

Appeal No. 959/2014

4

18.3.2015

None present for appellant despite issuance of notice to appellant and her counsel through registered post. The appeal was called time and again but none appeared on behalf of the appellant. The appeal is, therefore, dismissed in default. File be consigned to the record.

ANNOUNCED

18.3.2015

  
Chairman

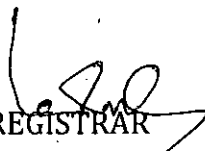


Camp Court A/Abad

18.03.15

Form- A  
FORM OF ORDER SHEET

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

Case No. 959/2014

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	16/07/2014	<p>The appeal of Mst. Gul Naz Bibi presented today by Sardar Muhammad Akmal Advocate may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	28.5.14	<p>This case is entrusted to Touring Bench A.Abad preliminary hearing to be put up there on <u>16.2.15</u></p> <p style="text-align: right;"> CHAIRMAN</p>
3	16.2.2015	<p style="text-align: center;">None present for appellant. Notice to appellant and her counsel be issued for preliminary hearing before S.B for 18.3.2015 at camp court A/Abad.</p> <p style="text-align: right;"> Chairman Camp Court A/Abad</p>

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR.**

**Service Appeal No. 959 /2014**

Gul Naz Bibi

...APPELLANT

**V E R S U S**

Government of Khyber Pakhtunkhwa through Secretary to Government of  
Khyber Pakhtunkhwa, E&SE Department, Peshawar & others

...RESPONDENTS

**SERVICE APPEAL  
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**Gulnaz Bibi  
...APPELLANT**

**Through:**

ed: 14/7 /2014

  
**(SARDAR MUHAMMAD AKMAL)**  
Advocate High Court, Abbottabad.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. 959 /2014

Gul Naz Bibi, CT Teacher (BPS-15), Govt. Girls High School Rajoya, District Abbottabad at present Govt. Girls Middle School Mohri Bed Bhen, Abbottabad.

...APPELLANT

**V E R S U S**

- 1) Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber Pakhtunkhwa, E&SE Department, Peshawar.
- 2) Directorate of Elementary and Secondary Education, Peshawar through Director Education.
- 3) District Education Officer (Female), Abbottabad.
- 4) Maria Syed, C.T Teacher BPS-15, GGHS Rajoya, Abbottabad.
- 5) Head Mistress, Government Girls High School, Rajoya, Abbottabad.

...RESPONDENTS

=====

**APPEAL UNDER SECTION 4 OF NWFP SERVICE TRIBUNAL ACT 1974, AGAINST THE OFFICE ORDER NO.1037-42/EB-III/ADY:(F/S) DATED 13.03.2014 ISSUED BY RESPONDENT NO.3 WHEREBY THE APPELLANT WAS TRANSFERRED FROM G.G.H.S RAJOYA TO MOHERI BED BEHN AND RESPONDENT NO.2 TRANSFERRED RESPONDENT NO.4 FROM MANSEHRA DISTRICT TO ABBOTTABAD DISTRICT AT GGMS GHORA BAZGRAN, AFTER THREE MONTHS, RESPONDENT NO.3 AGAIN TRANSFERRED THE RESPONDENT NO.4 FROM GGMS GHORA BAZGRAN TO GGMS RAJOYA IN PLACE OF APPELLANT WHICH IS PRE-MATURE, ILLEGAL, AGAINST THE TRANSFER**

*[Handwritten signature]*  
16/7/14

POLICY OF THE GOVERNMENT OF NWFP, MALAFIDE POLITICAL INFLUENCE AND HIGH HANDEDNESS OF THE RESPONDENTS.

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**PRAYER:-**

ON ACCEPTANCE OF THE INSTANT APPEAL, RESPONDENT NO.3 MAY GRACIOUSLY BE DIRECT TO WITHDRAW HER ORDER NO.1037-42 OF SERIAL NO.2 DATED 13.03.2014 AND APPELLANT MAY GRACIOUSLY BE ALLOWED TO PERFORM HER DUTIES IN GOVERNMENT GIRLS HIGH SCHOOL, RAJOYA, ABBOTTABAD.

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***Respectfully Sheweth,***

***The facts giving rise to the present appeal are as under:***

1. That, the appellant was appointed as Primary School Teacher in Education Department on 26.06.1997 and has served the Department for about 17 years of her service. ***(Copies of appointment order is annexed as Annexure "A")***
2. That, the appellant is performing her duty to the entire satisfaction of her superiors as well as the community where she is serving as a Teacher. The

appellant has never given any chance of complaint to the local public as well as to the Department.

3. That, the appellant served as P.T.C Teacher at Government Primary School Dhaken for about 8 years and promoted as C.T Teacher at GGMS Seer, Abbottabad. Moreover, appellant served as P.T.C/CT Teacher performing her duties in remote and hilly area. *(Copies of the service record are attached as Annexure "B")*
4. That, appellant was transferred/adjusted against vacant post at GGHS Rajoya on 23.02.2006. *(Copy of transfer order is annexed as Annexure "C")*
5. That, respondent No.4 by using political influence and with collusion of the respondents No.2 & 3 has thrown the appellant at a distance of about 130 K.M away in a School namely Moheri Bed Behn which is situated at the Top of the Hill vide order No.1037-42 dated 13.03.2014 whereas respondent No.2 was transferred respondent No.4 from Mansehra District to Abbottabad at GGMS Ghora Baz Gran, but respondent No.3 after three months again transfer respondent No.4 from Ghora Baz Gran to GGHS Rajoya in place of appellant. *(Copy of the said*

**transfer order dated 13.03.2014 is annexed as Annexure "D")**

6. That, large number of teachers who were working at the same station for more than 20 years in Abbottabad City having political back ground have not been disturbed and the appellant who has no such background, why respondent No.4 has not been transferred Moher Bad Bhen instead of Rajoya.
  
7. That, the appellant is married and permanent bonafide resident of Havelian Sultanpur and have three children, Husband of the appellant is employee of Pakistan Navy and has posted at Karachi the children of the appellant are school going due to which the appellant has performing the responsibility of her school going children, education etc and other domestic responsibilities as well.  
**(Copy of service card of appellant's husband is attached as Annexure "E")**
  
8. That, appellant transferred from Rajoya to Mohri Bed Behn, the education and looking after of her children was disturbed. Respondent No.4 who marriage at Dehri Kehal Havelian in case she is adjusted at GGMS Mohri Bed Behn can easily

performing her duties instead of Rajoya without disturbing the appellant.

