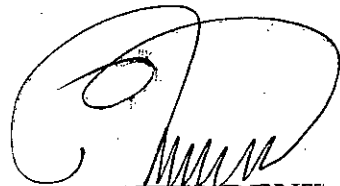


Cost of Rs. 5000/2 received in Service Appeal No. 1481/23,

Titled Shahnaz Begum VS. Edy

in the office of Superintendent Vide Order 18/3/2024.

Dated: 08 / 04 / 2024.



SUPERINTENDENT

Khyber Pakhtunkhwa

Service Tribunal, Peshawar

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE
TRIBUNAL PESHAWAR.**

Service Appeal No: 1481/2023

**Shahnaz Begum, Principal (BS-18), GGHS Wad Pagga,
Peshawar.....Appellant.**

VERSUS

The Secretary (E&SED) KP Peshawar & others.....Respondent

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**SAMINA ALTAF
DIRECTOR**

E&SE Department Khyber
Pakhtunkhwa, Peshawar.

16-09-24
Peshawar
S.B.

①

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE
TRIBUNAL PESHAWAR.**

Service Appeal No: 1481/2023

**Shahnaz Begum, Principal (BS-18), GGHS Wad Pagga,
Peshawar.....Appellant.**

VERSUS

The Secretary (E&SED) KP Peshawar & others.....Respondent

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1 to 3.

Respectfully Sheweth:-

The Respondents No. 1 to 3 submit as under: -

Khyber Pakhtunkhwa
Service Tribunal

Dary No. 12170

Dated 08-04-2024

PRELIMINARY OBJECTIONS.

- 1 That** the Appellant has got no cause of action/locus standi to file in the instant case before this Honorable Bench.
- 2 That** the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act-1974 read with Article 212 of the constitution of Islamic Republic of Pakistan, 1973.
- 3 That** the Appellant has concealed material facts & record from the ambit of this Honorable Tribunal in the titled case.
- 4 That** the Appellant has not come to this Honorable Tribunal with clean hands.
- 5 That** the matter in hand is based on mala fide intentions for gaining illegal service benefits of selection grade from the Department against the principal in BS-18 post in violation of Rules & Policy.
- 6 That** the titled case is not only barred by law and limitation Act 1908 but is also has been filed in violation of provision of CPC 1908 regarding the Res judicata in view of the Judgment dated 26-01-2009 of this Honorable Tribunal in S/A No. 1087/2007 under the above said titled appeal.
- 7 That** the cited Judgment dated 26-01-2009 has already been implemented by the Department vide Notification dated 31-10-2022, wherein, the issue of selection grade has been declined by the Department in view of afore said Judgment.

- 8 **That** the appellant has already availed selection grade in BPS-17 vide Notification dated 13-05-2002 against the SET in BPS-17 personal post in the Department w.e.f 12-12-1996.
- 9 **That** the titled case is bad for mis-joinder & non-joinder of the necessary parties to the case.
- 10**That** the appellant is estopped by her own conduct to file the instant case against the Department.
- 11 **That** the matter is not maintainable in its present circumstances and even facts of the case rather the appellant is a habitual litigant against the Department for no good cause of action.
- 12**That** the appellant is not entitled for the grant of Selection grade as she has already availed this benefits w.e.f 12-12-1996 vide Notification dated 13-05-2002 of the Respondent Department.

ON FACTS.

1. **That** Para-1 pertains to the service record of the appellant regarding his appointment as an untrained SET Science on fixed pay vide Notification dated 09-04-1990 & was then appointed on regular basis as SET on dated 04-05-1991 upon her acquiring the B.Ed Degree on 08-11-1990.
2. **That** Para-2 is correct to the extent of the award of graded pay w.e.f 08-11-1990 in compliance of the Judgment dated 16-07-1996 of this Honorable Tribunal in S/A No. 99/1996 under the above said case titled.
3. **That** para-3 is also correct to the extent of grant of seniority w.e.f 08-11-1990 in view of the Judgment dated 26-01-2009 of this Honorable Tribunal in S/A No. 1087/2007 case titled Shahnaz Begum VS Govt: vide Notification No. 4935-40 dated 31-10-2022, wherein, the issue for the grant of selection grade has been declined by the Department in view of the Notification dated 13-05-2002 of the Respondent Department, whereby, the same has already been awarded to the appellant w.e.f 12-12-1996, hence, the claim of the appellant regarding the grant of selection grade w.e.f 01-10-1997 in the titled appeal is in violation of the provision of Res Judicata of CPC 1908 (***Copies of the Judgment dated 26-01-2009 & Notification dated 13-05-2002 are Annex-A & B).***)
4. **That** Para-4 is mis-leading on the grounds that as per Para-8 of the Judgment dated 26-01-2009 in S/A No. 1087/2007 Shahnaz Begem VS Govt: this Honorable tribunal has observed that **“we therefore accept the present appeal & direct the official respondents to fix the seniority of the appellant as it was on 08-11-1990 with reference to the persons who qualified & were available in service on that date, without reference to the cases of the person who belong to the batch/year of**

passing of B.Ed examination like the appellant but were not in service on 08-11-1990". (Copy of the Judgment is already attached as Annex-A)

