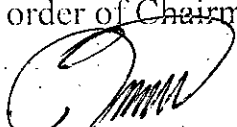


FORM OF ORDER SHEET

Court of _____

Appeal No. 533/2024

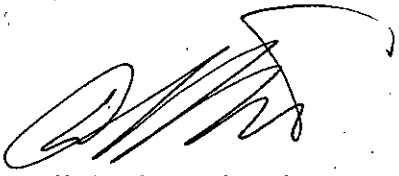
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	09/04/2024	<p>The appeal of Mst. Shamia Bibi resubmitted today by Mr. Kabir Ullah Khattak Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on _____ .Parcha Peshi given to the counsel for the appellant.</p> <p>By the order of Chairman</p>  <p>REGISTRAR</p>

The appeal of Mst. Shamia Bibi received today i.e on 03.04.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

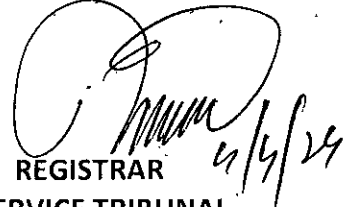
- ① Address of appellant is incomplete be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Affidavit is not attested by the Oath Commissioner.
- 3- Annexures-A&C of the appeal are illegible be replaced by legible/better one.

No. 756 /S.T,

Dt. 5/4 /2024.



Kabir Ullah Khattak Adv.
High Court Peshawar.

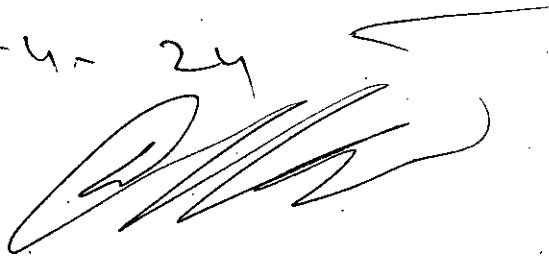


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Re-submitted

All objection has
been removed

5-4-24



BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 533 /2024

Mst. Shamia Bibi

VERSUS

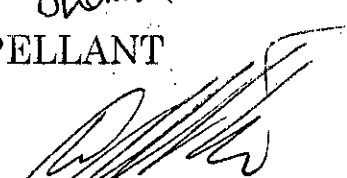
Director of Educational New Merged Area Secretariat
Peshawar & others

INDEX

S#	Description of Documents	Annexure	Pages
1.	Grounds of Petition.		1-5
2.	Affidavit.		6
3.	Addresses of parties		7
4.	Condonation of delay		8-9
5.	Copy of removal order dated 18.02.2016 and service appeal/ judgment	"A & B"	10-14
6.	Copy of reinstatement order	"C"	15
7.	Copy of service book	"D"	16-20
8.	Cop of departmental appeal	"E"	
9.	Wakalatnama		

Through

Shamia
APPELLANT


Kabirullah Khattak
Advocate, High Court
Peshawar.

①

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. 533 /2024

Mst. Shamia Bibi D/o Isam Khan PST District
Kurram.

Appellant

VERSUS

1. Director of Educational New Merged Area Secretariat Peshawar.
2. Additional District Education Officer, Lower & Central Kurram Sadda District Kurram.
3. District Account Officer District Kurram.

Respondents

APPEAL U/S-4 OF THE KHYBER
PAKHTUNKHWA SERVICES TRIBUNAL
ACT 1974 AGAINST THE INACTION OF
THE RESPONDENTS BY NOT
GRANTING ANNUAL INCREMENTS TO
THE APPELLANT W.E.F 2018 TO 2020
AND AGAINST THE INACTION OF THE
RESPONDENT NO.1 BY NOT DECIDING
THE DEPARTMENTAL APPEAL OF THE
APPELLANT WITHIN THE STATUTORY
PERIOD OF 90-DAYS.

