attested to be true
Copy

18



Location: Nowshera GPO
Date & Time: 20/11/2023 15:15
Article ID: RGL116823334
Recipient: DIRECTOR
PSH
Peshawar

Contact No:
Sender: MAJIDA GUL
NSR
Nowshera

Contact No: 03219731771

Weight: 30gm

Tariff: 90Rs

TOTAL: 90Rs

DED: ZUBAIR_NSRGPO

Inquiry No: 111-111-117/051-8487080/8840360

For Tracking: www.ep.gov.pk

Please make photo copy of the receipt to keep it a
reference.

PTN: 9010405

M
Attested to be true
Copy

Dist. Govt. NWFP-Provincial
District Accounts Office Swabi
Monthly Salary Statement (September-2023)



Personal Information of Miss MAJIDA GUL d/w/s of TILAWAT KHAN

Emp. Card Number: 00456821 CNIC: 1720166453016
 Date of Birth: 01.06.1985 Entry into Govt. Service: 25.11.2008

NTN:
 Length of Service: 14 Years 10 Months 007 Days

Employment Category: Vocational Temporary

Designation: SECONDARY SCHOOL TEACHER

80004668-DISTRICT GOVERNMENT KHYBE

DDO Code: SU6257-Head Mistress GGHS Tazo Swabi

Payroll Section: 003

GPF Section: 001

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF Balance:

566,086.00

Vendor Number: 30574284 - majida gul SWABI

Pay and Allowances:

Pay scale: BPS For - 2022

Pay Scale Type: Civil BPS: 17

Pay Stage: 4

Wage type	Amount	Wage type	Amount
0001 Basic Pay	58,250.00	1001 House Rent Allowance 45%	6,650.00
1210 Convey Allowance 2005	5,000.00	1947 Medical Allow 15% (16-22)	1,346.00
2148 15% Adhoc Relief All-2013	580.00	2199 Adhoc Relief Allow @10%	400.00
2316 Dressing Allowance 2021	6,074.00	2341 Dispr. Red All 15% 2002KP	5,591.00
2337 Adhoc Rel All 15% 22(PS17)	5,591.00	2379 Adhoc Relief All 2023 30%	17,625.00

Deductions - General

Wage type	Amount	Wage type	Amount
3017 GPF Subscription	-6,350.00	3501 Benevolent Fund	-1,500.00
3009 Income Tax	-1,698.00	3990 Emp. Edu. Fund KPK	-270.00
4001 R. Benefits & Death Comp.	-900.00		0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
6505	GPF Loan Principal Intstl	252,000.00	-7,000.00	28,000.00

Deductions - Income Tax

Payable: 27,160.38 Recovered till September-2023: 5,094.00 Exempted: 6789.42 Recoverable: 15,276.96

Gross Pay (Rs.): 108,107.00 Deductions: (Rs.): -17,718.00 Net Pay: (Rs.): 90,389.00

Payee Name: MAJIDA GUL

Account Number: 0405999491000011

Bank Details: MCB BANK LIMITED, 240936 KABUL RIVER KABUL RIVER.

Leaves: Opening Balance: Availed: Earned: Balance:

Permanent Address:

City: NOWSHERA

Domicile: -

Housing Status: No Official

Temp. Address:

City:

Email:

Attested to be true Copy

DETAIL OF TEACHING STAFF RECOMMENDED FOR TEACHER INCENTIVE PROGRAMME FOR THE SESSION 2017-18

Name of school	Name of Principal/HM	Sr	Names of Teacher	Designation	Subjects Taught	Class	Total Attendance in school	Casual Leave	Absentee
G. G. S Tano (Swabi)	Shaista Begum	1	Sumaira	SST (G)	Urdu Eng. PS	9 th , 10 th	210/227	17	Nil
		2	Majida	SST (G)	Maths (G) Isl (com), PS	9 th , 10 th	210/227	17	"
		3	Radia	SST Bio/ Chem	Bio, Chem, Phy Chem	10 th 9 th	208/227	19	"
		4	Amsa	CT (G)	Math (Sc) Phy	10 th 9 th	216/227	11	"
		5	Sheeba	AT	Isl-Elec Isl-com	9 th , 10 th	207/227	20	"
		6	Asmat	CT (G)	English Bio	9 th	214/227	13	"
		7	Safia	TT	G. Science	9 th , 10 th	207/227	20	"

Criteria:

- Principal/HM and teachers having served for at least 5 months (excluding summer vacations) in the high performing schools and has taught to 9th & 10th class will received cash incentive.
- Beside Principal/HM only upto seven teachers recommended by Principal/HM of the respective school fulfilling condition at Sr. No.1 will receive cash incentive.