9. That, feeling aggrieved of the same, the appellant preferred Departmental representation/appeal before respondent No.2 on 17.03.2014 but no result within the statutory period. *(Copy of the departmental appeal is annexed as Annexure "F")*
10. That, appellant took charge under protest on 25.04.2014 at GGHS Mohri Bed Behn. *(Copy of charge report is attached as Annexure "G")*

Thus appellant has come to this Honourable Tribunal after expiry of prescribed period of appeal assailing the impugned order, inter-alia, on the following grounds:-

### **GROUND S:-**

- a. That, impugned order is pre-mature, void, illegal, without lawful authority, against the policy of the Government, arbitrary, perverse and Smacks of favoritism, nepotism, result of illegal exercise of power and it has been issued under the political influence and has ignored the merits.



- b. That, impugned order is malafide, discriminatory and against the public policy hence, liable to be set aside.
- c. That, impugned order is against the tenure policy of the Government and is in violation of principle of natural justice and law.
- d. That, impugned order is wholly without jurisdiction and called for interference by this Honourable Tribunal where civil servant was transferred out of District according to the transfer policy of the Government must be transferred against the vacant post whereas respondent No.3 malafidely adjusted the respondent No.4 in place of appellant at GGHS Rajoya, Abbottabad which was transferred from Mansehra District to Abbottabad.
- e. That, public representative have nothing to do with the internal affairs of the Department and the employees hence, at the behest and instance of public representative, any order passed against the rights of an employee or official shall be a nullity in the eye of law and deserve to be set aside.

- f. That, the appellant seeks leave of this Honourable Tribunal to agitate additional grounds at the time of hearing of this appeal.

In the circumstances, it is, most humbly prayed that on acceptance of instant appeal, the respondent No.3 may graciously be directed to cancel/withdraw her order No.1037-42 dated 13.03.2014 serial No.2 and the appellant be graciously allowed to continue in her position at GGHS Rajoya, Abbottabad in the interest of justice. Any other relief deems fit and proper in the circumstances of the case.

  
Gulnaz Bibi  
...APPELLANT

**Through:**

Dated:- 14/7 /2014

  
(SARDAR MUHAMMAD AKMAL)  
Advocate High Court, Abbottabad.

**VERIFICATION:-**

*Verified that the contents of the instant **Appeal** are true and correct to the best of my knowledge and belief and that nothing material has been suppressed from this Honorable Tribunal.*

Dated:- 14/7 /2014

  
...APPELLANT

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR.**

**Service Appeal No. /2014**

Gul Naz Bibi

...APPELLANT

**V E R S U S**

Government of Khyber Pakhtunkhwa through Secretary to Government of  
Khyber Pakhtunkhwa, E&SE Department, Peshawar & others

...RESPONDENTS

**APPEAL**

**AFFIDAVIT**

I, Gul Naz Bibi, CT Teacher (BPS-15), Govt. Girls High School Rajoya, District Abbottabad at present Govt. Girls Middle School Mohri Bed Bhen, Abbottabad *appellant*, do hereby solemnly affirm and declare on Oath that the contents of instant *Appeal* are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal.

**DEPONENT**

Dated:- 14/7 /2014

  
...APPELLANT

**IDENTIFIED BY:-**

  
**(SARDAR MUHAMMAD AKMAL)**  
Advocate High Court, Abbottabad.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR.**

**Service Appeal No. /2014**

Gul Naz Bibi

...APPELLANT

**V E R S U S**

Government of Khyber Pakhtunkhwa through Secretary to Government of  
Khyber Pakhtunkhwa, E&SE Department, Peshawar & others

...RESPONDENTS

**APPEAL  
CERTIFICATE**

***Certified that no such like Appeal has earlier been  
filed before this Hon'ble Tribunal.***

...APPELLANT

**Through:**

Dated:- 14/7 /2014

  
(SARDAR MUHAMMAD AKMAL)  
Advocate High Court, Abbottabad.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR.**

**Service Appeal No. /2014**

Gul Naz Bibi

...APPELLANT

**VERSUS**

Government of Khyber Pakhtunkhwa through Secretary to Government of  
Khyber Pakhtunkhwa, E&SE Department, Peshawar & others

...RESPONDENTS

**APPEAL**

**ADDRESSES OF THE PARTIES**

***Respectfully Sheweth,***

The addresses of the parties are as under;

**APPELLANT:**

Gul Naz Bibi, CT Teacher (BPS-15), Govt. Girls High School Rajoya, District  
Abbottabad at present Govt. Girls Middle School Mohri Bed Bhen, Abbottabad.

**RESPONDENTS:**

- 1) Government of Khyber Pakhtunkhwa through Secretary to Government of Khyber  
Pakhtunkhwa, E&SE Department, Peshawar.
- 2) Directorate of Elementary and Secondary Education, Peshawar through Director  
Education.
- 3) District Education Officer (Female), Abbottabad.
- 4) Maria Syed, C.T Teacher BPS-15, GGHS Rajoya, Abbottabad.
- 5) Head Mistress, Government Girls High School, Rajoya, Abbottabad.

...APPELLANT

***Through:***

Dated:- 14/3 /2014

  
(SARDAR MUHAMMAD AKMAL)  
Advocate High Court, Abbottabad.

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) LRY: ABBOTTABAD.  
NOTIFICATION

Consequent upon the selection by the Departmental Selection Committee the District Education Officer (Female) Primary Abbottabad has been pleased to appoint the following trained PTC Candidates at the Schools noted against their names in BES.7. Rs. 1480-81-2695n plus usual allowances as admissible under the rules with immediate effect subject to the existing terms and conditions:-