PRAYER:-

(2)

ON ACCEPTANCE OF THIS APPEAL THE APPELLANT MAY KINDLY BE TREATED ACCORDING TO LAW AND RULES AND THE ANNUAL INCREMENTS W.E.F 2018 TO 2020 MAY KINDLY BE GRANTED / RESTORE IN FAVOUR OF THE APPELLANT ALONG WITH ALL BACK BENEFITS.

ANY OTHER RELIEF DEEMED APPROPRIATE IN THE CIRCUMSTANCES OF THE CASE NOT SPECIFICALLY ASKED FOR, MAY ALSO BE GRANTED TO THE APPELLANT.

Respectfully Sheweth.

1. That the appellant is working as PST with respondent department since long time and performing her official duty with full devotion and hard work and no complaint whatsoever has been made against the appellant.
2. That while performing her official duty with respondent department the appellant was removed from service on 18.02.2016 against which the appellant filed service appeal No.603/2016 which was accepted on 31.07.2018.
(Copy of removal order dated 18.02.2016 and

service appeal/judgment are attached as annexure "A & B").

3. That in compliance of the judgment of the Hon'ble Tribunal the appellant was reinstated on service on 20.05.2020. (Copy of reinstatement order is attached as annexure "C").

4. That although the appellant was reinstated in service but according to service book no increments has been granted to the appellant w.e.f 2018 to 2020 without any legal justification. (Copy of service book is attached as annexure "D").

5. That the appellant submitted departmental appeal for granting her annual increments w.e.f 2018 to 2020 on 02.01.2024. But no response has been given by the respondent department within the statutory period. (Cop of departmental appeal is attached as annexure "E").

6. That feeling aggrieved the Appellant prefers the instant service appeal before this Hon'ble Tribunal on the following grounds inter alia:-

GROUND:-

41

A. That the appellant has not been treated in accordance with law and rules hence his rights secured and guaranteed under the constitution of 1973 were badly violated.

B. That there was no absentee on part of the appellant as such the impugned removal order was been issued in winter vacation which is clarified from the judgment passed by this Hon'ble tribunal as well as from the impugned order.

C. That no opportunity of personal hearing and defense was provided to the appellant.

D. It is a well settled maxim no one can be condemned unheard because it is against the natural justice of law in this respect the appellant relied upon a judgment reported on 2008 SCMR page:678.

E. That there is no illegality on part of the appellant.

(5)

F. That any other ground not raised here may graciously be allowed to be raised at the time of arguments on the instant service appeal.

It is therefore, most humbly prayed that on acceptance of this appeal the annual increments of the appellant w.e.f 2018 to 2020 may kindly be granted / restore in favour of the appellant along with all back benefits.

Any other relief not specifically asked for may also graciously be extended in favour of the Appellant in the circumstances of the case.

Shameel
APPELLANT

Through

Kabir Ullah Khattak
& *Roeeda Khan*
Advocates, High Court
Peshawar.

NOTE:-

As per information furnished by my client, no such like appeal for the same petitioner, upon the same subject matter has earlier been filed, prior to the instant one, before this Hon'ble Tribunal.

R
Advocate.

(6)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR.

In Re S.A No. _____/2024

Mst. Shamia Bibi

VERSUS


Director of Educational New Merged Area Secretariat
Peshawar & others

AFFIDAVIT

I, Mst. Shamia Bibi D/o Isam Khan PST District
Kurram, do hereby solemnly affirm and declare that all the
contents of the **instant appeal** are true and correct to the
best of my knowledge and belief and nothing has been
concealed or withheld from this Hon'ble Court.


DEPONENT

Identified by:


Roeda Khan
Advocate High Court
Peshawar.

(7)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____ /2024

Mst. Shamia Bibi

VERSUS

Director of Educational New Merged Area Secretariat
Peshawar & others

ADDRESSES OF PARTIES

PETITIONER

Mst. Shamia Bibi D/o Isam Khan PST District
Kurram.

ADDRESSES OF RESPONDENTS

1. Director of Educational New Merged Area Secretariat
Peshawar.
2. Additional District Education Officer, Lower & Central
Kurram Sadda District Kurram.
3. District Account Officer District Kurram.

