

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 7563/2021

Mst. Hira Shams.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa & others.....Respondents

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**Senior Law Officer
Khyber Pakhtunkhwa
Public Service Commission**

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PARAWISE COMMENTS ON BEHALF OF (RESPONDENT NO. 03)

Respectfully Shewth:

PRELIMINARY OBJECTIONS:

1. The appellant has not been recommended against any of the advertised posts. She is not a genuine recommendee / selectee of the Public Service Commission in respect of the post in question.
2. That the instant Service Appeal is not maintainable against the replying Respondent No.3.
3. That the appellant has malafidely dragged Khyber Pakhtunkhwa Public Service Commission in the instant case.
4. That the appellant is misleading this Honorable Service Tribunal as she never applied to the answering Respondent.
5. That instant Service Appeal is liable to be dismissed with special costs as the same is based on ulterior motives of the appellant.
6. Instant service appeal is based on misrepresentation.

ON FACTS:

- 1-2. That the Khyber Pakhtunkhwa Public Service Commission advertised 973 (782 for Arts Group & 191 Science) posts of SETs/SSTs vide Advertisement No. 01/2009 S.No. 55 dated 26.01.2009 with the following qualifications: (Break up of 973 (782 Arts 191 Science) was published in Advt. No. 02/2009 through corrigendum).

QUALIFICATION: For Secondary School Teacher (General) (i) B.A Second

Division from a recognized University and (ii) B.Ed or Equivalent Qualification from a recognized University.

For Secondary School Teacher (Science) (i) BSc Second Division with at least Two of the Subjects of Physics, Chemistry, Zoology, Botany, and Mathematics –A or Mathematics-B and (ii) B.Ed or Equivalent Qualification from a recognized University.

AGE LIMIT: 21 to 35 years. **PAY SCALE:** BPS-16 **ELIGIBILITY:** Female.

ALLOCATION:

Merit	Zone-1	Zone-2	Zone-3	Zone-4	Zone-5
243	162	162	162	122	122

(Annex-A)

A total of 918 candidates qualified. Final merit list is **Annex-B**. According to Zonal allocation 696 candidates were recommended out of 918 candidates on basis of their total marks and interview marks. The remaining posts were conveyed to the parent department, because it went out of the purview of Khyber Pakhtunkhwa Public Service Commission. The appellant neither applied nor recommended against any of the advertised posts. List of the genuine candidates who appeared before the Commission and qualified the viva voce is already annexed as B. Therefore her name not found in the list ibid. The rest of the contents does not pertain to Khyber Pakhtunkhwa Public Service Commission


3-5. Not pertaining to Public Service Commission.

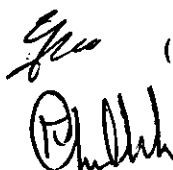
GROUND.

A-I. Not pertaining to Public Service Commission.

J. The appellant may not be allowed to raise any other grounds during the course of arguments against the replying respondent Khyber Pakhtunkhwa Public Service Commission.

It is, therefore, most humbly prayed that in light of above submissions the instant Service Appeal may kindly be dismissed with cost.


 CHAIRMAN
 KHYBER PAKHTUNKHWA
 PUBLIC SERVICE COMMISSION
 PESHAWAR
 (RESPONDENT NO.03)



AFFIDAVIT

Stated on oath that the contents of this Para wise comments are true and correct & nothing has been concealed from this Honorable tribunal.

DEPONENT



MEHTAB GUL
LAW OFFICER
KP PUBLIC SERVICE
COMMISSION *Resp # 3*
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