S.No.	Name, Father's Name & address.	DOB	Age	School	Remarks.
1.	Naveeda Bano d/o Gul Bahar r/o S. Bandi.	1-4-72	17/75	GGS, Arona	Vice Rozina Malik Terminated. LF-3
2.	Rizwana Shaheen d/o Lal Khan r/o Dhor	1-1-74	2/75	" Kadal	Vice Naheed Terminated. LF-3
3.	Tasleem Akhter d/o Hayat Mohd r/o H. Shehr	1-1-75	2/75	" Kojala -do-	Vice Samina Terminated. LF-3
4.	Safia Habib d/o H. Bibur Rehman r/o B. Jodhan	10-2-72	4/75	" Bachr Sani	Re-Appointed.
5.	Samky Noreen d/o H. Nazir r/o Kunj	17-1-75	2/75	" Banwari	Vice Surmara Terminated. LF-3
6.	Shaista Bibi d/o Aslam r/o B. Mair	15-2-76	6/76	" Kari Sarfili	Vice Robina Bibi Terminated. LF-3
7.	Samira Bano d/o Fazal r/o N. Shehr	5-1-71	7/75	" Beer	Re-Appointed.
8.	Shahida Parveen d/o Ali Mardan r/o Messana	1-4-73	8/68	" Sangrari	Vice Khadija Terminated. LF-3
9.	Gulnaz Bibi d/o Aman r/o Chamnaka	12-9-75	2/66	" Dhakan	Vice Samina Terminated. LF-3
10.	Rahana Khalil d/o Khalilur Rehman, r/o Gori	30-3-78	10/66	" Gori	Vice Robina Nawaz Terminated. LF-3
11.	Nabila Shaheen d/o Mohd Yousaf r/o B. Sapou	31-1-73	11/65	" Channali	Vice Shaista Terminated. LF-3
12.	Chezala Shaheen d/o Wali Aman r/o Kakotri	15-10-71	12/64	" Kanger Hanga	Re-Appointed.
13.	Rozina Malik d/o Maqsood Elhi r/o Kadal	6-6-73	12/64	" Kiala (Khanispur)	-do-
14.	Robina Shaheen d/o Mohd Aslam r/o Narila	18-4-74	14/64	" Narila	-do-
15.	Nighat Akhter d/o Akram r/o S. Bandi	1-1-75	8/64	" Kinger	Vice Rozina Bano Terminated. PF-34
16.	Rizwana Shaheen d/o Fazlur Rehman r/o N. Shehr	1-3-74	9/62	" Hoter N. Tutial	Vice Sajida Shaht Terminated PF-34
17.	Qasira Bano d/o Aziz r/o S. Bandi	10-2-75	10/62	" -do-	Vice Sumaira Bano Terminated PF-34
18.	Farhat Bibi d/o Hadir r/o Romati	2-4-74	2/75	" Houz Li	Re-Appointed. LF-3
19.	Pazir Sultana d/o Mohd Sharif (Sub: to the Education of	29-3-75	3/75	" Balikote Domicile Cert	Vice Saeeda Bano Terminated. PF-34
20.	Nagina Bibi d/o Yousaf r/o Kokmar	10-11-76	4/54	" Kokmong	Vice Yasmin Terminated. PF-34
21.	Nusrat Jabeen d/o Ghulam Haider r/o Gh. Hri	7-1-75	3/52	" Banota	Vice Sadia Riaz Terminated. LF-34
22.	Asia Bibi d/o Gali Bannian	1-1-75	1/62	" Nagri Hayan	Vice Sadiqat Terminated LF-34

Approved

(Cont: F-2)

1	2	3	4	5	6
22.	Naghma Ahmed d/o Haji Ahmed r/o Havelian	5-5-74	3/63		GGS, Noja Bandi Vice Terminated FF-37.
24.	Nabila Khatun r/o Mohd Iqbal, r/o Khy. La	10-4-73	4/62	" Jatala	Vice Shazia Terminated FF
25.	Shabana Banoo d/o Khalid Mehmood r/o Havelian.	10-7-76	5/62	" Garba	Vice Shaheen Terminated FF
26.	Rabia Bassri d/o Mohd Iqbal r/c Hieh Ehen	1-1-76	3/64	" Talhar	Re-Appointed FF-
27.	Aqeela Taj d/o Ali- Ur Rehman r/o Irtedal	26-6-76	4/62	" Kinger Hamga	Vice Nusrat Terminated FF
28.	Yasmin d/o Dilbar Khan r/o Bandi k. trach	4-7-77	5/62	" Shadiel	Vice Nazma Sa Terminated FF-

TERMS & CONDITIONS

1. They will be governed by such rules & regulations as may be prescribed by the Govt. from time to time for the category of the Govt. Servant to which they belong.
2. Their services will be liable to termination on one month notice from either side. In case of resignation without notice one month pay will be forfeited in lieu thereof.
3. They should join the posts within one month of the issue of this Notification.
4. Charge report should be submitted to all concerned.
5. Their original Certificates/Degree should be checked and verified from the concerned Institutions / BISE/REE concerned before handing over the charge.
6. Service Books of the teachers must be prepared complete in all respect before handing over the charge.
7. The declaration of assets should be obtained from them immediately and placed on record.
8. They are required to produce Health & Age Certificates from Medical Authority concerned before taking over charge.
9. NO TA/DA is allowed.
10. An undertaking shall be obtained from Master & Degree holder PTC that they will serve in the Department for at least 5 years.

Endst: No. 172/77

Date: 26-6-97

M. Iqbal  
DISTRICT EDUCATION OFFICER  
(FEMALE) P.R.Y. ABBOTTABAD.

- Copy forwarded for information to the:-
1. Accountant General NWFP, Peshawar.
  2. Director Primary Education M.W.F.P, Peshawar.
  3. District Account Officer Abbottabad.
  4. P/S to Secretary to Govt. of NWFP, Education Deptt: Peshawar.
  5. SDEO(F) Abbottabad.
  - 6-34. Officials Candidate concerned.
  35. M/File.

M. Iqbal  
DISTRICT EDUCATION OFFICER  
(FEMALE) P.R.Y. ABBOTTABAD.

Annexure

"B"

13

LAST PAY CERTIFICATE

1. Last Pay Certificate of GTUL NAZ BIBI PTL  
of the G.G.P.S. DAKHAN CHAMNAKA.  
proceeding of PROMOTED To C.T. POST  
to G.G.M.S. SEER.

2. He has been paid upto 28.2.05  
at the following rates -

Particulars.	Pay	Rs.
Substantive Pay		3570/-
Officiating Pay	HRA	355/-
Exchange Compensation Allowance	M.A	210/-
	CH. AM	40/-
	SOA	401/-
	SRA	535/-
	ADH. R	535/-

Deduction.  
 GPF - Rs. 230/- BP - Rs. 35/-  
 G.I. - Rs. 44/- B.P. - Rs. 3/-  
 Total Rs. 5646/-  
 G.P.P. No. 20734/05  
 Camp. No. 0000 6272

3. It is made over charge of Office of G.G.P.S. Dakhan Chamnaka  
on the 27th noon of 28.2.05

4. Recoveries are to be made from the pay of the Government servant as detailed on the reverse.

5. He has been paid leave salary as detailed below. Deductions have been made as noted on the reverse.

Period.	Rate.	Amount.
From..... to.....	at Rs.....	..... a month.
From..... to.....	at Rs.....	..... a month.
From..... to.....	at Rs.....	..... a month.