Sham

APPELLANT

Through

R

Roeeda Khan
Advocate, High Court
Peshawar.

(8)

BEFORE THE HON'BLE SERVICE TRIBUNAL
PESHAWAR

In Re S.A No. _____/2024

Mst. Shamia Bibi

VERSUS

Director of Educational New Merged Area Secretariat
Peshawar & others

APPLICATION FOR CONDONATION OF DELAY (if any)

Respectfully Sheweth,

Petitioner submits as under:

That the above mentioned appeal is filing before this Hon'ble Tribunal in which no date is fixed for hearing so far.

Grounds:

- A. That the impugned orders are void order and no limitation run against the void orders.
- B. That the dispute / issue of the appellant is come under the definition recurrence cause of action against which no limitation has been run.

(9)

c. That there are number of precedents of the Supreme Court of Pakistan which provides that the cases shall be decided on merits rather than technicalities.


It is, therefore, requested that the limitation period (if any) may kindly be condone in the interest of justice.


Appellant

Through


Kabir Khan Khattak

&


Roeda Khan
Advocates, High Court
Peshawar



A/10

ADD: AGENCY EDUCATION
OFFICE SADDU KURRAM AGENCY


PHONE: 0916-510674 FAX: 0916-510671
No: 3374-78 /Edu:
Dated Sadda the: 18/02/2016

REMOVAL FROM SERVICE

On the fulfilling of all codal formalities the following teachers/Class Ivs are hereby removed from their service due to their long absence from duty with immediate effect.

Note: Entry to this effect should be made in their service books.

Sr#	Name	Desig:	School
1	Sadiqa	PET	GCMS Bilyamin
2	Maryam Farooq	CT	IHC Gogani
3	Shehnaz	TT	GGPS Barari
4	Abida Nawaz	AT	GCMS Tindo
5	Farah Deebe	PST	GGPS Bagzai
6	Shamla Bibi	PST	GCMS Badama
7	Irfanullah	PST	GPS Hamish Gul Kali
8	Larif Shah	PST	GPS Had Molla
9	Iqbal Hussain	PST	GHS Bilyamin
10	Jasim Khan	Peon	GHS Shah Ibrahim
11	Samad Hussain	Ch	GPS Talo Kunj
12	Muzafar Dawood	Ch:	GGPS Muzafar Kot
13	Sher Muhammad	Ch:	GHS Dogar
14	Fazal Rehman	Behish:	GHS Dogar
15	Awal Shah	Ch:	GPS Mirdo Tang
16	Zainullah	Swp:	GHS Paloseen
17	Sulaiman	N/Q	GHS Paloseen


Add: Agency Education Officer
Lower & Central Kurram Sadda

NO: 3374-78 /Edu dated 18/02/2016

Copy for information to the

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Agency Account Officer Kurram Agency.
4. Head-Masters /Teachers Concerned.


Add: Agency Education Officer
Lower & Central Kurram Sadda

ATTESTED



Amendore
Q6



Better Copy

**ADD AGENCY EDUCATION
OFFICE SADDA KURRAM AGENCY**
No. 3374-78/EDU:
Dated Sadda the 18/2/2016

Removal From Service

On the fulfilling of all codal formalities the following teachers/Class ___ hereby removed from their service due to their long absence from duty with immediate effect.

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5	Farah Deebe	PST	GGPS Begzai
6	Shamia Bibi	PST	GGMS Badama
7	Irfanullah	PST	GPS Hamish Gul Kali
8	Latif Shah	PST	GPS Had Malla
9	Iqbal Hussain	PST	GHS Bilyamin
10	Jasim Khan	Penn	GHS Shah Ibrahim
11	Samad Hussain	Ch:	GPS Talo Kunj
12	Muzafar Dawood	Ch:	GGPS Muzafar Kot
13	Sher Muhammad	Ch:	GHS Dogar
14	Fazal Rehman	Behish:	GHS Dogar
15	Awal Shah	Ch:	GPS Mirdo Tang
16	Zainullah	Swp:	GHS Paloseen
17	Sulaiman	N/Q	GHS Paloseen

Add: Agency Education Officer
Lower & Central Kurram Sadda

No. 3374-78/Edu Dated 18/02/2016

Copy for information to the

1. Director of Education FATA Peshawar.
2. Political Agent Kurram Agency.
3. Agency Account Officer Kurram Agency
4. Head Master/Teacher Concerned.