5. **That** Para-5 is incorrect that the issue for the grant of selection grade has been declined by the Department in view of the Notification dated 13-05-2002 of the Respondent Department, because the same selection grade has already been awarded to the appellant w.e.f 12-12-1996, hence, the claim of the appellant regarding the grant of selection grade w.e.f 01-10-1997 in the titled appeal is in violation of the provision of Res Judicata of CPC 1908. (Copy of the Notification is already attached as Annex-B)
6. **That** Para-6 is incorrect as the appellant is not an aggrieved person within the meaning of Section-4 of Khyber Pakhtunkhwa Service Tribunal Act-1974 read with Article 212 of the constitution of Islamic Republic of Pakistan 1973 furthermore, the appellant has got no cause of action to file instant appeal nor his filed any Departmental appeal for the grant of selection grade to the Department. therefore, the appeal in hand is liable to be dismissed on the following grounds inter alia: -


GROUND: -


- A. **Incorrect & not admitted.** The stand of the appellant is illegal and liable to be rejected in view of the above cited Notification; hence, the act of the Respondent Department with regard to the non-grant of double selection grade to the appellant is legally competent & liable to be maintained.
- B. **Incorrect & not admitted.** The plea of the appellant is against the facts & relevant provision/rules regarding the award of selection grade, hence, deserves rejection in favor of the Department.
- C. **Incorrect & not admitted.** The statement of the appellant is misconceiving and even against the facts as agitated in the foregoing paras of the reply on behalf of the Respondents.
- D. **Incorrect & not admitted.** The stance of the appellant is illegal & liable to be rejected in favor of the Department in view of the above made submissions by the replying Respondents in the titled appeal before this Honorable Tribunal.
- E. **Incorrect & not admitted.** The appellant has been treated as per law, rules & policy in vogue by the Department as the appellant has already availed the benefit of selection grade in BPS-17 w.e.f 12-12-1996 as evident from the Notification dated 13-05-2002 .Therefore, the claim of the appellant is liable to be rejected with the prayer that the Respondents seek permission to raise additional grounds, record & case law at the time of arguments.

4

Therefore, in view of the above made submissions, the appeal in hand may kindly be rejected in favor of the Department in the interest of justice.

Dated. ___/___/2024.


MASOOD AHMAD
SECRETARY
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 1)


SAMINA ALTAF
DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondents No: 2 & 3)

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal No: 1481/2023

Shahnaz Begum, Principal (BS-18), GGHS Wad Pagga, Peshawar.....Appellant.

VERSUS

The Secretary (E&SED) KP Peshawar & others.....Respondent.

AFFIDAVIT

I, Samina Altaf, Director E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief. It is further stated on oath that in this appeal the answering Respondents have neither been placed Ex-Parte nor their defense has been struck off/~~cost~~.



Samina Altaf
Deponent
SAMINA ALTAF
E&SE Department Khyber
Pakhtunkhwa, Peshawar.

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Annexure "B/C"

BEFORE THE N.W.F.P SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 1087/2007

Date of institution 07.11.2007
Date of decision 26.01.2009



Mst. Shahnaz Begum, SET,
Govt. Girls High School, Hayatabad, Peshawar
R/o Phase-I, Sector D/2, St. No. 59, H/No. 480
Hayatabad, Peshawar.....(Appellant)

VERSUS

1. The Secretary, Schools & Literacy Department, Government of NWFP, Peshawar.
2. The Director, Schools & Literacy Department, Peshawar.
3. Mst. Taslim-un-Nissa SET, GGHS Rech Bench Abbottabad and 367 other SETs.....(Respondents)

APPEAL U/S 4 OF THE NWFP SERVICE TRIBUNALS ACT, 1974 AGAINST THE FINAL SENIORITY LIST OF SETs (FEMALE) AS STOOD ON 31.12.2006, WHEREIN THE NAME OF APPELLANT IS FIGURED AT S.NO. 758 INSTEAD OF S.NO. 390 ABOVE THE NAME OF RESPONDENT NO.3

Mr. Muhammad Adam Khan, Advocate.....For appellant
Mr. Arshad Alam, A.G.P.....For official respondents.
None for private respondents.