6. He is entitled to draw the following -

7. He is also entitled to joining time for ..... days.

8. The detailed to the Income-tax recovered from him up to the date from the beginning of the current year are noted on the reverse.

NO 2073 dt 26.3.05  
Distt. Account Officer A/c

at .....

*Signature*

*Signature*  
Dy. District Officer (F)  
Primary Abotabad  
Signature.....  
Designation.....



## REVERSE

### Details of Recoveries

Name of recovery .....  
 Amount Rs.....  
 To be recovered in..... installments.

#### Deductions made leave Salary

From..... to..... on account of..... Rs.....  
 From..... to..... on account of..... Rs.....  
 From..... to..... on account of..... Rs.....

Name of months	Pay	Gratuity Fee, etc.	Funds and other deductions	Amount of Income-tax recovered	Remarks
July, 19					
August, 19					
September, 19					
October, 19					
November, 19					
December, 19					
January, 19					
February, 19					
March, 19					
April, 19					
May, 19					
June, 19					

14

(For use in Police Department only)

Heir: N.I.C NO. 121-75-558823

① 1. Passed SSC Exam: From BISE Abbottabad under R.No. 729 during the session 1993  
 2. Marks obtained 566 out of 856  
 3. *Signature*  
 Sub-Divisional Education Officer (Female) Abbottabad

② Verification Roll No. *22266* dated *1996* received back.  
 Passed Intermediate Exam: From BISE Abbottabad under R.No. 22266 during the session 1996. Marks obtained 666-B out of 1100. Result declared on 1100.

Left Thumb-Impression

*Signature*  
Sub-Divisional Education Officer (Female) Abbottabad

③ Passed PTC Exam: From Govt. Elementary College for women, Chayikote, Manshetra under R.No. 2516 during the session 1993-94  
 Qualifications: *2516* Date: *18-1-95*  
 Result declared on 18-1-95

English

First Arts

Marks obtained 913 out of 1200

Pushto

B.E. or B.A.

*Signature*  
Sub-Divisional Education Officer (Female) Abbottabad

④ Passed CT Exam from ABOU obtaining 57 Urdu marks during Spring 99 semester and result declared on 30/11/99; duly verified under No. 22278 dated 21-10/2001 (attached). Under No. 9-6851950.  
 Plan-Drawing  
 Pledership Examination  
 Training School Final Examination

Finger Print

Other Qualifications:

Dy: District Officer (Female)

Drill Instructing

Prin. Edu: Abbottabad

⑤ Passed BA Exam: from University of Peshawar Under Roll No. 32135 session 2001 (sup). Marks obtained 295 out of 300. Result declared on 21-10/2001 (attached).  
 Court Duties  
 Reserve Duties  
 Verified

*Don 7/5/2002*

N.B.— Line to be drawn under the qualification possessed

⑥ Passed B.ED from University of Peshawar under roll No 608144708 the session Feb 2010  
 Marks obtained 571 out of 900  
 Literacy

⑦ Passed M.A Islamiat from Hazrat Nizamuddin University under Roll No 69041 during the session 2007  
 Marks obtained 681 out of 1100  
 Head Mistress  
 Govt. Girls High School  
 Rajoya, Abbottabad

Note:— The entries in this page should be renewed or re-started at least every five years and the Signature to lines 9 and 10 should be dated.

1. Name: Gulnaz Binti

2. Race: Pathan

3. Residence: HIND 177/C.B.H Mohi Dhanga  
Rawlian Abbottabad

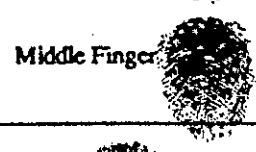
4. Father's name and residence: Haji Kala Khan

5. Date of birth by Christian era as nearly as can be ascertained: 12-09-1975  
Twelve September N.H of Seventy five.

6. Exact height by measurement: 5-0

7. Personal marks for Identification: NIL

8. Left hand thumb and Finger Impression of (Non-Gazetted) Officer.



9. Signature of Government Servant ✓ Gulnaz

10. Signature and Designation of the Head of the Office, or other Attesting Officer. Sub-Divisional Education Officer  
16.7.79  
Form 10

1	2	3	4	5	6	7	Sig
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Government
PTC CAGPS, DAKKAN CHANNARA	Off./Temp	BPS-7 Rs. 7 Rs. 1480-81-2695		1480/-		276 97	Govt
do	do	BPS-9 Rs. 1605-97-3060		1605/-		276 97	Govt
do	do			Rs 1605/-		PM 1-12-97	Govt
do	do			Rs 1702/-		PM 1-12-98	Govt
do	do			Rs 1799/-		PM 1-12-99	Govt
do	do	Scale Rs. 1896/- Scale Rs. 1896/- BPS-9 - Rs. 2410-145-6760.		Rs 1896/-		PM 1-12-2000	Govt
do	do			Rs 2990/-		PM 1-12-2001	Govt
do	do	Revised Entries due to passing CI Exam on 30 <sup>th</sup> 99					
do	do			one Adv. Incri. 1799 1/2		30-11-99	
do	do			Rs. 1896/-		1-12-99	Govt
do	do			Rs. 1993/-		1-12-2000	Govt
do	do	RBPS No. 9 (2410-145-6760)					
do	do	Wadon on 30/11/99		Rs. 3135/-		1-12-2001	Govt
		(2001) Office of the Assistant General Secretary with effect from the scale 2001 of Rs. 2410-145-6760 vide 9 of Rs. 3135/- P.M. V.E.F. 1-12-2001 with effect from 1-12-2002		3280 1/2		PM 12/2002	Govt
		Accounts Officer F. P. Peshawar					