Add: Agency Education Officer
Lower & Central Kurram Sadda

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 603/2016

Date of Institution ... 07.06.2016

Date of Decision ... 31.07.2018

Mst. Shamia Bibi D/O Isam Khan, Ex-PST Teacher,
Government Girls Middle School, Baddama, Central Kurram, Kurram Agency.
... (Appellant)

VERSUS

1. Additional Agency Education Officer, Lower & Central Kurram, Sadda,
Kurram Agency and three others.
... (Respondents)

MR. MIAN ASIF AMAN,
Advocate

For appellant.

MR. KABIRULLAH KHATTAK,
Additional Advocate General

For respondents

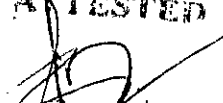
MR. AHMAD HASSAN,
MR. MUHAMMAD HAMID MUGHAL

MEMBER (Executive)
MEMBER (Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER:- Our this judgment shall also dispose of instant service appeal as well as Service Appeal No. 604/2016 titled "Mst. Abida Nawaz Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others", Service Appeal No. 605/2016 titled "Sher Muhammad Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others", Service Appeal No. 606/2016 titled "Fazal Ur Rehman Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others", Service Appeal No. 607/2016 titled "Mst. Maryaum Farooq Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three others", Service Appeal No. 608/2016 titled "Muzaffar Daud Versus Additional Agency Education Officer, Lower & Central Kurram, Sadda, Kurram Agency and three

ATTESTED


Ahmad Hassan
Member (Executive)

absent. Various requirements prescribed in the rules were not observed, so the impugned order was void ab-initio.

5. Learned Additional Advocate General argued that all the affected civil servants were required to file separate departmental appeal but in the instant case joint departmental appeal was filed in violation of rules. Major penalty of removal from service was imposed on the appellant and others after observance all codal formalities.

CONCLUSION.

6. On the allegations of willful absence from duty, the appellant and others were proceeded departmentally and upon conclusion, major penalty of removal from service was imposed on them vide impugned order dated 18.02.2016. It is strange that the respondents failed to mention the exact date from which the appellant was absent from duty. Learned Additional AG when confronted on this point, candidly conceded that the record was silent on this score. He was further confronted on the point that the impugned order was issued and the period of absence showed in the impugned order related to winter vacations but he was unable to give an convincing reply. Despite opportunities on the previous date of hearing the respondents failed to produce record about service of notices at the home address of the appellant and others employees. It has also not been clarified that why action were taken against only 17 employees whereas names of 53 employees were mentioned in the notice published in daily "Mashriq" on 02.02.2016. Action taken by the respondents appeared discriminatory and violative of Article-25 of the Constitution of Islamic Republic of Pakistan. It can be stated safely inferred that the procedure laid down in the rules was not followed by the respondents before issuing the impugned order and as such the appellant and others were condemned unheard.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

(14)

7. As a sequel to above, the appeals are accepted, the impugned order is set aside and the appellant is reinstated in service. However, the respondents are at liberty to conduct de-novo inquiry within a period of three months from the date of receipt of this judgment. The intervening period may be treated as leave without pay. Parties are left to bear their own costs. File be consigned to the record room.