Mr. Justice (R) Salim Khan.....Chairman
Mr. Muhammad Farid Qureshi.....Member

JUDGMENT

JUSTICE (R) SALIM KHAN, CHAIRMAN:- Contentions of the appellant are that she was appointed as SET in BPS-15 on fixed pay vide order dated 9.4.1990, her result of B.Ed course was declared on 8.11.1990, her name was enlisted on 25.11.1990 as B.Ed qualified teacher. She was appointed on merit on 4.5.1991 but on fixed pay. She was allowed BPS-16 on 23.5.1995, and she used to receive graded pay vide order dated 23.2.1993 w.e.f 24.1.1991. Vide Service Appeal No. 99 of 1996, this Tribunal decided the case in her favour on 16.7.1996 and the August Supreme Court of Pakistan maintained the judgment of this Tribunal in C.P.No.228-P of 1997 vide judgment/order dated 6.2.1998.

2. The appellant further contended that final seniority list of SETs(Science) Female, as it stood on 31.12.2006, was circulated on 25.1.2007. The name of the appellant was mentioned in that list at S.No. 758 instead of S.No. 390 above the name of Mst.Taslim-un-Nissa (respondent No.3). The appellant submitted departmental appeal on 19.7.2007 which was forwarded vide letters dated

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Peshawar.

EXAMINER
N.W.F.P. Service Tribunal

21.7.2007 and 31.7.2007. But the same had not been finally decided till the filing of this appeal on 07.11.2007.

3. The official respondents contested the appeal and contended that the appellant was initially appointed purely on temporary and ad-hoc basis as stop-gap arrangement on fixed pay, and the appellant accepted the terms and conditions without any objection. It was further contended that the appellant was appointed on fixed pay, alongwith others, after acquiring the required qualification of B.Ed, and the appellant did not object to the terms and conditions of such appointment. They were of the view that the appellant was regularized with other candidates on her own batch-wise/year-wise turn which she accepted accordingly without any hesitation/resistance. They further contended that the judgment of the August Supreme Court of Pakistan was regarding the grant of graded pay from the date of acquiring the requisite qualification.

4. We heard the arguments and perused the record.

5. The basic issues of temporary and ad-hoc appointment and graded pay have already been decided vide judgment in Service Appeal No. 99/1996 decided on 16.7.1996. It was held in that case that the contention that graded pay had been granted to her on her turn on merit did not hold ground because, according to August Supreme Court of Pakistan, if a person working on a post, was fully qualified, he/she was perfectly entitled to get the pay and other monetary benefits attached to that post. It was further held that the appellant was fully qualified, that she was B.Sc, B.Ed and had also passed M.Ed, so her educational qualifications were much more than the required qualification. She had got a spotless service record and had gained sufficient teaching experience at her credit. There was no hurdle for the grant of graded pay to the appellant. It was declared that she was perfectly entitled to grant of graded pay from the date of acquiring the requisite qualification.

6. That judgment, in the light of the judgment in C.P. No. 228-P of 1997, granted by the August Supreme Court of Pakistan, has attained finality. The Civil Petition against that judgment of this Tribunal was dismissed as time-barred because no sufficient cause had been shown for condoning the delay. In the light of the above, it has to be accepted that the services of the appellant were declared regular with effect from the date of her acquiring the higher qualification on 8.11.1990.

7. The respondents contended that the appellant was regularized in

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Peshawar

EXAMINER
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accordance with her batch-wise/year-wise merit. The appellant was entitled to the grant of seniority with effect from 8.11.1990 which is the date of her acquiring the higher qualification. The respondents do not have the right to keep her regularization pending till the appointment of other persons of the same batch. The appellant is entitled to seniority among the persons who were available in service on 8.11.1990. Her seniority cannot be delayed for the purposes of its fixation with reference to the persons who were not then recruited and were not available in service on 8.11.1990.

8. We, therefore, accept the present appeal, and direct the official respondents to fix the seniority of the appellant as it was on 8.11.1990 with reference to the persons who were qualified and were available in service on that date, without reference to the cases of the persons who belonged to the batch/year of passing of B.Ed examination like the appellant but were not in service on 8.11.1990. We leave the parties to bear their own costs.