8	9	10	11	12	13	14	15
Gulmarg	DEO(F)	22/97	6/97	Allowed BPS No. 9	SDEO(F) ATD	Appointed against RTC post at G.D.S, DAKKAN Channakani BPS-7	
Queluz	DEO(F) ATD	30/97	11/97	Forward less than 6 months	SDEO(F) ATD	Rs. 1480-81-2695 by the DEO(F) P. R. A. Ball under her Enrolment No. 1701-35 dated 26-6-97	
Queluz	DEO(F) ATD	30/98	4/98	one month	SDEO(F) ATD		
Queluz	SDEO(F) Abbottabad	30/2000	1/2000	one month	SDEO(F) ATD		
Queluz	Dy D.O. (F) P. R. Edu. Abbottabad	30/2001	11/2001	do	Scale Revised	3897 in 9/97	
Queluz	Dy D.O. (F) P. R. Edu. Abbottabad	29/99	11/99	Passing of Exam & awarded one month	Dy D.O. (F) P. R. Edu. Abbottabad	Service Verified from 22-6-97 to 30-11-98 from The Acq. Rolls & Other records.	
Queluz	Dy D.O. (F) P. R. Edu. Abbottabad	30/2000	12/2000	A/Inca	Dy D.O. (F) P. R. Edu. Abbottabad	Service Verified from 1-12-97 to 30-11-2000 from The Acq. Rolls & Other records.	
Queluz	Dy D.O. (F) P. R. Edu. Abbottabad	30/2001	11/2001	-	Dy D.O. (F) P. R. Edu. Abbottabad	Service Verified from 1-12-2000 to 30-11-2001 from The Acq. Rolls & Other records.	
Queluz	Dy D.O. (F) P. R. Edu. Abbottabad	30/2002	11/2002	RBPS	Dy D.O. (F) P. R. Edu. Abbottabad	Service Verified from 1-12-2001 to 30-11-2002 from The Acq. Rolls & Other records.	
Queluz	Dy D.O. (F) P. R. Edu. Abbottabad	30/2003	4/2003	Annual	Dy D.O. (F) P. R. Edu. Abbottabad	Service verified from 1-12-2001 to 30-11-2002 and other record kept in this office.	

Govt. Divisional Educational Officer (Finance) Abbottabad

Service Verified from 22-6-97 to 30-11-98 from The Acq. Rolls & Other records.

Service Verified from 1-12-97 to 30-11-2000 from The Acq. Rolls & Other records.

Service Verified from 1-12-2000 to 30-11-2001 from The Acq. Rolls & Other records.

Service verified from 1-12-2001 to 30-11-2002 and other record kept in this office.

S.D.O. (F) Attd

S.D.O. (F) Attd

Dy D.O.

Dy D.O.

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 S Govern
-do-	-do-		Rs.	3425/-	pm	1-12-2003	Govt
dhakari						1-12-04	
Chammakari	do		Rs.	3570/-	pm	1-12-2003	Govt
-do-	-do-		"	3570/-		28 <sup>th</sup> 2005	Govt
ET							
Gems Sear	do			3570/-		13 2005	Govt
BPS-14 B 3100-2610-10300							
ET							
Gems Sear	537		B	3580/-	pm	13 2005	Govt
one premiare increments				240/-			
				B 3820/-	pm	13 05	Govt
BPS-14 B 3565-275-1815							
-do-	-do-			B 4390/-	pm	12 2005	Govt
-do-	-do-			Rs. 4665/-	pm	12 05	Govt
-do-	-do-			Rs 4440/-	pm	12 06	

8	9	10	11	12	13		14	15
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitabile to another Government		
Signature and position of the head of the office or other attesting officer in Government Form 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Period	Government to which debitabile	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
[Signature]	30/11/04	Annual Increment	[Signature]				[Signature]	Allowed one advance increment on passing of Exam w.e.f 30-11-99 by EDO (edu) AED under Enclust. No. 5086 dated 29-7-2002 at Sr. No. 4.
	30/11/04		[Signature]					
[Signature]	28/05	Transfer of Promotion	[Signature]				[Signature]	Service verified from administrative roll and other records kept in this office from 30-12-2001 to 30-11-2002
	1/3/2005	Annual Increment B-14	[Signature]					
[Signature]	30/6/2005	Scale Revised	[Signature]				[Signature]	and other records kept in this office from 1-12-2002 to 30-11-2003
	30/11/2005	A/gmc	[Signature]					
[Signature]	3/3/2006	Transfer	[Signature]				[Signature]	Service verified from Reg. rolls and other office records from 1-12-2004 to 28-2-2005
		Annual Increment	[Signature]					
[Signature]			[Signature]				[Signature]	Appointed as ET in BPS-07 (Regular) vide E.D.O Sch. x Literacy Abbottabad Endst. No. 35415-30 (Mx F) Appdt. 2004/1/22-12-2004
			[Signature]					
[Signature]			[Signature]				[Signature]	Pay Regularised as ET B-14 CR 3469-PAD w.e.f 1-3-06
			[Signature]					

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether permanent or temporary	If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
ET, 99142 Rajaya Tompoff	Grade R5	1880	315	3560	BPS-14		
— " —	— " —	Rs 5675/2				1-7-2007	C. Subbaraj
— " —	BPS-14	Rs 5990/2 Rs 4920-380-16320				12/2007	C. Subbaraj
— " —	BPS-15	Rs 7205/2 Rs 4350-350-4850				1-7-2008	
— " —	BPS-15	Rs 6100/2 Rs 5220-420-17820				2-12-07	C. Subbaraj
— " —		Rs 7320/2				1-7-08	C. Subbaraj
— " —		Rs 7740/2				12/2008	C. Subbaraj
— do —	d-	Rs 8160/PM				12/2009	
— do —	do	Rs 8580/PM BPS-15 Grade-R5-8500-700-29500				12/2010	
		Rs 14100/2				01/07/11	
See in 7/5/2012							
— do —	do	Rs 14800/2				01/12/11	

B.A.  
 2<sup>nd</sup> Div.  
 Plots  
 B.A. Degree in  
 Panchajanya



20

Signature of Government Servant

Signature of Headmistress

7	Culniaz	30/11/2007	Annual Increment	Service Verified from 21-03-06 to 30-11-2007	01-3-2005
	Zaidi	30/6/2008	Scale Revised		
8	Culniaz	30/7/08	up grad	Service verified from 22.3.2006 to 30.11.2006 from the a/cg Rolls and other record of school.	
	Culniaz	30/6/08	Scale Revised		
	Culniaz	30/11/2008	Annual Increment		
	Culniaz	30/11/2009	Annual Increment		
	Culniaz	30/11/2010	Annual Increment		
	Culniaz	30/6/11	Scale Revised		
	Culniaz	30/11/2011	Annual Increment		