(AHMAD HASSAN)
MEMBER

(MUHAMMAD HAMID MUGHAL)
MEMBER

ANNOUNCED
31.07.2018

Certified to be true copy

Secretary
Service Tribunal
Peshawar

Date of Presentation of Application 01-04-24
Number of Writs 47
Copying Fee 20/-
Urgent 5/6
Total 25/-
Name of Applicant _____
Date of Contention 01-04-24
Date of Delivery of Copy 01-04-24

(D) (15)

107651 and beam 442/1850
Head F.A (A) Exam 2006 marks
in BISE Mardan, under
No. 38488 and beam
39/1110 MARKS.
Head P.T.C Exam from
104 Islamabad, under
ROLL NO: L 6130811 and
marks 593/900 marks
in of Result declaration
06-05-2003.

1. Name (فرد) Shamia Bibi
2. Nationality and Religion Pakistani (Islam)
(قومیت اور مذہب)
3. Residence Village z. P. O Parkto Dheri
(ستل رہائش) DIST: Mardan.
4. Father's Name and residence Isam Khan Asabary
(والد کا نام اور پتہ)
5. Date of birth Christian era as 05-03-1983
nearly as can be ascertained
(تاریخ پیدائش مطابق سن عیسوی)
6. Exact height by measurement 5'6"
(قد و قامت)
7. Personal mark of identification Mole on the side of
(نشان شناخت) face

Add: A.E.O
Sadda Kujram

8. Left hand/right hand thumb and finger impressions of (Non-gazetted officer)

(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (چوٹیا) Ring Finger (چھٹایا کے ساتھ کی انگلی) Middle Finger (انگشت میاں)
Fore Finger (انگشت شہادت) Thumb (انگوٹھا)

9. Signature of Govt. Servant (سرکاری ملازم کے دستخط)

10. Signature and designatin of the Head of the Office or other Attesting officer

(تصدیق کنندہ افسر کے دستخط اور سر)

Agency: Kujram Agency

Note : The entries in this page should be renewed or re-aggested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 hears under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر ۹ اور ۱۰ میں دستخطوں کے نیچے تاریخ لکھنی چاہیے۔ انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

8	9	11	12	13	14	15	16
Signature of Government servant	Reason of termination or appointment	Signature of the head of the officer or other Attesting officer	Nature and duration of leave taken	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debit to another Government	Signature of the Head of the office other attesting Officer	Reference to any recorded punishment of censure, or reward, or praised of the Government servants	
	تاریخ مطالع ملازمت	دراجات مطالع ملازمت ترقی چکر یہ طرنی	دستخط افسر مجاز	پرمانہ کی درخواست کے لے اوسط تنخواہ کا تین	دستخط افسر مجاز	سزا یا تعمیر یا کارکردگی کا ریکارڈ	
				Period ۱۲	Government to which debit گورنمنٹ		
							Appointed as P.T. Teacher on Contract Basis at G.P.S Mir Bacha Cantt. Kurram wide Endor. No 2935-2946/Edu. Dated 15-05-2004. (Ld 3166/-104 Fixed Project Programme)
		Agency Education Officer Kurram Agency					
		Add: A.E.O Sadda Kurram					Agency Education Officer Kurram Agency
		Add: A.E.O Sadda Kurram					Service Verified w.e.f 17-05-2013 to 30-11-2013 From the office record
		D.E.O Kurram					A.E.O Kurram Agency
							Regulation of Project P.T.E. Service with effect from 1-4-2013, vide Addl AEO Lulus & Central Kurram Sadda Endor No. 1083-90/Edu Dated: 22-5-2013.
							Add: A.E.O Sadda Kurram

Handwritten notes in the left margin, including names and dates, such as "30/11/2013" and "30/11/2014".