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Sd/- Justice (R) Salim Ullah
Chairman
Sd/- Muhammad Farid Qureshi
Member

ANNOUNCED
26.01.2009 (IV)

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PRINCIPAL
GGHSS Wadpaga
Peshawar.

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Date of presentation of application	17-2-09
Number of words	1200
Copying fee	8
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Total	10
Date of copyist	17-2-09
Date of completion of copy	17-2-09
Date of delivery of copy	17-2-09

OFFICE OF THE DIRECTOR SECONDARY EDUCATION NWFP PESHAWAR

NOTIFICATION

The Governor N.W.F.P in Consultation with the Departmental Promotion Committee is pleased to award BPS-17 as Selection Grade to the following Senior English Teacher BPS-16 with effect from the dates noted against each: -

S.No	Name / Father Name / Schools.	Date of award of s/Grade B-17
1	Naseem Ara D/O Muhammad Naem BA, Bed, GGHS, Haji Abad, Dir	18/11/96
2	Mumlikat D/O Safdar Khan, BA, Bed GGHS Lund Khawar (Mardan)	05/12/96
3	Jehan Ara Begum D/O Hamid Jalal, BA, Bed, ASDEO(F) Chitral	05/12/96
4	Naheed Akhtar D/O Ghulam Yasin, BA, Bed, GGHS No.1 Bannu	05/12/96
5	Roshan Jehan Bibi D/O Ghulam Rasul, BA, Bed, GGMS: Miltha Pur D.I.khan	10/12/96
6	Shahnaz Begum D/O Sultan Muhammad, MSc, B.Ed ADO(F) Peshawar Now working on deputation F.G Secy: School Qadiazim University colony Islamabad	12/12/96
7	Rehana Kousar D/O Mirza Ashraf, BA, B.Ed GGMS, Kotewali (A/Abad)	01/04/97
8	Naheed Fida D/O Fida Muhammad, MA, B.Ed, GGHS, NO:1, Haripur	01/04/97
9	Hasina Shaheen D/O Muhammad Yaqub BA, B.Ed, GGHS, KT-Ship No.2 (Haripur)	01/04/97
10	Bibi Nighat Ara Begum D/O Habibur Rehman, BA, B.Ed, GGMS, Batagram	01/04/97
11	Nasreen Akhtar GGHS Kot Najib ullah Haripur	01/04/97
12	Shahida Nasreen D/O S.Muhammad Yousof, BA, B.Ed, GGHS, Toru(Mardan)	01/04/97
13	Masoom Jan D/O Pir Fazle Rauf, BA, B.Ed, GGHS, Takht Bhai (Mardan)	01/04/97
14	Saeeda Begum D/O Muhammad Afzal, BA, B.Ed, GGHS, T/Bhai (Mardan)	01/04/97
15	Riffat Naz I/C SS D/O Said Mohibullah, M Sc B.Ed, GGHS, Mathra Peshawar	01/07/97
16	Farhat Akhter D/O Abdur Rahim, B.Sc B Ed, GGHS, Chamkani(Peshawar)	26/8/97
17	Mamoona Hamid Lodhi I/C SS D/O Abd ul Hamid Lodhi, M.Sc, B.Ed, GGHS, Comp: A/A	01/09/97
18	Lubna Tabassum D/O Faqir Hussain, B. Sc, B.Ed, GGHS, Utmanzai (Chd)	1/09/97

Seniority List No

- 216
- 217
- 218
- 219
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- 222
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- 225
- 226
- 227
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- 230
- 232
- 233

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Signature Begum
Abdullah Khan