Certified that the amount loan from NCB Naulian amounting Rs: 11500/- is allowed by No. 3919 dt. 17/10/07

District Officer School & Literacy Abbottabad

Verified w.e.f. 12-2007 to 30-11-2007

Headmistress Govt. Girls High School Rajoya ATD

Scale upgradation allowed by NWFP, No-FD/50(CR)10-22/2007 dated 26-2-2008 and No-ED0 E-5-Edu (At) Endstt: No. 12905-1405 dt. 10/11/08

HEAD MISTRESS Govt. Girls High School Rajoya Abbottabad

option  
I Culniaz Bibi MD Mujibkhal Khan CT-Teacher GHS, Rajoya hereby opt. for Re-Fixation of my pay in BPS-15 w.e.f. 2-12-2007 instead of 1-10-2007 under Para 10(3) of NWFP Civil Services Pay Revision Rules 1978

CULNIAZ BIBI  
GHS RAJOYA

Attested

HEAD MISTRESS Govt. Girls High School Rajoya Abbottabad

1 Name of Post	2 Whether substantive or officiating and whether permanent or temporary	3 If Officiating, state (i) Substantive appointment, or (ii) whether service counts for pension under Art. 371 C.S.R.	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government
<p>2005 OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P PESHAWAR. PAY FIXED IN THE REVISED BASIC PAY SCALES 1 OF RS. 3565-275-11815 AT RS. 4890/P.M.W.E.F. 1-07-2005 With Next Increment on 1-12-2005</p> <p><i>Mantleman 12/9/11</i></p>							
<p>Accounts Officer Pay Fixation Party N.W.F.P. Peshawar</p> <p><i>✓</i></p>							
<p>2008 OFFICE OF THE ACCOUNTANT GENERAL N.W.F.P PESHAWAR. PAY FIXED IN THE REVISED BASIC PAY SCALES 1 OF RS. 5220-470-17820 AT RS. 7320/P.M.W.E.F. 1-07-2008 With Next Increment on 1-12-2008</p> <p><i>Mantleman 12/9/11</i></p>							
<p>Accounts Officer Pay Fixation Party N.W.F.P. Peshawar</p> <p><i>✓</i></p>							
<p>4390/14</p>							
<p>5675/14</p>							
<p>7320/15</p>							
<p>14100/15</p>							

2007  
OFFICE OF THE ACCOUNTANT GENERAL  
N.W.F.P PESHAWAR.  
PAY FIXED IN THE REVISED BASIC  
PAY SCALES  
OF RS. 4100-315-13560/B-14  
AT RS. 5675/P.M.W.E.F. 1-07-2007  
With Next Increment on 1-12-2007




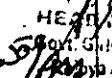
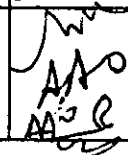
*Mantleman 12/9/11*

Basic Pay Scales 2011  
Office of The Accountant General  
Khyber Pakhtun Khwa Peshawar  
Pay Fixed in R.S.P.S. 2011  
OF RS. 8500-700-29800/B-15  
AT RS. 14100/P.M.W.E.F. 1-07-2011  
With Next Increment on 1-12-2011

*Mantleman 12/9/11*

Pay Fixation Party N.W.F.P. Peshawar

22

8	9	10	11	12	13		14	15	
					Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debit to another Government			
	Signature and designation of the head of the office or other attesting officer in columns 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal, etc.)	Signature of the head of the office or other attesting Officer		Period	Government to which debit	Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
							* Verified w.e.f. 12/2007		30/11/2008
								 HEAD MISTRESS Govt. Girls High School Rojaya Abbottabad	
								TWR - 444 dt. 1-4-09 Drawn Rs = 4600/- vide sanction No 7189-90 by EDO SRE MTD vide 7189-90 @ 2000/- p.m. vide T-4874 dt. 20/3/09	
								S / Verified w.e.f. 1-12-2008	30/11/2009
								 HEAD MISTRESS Govt. Girls High School Rojaya Abbottabad	
								S / Verified w.e.f. 12/2007	30/11/2010
								 HEAD MISTRESS Govt. Girls High School Rojaya Abbottabad	
								S / Verified w.e.f. 1-12-2010	30/11/2011
								 HEAD MISTRESS Govt. Girls High School Rojaya Abbottabad	
								TWR 1104 15/11/12 Drawn Rs = 10000/- vide S.M. 95 dt. 15/11/12 as granted advance	
								 HEAD MISTRESS Govt. Girls High School Rojaya Abbottabad	

# ORDER

23

The District Government Abbottabad is please to appoint the following CT (Female) in BPS-09 on Regular Basis (Rs.2410-145-6760) in case of BA 2<sup>nd</sup> Division BPS-14 (Rs. 3100-240-10300) plus usual allowances as admissible under the rules and posted in the school as noted against the names with effect from the date of taking over charge subject to the terms and conditions mentioned below: -

## CT(F) OPEN MERIT ON REGULAR BASIS.

SNO	RNO	NAME OF CANDIDATES	FATHER'S NAME	ADDRESS	TOTAL MERIT POSITION	PLACE OF POSTING	REMARKS
1	2	3	4	5	6	7	8
1	642	GUL NAZ BIBI	KALA KHAN	PTC.D.CHAMNAKA	59.5	GGMS SEER.	A.V.POST
2	862	SUMAIRA SYED	S.SABIR SHAH	TT B.S.KHAN	57.82	GGMS B SAD KHAN	A.V.POST
3	1004	HINA JALAL	ABDUL JALIL	PTC.JHANGRA	57.28	GGMS.BAN NARA	A.V.POST
4	859	SHAHNAZ	ABDUR REHMAN	PTC KARACH	55.83	GGHS.HAJIA GALI	A.V.POST

3 MS

W/...