Agency Education Officer
Kurram Agency

2048

18

8 Signature of government servant	9 Signature and designation of Head of the office or other attesting officer (Ann 1 to 3)	10 Date of termination or appointment	11 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	Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debit to another Government	Signature of the Head of the office or other attesting Officer	Reference to any recorded punishment, censure, or reward, or praised of the Government servants				
						<table border="1"> <tr> <th>Period</th> <th>Government to which debit</th> </tr> <tr> <td></td> <td></td> </tr> </table>	Period	Government to which debit				
Period	Government to which debit											
شاہد	دستخط افسر محترم	17-2-2016	Removed from Service	دستخط افسر مجاز	رخصتی نوعیت دعویہ	پہلے مذکورہ مدت کے لے دوسرا حکومت کو تعلق	دستخط افسر مجاز	Service verification Service verified on 01-04-2013 to 30-11-2016 from office records				
شاہد	دستخط افسر محترم	30-6-2016	Pay Revision	دستخط افسر مجاز								
شاہد	دستخط افسر محترم	30-11-2016	No Inert	دستخط افسر مجاز				Add: A.E. Sada				
شاہد	دستخط افسر محترم	30-6-2017	Pay Revision	دستخط افسر مجاز				No back benefit during Removal Period 18-2-2016 to 19-5-2017				
شاہد	دستخط افسر محترم	30-11-2017	No Inert	دستخط افسر مجاز								
شاہد	دستخط افسر محترم	30-11-2018	No Inert	دستخط افسر مجاز								
شاہد	دستخط افسر محترم	30-11-2019	No Inert	دستخط افسر مجاز								
شاہد	دستخط افسر محترم	19-5-2020	Re-instated	دستخط افسر مجاز								
شاہد	دستخط افسر محترم	30-1-2021	Transferred	دستخط افسر مجاز								

Government Station of Column 1 to 8	Promotion transfer, dismissal etc.)	Other Attesting officer	Leave taken	Salary is debitable to another Government	Attesting Officer	Approved by the Government servants
				Period	Government to which debtible	
DEO Kurrum Sadda	30-2-20	Transferred Addl: DEO Kurrum Sadda				Reinstated upon the approval of the competent authority with own back benefits on her own part with immediate effect
DEO Sakht Bazar						Vide DEO: Kurrum Endstrs: 439-43 Dated 20/5/2020
						Addl: DEO Kurrum Sadda
						Room of P2 my dt. 10-2-2020 to 31-1-2020 dated=12/8/2020
						Arrear of pay & Allowances w.e.f 2/6/2020 to 31/7/2020 Rs = 53,145/- as per order no: 439-43 dated 20/20
						Drawn
						Inst: Sharmila has been transferred to GCP Kati Khel Sadand Distric Mardan, vide Director of Elem entry & Secondary Edu: Endstrs No: 5291-94 Dated: 25-9-2020
						Addl: DEO Kurrum Sadda

ڈائریکٹر ایگزیکیوٹو اینڈ سیکرٹری ایجوکیشن، سندھ حکومت، کراچی

زیریں تفصیل میں برائے گورنمنٹ

دستخط سالانہ اینڈ کنٹریکٹ سال

2018 تا سال 2020

جناب عالی: سائل حسب ذیل عرصہ در سال میں

1) یہ کہ سائل بطور P51 اپنی ڈیوٹی سر انجام

دے رہی ہے۔ ایگزیکیوٹو

2) یہ کہ سائل کو عرصہ 18/02/2018 کو عیناً عرصہ تمام

کا وہاں سے برخاستہ کیا گیا جس نے صرف

سائل نے سروس میں ملبر 03/11/2018 ڈائری میں

ہوئے عرصہ 7/13 کو فصلی ہو کر ایگزیکیوٹو

کو فونر کا بہت حال کیا۔

3) یہ کہ اگرچہ ایگزیکیوٹو کو فونری بہت حال بھی کیا گیا

لیکن سالانہ اینڈ کنٹریکٹ سال 2018 تا 2020 تا حال

میں لگائی گئی ہے لہذا استعفیائی جاتی ہے کہ سالانہ

اینڈ کنٹریکٹ سال 2018 تا 2020 ایگزیکیوٹو گرانٹ

Restore کرنے کا حکم صادر فرمائی جائے

1/2024

عوض

شاہد شاہ

ADD: District Education Officer Lower &
Central Kurram Sadda

No _____ /Edu:

Dated _____ /2019

Ph 0926-520674 Mail: educationsadda@gmail.com

REINSTATEMENT

In Pursuance to the Directorate of Education Merged Districts Peshawar vide letter No 13051 Dated Peshawar the 16.10.2020 and No 1906 Dated 18.02.2020 in the light of Honorable court Khyber Pakhtunkhwa Service Tribunal Peshawar judgment No 1717/ST dated 24.08.2018 in service appeal No 603/2016 filed by Mst. Shamia Bibi & others Vs ACS FATA & Others and recommendation of the inquiry committee, the following appellants are hereby reinstated without back benefits as their own posts in the following institutions with immediate effect.

