

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

C.M. No. _____/2024

In

Service Appeal No.1959/2023

Mst Zahida Parveen.....Appellant

V E R S U S

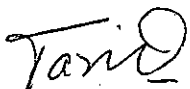

The Secretary to Government of Khyber Pakhtunkhwa E&SE,
Peshawar & Others

.....Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Application for additional documents		1-2
2.	Affidavit		3
3.	Copies of relevant documents		4- 8

Through Appellant


Tariq Kamal
& 
Muhammad Alamzeb Khan
Advocates, High Court
Cell#0301-5932818

Dated 27.03.2024

Next date
3/6/2024
DB Peshawar

①

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

C.M. No. _____/2024
In
Service Appeal No.1959/2023

Khyber Pakhtunkhwa
Service Tribunal
Case No. 11996
Dated 29/3/24

Mst Zahida Parveen.....Appellant

V E R S U S

The Secretary to Government of Khyber Pakhtunkhwa E&SE,
Peshawar & Others

.....Respondents

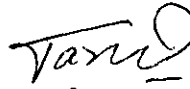

**Application for place on file
additional document in the above
mentioned Service Appeal.**

Respectfully Sheweth:

1. That the above titled Service Appeal is pending for adjudication before this Honourable Tribunal on 28.03.2024.
2. That the following additional documents accompanied herewith are necessary for just and proper disposal of the above titled Service Appeal.
3. That there is no legal bar in bringing on record the documents necessary for just conclusion of the case.

It is, therefore, most humbly prayed that on acceptance of this application, the above mentioned additional documents may kindly be considered part and parcel of the above mentioned Service Appeal and same may kindly be included in the main petition.

Appellant
Through


Tariq Kamal
& 
Muhammad Alamzeb Khan
Advocates, High Court
Cell#0301-5932818

Dated 27.03.2024

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

C.M. No. _____/2024
In
Service Appeal No.1959/2023

Mst Zahida Parveen.....**Appellant**

VERSUS

The Secretary to Government of Khyber Pakhtunkhwa E&SE,
Peshawar & Others

.....**Respondents**

AFFIDAVIT

I, Mst Zahida Parveen , do hereby solemnly affirm and declare on oath that the contents of the **Application** are true and correct and nothing has been concealed from this Hon'ble Court.

Identified By.

Muhammad Manzoor Khan

[Signature]

DEPONENT



[Signature]

29.3-24

Today, 4:12 pm

The District Education Officer,

(Female) Karak

Subject: - APPOINTMENT OF MISS NATASHA RAZA, MISS MEHTAB NAZIR AND NAJMA US SAHAR
PSTs.

Memo: -

It is stated for your kind information that the above named PSTs were appointed on Deceased/Medical Board Quota. Some Facts/Points are brought into your notice are as under.

1. Miss Natasha Raza D/O Late Muhammad Raziq CNIC No. 14203-9867279-0 PST GGPS Tattar Khel No.02 (Karak) has been appointed as a PST B-12 under the Provision of rules 10 (4) Existing policy of the provincial policy of the Government of Khyber Pakhtunkhwa in Deceased/ Medical Board Daughter Quota at GGPS Tattar Khel Vide DEO (F) Karak Endst: No. 7498-500/AE-II/ Apptt:/ PST Dated 26.6.2023.
 - i. She got a Certificate signed by Secretary Village council Tattar Khel Karak on 12.07.2023 that she is personally known to me and still un-married till to date.
 - ii. An another Certificate got from Addl: deputy Commissioner Karak that she is customarily separated from her husband and fully depended and residing at her parents' home Vide No. 3910/DC/EA Dated 22.9.2023.
 - iii. These Both Certificates have been obtained after the date of her appointment and these Certificates are contradictions of each other.
2. Miss Mehtab Nazir D/O Pto Zada Ex-PSHT CNIC No. 14203-0269041-4 PST GGPS Warana Mashan Khel (Karak) has been appointed as a PST B-12 under the Provision of rules 10 (4) Existing policy of the provincial policy of the Government of Khyber Pakhtunkhwa in Deceased/ Medical Board Daughter Quota at GGPS Warana Mashan Khel Vide DEO (F) Karak Endst: No. 1322-25/AE-II/ Apptt:/ PST Dated 18.01.2023.
 - i. She got a Certificate from Addl: deputy Commissioner Karak that she is customarily separated from her husband and fully depended and residing at her parents' home Vide No. 4374/DC/EA Dated 25.10.2023. While this Certificate has been obtained after 10 months later from the date of her appointment. How it is acceptable.