## TERMS AND CONDITIONS OF THEIR APPOINTMENTS.

1. They will be governed by such rules regulations as may be prescribed from time to time by the Govt. for the category of the Govt. servants to whom they belong to.
2. Their services are liable to be terminated on one month's notice from either side. In case of resignation without notice one-month pay will be forfeited in lieu thereof.
3. The appointees should join their post by 01/03/2005 positively other wise the appointment shell stand cancel and the individual next on merit will be appointed in his / her place.
4. They shall be required to furnish copies of all their certificates / Degrees along with the original receipts and photocopies thereof pertaining to the verification fee of the concerned examining bodies (Board / University) to the D.O (Sel. & Lit). The later shall arrange verification of all the certificates / Degrees of the appointees and will issue a clearance certificate to each appointee for the release of his/her pay. Bills should be submitted to the Accounts Officer after verification of all certificates / Degrees from the concerned institutions of each candidate, herein all relevant documents must be submitted to the EDO(S&L)Atd upto 01/02/2005 positively.
5. The Heads of the Institutions / DDOs must check the service books of the In-Service candidates before handing over charge to them.
6. Compliance report regarding taking over charge by the appointee within stipulated period.

A. F. Khan

**File**

DIRECTOR GENERAL  
SCHOOL & LAB: AMBOLD

*[Signature]*

- 1. District Coordination Officer, Ambold.
- 2. District Accounts Officer, Ambold.
- 3-4. Handwritten notes and GMS Rajya, Ambold.
- 5. AD(DA) Local Office.
- 6. Ministers concerned.

Copy to the:-

Enst: No. 3396-97 / HR(E/S) Dated a. Amb to 23/09/2006.

EX-GRATIA PAYMENT  
SCHOOL & LAB: AMBOLD

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

As approved by the competent authority, the GMS Rajya, Ambold is hereby adjusted against vacant post of OJ at GMS Rajya, and to her own pay and hrs in the interest of public service with effect from the date of her taking over charge.

ADJUTANT

OFFICE OF THE EXECUTIVE DIRECTOR GENERAL SCHOOLS & LAB: AMBOLD

**Ammiture (24)**

Annex 25  
D

OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE) ABBOTTABAD.

TRANSFER/ADJUSTMENT.

The following transfer/adjustment of CT teachers BPS-15 are hereby ordered in their own pay & scale in the school noted against each in the interest of public service from the date of taking over charge.

S/N o.	NAME OF TEACHER	FROM.	TO	REMARKS
1.	Gulnaz Bibi, CT BPS-15	GGHS Rajoya.	GGMS Mohri Bed Bhen.	Ag: Vacant CT post.
2	Maria Syed, CT BPS-15	GGMS Ogra Mansehra under transfer to GGMS Ghora Bazgran vide Director E&SE KPK Peshawar No2083-88 dated 12-12-2013(Surplus)	GGHS Rajoya.	Vice Sr:No.1

Note:-

1. Charge report should be submitted to all concerned.
2. No TA/DA is allowed.

*sd-*  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

Endstt: No. 1037-47 /EB-II /Adj: (F/S)/

Dated A/Abad the 13 /3 /2014.

Copy to the:-

1. The District Accounts Officer Abbottabad.
2. The H/M GGHS Rajoya Abbottabad.
3. The H/M GGMS Mohri Bed Bhen, Abbottabad.
4. Budget & Account Officer Local Office.
5. K.P.O Local Office.
6. Teacher concerned.

*[Signature]*  
DISTRICT EDUCATION OFFICER  
(FEMALE) ABBOTTABAD

*Attested*

Handwritten text in the top left corner, possibly a signature or date, oriented vertically.

Handwritten text in the bottom right corner, possibly a signature or date, oriented vertically.

۲۶

# Annexure "E" ۲۶



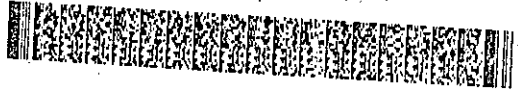
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فائین نمبر: I65D1P  
موجودہ پوسٹ: بار بارک ٹی این ایس کار سار، کراچی، تحصیل و ضلع کراچی شرقی

1219129892



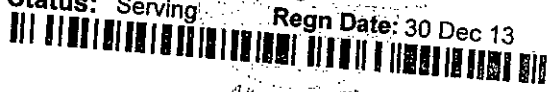
سنگل پوسٹ: ریٹائرمنٹ نمبر: CBH-177  
ڈسٹریکٹ: حیدرآباد، ڈاکخانہ: حیدرآباد  
مستقل پوسٹ: ریٹائرمنٹ نمبر: CBH-177  
ڈسٹریکٹ: حیدرآباد، ڈاکخانہ: حیدرآباد

تاریخ اجراء: 22/02/2013  
تاریخ سروس: 22/02/2023  
مقررہ کارڈ نمبر: ۲۶



## MEDICAL TREATMENT CARD

MR No: 44-13-7318383  
Name: Gul Naz Bibi W/O Chief Petty Officer  
Muhammad Shabbir  
Svc No: O/NO-890116 Unit: PNS BADAR  
CNIC No: 42201-0500353-3  
Status: Serving Regn Date: 30 Dec 13



### COMBINED MILITARY HOSPITAL, ABBOTTABAD

- This card is NON TRANSFERABLE
- This card is to be presented for medical checkup
- In case of loss, report immediately to the nearest CMH
- Finder of this card may please deposit it at the nearest Army Hospital, or contact CMH ATD, HMS Admin: 0992-340923

### COMBINED MILITARY HOSPITAL, ABBOTTABAD

- This card is NON TRANSFERABLE
- This card is to be presented for medical checkup
- In case of loss, report immediately to the nearest CMH
- Finder of this card may please deposit it at the nearest Army Hospital, or contact CMH ATD, HMS Admin: 0992-340923

AGC  
۲۶



27

حکومت پاکستان  
قومی شناختی کارڈ  
42201-0500353-3

نام: *محمد شہبیر*  
پیشہ: *چیف پٹی آفیسر*  
وزارت: *وزارت صحت*

قومی شناختی کارڈ  
تاریخ پیدائش: 01/03/1972

دستور پاکستان  
دستور عدالت

COMBINED MILITARY HOSPITAL. ABBOTTABAD

- This card is NON TRANSFERABLE
- This card is to be presented for medical checkup
- In case of loss, report immediately to the nearest CMH
- Finder of this card may please deposit it at the nearest Army Hospital, or contact CMH ATD. HMS Admin: 0992-340923

MEDICAL TREATMENT CARD

MR No: 44-13-7318393  
Name: Ubaid Ullah Khan S/O Chief Petty Officer  
Muhammad Shabbir

Svc No: O/NO-890116 Unit: PNS BADAR  
CNIC No: 42201-0500353-3  
Status: Serving Regn Date: 30 Dec 13



A Project of C&I Div.

