

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

**12(2) No. 154/2024 in  
Execution Petition No. 963/2023 in  
Service Appeal # 137/2022**

**Mst. Shamshad Bibi.....Appellant.**

**VERSUS**

**Govt: of Khyber Pakhtunkhwa & others.....Respondents.**

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**Deponent**

*one copy  
handed over  
to the court.*

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

12(2) No. 151/2024 In  
 Execution Petition # 963/2023 In  
 Service Appeal # 137/2022

Mst. Shamshad Bibi (SDEO) DI Khan.....Appellant

**VERSUS**

Govt. of Khyber Pakhtunkhwa & others..... Respondents

**REPLY IN 12(2) NO. 151/2024 IN THE EXECUTION PETITION NO. 963/2023 IN  
 SERVICE APPEAL NO. 137/2022 ON BEHALF OF THE RESPONDENTS.**

Respectfully Sheweth,

**Khyber Pakhtunkhwa  
 Service Tribunal**

The Respondents submit as under:-

Date No. 13433

**PRELIMINARY OBJECTIONS:-**

Date 11-06-24

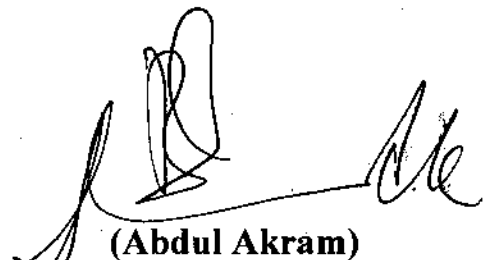
1. That the appellant has got no cause of action/locus standi for filing of this 12(2) Petition as there is no irregularity or non-compliance on the part of the respondents. The appellant on the same cause of action has also filed Service Appeal No. 440/2024 wherein this Honorable Tribunal sought reply from the respondent on 12-06-2024 (copy of Service Appeal & Notice attached as annexed A&B)
2. That the instant application is bad in its present form, therefore, liable to be dismissed summarily.
3. That the applicant has concealed the material facts from this Hon'ble Tribunal, hence the instant application is not maintainable.
4. That the applicant has not come to this Hon'ble Tribunal with clean hands.
5. That the applicant has filed the instant application with malafide intention just to pressurize the Respondents for gaining illegal service benefits.
6. That the instant application is against the prevailing law; hence not maintainable.
8. That the applicant is estopped by her own conduct to file the instant application, as the appellant impugned the same cause of action through Service Appeal No. 440/2024 and come under the principle of sub-judicata.
9. That the instant application is not maintainable in the present circumstances of the issue.
10. That the Notifications dated 05-12-2023 of the Respondent is competent and in accordance with existing law/rules, therefore, liable to be maintained.

**ON FACTS:**

1. Correct and pertains to record of the appellant.
2. Correct and pertains to record.
3. Incorrect, hence denied.
4. Para-4 needs no comments.
5. Incorrect, hence denied as no adverse action has been taken against the appellant.
6. Somehow, correct. The Department immediately acted upon the directions of the Hon'ble Tribunal in E.P No. 493/2023 which was implemented in letter & spirit (**Annex-C**).
7. Incorrect hence denied, as the appellant was transferred from the post of SDEO (F) Pharpur DI Khan to SDEO (F) Ghazni Khel, Lakki Marwat after completion of her normal tenure as per judgment of the Hon'ble Tribunal/tenure policy of Provincial Govt.
8. Incorrect, hence denied as the transfer order of the appellant was issued after completion of her normal tenure and as per Section-10 of the Civil Servant Act, 1973.
9. Incorrect hence denied. The report of District Accounts Officer DI Khan containing details of salary of the appellant is attached as (**Annex-D**) for kind perusal of the Hon'ble Tribunal.
10. Para-10 needs no comments.
11. Incorrect and has already been explained in Para-7 above.
12. Needs no comments as already explained in Para-8 above.