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seniority list

No

19	Shahida Begum I/C SS D/O Abdul Qudus, B.Sc B.Ed, GGHS, Shahdand Baba Mardan	26/9/1997
20	Farzana Shaheen D/Omalik Ishaq Hussain B.Sc, B.Ed, GGHS Akberpura Nowshera.	01/10/97
21	Zahida Begum Afridi D/O Alam Khan Afridi MA, B.Ed, GGMS Karighar Garhi Khyber Agency	01/10/97
22	Saleema Begum D/O.muhammad Sharif BA,B.Ed, GGMS, Kotika Ghaffar (Bannu)	01/10/97
23	Shafiqat Rana D/O Syed Tajdar Hussain, M.Sc,B.Ed, GGHS, No.2 (Kohat)	01/10/97
24	Naneed Haicer I/C SS D/Ohaider Hussain, M.A, B.Ed, GGHS, Babri Banda (Kohat)	01/10/97
25	Mumtaz Bibi D/O Gul Mar Jan, BA, B.Ed, GGHS, Saleh Khan Mundan (Bannu)	01/10/97
26	Shahida Naseem D/O Habibur Rehman BA,B.Ed, GGHS, NO:2, Bannu.	01/10/97
27	Nighat Yasmin D/O Haq Nawaz Gndapur BA,B.Ed ADEO(F) D.I.Khan	01/10/97
28	Snaheera Yasmin D/O Abdur Rehman, B.Sc, B.Ed, GGHS, Shakardara(Kohat)	01/10/97
29	Saeeda Sultana D/O Khuda Baksh B.Sc, B.Ed, GGHS, NO:1, D.I.Khan	01/10/97
30	Naghma Sherin D/O Muhd: Akram Khan B.Sc, B. Ed, GGHS, No.4 (D.I.Khan)	01/10/97
31	Zahida Nasreen D/O Fateh Muhammad BA,B.Ed, GGHS, Badrashi (Nowshera).	01/10/97
32	Nasreen Noor D/O Noor Mohammad BA,B.Ed, GGMS, Koper Malakand Agency	01/10/97
33	Saeeda Begum D/Omuhammad Durani BA,B.Ed, ADEO(F) Chitral	1/10/1997
34	Zeenat Begum D/Omuhammad Zareen, BA,B.Ed, GGHS, No.1 Mangora (Swat)	25/10/1997
35	Mamoor a d/O Rasul Shah, BA,B.Ed GGHS, Pacha Kalay (Buneeer)	25/10/1997
36	Shamim Akhtar D/O Muhar Jan, BA,B.Ed GGHS Manglor (Swat)	1/11/1997
37	Parveen Akhter D/O Sultana Mohammad BA,B.Ed, ADEO(F) Prry: Swat,	4/11/1997
38	Zaibul Haram D/O Muhd: Aslam Khan BA,B.Ed, GGHS, Dargai (Mkd: Agency)	01/04/98
39	Zohra D O bali Khan, B.Sc, B.Ed, GGMS, Zana Gram (Chitral)	01/04/98
40	Nasim Akhter D/O Allah: Dad Khan, BA B.Ed, GGHS, Jawan Sherh (A/Abad)	01/04/98
41	Madni Kousar D/O Abdul Razaq, MA, B.Ed GGHS, Pakatoot (Peshawar)	01/04/98
42	Johar T. J D/O Khan Gul, BA,B.Ed, ASDEO(F) Charsada.	01/04/98
43	Gohar Juna D/O Ali Sarwar, BA,B.Ed GGHS, Panyala (D.I.Khan)	01/4/98
44	Rukhsana Begum D/O Ali Haider Khan, BA,B.Ed, GGHS, Sarai Naurang (Bannu)	01/09/98
45	Nighat Ara D/O S.Muhammad Ali, S.E.T GGHS, Serai Naurang (Bannu)	01/09/98

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3	Asma Malik D/O Malik Noor Muhammad, SET, GGHS No.1 (Haripur)	01/09/98	262
7	Amir Aziz D/O Abdul Aziz, SET, BA, B.Ed, O (F) Prg: A/Abad	01/09/98	265
3	Rubina Abbasi D/O Bashir-Ahmd Abbasi, SET, BA,B.Ed, GGHS, No.2 Lakki	01/09/98	263
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0	Attia Firdous D/O S.Muhammad Shah, SET, BA,B.Ed, GGMS, Mir Ahmad Khel (Kohat)	01/09/98	265
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2	Umbreen Iqbal D/O Qazi Muhammad Iqbal BA,B.Ed, GGHS, NO:2, A/Abad	01/09/98	267
3	Nasreen Akhtar D/O Ghulam Hussain, SET BA,B.Ed, GGHS, Seri Kot	01/09/98	268
1	Naeema Begum D/O Muhammad Faridoon Khan, SET, BA, Bed, GGHS, Bala Kot Mansehra	01/9/98	269
	Bibi Amina D/O Syed Muhammad Shah SET, BA, BED, GGHS No.1 Mansehra	01/10/98	270
	Azra Khatoon D/O Nawab Khan, BA,B.Ed GGMS, Shehria Mansehra	01/10/98	271
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	Sajida Bibi D/O Abdur Rashid, M.Sc GGHS, NO: 2, A/Abad	01/11/98	272
	Mussarat Shaheen D/O Ghulam Rasul SET, BA, BED, GGMS, Meelam (Haripur)	01/11/98	273
	Parveen Aziz D/O Abdul Aziz, BA,B.Ed GGHS, Datta (Mansehra)	01/11/98	274
	Parveen Akhter D/O Khan Bad Shah, BA,B.Ed, GGHS, Takhti Nasrati (Karak)	01/11/98	275
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	Bibi Fatima D/O Guleen Khan, BA,B.Ed GGHS, Shakardara (Kohat)	01/11/98	277
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	Shabnam Ara D/O Malik Abdul Sami B.A,B.Ed, GGHS, NO:2, Haripur	01/11/98	279
	Shaheeda Nameer D/O Nameer Khan, BA,B.Ed, GGHS, Jogiwara (Peshawar)	01/11/98	280
	Iqbal Begum D/O Habibullah, SET, BA, B.Ed, GGHS, Pahar pur D.I.Khan	01/11/98	281
	Rashida Begum D/O Ali Abas Khan, BA,B.Ed, GGMS Bund Kuri (D.I.Khan)	01/11/98	282
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	Kanwal Yasmin D/O Malik Mehraban Shah BA,B.Ed, GGHS, Kulachi	01/12/98	284