MEDICAL TREATMENT CARD

MR No: 44-13-7318392  
Name: Tamim Ullah Khan S/O Chief Petty Officer  
Muhammad Shabbir

Svc No: O/NO-890116 Unit: PNS BADAR  
CNIC No: 42201-0500353-3  
Status: Serving Regn Date: 30 Dec 13



A Project of C&I Div.

Handwritten signature and stamp

28

Annexure  
"F"

To,  
Director Education Officer  
KPK Peshawar.

Subject:- APPEAL FOR THE CANCELLATION OF ORDER NO 1037-42  
DATED 13/03/2014.

Respected Sir,

The facts of the subject noted appeal are herein under.

- I. That, the appellant is serving in Education department for last seven <sup>month</sup> years.
- II. That the appellant is the permanent resident of Sultanpur Haveliam.
- III. That the appellant is married and have three children including school going childes. ~~She~~ <sup>Her</sup> Husband of the appellant is the employee of Pakistan NAVY and has posted at Karachi, Due to which the appellant has duty performing the responsibility of looking after the children's Education etc and domestic responsibilities as well.
- IV. That , the appellant has already been served at GGMS seer for two years before this station which is far flung and remote unattached area almost 200km one sided from the residence of appellant.
- V. That, the under transfer teacher at Sr. No. 2 is blue eyed and facilitated on political bases because she has transferred from Mansehra District due to marriage at Dehri Kehal Havelian and can easily be adjusted at GGMS mohri Bed Behn rather than GGMS Rajoya without disturbing the appellant .

Keeping in view the above mentioned fact your good sells is requested, please, to cancel the aforementioned order, other views I have reserved the right to knock the door of any cover of law to protect my right.

Yours obediently  
**GULNAZ BIBI**  
C.T (BPS-15)  
GGMS Rajoya

*Gulnaz Bibi*

*DEO F-2  
Abbottabad  
Solre her  
and submit  
report to his  
office*

Dated: 17-03-2014

*20/3/14*

Director  
Elementary & Secondary Education  
Khyber Pakhtunkhwa Peshawar

*20/3/14*



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

Endst No. 66241 Dated Peshawar the 14/4 2014

To

The District Education officer (F),  
Elementary and Secondary Education,  
Abbottabad.

**SUBJECT: DEPARTMENTAL APPEAL.**

Memo:

I am directed to refer to the subject noted above and to forward herewith a departmental appeal of Miss Gulnaz Bibi Ex-CT GHS Rajoya, District Abbottabad for necessary action and the undersigned may be informed regarding the proceedings upon aforesaid appeal.

It is, therefore requested to kindly take necessary action in the matter please.

*ok*  
Dy: Director Estb (F),  
E&S Education Department,  
KPK, Peshawar.


*Amesid*

Annexive  
30 "G"

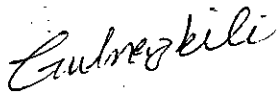
**OFFICE OF THE HEAD MISTRESS GGMS MOHRI BAD BHEN,  
ABBOTTABAD.**

**CHARGE REPORT (UNDER PROTEST)**

In compliance with the District Education officer E & S (female) District Abbottabad Transfer order No.1037-42/EB-II/Adj & F/S Dated Abbottabad the 13.03.2014 charge was assumed (under protest) by Mrs. Gulnaz Bibi C.T GGH Rajoya, Abbottabad transfer/adjusted at GGMS Mohri Bad Bhen, Abbottabad Against the vacant post of C.T today on 25-04-2014 (F/N)

  
Head Mistress  
Govt. Girls Middle School  
Mohri Bad Bhen Abbottabad

Head Mistress  
GGMS Mohri Bad Bhen  
Abbottabad



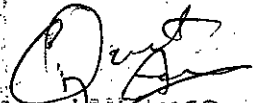
Relieving  
Gulnaz Bibi C.T  
GGMS Mohri Bad Bhen  
Abbottabad

Dated:- 25.04.2014

**Copy for Information to the:-**

1. P.S To Secretary E & SE Khyber Pakhtunkhwa, Peshawar.
2. P.A To Director E & SE Khyber Pakhtunkhwa, Peshawar.
3. District Education officer E & S (Female) District Abbottabad.
4. District Comptroller of Accounts District Abbottabad.
5. Dy: Education officer E & S (Female) District Abbottabad.
6. Teacher Concern.
7. Office File.



  
Head Mistress  
Govt. Girls Middle School  
Mohri Bad Bhen Abbottabad  
Head Mistress  
GGMS Mohri Bad Bhen  
Abbottabad

Dated:- 25.04.2014

کورٹ فیس

# وکالت نامہ

Before the Khyber Pakhtunkhwa Service Tribunal Peshawar

مستعد: Govt of K.P.K. نام: MST Gul Nazari

منجانب: Appellant

نوعیت مقدمہ: Service Appeal  
باعث تحریر آئندہ

مقدمہ مندرجہ میں اپنی طرف سے واسطے پیروی و جواب دہی کل کارروائی متعلقہ آں مقام Peshawar

Sardar Mohammad Akmal Advocate

کو وکیل مقرر کر کے اقرار کرتا ہوں کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا نیز وکیل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف و دینے اقبال دعویٰ اور بصورت دیگر ڈگری کرانے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دستخط کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور کی کل یا کسی جزوی کارروائی کے لئے کسی اور وکیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیارات ہوں گے اور اس کا ساختہ پر داختم مجھ کو منظور و قبول ہوگا۔ دوران مقدمہ جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب ہوگا اس کے مستحق وکیل صاحب ہوں گے۔ نیز بقایا رقم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب موصوف پابند ہوں گے کہ پیروی مقدمہ مذکورہ کریں اور اگر مختار مقرر کردہ میں کوئی جزو بقایا ہو تو وکیل صاحب موصوف مقدمہ کی پیروی کے پابند نہ ہوں گے۔ نیز درخواست بمراد استجارت نالش بصیغہ مفلسی کے دائر کرنے اور اس کی پیروی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کر دیا تاکہ سند رہے۔

الرقوم 14/7/2014

بمقام: Peshawar.

Acceptance

القبول

Signature

1/2

Before in right Pakistan. Some 1947  
1st Oct 1947: Most of W.P.K  
Hyderabad  
Darius Khan

Hyderabad

Order Miscellaneous Branch Hyderabad

Hyderabad.

1/12/50

Hyderabad