(Contd: on Page-02)

Attested
Tariq

28/3/24

2

To,

The District Education Officer,

(Female) Karak

Subject:- **APPOINTMENT OF MISS NATASHA RAZA, MISS MEHTAB NAZIR AND NAJMA US SAHAR PSTS.**

Memo:-

It is stated for your kind information that the above named PSTs were appointed on Deceased/Medical Board Quota. Some Facts/Points are brought into your notice are as under:-

1. **Miss Natasha Raza** D/O Late Muhammad Raziq CNIC No.14203-9867279-0 PST GGPS Tattar Khel No.02 (Karak) has been appointed as a PST B-12 under the Provision of rules 10 (4) Existing policy of the provincial policy of the Government of Khyber Pakhtunkhwa in Deceased/Medical Board Daughter Quota at GGPS Tattar Khel vide DEO (F) Karak Endst: No.7498-500/AE-II/Apptt:/PST dated:26.6.2023.
 - (i) She got a Certificate signed by Secretary Village Council Tattar Khel Karak on 12.07.2023 she is personally known to me and still un-married till to date.
 - (ii) An another Certificate got from Addl: Deputy Commissioner Karak that she is customarily separated from her husband and fully depended and residing at her parent's home Vide No.3910/DC/EA Dated:22.09.2023
 - (iii) These both Certificates have been obtained after the date of her appointment and these Certificates are contradictions of each other.
2. **Miss Mehtab Nazir** D/O Pio Zada Ex-PSHT CNIC No.14203-0269041-4 PST GGPS Warana Mashan Khel (Karak) has been appointed as a PST B-12 under Provision of rules 10 (4) Existing policy of the provincially policy of the Government of Khyber Pakhtunkhwa in Decesed/Medical Board Daughter Quota at GGPS Warana Mashan Khel Vide CEO (F) Karak Endst No.1322-25/AE-II/Apptt/PST Dated:18.01.2023.
 - i. She got a Certificate from Addl: Deputy Commissioner Karak that she is customarily separated from her husband and fully depended and residing at her parent's home vide No.4374/DC/EA Dated:25.10.2023. While this Certificate has been obtained after 10 months later from the date of her appointment. How is acceptable.

Attested
Jorio
28/3/2024



OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) KARAK

Address: KDA Karak

Phone: 0927-291177
Email: emskarak@yahoo.com

6

APPOINTMENT

Under the provision of rule-10 (4) of the Government of NWFP Civil Servants (Appointment, Promotion & Transfer) Rules 1979 and further Amended by the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) Notification No SO (R-VI) TRA/1-3/2015 dated 19/4/2016, Miss MARSA IQEEL D/O LATE FAHMIDA TUJIL CNIC NO. 1-203-9135268-0 is hereby appointed against the vacant post of PST RPS 12 at GGPS GHUNDI KILLA (CRS, 19770-1430-02670) plus usual allowances as admissible under the rules and existing policy of the Provincial Policy of the Provincial Government, in (Deceased/Medical Board/Son/Daughter/Wife Quota) on the terms & condition given below with effect from the date of her taking over charge -

TERMS & CONDITION

1. No TA/DA etc is allowed
2. Charge reports should be submitted to all concerned in duplicate
3. She should not be handed over charge if she exceed 35 years or below 18 years of age
4. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned). Anyone found producing bogus certificate will be reported to the law enforcing agencies for further action and appointment will stand withdrawn
5. Her services are liable to termination on one month's notice from either side in case of resignation without notice her one month pay/allowances shall be forfeited to the Government
6. Her pay will not be drawn until and unless verification of the Degrees of the appointee are verified from the concerned Boards/Universities by this office and her pay will be released properly with the signature of the undersigned.
7. The Appointee should join her post within 15 days of the issuance of this notification. In case of failure, her Appointment will expire automatically and no subsequent Appeal etc shall be entertained.
8. Health & Age certificate should be produced from the Medical Superintendent concerned before taking over charge
9. She will be governed by such rule & regulation as may be issued from time to time by the Government
10. Her services shall be terminated at any time, in case her performance as found unsatisfactory during her contract period. In case misconduct, she will be proceeded under the rules framed from time to time
11. Her pay will be drawn w.e from her taking over charge
12. In case it is identified that any child/widow of the deceased mentioned in this order has already availed this opportunity, her order will be considered cancelled.
13. The appointee is required to undergo nine (9) months in service mandatory Professional training at Regional Institute for teacher Education, (RITE) OR (PITE).