**GROUND:****Prayer:**

In view of above legal and factual position, it is humbly prayed that since judgment of the Hon'ble Tribunal was implemented in letter & spirit and the appellant has been transferred after completion of her normal tenure of 02-years as per service record at (**Annex-E**); hence the instant 12(2) filed by the appellant, being devoid of any merits, may kindly be dismissed with cost.



(Abdul Akram)

Additional Secretary (G), E&amp;SED

On behalf of

SECRETARY E&amp;SED

(Respondent No. 01)

**BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR**

12(2) No.151/2024  
Execution Petition No. 963/2023  
in  
Service Appeal # 137/2021

Mst. Shamshad Bibi..... Appellant

**VERSUS**

Govt. of Khyber Pakhtunkhwa & others..... Respondents

**AFFIDAVIT**

I, **Abdul Akram**, Additional Secretary (General), Elementary & Secondary Education, Department do hereby solemnly affirm and declare that the contents of the accompanying para-wise comments, submitted by the respondents, are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

**It is further, stated on oath that in this appeal the answering Respondents have neither been placed ex-parte nor has their defense been struck off.**



**Authorized Officer  
(Abdul Akram)  
Additional Secretary (General)  
E&SE Department  
(Masood Ahmad)  
SECRETARY E&SED  
(Respondent No. 01)**



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**GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**

**Block "A" Civil Secretariat, Peshawar**

**Phone No. 091-9211128**

**AUTHORITY LETTER**

It is certified that **Mr. Sajid Ullah, Section Officer (Litigation-II)** Elementary & Secondary Education Department, Government of Khyber Pakhtunkhwa, Peshawar is hereby authorized to submit parawise comments on behalf of Secretary Elementary & Secondary Education Department Peshawar **12(2) No. 151/2024** in Execution Petition No. **963/2023** in Service Appeal # **137/2021** Case Titled **Mst. Shamshad Bibi** vs Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education Department Khyber Pakhtunkhwa, Peshawar.

**Authorized Officer  
(Abdul Akram)  
Additional Secretary (General)  
E&SE Department  
(Masood Ahmad)  
SECRETARY E&SED  
(Respondent No. 01)**



GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Block "A" Civil Secretariat, Peshawar

Phone No. 091-9211128

Dated Peshawar, the 29-04-2024

**NOTIFICATION**

**NO.SO(Lit-II)/E&SED/1-5/2021.** The undersigned (Masood Ahmad, Secretary Elementary & Secondary Education Department) is pleased to authorize Mr. Abdul Akram, Additional Secretary General, Elementary & Secondary Education Department to sign parawise comments, replies, implementation reports, objection petitions, civil miscellaneous applications etc on my behalf for submission before various courts of law/tribunals in the best public interest.

(MASOOD AHMAD)

SECRETARY


Elementary & Secondary Education  
Department, Khyber Pakhtunkhwa

Endst: No. \_\_\_\_\_

Dated \_\_\_\_\_

Copy forwarded to the:-

1. Chief Secretary Khyber Pakhtunkhwa.
2. Advocate General Khyber Pakhtunkhwa.
3. Secretary Law Department.
4. Registrar Peshawar High Court Peshawar (with one each spare copy for the Honorable Judges).
5. Registrar Service Tribunal Peshawar (with one each spare copy for the Honorable Chairman/Members)
6. All Section Officers (Litigation) E&SE Department.
7. PS to Secretary E&SE Department.
8. PA to Additional Secretary (General) E&SE Department.
9. PAs to Deputy Secretary (Legal-I&II) E&SE Department.

  
(SAJID ULLAH)  
SECTION OFFICER (Lit-II)

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Annexure - A

GS&PD-2/664-RST-30,000 Forms-1-11-2022/PHC Jobs/Form A&B Ser. Tribunal/P2

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR,  
JUDICIAL COMPLEX (OLD), KHYBER ROAD,  
PESHAWAR.

No.

Appeal No. 440 of 2024

Mst. Shamshad Bibi Appellant/Petitioner

Versus

Chief Secy: Pesh Respondent

Respondent No. 2

Notice to:

Secretary (GSSSE) 141K Peshawar  
D/S... 5/6/24

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal \*on 12-6-24 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. .... dated.....

