

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

Service Appeal No: 2542/2023

Kiran Sabeen, SS in Urdu BS-17 GGHSS No. 2 MansehraAppellant.

VERSUS

The Chief Secretary KP Peshawar & others.....Respondents.

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SAMINA ALTAF
DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.

26/3

BEFORE THE HONORABLE KHYBER PAKHATUNKHWA SERVICE

TRIBUNAL PESHAWAR.

Service Appeal No: 2542/2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 14/24

Dated 10-07-2024

Kiran Sabeen, SS in Urdu BS-17 GGSS No. 2 MansehraAppellant.

VERSUS

The Chief Secretary KP Peshawar & others.....Respondents.

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

Respectfully Sheweth:-

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

PRELIMINARY OBJECTIONS.

- 1 **That** the Appellant has got no cause of action/locus standi to file in the instant case before this Honorable Service Tribunal.
- 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 seniority from the Department against the SS in Urdu BS-17 post in violation of the mandatory provision of Section-8 of Civil Servants Act, 1973 read with Rule-17 of APT Rules, 1989.
- 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 09-02-2018 of this Honorable Tribunal in S/A No. 818/2023 under the said titled appeal.
- 7 **That** the cited Judgment dated 09-02-2018 has already been implemented by the Department as evident from the Notification dated 02-09-2022 of the Respondent No. 3.

- 8 **That** the appellant has correctly been placed at Seniority No. 282 in the final seniority list dated 05-04-2023 pertaining to the female SS in BS-17 TC of the Respondent Department with no final seniority dated 06-06-2023 is available & notified by the Department till date.
- 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 as the act of the Department with regard to the final seniority list dated 05-04-2023 with reference to S.No. 282 is in accordance with the provision of the Regularization of Services Act, 2009 & liable to be maintained.
- 11 **That** the matter is not maintainable in its present circumstances and even facts of the case as the matter of joint seniority of SS/HM in BS-17 has also been settled down during the meeting held on 05-07-2022 charred by the Respondent -No. 2 being a competent authority in the titled matter as evident from the order sheet dated 20-07-2020 of this Honorable Tribunal vide Notification dated 05-11-2019.
- 12**That** the appellant is not entitled for correction of her seniority as she has correctly been placed at S.No. 282 in the final seniority list dated 05-04-2023 of the Respondent Department.
- 13**That** the appellant was not on the strength of the Department against the SS post in BPS-17 w.e.f 24-09-2009 to 09-05-2012 & has resumed her duty w.e.f 06-12-2012 in the Department.

ON FACTS.

1. **That** Para-1 pertains to the service record of the appellant regarding her appointment against the SS in BPS-17 on contract/fixed pay vide Notification dated 14-04-2007 with reference to Serial No. 112 with her adjustment against the said post at GGHSS Ghari Habibi Ullah Mansehra in the Respondent Department, however, it is important to note that the appellant was not on actual strength/willful absent from duty of the Department as SS w.e.f 24-09-2009 to 09-05-2012, therefore, the said period was treated as period leave without pay by the Respondent No. 2, where against she has filed a S/A No. 818/2023 on 24-04-2013 before this Honorable Tribunal which was decided vide Judgment dated 09-02-2018, whereby, the appellant has been made entitled for the pay. ***(Copies of the Judgment dated 09-02-2018 & order dated 20-07-2020 are Annex A & B).***
2. **That** Para-2 is correct to the extent of the Regularization of Services of the contractual SS in BS-17 vide Notification dated 31-05-2009 except the appellant who was absent from duty w.e.f 24-09-2009 to 09-05-2012

without leave sanction/approval of the competent authority, however, she has filed a S/A No. 818/2023 on 24-04-2013 before this Honorable Tribunal which was decided vide Judgment dated 09-02-2018, whereby, the appellant has been made entitled for the pay by placing reliance on the inquiry report, hence, vide Notification dated 05-11-2019, the Judgment dated 09-02-2018 has been implemented by the Department.