Attested
Tariq

28/3/2024

DISTRICT EDUCATION OFFICER
(FEMALE) KARAK

Endst: No. 3564-68 /AE-II/Appn/PST dated Karak the 17/3 /2023

Copy for forwarded for information & necessary action to:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar
2. District Accounts Officer Karak with the request that not to draw pay of the officials until and unless of the proper verification & pay release of the undersigned
3. Registrar Peshawar High Court Bannu Bench
4. SDEO (F) T/Nasrati for necessary action.
5. Candidates concerned
6. Master file

Sub: Divi Edu Officer
(F) Takht-o-Nasrati
(Karak)

DISTRICT EDUCATION OFFICER
(FEMALE) KARAK

6

LEGIBLE COPY

**OFFICE OF THE DISTRICT EDUCATION OFFICER
(FEMALE) KARAK**

Phone:0927-291177

Address KDA Karak

Email:emiskarak@yahoo.com

APPOINTMENT

Under the provision of rule-10 (4) of the Government of NWFP Civil Servants (Appointment Promotion & Transfer) Rules, 1989 and further Amended by the Government of Khyber Pakhtunkhwa Establishment Department (Regulation Wing) Notification No.SO(R-VI) E&AD/1-3/2015 dated:19/4/2016, **Miss Hafsa Tofil D/O Late Fahmida Tofil, CNIC No.14203-9135268-0 is hereby appointed against the vacant post of PST BPS-12 at GGPS Ghundi Killa @Rs.19770-1430-62670** plus usual allowances as admissible under the rules and existing policy of the Provincial Policy of the Provincial Government. In **(Deceased/Medical Board/Son/Daghter/Wife Quota)** on the terms & condition given below with effect from the date of taking over charge.

TERMS & CONDITION:-

1. No TA/Da is allowed.
2. Charge reports should be submitted to all concerned in duplicate.
3. She should not be handed over charge is she is exceed 35 years or below 18 years of age.
4. Appointment is subject to the condition that the certificate/documents must be verified from the concerned authorities by the DEO (concerned) Anyone found producing bogus certificate will be reported to the law enforcing agencies for further action and appointment will stand withdrawn.
5. Her services are liable to termination on one month's notice from either side in case of resignation without notice her one month pay/allowances shall be forfeited to the Government.
6. Her pay will not be drawn until and unless verification of the Degrees of the appointee are verified from the concerned Boards/Universities be this office and her pay will be released properly with the signature of the undersigned.
7. The Appointee should join her post within 15 days of the issuance of this notification in case of failure, her appointment will expire automatically and no subsequent Appeal etc shall be entertained.
8. Health & Age certificate should be produced from the Medical Superintendent concerned before taking over charge.
9. She will be governed by such rule & regulation as may be issued from time to time by the Government.
10. Her services shall be terminated at any time, in case her performance as found unsatisfactory during her contract period in case of misconduct, she will be proceeded under the rules framed from time to time.
11. Her pay will be drawn w.e.from her taking over charge.
12. In case it is identified that any child/widow of the deceased mentioned in this order has already availed this opportunity, her order will be considered canceled.
13. The appointee is required to undergo nine (9) months in service mandatory Professional training at Regional Institute for teacher Education, (RITE) OR (PITE).

**DISTRICT EDUCATION OFFICER
(FEMALE) KARAK**

Endst No.3564-68/AE-II/Apptt/PST dated Karak the 17/3/2023.

Copy for forwarded for information & necessary action to:-

1. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
2. District Accounts Officer Karak with the request that not draw pay of the officials until and unless of the proper verification & pay release of the undersigned.
3. Registrar Peshawar High Court Bannu Bench.
4. SDEO (F) T/Nasrati for necessary action.
5. Master file.

**DISTRICT EDUCATION OFFICER
(FEMALE) KARAK**

*Attested
Tamil
28/3/2024*

OFFICE OF THE DEPUTY COMMISSIONER KARAK

Phone: 2022 212274, Fax: 0112 210221 & 210222, E-mail: dco@karak.gov.pk

7

No. 437/DC/LM Certificate
Dated 25-2-2023

To

The District Education Officer (Female)
Karak

Subject

FULLY DEPENDENT CERTIFICATE

Memorandum

Reference to the application submitted by Miss Mehtab Nazir D/o Mst. Pio Zada Ex-PSHT and Wife of Muhammad Sajad R/o Warana Mashan Khel Tehsil Takht-e-Nasrati District Karak

It is submitted that Miss Mehtab Nazir D/o Mst. Pio Zada, Ex-PSHT and Wife of Muhammad Sajad is the real daughter of Mst. Pio Zada Ex-PSHT GGPS Warana Mashan Khel (consistently separated from her husband Muhammad Sajad since long) and fully dependent and residing with her mother duly verified by Field Revenue Staff of Tehsil Takht-e-Nasrati forwarded by Assistant Commissioner Takht-e-Nasrati vide letter No. 800/ACTN dated 24-10-2023 is sent herewith for further necessary action at your end


Addl: Deputy Commissioner (G)
Karak 25/11/23

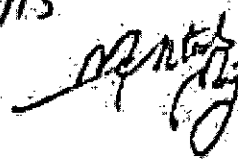
Copy forwarded for information to Miss Mehtab Nazir D/o Mst. Pio Zada, R/o Warana Mashan Khel Tehsil Takht-e-Nasrati District Karak.