It is hereby certified that the information provided above are correct to the best of my knowledge. I shall be personally responsible for any irregularity if found at any stage.

Majida Gul.

Name of Principal / HM:

(Signature)

Stamp:

HEAD MESSRESS
Govt. Girls High School
(Swabi)

Attested to be true
Copy

TEACHER'S ATTENDANCE REGISTER

For the month of December 2013

No. 01	No. 02	No. 03
Name: MAJIDA GHA	NAJMA	SARA GHA
Designation: SGT (1)	SP (1)	SGT (1)
Phone # *313-9767673	0311-9250134	0315-4461498
NIC #		

Attested to be true

 Copy

Date	01		02		03							
	Att	Sig	Att	Sig	Att	Sig						
1	8:15	Majida	12:00	Majida	8:15	Najma	12:00	Najma	8:15	Sara	12:00	Sara
2	8:15	Majida	12:00	Majida	8:15	Najma	12:00	Najma	8:15	Sara	12:00	Sara
3												
4	8:15	Majida	12:00	Majida	8:15	Najma	12:00	Najma	8:15	Sara	12:00	Sara
5	8:15	Majida	12:00	Majida	8:15	Najma	12:00	Najma	8:15	Sara	12:00	Sara
6	8:15	Majida	12:00	Majida	8:15	Najma	12:00	Najma	8:15	Sara	12:00	Sara
7	8:15	Majida	12:00	Majida	8:15	Najma	12:00	Najma	8:15	Sara	12:00	Sara
8	8:15	Majida	12:00	Majida	8:15	Najma	12:00	Najma	8:15	Sara	12:00	Sara
9					8:15	Najma	12:00	Najma				
10												
11	8:15	Majida	12:00	Majida					8:15	Sara	12:00	Sara
12	8:15	Majida	12:00	Majida	8:15	Najma	12:00	Najma	8:15	Sara	12:00	Sara
13	8:15	Majida	12:00	Majida	8:15	Najma	12:00	Najma	8:15	Sara	12:00	Sara
14	8:15	Majida	12:00	Majida					8:15	Sara	12:00	Sara
15	8:15	Majida	12:00	Majida	8:15	Najma	12:00	Najma	8:15	Sara	12:00	Sara
16					8:15	Najma	12:00	Najma	8:15	Sara	12:00	Sara
17												
18	8:15	Majida	12:00	Majida					8:15	Sara	12:00	Sara
19	8:15	Majida	12:00	Majida					8:15	Sara	12:00	Sara
20	8:15	Majida	12:00	Majida					8:15	Sara	12:00	Sara
21	8:15	Majida	12:00	Majida	8:15	Najma	12:00	Najma				
22					8:15	Najma	12:00	Najma				
23												
24												
25												
26												
27												
28												
29												
30												
31												

STATEMENT OF LEAVES TAKEN.

	01				02				03			
	Sick	Casual	Pri.	Total	Sick	Casual	Pri.	Total	Sick	Casual	Pri.	Total
This month.		03				05				03		
Previous		14				13				16		
Total		17				18				19		

Dated _____
Master Book Center, 16-Urdu Bazar Lahore
Tel: 3722-1571 Fax: 3722-1572
Headmistress: Headmaster

HEADMISTRESS
 Govt. Girls High School
 Tano (Swabi)



TEACHER'S ATTENDANCE REGISTER

For the month of NOVEMBER 20 25

No. 01

No. 02

No. 03

Name: <u>MASIDA GUL</u>	<u>NAJINA</u>	<u>SABA GUL</u>
Designation: <u>SST (Y)</u>	<u>S (P.E.T)</u>	<u>SST (M/P)</u>
Phone # <u>0313-9767627</u>	<u>0311-9250174</u>	<u>0315-4497798</u>
N.I.C #		