S#	Name	Desig:	Institution	Remarks
1.	Maryam Farooq	CT	GGMS Gogani	Against Vacant post
2.	Shamia Bibi	PST	GGPS Khormana	Against Vacant Post

1. Their Documents, service books, CNIC and domicile certificate should be checked before handing over charge of the post and attested copies thereof may be kept on record in the office.
2. Charge report should be submitted to all concerned.
3. If they failed to report their arrival within 15-days of the issuance of her appointment order, it will be considered as cancelled.

District Education Officer
Tribal District Kurram

No. 439-F-43 /Edu: Dated 20/5/2020
Copy for information to the:-

1. Director of Elementary & Secondary Education Department KPK Peshawar
2. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
3. Director of Education Merged Districts Peshawar.
4. District Account Officer Kurram Parachinar.
5. Teachers concerned.

District Education Officer
Tribal District Kurram

C.T.C

Better Copy

**Addl: District Education Officer Lower &
Central Kurram Sada**

No. _____ / Edu:

Dated _____ / _____ /2019

Ph 0926-520674 Mail: Educationsadda@gmail.com

REINSTATEMENT:

In Pursuance to the Directorate of Education Mergal Districts Peshawar vide letter No. 13051 dated Peshawar the 16.10.2020 and No 1906 dated 18.02.2020 in the light of Hon'ble court Khyber Pakhtunkhwa Service Tribunal Peshawar judgment No.1717/ST dated 24.08.2018 in service appeal No.603/2016 filed by Mst. Shamia Bibi & others Vs ACS FATA & Others and recommendation of the inquiry committee the following appellants are hereby reinstated without back benefits as their own posts in the following institutions with immediate effect.

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District Education Officer
Tribal District Kurram

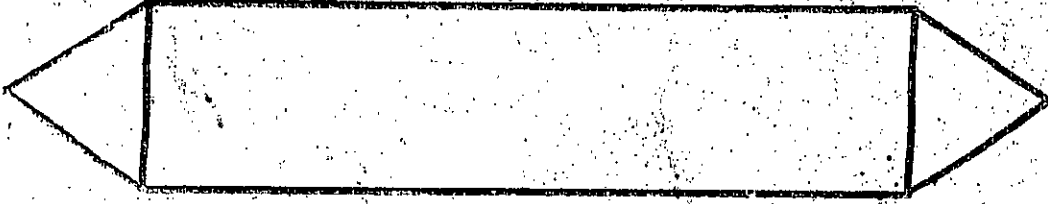
No. 439-43/Edu: dated 20/05/2020

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2. Registrar Khyber Pakhtunkhwa Service Tribunal, Peshawar.
3. Director of Education Merged District Peshawar.
4. District Accounts Officer Kurram Parachinar
5. Teachers concerned.

District Education Officer
Tribal District Kurram

بعدالت جواب سے درخواستی کارروائی



2025 منجانب اسلام آباد

مورخہ

کامیاب نام اٹوٹ

مقدمہ

دعویٰ

جرم

باعث تحریر آنکے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ

کلیئے لیسر ایٹوٹ

آن مقام

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے کے تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور وصولی چیک و روپیہ ارضعی 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 منسوتی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا محتاج ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مندرجہ شدہ وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ ہوں گے سب سے وہو کا کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ البتہ نکالت نامہ لکھد یا کہ مندر ہے۔

2025

ماہ 11

المرقوم 3

العبد دنگ واه العبد

مقام کے لئے منظور ہے۔