Addl: Deputy Commissioner (G)
Karak

Attested
Tariq

28/3/24

سید منیر حفیظ لغوی کرار
2. 03465655115



OFFICE OF THE DEPUTY COMMISSIONER KARAK

No.4374/DC/EA/Certificate

Dated:25.2.2023

To,

The District Education Officer (Female)

Karak

Subject:- **FULLY DEPENDENT CERTIFICATE**

Memo:-

Reference to the application submitted by Miss Mehtab Nazir D/o Pio Zada Ex-PSHT and Wife of Muhammad Sajjad R/O Warana Mashan Khel Tehsil Takht-e-Nasratti District Karak.

It is submitted that Miss Mehtab Nazir D/o Pio Zada Ex-PSHI and Wife of Muhammad Sajjad, is the real daughter of Mst Pio Zada, Ex-PSHT GGPS Warana Mashan Khel (customarily separated from her husband Muhammad Sajjad since long) and fully dependent and residing with her mother duly verified by Field Revenue Staff of Tehsil Takht-e-Nasratti forwarded by Assistant Commissioner Takht-e-Nasratti vide letter No.800/ACTN dated:24.10.2023 is sent herewith for further necessary action at your end.

Addl: Deputy Commissioner (G)**Karak**

Copy forwarded for information to Miss Mehtab Nazir D/O Mst Pio Zada, R/O Warana Mashan Khel Tehsil Takht-e-Nasratti District Karak.

Addl: Deputy Commissioner (G)**Karak**

*Attested
Yarid
28/3/2023*

8

OFFICE OF THE DEPUTY COMMISSIONER KARAK

Office: 0911-710013 Fax: 0911-710024 B. Karak

No. 4539/DC/EA/Certificate

Dated: 06/11/2023

To

The District Education Officer (Female)
Karak

Subject: **FULLY DEPENDENT CERTIFICATE**

Memo:

Reference to the application submitted by Miss Zahida Parveen D/o Muhammad Rauf, Ex PST and Wife of Muhammad Ghayas Ul Islam R/o Zera Banda Tehsil Takht-e-Nasratti District Karak.

It is submitted that Miss Zahida Parveen D/o Muhammad Rauf, Ex-PST and Wife of Muhammad Ghayas Ul Islam, is the real daughter of Muhammad Rauf, Ex-PST GPS Alwargi Banda (customarily separated from her husband Muhammad Ghayas Ul Islam since long) and fully dependent and residing with her mother duly verified by Field Revenue Staff of Tehsil Takht-e-Nasratti forwarded by Assistant Commissioner Takht-e-Nasratti vide letter No. 832/ACTN dated 06/11/2023 is sent herewith for further necessary action at your end.



[Handwritten Signature]
Addl Deputy Commissioner (G)
Karak

CC:-

Miss Zahida Parveen D/o Muhammad Rauf, R/o Zera Banda Tehsil Takht-e-Nasratti District Karak.

Attested
Tariq

28/3/2024 Addl: Deputy Commissioner (G)
Karak

8

LEGIBLE COPY

OFFICE OF THE DEPUTY COMMISSIONER KARAK

No.4538/DC/EA/Certificate

Dated:06.11.2023

To,

The District Education Officer (Female)

Karak

Subject:- **FULLY DEPENDENT CERTIFICATE**

Memo:-

Reference to the application submitted by Miss Zahida Parveen D/o Muhammad Rauf Ex-PSI and Wife of Muhammad Ghayas Ul Islam R/O Zera Banda Tehsil Takht-e-Nasrati District Karak.

It is submitted that Miss Zahida Parveen D/o Muhammad Rauf, Ex-PST and Wife of Muhammad Ghayas Ul Islam, is the real daughter of Muhammad Rauf, Ex-PST GPS Alwargi Banda (customarily separated from her husband Muhammad Ghayas Ul Islam since long) and fully dependent and residing with her mother duly verified by Field Revenue Staff of Tehsil Takht-e-Nasratti forwarded by Assistant Commissioner Takht-e-Nasratti vide letter No.832/ACTN dated:06.11.2023 is sent herewith for further necessary action at your end.

Addl: Deputy Commissioner (G)

Karak

CC:-

Miss Zahida Parveen D/o Muhammad Rauf, R/o Zera Banda Tehsil Takht-e-Nasratti District Karak.

Addl: Deputy Commissioner (G)

Karak

Attested
Tariq

28/3/24