Dates	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
1	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina	8:15	Saba	2:20	Saba
2	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina	8:15	Saba	2:20	Saba
3	8:15	Majida	2:20	Majida	8:15	Najina	2:10	Najina	8:15	Saba	12:00	Saba
4		C-leave			8:15	Najina	2:20	Najina	-	C-leave	-	-
5		SUNDAY				SUNDAY				SUNDAY		
6	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina	8:15	Saba	2:20	Saba
7	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina	8:15	Saba	2:20	Saba
8	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina	8:15	Saba	2:20	Saba
9		ICRAL				DAY						
10	8:15	Majida	12:00	Majida	8:15	Najina	12:00	Najina	8:15	Saba	2:20	Saba
11	8:15	Majida	2:20	Majida	8:15	Najina		Najina	8:15	Saba	2:20	Saba
12		SUNDAY				SUNDAY				SUNDAY		
13	8:15	Majida	2:20	Majida		C-leave			8:15	Saba	2:20	Saba
14	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina	8:15	Saba	2:20	Saba
15	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina		C-leave		
16	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina		C-leave		
17	8:15	Majida	12:00	Majida	8:15	Najina	12:00	Najina		C-leave		
18	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina		C-leave		
19		SUNDAY				SUNDAY				SUNDAY		
20	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina	8:15	Saba	2:20	Saba
21	8:15	Majida	2:20	Majida		C-leave			8:15	Saba	2:20	Saba
22	8:15	Majida	2:20	Majida		C-leave			8:15	Saba	2:20	Saba
23	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina	8:15	Saba	2:20	Saba
24	8:15	Majida	12:00	Majida	8:15	Najina	2:20	Najina	8:15	Saba	2:20	Saba
25		C-leave				C-leave			8:15	Saba	2:20	Saba
26		SUNDAY				SUNDAY				SUNDAY		
27	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina	8:15	Saba	2:20	Saba
28	8:15	Majida	2:20	Majida	8:15	Najina	2:20	Najina	8:15	Saba	2:20	Saba
29	8:15	Majida	2:20	Majida		C-leave			8:15	Saba	2:20	Saba
30		C-leave			8:15	Najina		Najina	8:15	Saba		Saba
31												


STATEMENT OF LEAVES TAKEN.


	Sick.	Casual.	Pri.	Total	Sick.	Casual.	Pri.	Total	Sick.	Casual.	Pri.	Total
This month.		03				05				05		
Previous		11					08				11	
Total		14					13			16		

Dated: _____

Master Book Center, 16-Urdu Bazar Lahore.
 Tel: 4423722263, 37357732, Email: masterbookcenter@yahoo.com

Headmistress/Headmaster


HEAD MISTRESS
 Govt: Girls High School
 Tano (Swabi)

 CamScanner

Headmistress/Headmaster

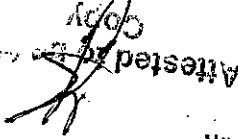
Total	02	01	03	03
Present	02	01	03	03
Absent				
Case				
Casual				
PN				
Total				

STATEMENT OF LEAVES TAKEN

No.	Name	From	To	Days	Remarks
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
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17					
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20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					

Name: MAJIDA GUL
 Designation: SST (G)
 Phone: 9767627
 NIS: 1721-6645301-6
 Date: 16/11/2024

Attested to be true
 For the month of January 2024
 HEAD MISTRESS
 Govt. Girls High School
 Tano Swabi

Attested by 

TEACHER'S ATTENDANCE REGISTER

For the month of MARCH 2024

No 01 No 02 No 03

Name: MAJIDA Gul
 Designation: SST (G)
 Phone # 0313-9767627
 N.I.C. # 17201-6645301-6

Name: NAGINA
 Designation: (P.E.T)
 Phone # 0311-9250174
 N.I.C. # 16201-0663760-2

Name: BAS MEENA BEGUM
 Designation: SST (G)
 Phone # 0313-9936800
 N.I.C. # 16202-0885331-0