3. **That** para-3 is incorrect & denied on the grounds that no tentative/final seniority list has been notified by the Respondent Department till date, however, as per available record, the Respondent Department has issued final seniority list of female officers in BS-17 TC on 05-04-2023, wherein, the appellant has been placed at S.No. 282 with her qualification of MA, M.Ed, date of birth as 30-03-1981, District Mansehra, date of 1st appointment in Education Department 24-09-2009 with the same date of regularization of services under the Act of 2009 in BPS-17, hence, the claim of the appellant is illegal & liable to be rejected. ***(Copy of the final seniority list dated 05-04-2023 is Annex-C).***
4. **That** Para-4 is also incorrect & mis-leading on the grounds as agitated in Para-3 of the present reply on behalf of the Respondent Department, hence the claim of the appellant regarding the final seniority list dated 06-06-2023 instead of 05-04-2023 as well as filing of Departmental appeal against the seniority list dated 06-06-2023 which is not available nor notified till date by the Department is liable to be rejected in favor of the Department.
5. **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 made submissions in the forgoing paras of the present rely on behalf of the Respondents, hence, the act of the Respondent Department with regard to the final seniority list dated 05-04-2023 is legally competent & liable to be maintained.
- B. **Incorrect & not admitted.** The plea of the appellant is against the facts/record available on file & relevant provision/rules regarding the award of seniority against the SS post in BS-17 with reference to S.No. 282 of the appellant in the final seniority list dated 05-04-2023 of the

Respondent Department, hence, the plea of the appellant 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 by placing her in the final seniority list dated 04-05-2023 at S.No. 282 as against Mst. Nazia Shaheen & Lubna Shaukat who are falling at Seniority No. 188 & 189 respectively with their qualification of MA, M.Ed, dates of birth as 21-11-1975 & 01-12-1975 as against the appellant date of birth as 30-03-1981 shows that both of the afore-mentioned SS are senior to the appellant in terms of age, hence, the plea of the appellant regarding the determination of her seniority on the basis of age is illegal & liable to be rejected.
- F. **Incorrect & not admitted.** The stance of the appellant is illegal & liable to be rejected in favor of the Department.
- G. **Incorrect & not admitted.** The stance of the appellant is illegal & liable to be rejected in favor of the Department as the cited Judgment is not applicable upon the case of the appellant.
- H. **Incorrect & not admitted.** The stance of the appellant is illegal & liable to be rejected in favor of the Department as the act of the Department with regard to the final seniority list dated 05-04-2023 is in legal sphere.
- I. **Incorrect & not admitted.** The stance of the appellant is illegal & liable to be rejected.
- J. **Incorrect & not admitted.** The stance of the appellant is illegal as no final seniority list dated 06-06-2023 has been notified by the Department till date.
- K. **Incorrect & not admitted.** As replied above.
- L. **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.
- M. **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

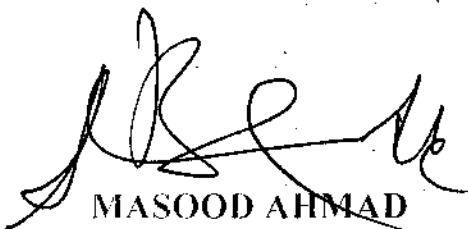
submissions by the replying Respondents in the titled appeal before this Honorable Tribunal.

N. **Incorrect & not admitted.** The plea 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.

O. **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, however, the Respondents seek leave of this Honorable tribunal to submit additional record & case law at the time of arguments on the date fixed please.

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

Dated. ___/___/2024.



**MASOOD AHMAD
SECRETARY**

E&SE Department-Khyber
Pakhtunkhwa, Peshawar.

(Respondents No: ~~2~~ 2)



**SAMINA ALTAF
DIRECTOR**

E&SE Department Khyber
Pakhtunkhwa, Peshawar.
(Respondent No: 3)

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

Service Appeal No: 2542/2023

Kiran Sabeen, SS in Urdu BS-17 GGSS No. 2 MansehraAppellant.

VERSUS

The Chief Secretary KP Peshawar & others.....Respondents.

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.

ATTESTED



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

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 818/2013

Date of Institution ... 29.04.2013

Date of Decision ... 09.02.2018



Kiran Sabeen, S.S (Urdu), GGHSS Behali, Manshra

... (Appellant)

VERSUS

1. The Chief Secretary KPK Peshawar and two others.

... (Respondents)

MR. M. ASIF YOUSAFZAI,
Advocate

... For appellant

MR. MUHAMMAD JAN,
Deputy District Attorney

... For respondents.

MR. NIAZ MUHAMMAD KHAN,
MR. MUHAMMAD AMIN KHAN KUNDI,

CHAIRMAN
MEMBER

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

JUDGMENT

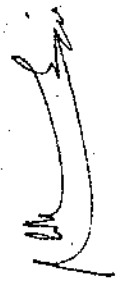
NIAZ MUIHAMMAD KHAN, CHAIRMAN: Arguments of the learned

counsel for the parties heard and record perused.

FACTS

2. The appellant was deputed on contract basis on 14.04.2007 and her contract was extended on 11.09.2008 for one year. During continuance of her contract

period an Act under the name of Khyber Pakhtunkhwa Employees (Regularization of Services) Act, 2009 was promulgated. As per the provisions of this Act she was to be regularized from 24.09.2009 but her name did not appear in the order of regularization. She then filed an application on 18.6.2010 before the appellate authority for the redressal of her grievance. On this application, the matter was referred to the EDO, E&SE, Mansehra and finally on 28.4.2012 the services of the appellant were regularized w.e.f. 24.09.2009. After this order she assumed her duty. But on 06.12.2012 another order was passed by the Secretary, Elementary & Secondary Education, Peshawar treating her period from 24.09.2009 to 09.5.2012 as leave without pay. Against this order, the appellant filed a departmental appeal on 02.1.2013 which was not responded to and thereafter she filed the present service appeal on 29.4.2013.



ARGUMENTS.

3. The learned counsel for the appellant after giving background of the present appeal argued that the appellant was on leave on medical ground for 45 days from 01.11.2008 to 16.12.2008. That she tried to resume her duty after the expiry of that period but the concerned Principal did not allow her to resume her duty. That a departmental enquiry was held on the basis of the departmental appeal of the appellant dated 2.1.2013 and the enquiry officer submitted fact finding report categorically mentioning that the appellant was ill for 45 days and it was the Principal who did not allow her to mark her attendance in attendance register. The enquiry officer also recommended that 45 days medical leave might be granted to the appellant and the remaining period might be treated as leave without pay. That

ATTESTED

[Signature]
 SECRETARY
 KHYBER PAKHTUNKHWA
 SECONDARY EDUCATION

on the basis of the said enquiry, a summary was moved and again the then Secretary Establishment in para-24 opined that the appellant was punished for no fault of her and para-7 of the summary was then approved by the Chief Secretary. That nowhere in para-7 the period of absence was treated as leave without pay. He next argued that the appellant was willing to perform her duty but the concerned Principal did not allow her to resume duty and now the principle of no work no pay would not be attracted in case of the appellant.



4. On the other hand, the learned Deputy District Attorney argued that the very application of the appellant dated 18.6.2010 revealed that the appellant did not perform her duty. That no leave was sanctioned in her favour. That it was rightly ordered that the absence period be treated as leave without pay as it was recommended by the enquiry officer also. That under the principle of no work no pay, the same was rightly refused.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

CONCLUSION.

5. Admittedly, the appellant was in service on the day when the Regularization Act was promulgated. The very regularization order of the appellant, though belatedly, is proof of her being in service. The only question for determination of this Tribunal is whether the appellant was responsible for not resuming her duty in the relevant period for which she was refused salary and that period was treated as leave without pay. The enquiry officer had opined that it was the fault of the Principal concerned and not the appellant for not resuming her duty. She was willing to resume her duty which was denied by the concerned principal. That

portion of the report of the enquiry officer which recommended that the relevant period be treated as leave without pay is not well founded because once the enquiry officer reached the conclusion that it was not the fault of the appellant then how could he propose that the said period be treated as leave without pay. And if the department was of the view that it was the fault of the appellant as argued by the learned Deputy District Attorney that it was the fault of the appellant that she absented herself without any sanction of leave then, of course, the department was duty bound to proceed against her under the disciplinary rules. Non-initiation of disciplinary proceedings itself is a proof that the appellant was not responsible for any misconduct or absence. In the summary in para-6 which was finally approved in para-7 nowhere the recommendation of the enquiry officer regarding withholding of salary was approved.

6. Consequently, this Tribunal reaches the conclusion that the appellant is entitled for the pay for the relevant period. The appeal is therefore, accepted. Parties are left to bear their own costs. File be consigned to the record room.

Muhammad Amin
 (MUHAMMAD AMIN KHAN KUNDI)
 MEMBER

Niaz Muhammad Khan
 (NIAZ MUIHAMMAD KHAN)
 CHAIRMAN

ANNOUNCED
 09.02.2018

Certified to be true copy
 MEMBER
 Khyber Pakhtunkhwa
 Service Tribunal,
 Peshawar

28.04.2020

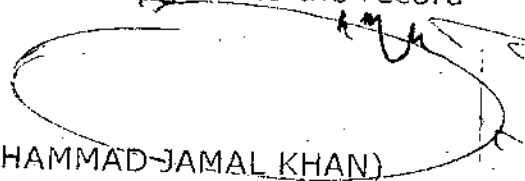
Due to COVID19, the case is adjourned to 20.07.2020 for the same as before.



Reader

20.07.2020

Syed Noman Ali Bukhari, learned counsel for the appellant is present. Mr. Kabirullah Khattak, Additional AG for the respondents is also present. Learned Additional AG submitted before the Tribunal that the judgment of this Tribunal dated 09.02.2018 has been fully implemented by virtue of notification bearing No. SO(S/F)E&SED/4-29/2019/Mst. Kiran Sabeen/SS Urdu dated 5th November 2019 whereby in view of notification in the S.O (G)E&SED/1-85/2012/Kiran Sabeen/SS Urdu dated 06.12.2012 the period from 24.09.2009 to 09.05.2012 of the aforesaid lady Kiran Sabeen S.S (Urdu) BS-17 GGSS Behali Mansehra has been treated as leave with full pay instead of leave without pay. The copy of this notification has been placed on file. Grievance of petitioner has been redressed. The learned counsel for the petitioner concur and agree with learned Additional AG, therefore, the implementation of the judgment of the Service Tribunal has been made. The respective claim of the petitioner has fully been satisfied, therefore, file be consigned to the record room.


(MUHAMMAD JAMAL KHAN)
MEMBER

ANNOUNCED
20.07.2020

FINAL SENIORITY LIST OF FEMALE OFFICERS B-17 TEACHING CADRE OF ELEMENTARY & SECONDARY EDUCATION DEPARTMENT STOOD ON 5-04-2023

S#	Name of Officer with academic qualification	Qualification	Date of Birth	Domicile	Date of 1st Appointment in Edu; Deptt	Regular appointment/ Promotion to the present post.			REMARKS
						Regular Date	Grade	Method of Recruitment	
1	Mst Aisha Jabeen D/o Muhammad Yahya SS (Economics) GGHSS Umarzai Charsadda	MSc B.Ed	14-03-75	Peshawar	12-01-2008	12-01-2008	17	Direct Selectee	No.SO (S)/3-2/2007/SS F
2	Mst Soltanat Jehan D/O Fazl e Mabood SS GGHSS Harichand Charsadda	MA B.Ed	03-12-76	Peshawar	12-01-2008	12-01-2008	17	Direct Selectee	No.SO (S)/3-2/2007/SS F
3	Farah Deebea HM GGHS Hakim Bharat Bannu	MSC M.Ed	01-12-66	Bannu	30-01-1990	14-11-2017	17	By promotion	SO (PE)/2-6/DPC meeting (03.10.2017)
4	Sabiha Naz D/O Shamsur Rehman Instructor RITE Swabi	m sc med	05-01-73	Swabi	11-11-1999	08-10-2010	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
5	Mst. Sumaira Mehdi D/O Aksay Mehdi SS GGHSS Phy: GGHSS Kalu Khan Swabi	MA Med	05-11-77	D.I.Khan	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
6	Farzana nayyer D/O M sabir HM GGHS Mir pur haripur	MA MEd	10-02-69	Haripur	07-07-2001	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
7	Ambreen Anjum D/O Sajid Ali shah HM GGHS Qasab khana peshawar	MAMEd	18-6-1971	Peshawar	16-12-1999	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
8	Zeenat Yasmeen D/O Muslim Khan HM GGHS Bashir Abad Peshawar	MA MEd	18-04-74	Peshawar	28-03-1995	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
9	Shagufta Anjum D/O Mohammad Masood HM GGHS city Railway station Peshawar	MA MEd	04-03-68	Mansehra	21/9/1999	10-03-2011	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2011/Headmistress
10	Mst. Bushra D/O Hakam Khan SS Stat GGHSS Barawal Banda Dir Upper	MSc MEd	04-11-78	Mansehra	09-12-2009	09-12-2009	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F
11	Saeeda Begum D/O Hazrat Ali SS (Pak Study) GGHSS Ghallanai Mohmand	MA MEd	1.4.1983	Mohmand Agency	25.7.2006	15-09-2010	17	Direct Selectee	No. SO (S/F) E&SED/3-2/2009/10/11/ Recruitment SS F

FTC
REMARKS
 Director (Edt.)
 Elementary & Secy. Education
 Khyber Pakhtunkhwa Peshawar

13

S#	Name of Officer with academic qualification	Qualification	Date of Birth	Domicile	Date of 1st Appointment in Edu; Deptt	Regular appointment/ Promoiiton to the present post.			REMARKS
						Regular Date	Grade	Method of Recruitment	
180	Mst. Farzana Kalsoom SS (Urdu) GGHSS Terri, Karak	MA M.Ed	17-04-78	Karak	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
181	Mst. Nabila SS (English) GGHSS Chakdara, Malakand	MA B.Ed	28-04-78	Dir Lower	24-09-2009	31-05-2010	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
182	Mst. Bibi Ayisha SS (Islamiyat) GGHSS Karak	MA B.Ed	15-10-80	Karak	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
183	Mst. Nishat Bibi SS (Chem) GGHSS Togh Blala, Kohat	MSc B.Ed	15-04-81	Kohat	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
184	Asma Shahzadi SS (Bio) GHSS Gulshan Abad Maneri Swabi	MSc M.Ed	13-04-82	Swabi	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
185	Mst. Adeela Batool SS (Maths) GGHSS No.5 D.I.Khan	MSc B.Ed	06-03-83	D.I.Khan	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
186	Mst. Sana Dilnasheen Fatima SS (Biology) GGHSS B.Colony, D.I.Khan	MSc M.Ed	25-12-81	D.I.Khan	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
187	Mst. Rukhsana Begum SS (Islamiyat) GGHSS Bhezadi Chakarkot, Kohat	MA M.Ed	09-06-72	Karak	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
188	Mst. Nazia Shaheen SS (Islamiyat) GGHSS Malakpura, Abbottabad	MA B.Ed	21-11-75	Abbottabad	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
189	Mst. Lubna Shaukat SS (Chemistry) GGHSS Shainkiari, Mansehra	MSc M.Ed	01-12-77	Mansehra	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
190	Mst. Nazia Nawaz D/O Haq Nawaz SS (English) GGHSS Titterkhel Lakki Marwat	MA M.Ed	09-05-79	Lakki Marwat	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
191	Mst. Asia Bibi SS (Chem) GGHSS Mansehra	MSc B.Ed	20-04-80	Mansehra	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
192	Mst. Asmat Bibi SS (Chem) GGHSS Lahor, Swabi	MSc M.Ed	11-07-80	Swabi	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
193	Mst. Amber Rabail SS (Maths) GGHSS Bhezadi Chakarkot, Kohat	MSc B.Ed	05-12-80	Kohat	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
194	Mst. Zahida Bibi SS (Chem) GGHSS Phulgarhi, Abbottabad	MSc B.Ed	12-12-80	Abbottabad	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
195	Mst. Musarrat Shaheen SS (Chem) GGHSS Karak	MSc B.Ed	06-01-81	Karak	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract

Director (Estt.)
Elementary Secy. Education
Khyber Pakhtunkhwa Peshawar

14

CTC
Deputy Director (Estt.)
Elementary & Secondary Education
Peshawar

S#	Name of Officer with academic qualification	Qualification	Date of Birth	Domicile	Date of 1st Appointment in Edu; Deptt	Regular appointment/ Promoiiton to the present post.			REMARKS
						Regular Date	Grade	Method of Recruitment	
273	Mst. Zainab SS (Urdu) GGHSS Ouch, Dir Lower	MA B.Ed	01-02-79	Malakand	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
274	Mst. Sobia Ahmad SS (English) GGHSS Gumbat, Kohat	MA B.Ed	01-04-79	Kohat	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
275	Mrs Rakhshanda Iram D/O Said Qayum SS GGHSS Rustam mardan	MScMEd	16/4/1981	Mardan	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
276	Akhtar Naqshband D/o Ghulam Naqshbandi SS (English) GGHSS Badaber Peshawar	MA MEd	10-07-79	Peshawar	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
277	Mst. Saima Gul SS (English) GGHSS Akora Khattak, Nowshera	MA M.Ed	12-02-81	Nowshera	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
278	Mst. Zainab Haider D/O Abdul Baqi SS (Economics) GGHSS Hajigali, Abbottabad	MA B.Ed	13-06-81	Abbottabad	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
279	Shamshad Begum SS (state)GGHSS NO.5 DIKhan	MSc MEd	16/1/1983	Lakki Marwat	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
280	Nazia Begum D/o Abdur rehman SS (H/Civics) GGHSS Ziam Charsada	MA MEd	04-02-81	Peshawar	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
281	Mst. Shakila Akhtar SS (Biology) GGHSS Nar Shukrullah, Bannu	MSc M.Ed	15-04-83	Bannu	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
[282]	Kiran Sabeen SS urdu GGHSS Kakul Abbotabd	MA MED	30-03-1981	Mansehra	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
283	Tasleem Begum D/O Ahmad khan SS chemistry GGHSS chokara Karak	MSc Med	01-10-83	Karak	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
284	Mst. Farah Deebea SS (H/Civics) GGHSS Tarnab Farm, Peshawar	MA B.Ed	17-03-66	Peshawar	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
285	Shamshad Bibi D/O Syed Marhamat shah SS(Maths) GGHSS warijune	MSc MEd	03-04-84	Chitral	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
286	Shakeela D/O muhammad akbar SS (Maths) SS GGHSS Fazal rahim colony	MSC MEd	16-03-1983	DIKhan	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
287	Mst. Shahnaz Akhtar SS (Urdu) GGHSS Malakpura, Abbottabad	MA B.Ed	24-09-72	Abbottabad	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract
288	Mst. Sadia Mumtaz SS (English) GGHSS Canal Road Mardan	MA B.Ed	20-11-1972	Mardan	24-09-2009	24-09-2009	17	Regularization	No. SO (G) E&SE/1-85/2009 /SS/ Contract

S#	Name of Officer with academic qualification	Qualification	Date of Birth	Domicile	Date of 1st Appointment in Edu; Deptt	Regular appointment/ Promoiiton to the present post.			REMARKS
						Regular Date	Grade	Method of Recruitment	
1590	Shazia Hina HM BS 17 GGHS Gandyaly Bala Kohat	BA/Bed	15-01-71	Hangu	12-07-1999	25-10-2018	17 -	By promotion	NO SO (PE)/2-6/DPC Meeting/SST-HM(M/F)/2018
1591	Nusrat Shaheen HM BS 17 GGHS Parmoli Swabi	BA/Bed	02-08-67	haripur	21-09-1999	25-10-2018	17 -	By promotion	NO SO (PE)/2-6/DPC Meeting/SST-HM(M/F)/2018

CTC
Deputy Director (Estt.)
 Elementary & Secy: Education
 Khyber Pakhtunkhwa Peshawar

Certificate

- 1 That the seniority list is widely circulated.
- 2 That seniority list is undisputed/ uncontroversial.
- 3 That there is no litigation pending.

[Signature]
Deputy Director (Estt.)
 Elementary & Secy: Education
 Khyber Pakhtunkhwa Peshawar


Deputy Director (Female)
 Elementary & Secondary Education
 Khyber Pakhtunkhwa 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. 2542/2023 case titled Kiran Sabeen SS District Mansehra Vs Government of Khyber Pakhtunkhwa & others, hence, an authority letter is hereby issued in favor of the above-named officer.


(Samina Altaf)
DIRECTOR
E&SE/Department Khyber
Pakhtunkhwa, Peshawar