Given under my hand and the seal of this Court, at Peshawar this 3

Day of 6 20 24

OFFICE OF SECRETARY GSSSE DEPTT:

Diary No. 2566

Date: 5/6/24

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

Recievd  
on  
6/6/24

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.  
2. Always quote Case No. While making any correspondence.

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Annexure - B

BEFORE THE HONORABLE SERVICE TRIBUNAL,  
KHYBER PAKHTUNKHWA

Service Appeal No.

440/2024

Mst. Shamshad Bibi, Sub Divisional Education  
Officer (female) Tehsil Paharpur, District D.I.Khan,  
Presently working as SDEO (Female) Ghani Khel, Lakki Marwat

Petitioner

VERSUS

1. Chief Secretary Khyber Pakhtukhwa Peshawar.
2. Secretary to Govt of Khyber Pakhtunkhwa Elementary & Secretary  
Education Department, Peshawar.
3. Sonia Nawaz, SDEO(F) Tank, presently working as SDEO(F) Paharpur.

Respondents

SERVICE APPEAL UNDER SECTION-4 OF THE KHYBER PAKHTUNKHWA  
SERVICE TRIBUNAL ACT -1974 AGAINST THE NOTIFICATION  
NO.SO(MC)E&SED/4-16/2023/PT/ASDEOs DATED 05.12.2023, ISSUED BY  
RESPONDENT NO.2

PRAYERS

On acceptance of this service appeal, the official respondent may kindly be directed to cancel the impugned notification bearing No.SO(MC)E&SED/4-16/2023/PT/ASDEOs dated 05.12.2023, be declared as void ab-initio, without lawful authority, against the norms of natural justice and ineffective upon the rights of appellant and posting of appellant as SDEO(F) Paharpur may kindly be restored in the best interest of justice.



Respectfully Sheweth,

Concise Facts

1. That Appellant was posted as SDEO (F) Paharpur and Respondent No.1 after completing two years as SDEO(F) Paharpur was posted as SDEO(F) Tank vide notification dated 07.10.2021 (Annexure-A) and appellant was again transferred as SDEO(F) Tank and Respondent reposted as SDEO(F) Paharpur within three months vide notification dated 12.01.2022, (Annexure-B) .
2. That against the Notification dated 12.01.2022, Appellant filed service Appeal No. 137 of 2022 before this Honourable Tribunal. On fixation of the case, the Honorable Tribunal suspended the Notification dated 12.01.2022 on 31.01.2022 and fixed for reply on 24.02.2022 (Annexure-C), but respondent did not complied the order of Honorable Tribunal and posted Mst. Samina Shehnaz as SDEO (F) Paharpur vide notification dated 21.12.2022 in place of Appellant and on 22.02.2022 withdrawn the said notification (Annexure-D).
3. That respondent implemented the order of Honorable Tribunal Dated 31.01.2022 on 22.02.2022 for just two days till 24.02.2022 (Annexure-E).
4. That after 24.2.2022 respondents violated the order dated 31.1.2022 and private respondent (Sonia Nawaz) continued to hold the office of SDEO Paharpur (Annexure-F & F1) and due to retirement of Honorable Chairman Service Tribunal, the Honorable Service Tribunal was dysfunctional, therefore aggrieved from act of respondents, petitioner filed CM petition No 195-D/2022 in Peshawar High Court Bench DIKhan and vide order dated 08.03.2023 of Honorable Court disposed of (Annexure-G).
5. That Appellant once again filed writ petition no 161-D/2022 before Honorable Peshawar High Court DIKhan Bench and vide order dated 15.03.2022 Honorable Court disposed of (Annexure-H) meaning by Appellant was not permitted to hold the post of SDEO(F) Paharpur by the respondents from 12.01.2022 to 17.03.2022 i.e. more than 2 months.
6. That after having heard the appellant counsel at great length vide judgment dated: 30.09.2022 passed by this Hon'ble Tribunal, the

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Notification dated 12.01.2022 was set-aside/ cancelled and thereby appeal of the Appellant was accepted (Annexure-I).

7. That in utter disregard of the Judgment, again posted the Appellant as OSD (report to directorate) vide notification dated 26.05.2023 (Annexure-J), aggrieved from this, Appellant filed execution petition no 493/2023 before the Honorable Tribunal and respondent cancelled the notification dated: 26.05.2023 vide notification dated 21.08.2023 (Annexure K) submitted before the Honorable Tribunal on 24.08.2023 (Annexure-L) i.e., after 3 months.

8. That during the performing of duties of Appellant, respondent No: 1 (Sonia Nawaz) was again transferred in place of Appellant vide impugned notification No: 05.12.2023 as alleged in compliance of judgment of Service Tribunal dated: 03.11.2023 in Service Appeal No: 1403/2023 titled "Noreen Saba & others VS Govt of KPK" (Annexure-M), however Sonia Nawaz has already been served as SDEO (F) Paharpur more than 2 years.

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9. That in Appeal No.1403/2022, Sonia Nawaz was transferred from SDEO Tank to Directorate vide Notification dated 09.06.2022 (Annexure-N) and Noreen Saba SDEO (Female) was transferred from SDEO Kohistan to SDEO Tank vide Notification dated 10.06.2022, (Annexure-N1) the notification dated 09.06.2022 was withdrawn vide Notification dated 27.06.2022, in which Noreen Saba SDEO (Female) was posted as SDEO (Female) Hangu and Sonia Nawaz was retained as SDEO (Female) Tank (Annexure-N2). the Notification dated 27.06.2022 was challenged by Noreen Saba SDEO (Female) before the Honorable Service Tribunal vide Appeal No.1403/2022, titled Noreen Saba SDEO (Female) versus Sonia Nawaz & Others (Annexure-N3), in which she wants to post as SDEO (Female) Tank.

10. That in Appeal No.1441/2023, Sonia Nawaz SDEO (Female) was transferred from SDEO Tank to SDEO Paroa and subsequently Nighat Shaheen SDEO (Female) was posted from SDEO Paroa to SDEO Tank vide Notification dated 20.03.2023 (Annexure-O), same notification was withdrawn vide Notification dated 22.03.2023 (Annexure-O1). Notification dated 22.03.2023 was challenged by

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Sonia Nawaz before Honorable Service Tribunal vide Appeal No.1441/2023 titled Sonia Nawaz versus Nighat Shaheen & Others, (Annexure-O2) in which she wants to remain as SDEO (Female) Paroa.

**Note: That both appeals was disposed-off vide judgement dated 13.11.2023, in service appeal No.1403/2022 & 1401/2023 (Annexure-P). It is pertinent to mention here that in both service appeals No. 1441/2023 & 1403/2023 disputes was between the posts of SDEO (Female) Tank, SDEO (Female) Paroa & SDEO (Female) Hangu**

11. That it is pertinent to mention here that in Service Appeal No: 1403/2022 and No.1441/2023 vide order dated: 13.11.2023 there was no direction about Appellant, however in Service Appeal No: 1403/ 2022 where Sonia Nawaz was respondent & connected Appeal No: 1442/2023, where Sonia Nawaz was Appellant and dispute was among three SDEO (F) i.e. Mst. Nighat Shaheen, Mst. Sonia Nawaz & Noreen Saba for the post of SEDO (F) Paroa, SDEO (F) Tank & SEDO (F) Hangu but respondent utter disregard of Judgment dated: 30.09.2022 displace the Appellant and posted the Sonia Nawaz as SDEO (F) Paharpur instead of Paroa and some other Sobia SDEO(F) DIKhan was posted as SDEO(F) Paroa.