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72	Farah Dooba D/O Amanullah, SET, BA, B.Ed, GGHS, Takhti Nasrati (Parak)	01/12/98	285
73	Bushran Bibi D/O Haq Nawaz, SET, BA B.Ed, GGMS, Outab Colony Tank	01/12/98	286
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85	Amina Begum D/O Qasim Jan, SET, BA, B.Ed, GGHS Hoti (Mardan)	01/04/99	298
86	Iqbal Sarwat d/omalik Lal Khan, SET BA, B.Ed, GGHS, Nishtar abad Peshawar	01/04/99	299
87	Dr. Niaz Begum D/O Sanullah, SET, BA, B.Ed GGHS, Swabi	01/04/99	300
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89	Kabir Bibi D/O Muhammad Nazim, SET, BA B.Ed, GGHS (Comp.) Peshawar	01/04/99	302
90	Aizania Begum D/O Unab Gul Kaka Khel BA, B.Ed, GGMS, Labour Colony, Mardan	01/04/99	303
91	Nazneen Zubaida D/O Mohabat Shah, SET BA, B.Ed, GGHS, Katlang (Mardan)	01/04/99	304
92	Zaibur Nisa D/O Sadullah Khan, BA, B.Ed GGHS, Irrigation Colony, Peshawar	01/04/99	305
93	Basirat Bano D/O Abdul Aziz, BA, B.Ed GGHS, L. Griffith, Peshawar	01/04/99	306
94	Zeenat Begum D/O Sajid Gul Kaka Khel BA, B.Ed, GGHS, Shergarh Mardan	01/04/99	307
95	Salma Khatoon D/O Muhammad Ramzan BA, B.Ed, GGHS, F.R Colony (DI Khan)	01/04/99	308
96	Shakila D/O Gul Ahmad Khan, SET, BA B.Ed, GGMS, Chiga Lar pakhel F.R Bannu	1/4/1999	309
97	Rahila Tabassum D/O Abdul Haqliq, M.Ed GGHS Gandhian Mansehera	21/05/99	310