Dates	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
1	8:15	Majida	12:15	Majida	8:15	Nagina	12:00	Nagina	8:15	Basma	12:00	Basma
2	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basma	11:15	Basma
3	SUNDAY											
4	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	- Leave -			
5	8:15	Majida	2:20	Majida	8:15	Nagina	1:12	Nagina	8:15	Basma	2:20	Basma
6	8:15	Majida		Majida	8:15	Nagina		Nagina	8:15	Basma		Basma
7												
8												
9												
10	SUNDAY											
11												
12												
13												
14												
15												
16												
17	SUNDAY											
18												
19												
20												
21												
22												
23												
24	SUNDAY											
25												
26												
27												
28												
29												
30												
31	SUNDAY											


STATEMENT OF LEAVES TAKEN.

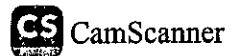
	Sick.	Casual.	Pri.	Total	Sick.	Casual.	Pri.	Total	Sick.	Casual.	Pri.	Total
This month.												
Previous												
Total												

Dated: _____

Master Book Center, 16-Urdu Bazar Lahore.
 Tel 643 372265, 373732, E mail: masterbookcenter@yahoo.com

Headmistress/Headmaster


HEAD MISTRESS
 Govt: Girls High School
 Tano (Swabi)



Attested by *[Signature]*

TEACHER'S ATTENDANCE REGISTER

For the month of FEB 2024

No 01 No 02 No 03

Name: MAJIDA GUL	NAGINA	Basminna Basmin
Designation: SST(G)	S(P.E.T)	SST(L)
Phone # 0313-9767627	0311-9250174	0313-9436800
N.I.C # 17201-66453046	16201-0663760-2	16202-0885331-0

Dates	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.	Arr.	Sig.	Dep.	Sig.
1	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
2	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
3	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
4	-	SUNDAY	-	-	-	SUNDAY	-	-	-	SUNDAY	-	-
5												
6												
7												
8												
9												
10	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
11	-	SUNDAY	-	-	-	SUNDAY	-	-	-	SUNDAY	-	-
12	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
13	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
14	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
15	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	-	on duty	-	-
16	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
17	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
18	-	SUNDAY	-	-	-	SUNDAY	-	-	-	SUNDAY	-	-
19	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
20	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	-	on duty	-	-
21	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
22	8:15	Majida	2:20	Majida	-	on duty	-	-	8:15	Basminna	2:20	Basminna
23	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
24	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
25	-	SUNDAY	-	-	-	SUNDAY	-	-	-	SUNDAY	-	-
26	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
27	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
28	8:15	Majida	2:20	Majida	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
29	-	SUNDAY	-	-	8:15	Nagina	2:20	Nagina	8:15	Basminna	2:20	Basminna
30												
31												

STATEMENT OF LEAVES TAKEN.

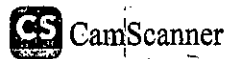
	Sick.	Casual.	Pri.	Total	Sick.	Casual.	Pri.	Total	Sick.	Casual.	Pri.	Total
This month.												
Previous												
Total												

Dated: _____

Master Book Center, 16-Urdu Bazar Lahore.
1641-DZK3, P1772, E-mail: masterbookcenter@yahoo.com

Headmistress/Headmaster

[Signature]
HEAD MISTRESS
Govt. Girls High School
Tano (Swabi)



بعدالت ۲۲ روز ٹریبونل



Petition
2024 منجانب

Govt نام Majeeda Azhar

Semi Appeal

مورثہ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی وکل کاروائی متعلقہ

آن مقام پشاور سہیل سنیہ ۱۷۱۷ کیلئے کا کے اسم آسے محمد سعید الدین اللہ کی

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے ق تقرر ثالث و فیصلہ پر حلف دیئے جواب وہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ار عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی 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 مذکور با اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے سب سے وہوگا۔ 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 سندر ہے۔

20ء

ماہ

المرقوم

العبد د گ واہ العبد

کے لئے منظور ہے۔

[Handwritten signature]

[Handwritten signature]

مقام

[Handwritten signature]