12. **That the tenures of SDEOs in impugned Notification dated 05.12.2023 was:-**

- i. Nighat Shaheen SDEO (Female) remained as SDEO (Female) Paroa (2 years & 8 months) from 12.04.2021 to 05.12.2023 and presently posted as SDEO (Female) Tank.
- ii. Sonia Nawaz SDEO (Female) remained as SDEO (Tank) (01 year & 11 months) from 07.10.2021 to 12.01.2022 & April 2022 to 05.12.2023 & presently posted as SDEO (Female) Paharpur, which also previously spent more than two years as SDEO (Female) Paharpur, DIKhan.

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- iii. Noreen Saba SDEO (Female) remained as SDEO (Female) Hangu (01 year & 05 months) from 27.06.2022 to 05.12.2023 & presently posted as SDEO (Female) Jandola.
- iv. Sobia Tabassum SDEO (Female) remained as SDEO (Female) DIKhan (02 years & 05 months) from 14.07.2021 to 05.12.2023 & presently posted as SDEO (Female) Paroa DIKhan.
- v. Samina Shahnaz SDEO (Female) remained as SDEO (Female) Jandola (11 months) from after 30.09.2022 to 26.05.2023 & 21.08.2023 to 05.12.2023, & presently posted as SDEO (Female) DIKhan.
- vi. Shamshad Bibi SDEO (Female) (Petitioner) remained as SDEO (Female) Paharpur (01 year & 08 months) from 07.10.2021 to 12.01.2022, 01.04.2022 to 26.05.2023 & 21.08.2023 to 05.12.2023, & presently posted as SDEO (Female) Ghaznikhel Lakki Marwat.

Although the longer tenure at District DIKhan as under:-

1. Nighat Shaheen SDEO (Female) 2 years & 08 months.
2. Sobia Tabassum SDEO (Female) 02 years & 5 months.
3. Shamshad Bibi SDEO (Female) 01 year & 08 months.

13. That thereafter the appellant submitted Department appeal/ representation on 09.12.2023, through postal service vide No.RGL-117395986. (Annexure-Q&Q1).
14. That as the representation filed by the appellant have not been rejected/ accepted and remain undecided, the appellant approached to this Honorable Tribunal for redressal of her grievances, inter alia on the following grounds.

#### GROUNDS

- a. That this Honorable Tribunal never directed to issue the impugned order and thus the respondents misinterpreted the order of this Honorable Tribunal dated 13.11.2023 and on this sole ground the impugned order may kindly be set-aside.

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- b. That the Judgment dated 30.09.2022 in the subject service Appeal is self-contained wherein was specifically stated that "As a sequel to the above the service appeal is allowed with the direction to the respondent department to allow the appellant to continue on her present station of posting till completion of her normal tenure. The appeal is accepted in above terms." but direction of this Hon'ble Tribunal has not yet been fully and wholly implemented.
- c. That the judgment dated 30.09.2022 in the main service appeal of this Tribunal is self-explanatory, simple and clear and it did not require any further interpretation. But respondents tactfully, illegally and unlawfully twisted the same on technical grounds to smash the essence of judgment in order to sabotage the rights of petitioner. As, Quoties in verbis nulla est ambiguitas, ibi nulla expositione contra verba fienda est which means "so long as there is no ambiguity in the words, there should be no interpretation contrary to the words" therefore, respondents have no lawful authority to go beyond the specific verdict of the ibid judgment.
- d. That the successive transfers of the petitioner to various stations within a span of one and half year are against the posting/transfer policy of the Provincial Government, which indicated that a Government servant should not be transferred, in ordinary circumstances, prior to completion of a period of three years at one place of posting. In this backdrop, the wisdom may also be derived from the judgment of Hon'ble Supreme Court 2011 P L C (C.S.) 935(Supreme Court of Pakistan), whereby it is held that;-

----- S. 30 (3) ----- Constitution of Pakistan Art.212(3)-

-Successive Transfer -- Respondent was patwari who was transferred to three stations within a span of eight month--- Service Tribunal accepted appeal filed by respondent patwari and set aside his transfer orders --- Validity --- Successive transfer of respondent to three stations within a span of eight months were against posting/transfer policy of

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SP

Provincial Government, which indicated that a government servant should not be transferred in ordinary circumstances, prior to completion of a period of three years at one place of posting --- Transfer order of respondent was passed during ban period, prematurely under political influence, as copy of the same was sent to private secretary to Provincial Minister for Revenue --- Tenure of posting of and officer or official of Government to a District Government was provided in S.30(3) of North-West Frontier Province Local Government Ordinance, 2001, as three years but any officer could be transferred earlier due to exigency of service or in public interest to an individual grievance and no substantial question of law of public importance was involved warrant interference by Supreme Court under Art.212 (3) of the Constitution--- Supreme Court did not find any illegality or infirmity in the Judgment passed by Service Tribunal so as to justify interference by Supreme Court under Art.221(3) of the Constitution---Petition was dismissed.

- e. That it is imperative to highlight that the respondents, in sheer violation of Rules and policy in vogue by the Government of Khyber Pakhtunkhwa, have posted the respondent No: 8 to Tehsil Paharpur DIKhan who were not obliged to do so for the reason the petitioner has not completed the normal tenure of service at the incumbent position. In fact, the petitioner has no political legs to stand upon to make her transfer and posting according to her wish and whims, that's why, exploited at the hands of respondent despite having decision in her favour.
- f. That it is pertinent to mention here that the respondent have used this Honorable Tribunal for their own wish and whim, because there was no any direction in order dated: 13.11.2023 in Service Appeal No: 1403/2022 regarding petitioner and nor

was petitioner disputed in Service Appeal No: 1403/2022 as well as 1441/2023.

- g. That the impugned transfer order issued by the respondent is illegal unlawful and against the natural justice as well as violation of fundamental rights, therefore, the impugned transfer order is liable to be set-aside.
- h. That Counsel of the petitioner may please be allowed to raise additional grounds at the time of arguments.

It is therefore, humbly prayed that on acceptance this appeal, the official respondents may kindly be directed to cancel the impugned transfer order bearing endst. NO.SO(MC)E&SED/4-16/2023/PT/ASDEOs DATED 05.12.2023, issued by respondent no.2 be declared as void ab-initio without lawful authority, against the norms of natural justice and ineffective upon the rights of appellant.

Yours humble Appellant  
Through Counsel

Khalid Mahmood  
Advocate High Court  
D.I.Khan

Dated: 18/3/2024

**AFFIDAVIT**

I, Mst Shamshad Bibi, Sub Divisional Education Officer (female), Education Department, D.I.Khan, the petitioner, do hereby solemnly affirm and declare on oath that all the Para-wise contents of this Service Appeal are correct and true to the best of my knowledge & belief. I further solemnly affirm and declare that no part of above petition is false and nothing material has been deliberately concealed.

Dated:

Identified by Counsel:

Khalid Mahmood AHC

Deponent

12101-4389262-8



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Annex - C

**NOTIFICATION**

Dated: 21<sup>st</sup> August, 2023

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O.SQ/MC/E&SED/4-16/2023/Posting/Transfer/MC/DIK: Consequent upon the Execution  
 petition No. 493/2023 in Service Appeal No. 137/2022 filed by Mst. Shamshad Bibi Vs Govt  
 Khyber Pakhtunkhwa. This Department's Notification of even number dated 26-05-2023  
 regarding posting / transfer Notification to the extent of Mst. Shamshad Bibi (MC BS-17),  
 appearing at Sr. No-2 is hereby withdrawn/Cancelled.

No TADA is allowed.

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

Under reference of even No. & date

Copy forwarded for information to the:

1. Registrar Service Tribunal Khyber Pakhtunkhwa
2. Director, E&SE Khyber Pakhtunkhwa, Peshawar.
3. Director EMIS, E&SE Department with the request to upload the same on the official  
 website of the department.
4. Section Officer (Lit-II) E&SE Department.
5. District Education Officer (Female) D.I. Khan.
6. District Accounts Officers D.I. Khan.
7. PS to Advisor to Chief Minister on E&SE Khyber Pakhtunkhwa.
8. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

*Handwritten signature of Imran Zaman*

**IMRAN ZAMAN**  
 SECTION OFFICER (Management Cadre)

**ATTESTED**

*Handwritten signature of Khalid Mehmood*

**KHALID MEHMOOD**  
 Advocate High Court  
 Stationed at D.I. Khan

*Handwritten signature of Section Officer*

**Section Officer (Management Cadre)**  
 Elementary & Secondary Edu. Deptt.  
 Govt. of Khyber Pakhtunkhwa





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Annex - D

GOVERNMENT OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION  
DEPARTMENT

No. SO(MC) E&SED/4-16/2024/SDEO(F)/Paharpur/Shamshad Bibi  
Dated; 5<sup>th</sup> January, 2024

To  
The District Accounts Officer  
D.I.Khan.

Subject: **VERIFICATION OF SALARY DRAWN BY MST. SHAMSHAD BIBI  
SDEO (F) PAHARPUR.**

I am directed to refer to the subject noted above and to state that Mst. Shamshad Bibi was posted as SDEO (Female) Paharpur vide this department notification dated 07.10.2021 and worked on the same post up to 05.12.2023. It is mention here that she was transferred from Paharpur to District Tank dated 12.01.2022 while the order was withdrawn on 22.02.2022.

Now your are requested to apprise this department as to whether she draw her salary continued form 07.10.2021 to 05.12.2023 or otherwise.

*111/aw*

SECTION OFFICER (Management Cadre)

**Encl; as above.**  
Cc to the: -

- PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.

*111/aw*

SECTION OFFICER (Management Cadre)

*[Signature]*  
Section Officer (Management Cadre)  
Elementary & Secondary Edu. Deptt.  
Govt. of Khyber Pakhtunkhwa

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Annex - E



OFFICE OF THE  
DISTRICT ACCOUNTS OFFICER  
DERA ISMAIL KHAN

No. Admn/DAO-DIK/2023-24/ 10737

Dated. 08/01/2024.

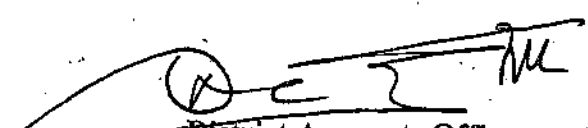
To,


✓ The Section Officer (Management Cadre),  
Elementary & Secondary Education  
Govt of Khyber Pakhtunkhwa, Peshawar.

SUBJECT: VERIFICATION OF SALARY DRAWN BY MST. SHAMSHAD BIBI EX-SDEO (F) PAHARPUR.

Memo;

Kindly refer to your letter No. SO (MC) E&SED/4-16/2024/SDEO (F)/Paharpur/Shamahad Bibi dated 05.01.2024 and to state that the monthly salary SAP System generated report in respect of above officer drawn at DDO Code DI6216 wef 01.11.2021 to 30.11.2023 is enclosed as desired please.

  
District Accounts Officer  
Dera Ismail Khan

  
District Account Officer  
D.I.Khan

Annex - E-ii

0

Selection / Personnel number: [ ]  
 all results from: [ ]

Personnel numbers selected: [ ]

Payroll Results SHAMSHAD BIBI / Other Countries

| RA | Pers.No | Name          |
|----|---------|---------------|
|    | 188304  | SHAMSHAD BIBI |

| Start of P | P  | End of P   | Date       | Time     | OC Payme | Void date | Void ti |
|------------|----|------------|------------|----------|----------|-----------|---------|
| 01.06.2021 | TK | 30.06.2021 | 27.06.2021 | 10:45:38 |          |           |         |
| 01.07.2021 | TK | 31.07.2021 | 14.07.2021 | 18:25:02 |          |           |         |
| 01.08.2021 | TK | 31.08.2021 | 30.08.2021 | 12:06:20 |          |           |         |
| 01.09.2021 | TK | 30.09.2021 | 29.09.2021 | 11:58:21 |          |           |         |
| 01.10.2021 | TK | 31.10.2021 | 28.10.2021 | 16:08:23 |          |           |         |
| 01.11.2021 | DI | 30.11.2021 | 24.11.2021 | 11:39:52 |          |           |         |
| 01.12.2021 | DI | 31.12.2021 | 19.12.2021 | 21:27:58 |          |           |         |
| 01.01.2022 | DI | 31.01.2022 | 24.01.2022 | 20:27:24 |          |           |         |
| 01.02.2022 | DI | 28.02.2022 | 21.02.2022 | 16:50:58 |          |           |         |
| 01.03.2022 | DI | 31.03.2022 | 23.03.2022 | 16:47:18 |          |           |         |
| 01.04.2022 | DI | 30.04.2022 | 20.04.2022 | 04:53:53 |          |           |         |
| 01.05.2022 | DI | 31.05.2022 | 26.05.2022 | 20:01:55 |          |           |         |
| 01.06.2022 | DI | 30.06.2022 | 22.06.2022 | 19:01:30 |          |           |         |
| 01.07.2022 | DI | 31.07.2022 | 26.07.2022 | 16:21:09 |          |           |         |
| 01.08.2022 | DI | 31.08.2022 | 28.08.2022 | 15:55:38 |          |           |         |
| 01.09.2022 | DI | 30.09.2022 | 29.09.2022 | 20:47:49 |          |           |         |
| 01.10.2022 | DI | 31.10.2022 | 27.10.2022 | 17:14:25 |          |           |         |

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Annex - E iii

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Personnel number

all results from



Personnel numbers selected

| R                                   | Pers No | Name          |
|-------------------------------------|---------|---------------|
| <input checked="" type="checkbox"/> | 188304  | SHAMSHAD BIBI |



Payroll Results SHAMSHAD BIBI / Other Countries

| Start P    | P  | End of In-P | Date       | Time     | OC Payme | Void date | Void |
|------------|----|-------------|------------|----------|----------|-----------|------|
| 01.07.2022 | DI | 31.07.2022  | 26.07.2022 | 16:21:09 |          |           |      |
| 01.08.2022 | DI | 31.08.2022  | 28.08.2022 | 15:55:38 |          |           |      |
| 01.09.2022 | DI | 30.09.2022  | 29.09.2022 | 20:47:49 |          |           |      |
| 01.10.2022 | DI | 31.10.2022  | 27.10.2022 | 17:14:25 |          |           |      |
| 01.11.2022 | DI | 30.11.2022  | 29.11.2022 | 18:27:08 |          |           |      |
| 01.12.2022 | DI | 31.12.2022  | 28.12.2022 | 16:52:47 |          |           |      |
| 01.01.2023 | DI | 31.01.2023  | 27.01.2023 | 17:53:36 |          |           |      |
| 01.02.2023 | DI | 28.02.2023  | 26.02.2023 | 20:45:18 |          |           |      |
| 01.03.2023 | DI | 31.03.2023  | 30.03.2023 | 11:36:55 |          |           |      |
| 01.04.2023 | DI | 30.04.2023  | 16.04.2023 | 15:55:14 |          |           |      |
| 01.05.2023 | DI | 31.05.2023  | 26.05.2023 | 21:19:10 |          |           |      |
| 01.06.2023 | DI | 30.06.2023  | 23.06.2023 | 08:47:16 |          |           |      |
| 01.07.2023 | DI | 31.07.2023  | 26.07.2023 | 19:34:24 |          |           |      |
| 01.08.2023 | DI | 31.08.2023  | 26.08.2023 | 12:10:54 |          |           |      |
| 01.09.2023 | DI | 30.09.2023  | 27.09.2023 | 00:28:54 |          |           |      |
| 01.10.2023 | DI | 31.10.2023  | 28.10.2023 | 14:57:14 |          |           |      |
| 01.11.2023 | DI | 30.11.2023  | 27.11.2023 | 21:35:09 |          |           |      |