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99	Abida Khatoon D/Oiaz Gul, SS MA, M, Ed GGHSS, S.K.Bala (Bannu)	21/05/99
100	Farida Saleem D/O Qazi Muhammad Saleem SET, B.Sc B.Ed, GGMS, Richbhan (Mansehra)	21/05/99
101	Mahar Jehan D/O Mian Qazim Jan, B.Sc, B.Ed, GGHS, Takht Bhai (Mardan)	21/05/99
102	Mehmooda Yasmin D/O Haji Ihsanullah Khan B.Sc, B.Ed, GGHS, Karak	21/05/99
103	Naeema Rana D/O Abdul Salam, SET, B.Sc B.Ed, GGHS, BSD, Peshawar	21/05/99
104	Misbah Sabir D/O Ayub Sabir, SET, B.Sc B.Ed, GGHS Nishter Abad Peshawar	21/05/99
105	Alam Taj D/O Dure Aman Khan, I/C SS M.Sc B.Ed, GGCHSS, Abbottabad	21/05/99
106	Bibi Abida, SET D/O Muhammad Sarwar GGHS, Shahbaz Ghari, Mardan	21/05/99
107	Raham Pari SET D/O Taj Mohammad, B.Sc, B.Ed, GGCHSS, Peshawar	21/05/99
108	Fouzia Rahim D/O Abdul Rahim, SET, M.Sc B.Ed, GGHS, Gul Bahar (Peshawar)	21/05/99
109	Siyyara Begum D/Olail I/C SS MA, B.Ed, GGHS, Kalu Khan (Mardan)	21/05/99
110	Nasreen Tabassum I/C SS D/O Sher Afzal Khan, SET, BSc, B.Ed GGCHSS, (A.Abad)	21/05/99
111	Rizwan Jabeen D/O Muhammad Behram, SET BSc, BEd GGHS No.1 (DIK)	21/05/99
112	Ziaqat Begum D/O Abdur Rahman, SET, BSc B.Ed GGMS, Panj Pir Mardan	21/05/99
113	Hajira Bibi D/O Haidar Zaman, SET, BA, Bed GGMS, Tofkian (Haripur)	21/05/99
114	Nahid Fatima D/o S. Munawar Hussain Shah BA, B.Ed, GGHS, Salhad (A.Abad)	21/05/99
115	Rukhsana Zia D/o Mohammad Ziaul Islam SET BA B-Ed GGHS Khnpur (Haripur)	21/5/99
116	Nuzhat Toqir D/O Muhammad Miskin Khan, SE BA, B.Ed, GGHS, No.1 Mansehera	21/05/99
117	Mst. Shahgulfa D/o Qalunder Khan SET BA B-Ed A DEO (F) Abbottabad	21/5/1999
118	Salma Shaheen D/O Raja Mohammad Iqbal SET, BA, B.Ed, GGHS, NO.1, A/Abad	21/05/99
119	Zahida Nasreen D/O Najmuddin Ahmad, SET BA, B.Ed, GGHS, No.1 Mansehera	21/05/99
120	Sajida Bibi D/O Hakim Khan, SET, BA, B.Ed GGHS Dhodial Mansehera	21/05/99
121	Bibi Bilqis D/O Mohammad Sarwar, SET BA, B.Ed, GGMS, Joulian Haripur,	21/05/99
122	Sabiha Naz D/O Ali Asghar, SET, MA, B.Ed, GGHS, Kakul (A.Abad)	21/05/99
123	Yasmin Ara D/O Haji Numir Khan, SET, BA, B.Ed, GGMS, Wazir Bagh Peshawar	21/05/99

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123	Bushra Naeem D/O Fazluddin, SET, B.Sc, B.Ed, C.G.I.S.S, Shaidu (Nowshora)	21/05/99	336
124	Bibi Rizwana D/O S. Kandar KJhan, SET BA,B.Ed, GGHS, Sadda Kurim Agency,	21/05/99	337
125	Farcesia Akhtar D/O S D/O Muhammad Aslam Khan SET MSc B.Ed GGHS Nowshora Kalan	21/5/99	
126	Farhad Yousaf D/O Mohammad Yousaf, MSc B.Ed, GGHS, Lund Khawar now principal GGHS Shakhakot Mkd	21/05/99	338
127	Malika Alizbeth D/O Nazar Aji, Bsc, B.Ed AAEO (F) (K.Agency)	21/05/99	339
128	Bibi Mujahida Parveen D/O Maqbool Shah SET, MA, B.Ed, GGI S, Hangu (R.Adjusted)	21/05/99	341
129	Bibi Aziz Fatima D/O Mohammad Hussain Shah, SET, BA, B.Ed GGMS, K.D.A Kohat	21/05/99	342
130	Zeenat D/O Ali Zaman, SEYT, BA, B.Ed GGHS, Kunj (Abbottabad)	21/05/99	343
131	Saeeda Begum D/O Muhammad Rehman, SET, BA, b.Ed, GGI S, NO:2, A/Abad	21/05/99	344
132	Anjuman Ara D/O Qazi Mohammad Ashraf SET BA, B.Ed, GGHS, Sarai Saleh(Haripur)	21/05/99	345
133	Inuzhat Perveen D/O Muhammad Iqbal SET BA B-Ed GGMS Mohandri Mansehera	21/5/99	347
134	Zeenat Nisa D/O Wasihullah, SET, BA, B.Ed GGHS, Tranori Bari Mansehera	21/05/99	348
135	Asia Khatoon D/O Abdul Rehman, SET, B.Ed GGHS, Darband	21/05/99	349
136	Pabia Mastoor D/O Naseer Khan, S.E.T BA, B.Ed, GGHS, Seri Kot	21/05/99	350
137	Samina Ghani D/O Sher Ghani, BA, B.Ed, GGHS, Universit Town Peshawar	21/05/99	351
138	Farzana Bano D/O Abdullah Jan, SET, BA B.Ed, GGHS, Civil Quarter, Peshawar	21/05/99	352
139	Rehana Parveen D/O Muhammad Yousaf, SET, MA, B.Ed, GGHS, Marghuz Swabi	21/05/99	353
140	Saeeda Begum D/O Abdul Hayee, SET, BA, B.Ed, GGMS, Narai Kal Shah	21/05/99	355
141	Khasiyat Begum D/O Abdul Qadir, SET, BA, B.Ed, GGHS, Zaida Swabi	21/05/99	356
142	Naseem Akhter D/O Abdur Rab, SET, BA B.Ed, GGHS, Akbar Aba J, Mardan	21/05/99	357
143	Rashida Begum D/O Munawar Khan, SET BA, B.Ed, GGMS, Bughdada NO:1, Mardan	21/05/99	358
144	Sirajud Nisa D/O Fohabat Khan, SET BA, B.Ed, GGHS, Chitral	21/05/99	359

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	Farwir Akhter D/O Ghulam Qadir Shah; SET B.Sc, Bed, GGHS, NO:1, A. Abad	21/05/99	361
146	Rizwana Saeed I/C SS D/O Muhammd Ashraf, SET BA, B.Ed, GGHS, Malik Pura	21/05/99	362
147	Mumlikat Bibi D/O Saeed Malook, SET BA, B.Ed, ASDEO(F) Batkhela	21/05/99	363
148	Hamida Bibi D/P. Ghulam Sarwar, SET BA, B.Ed GGHS, Hajia Abad	21/05/99	364
149	Zainab Begum D/O Mamood, SET, MA, B.Sc, B. Ed, GGHS, Chakdara	21/05/99	365
150	Shaheen D/O Abdul Jalil, BA, B.Ed, GGHS, Taimargara Dir	21/05/99	366
151	Nuzhat Fatima D/O Ghayasuddin, MA, B.Ed SI T, GGHS, Risalpur NSR	21/05/99	369
152	Imtiaz Begum D/O Haji Ahmad Gul; SET MA, B.Ed, GGHS, Khair Abad NSR	21/05/99	370
153	Saeeda Tun Nisa D/O Hussain Ali Shah SET, BA, B.Ed, GGMS, Choudwan(DIK)	21/05/99	372
154	Farhat Jehan D/O Abdul Aziz, SET, BA, B.Ed, GGHS, Togh Bala (Fohat)	21/05/99	373
155	Kousar Shaheen D/c Rokhan Afridi I/c SS GGHSS Umarzai Charsadda	21/05/99	

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DIRECTOR SECONDARY EDUCATION
N.W.F.P, PESHAWAR.

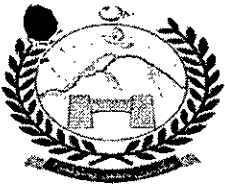
Urdsst: No. 1008-1370 /General /Selection /Grade/SET (F) W-II Dated Peshawar the 13th May 2002

- 1 Copy of the above is forwarded for information and necessary action to the
- 2 Accountant General NWFP, Peshawar.
- 3 Director Primary Education & Literacy NWFP, Peshawar.
- 4 Director of Education (FATA) NWFP, Peshawar.
- 5 Director General of Education Federal Government Islamabad.
- 6 Section Officer (Schools) Education and Literacy Government of NWFP,
- 7 Peshawar with reference to his letter No. SO (S) 2-4/2002/Minuts dated
- 8 23/4/2002
- 9 PS to Secretary Education NWFP, Peshawar.
- 10 All Executive District Officer Education & Literacy in NWFP.
- 11 All District Accounts Officer in NWFP.
- 12 Agency Accounts Officer concerned.
- 13 Agency Education Officer concerned.
- 14 Principal / Headmistress concerned.
- 15 Deputy District Officer (F) concerned.
- 16 Officials concerned.
- 17 P.A to D. S. E NWFP, Peshawar.

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[Signature]
DEPUTY DIRECTRESS
Secondary Education NWFP
Peshawar



**DIRECTORATE ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.**

AUTHORITY LETTER

I, Samina Altaf, Director (E&SE) Khyber Pakhtunkhwa Peshawar do hereby authorized Mr. Muhammad Rizwan, Assistant Director Litigation-II of this Directorate for submission of Joint Parawise Comments in **Service Appeal No. 1481/2023** case titled **Shahnaz Begum Vs Government of Khyber Pakhtunkhwa & others**, hence, an authority letter is hereby issued in favor of the above-named officer.

Samina Altaf
(Samina Altaf)
DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar