


FORM OF ORDER SHEET

Court of _____

Appeal No. 1049/2024

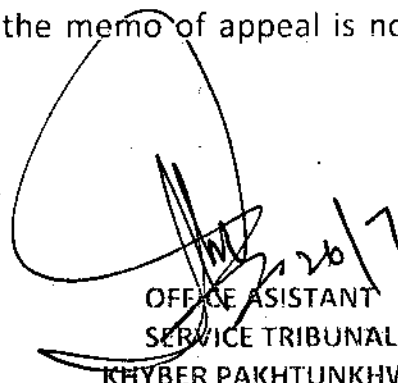
S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/07/2024	<p>The appeal of Mst. Bakht Zia Bibi presented today by Mr. Muhammad Shahidullah Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 29.07.2024. Parcha Peshi given to counsel for the appellant.</p> <p>By the order of Chairman  REGISTRAR</p>

The appeal of Mst. Bakht Zia Bibi received today i.e on 26.07.2024 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days:

- 1 ✓ According to sub-rule-4 of rule-6 of Khyber Pakhtunkhwa Service Tribunal rules 1974 respondent no. 1 is un-necessary/improper party, in light of the rules ibid and on the written direction of the Worthy Chairman the above mentioned respondent number be deleted/struck out from the list of respondent.
- 2 ✓ Memorandum is not signed by the appellant.
- 3 ✓ Address of appellant is incomplete be completed according to rule-6 of Khyber Pakhtunkhwa service Tribunal rules 1974.
- 4 ④ Copy of proper order passed on departmental appeal of the appellant by respondent no.2 mentioned in the memo of appeal is not attached with the appeal.

No. 474 /Inst./2024/KPST,

Dt. 26/07 /2024.


OFFICE ASISTANT
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

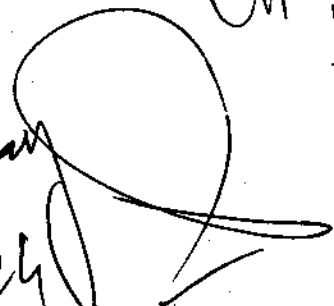
Muhammad Shahidullah Adv.

High Court at Peshawar.

Sir, 1, 2, 3 objection is cleared
and objection 4 is put on
to the Honorable Judge sb
InshaAllah I will explain.

M. Shahid ul Haq (AHC)

Be fixed
on Monday
29/07/24


26/7/24

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Bakht Zia Bibi vs. Govt of KP

S#	CONTENTS	YES	NO
1	This Appeal has been presented by:		
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?		
6	Whether affidavit is appended?		
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10	Whether annexures are legible?		
11	Whether annexures are attested?		
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?	✓	
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?		
16	Whether appeal contains cutting/overwriting?	✓	
17	Whether list of books has been provided at the end of the appeal?	✓	
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?		
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On		
26	Whether copies of comments/reply/rejoinder submitted? On		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On	✓	

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

Muhammad SHAHID

Signature:

[Handwritten Signature]

Dated:

**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR**

Service Appeal No. 1049 of 2024

Bakht Zia; BibiAppellant

VERSUS

Govt. of KP and others.....Respondents

INDEX

S #	Description	Annexure	Pages #
1.	Appeal with certificate	***	1-7
2.	Addresses of the parties & Affidavit	***	8-9
3.	Suspension application with affidavit		10-11
4.	Copy of appointment order	A	12
5.	Copy of service book	B	13-31
6.	Copies of relevant record	B-1	32-33
7.	Copies of orders dated 14-06-2024	C	35
8.	Copy of appeal along with order dated 27-06-2024	D	36
9.	Copy of impugned order dated 01-07-2024	E	38
10.	Power of attorney		39-40
11.	Wakalatnama		41

Appellant

Bakht Zia Bibi

Through Counsel



MUHAMMAD SHAHID

ULLAH YOUSAFZAI

Advocate, High Court

Office: Bar Room Darul Qaza, Swat
Cell No: 0341-5257453

1

**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 14532

Service Appeal No. 1049 of 2024

Dated 26-07-2024

Bakht Zia Bibi wife of Latifur Rahman resident of Ziarat
Talash, Dherai, Tehsil Timergara, District Dir Lower.

.....Appellant

VERSUS

1. Government of KPK through Secretary Education at Peshawar.
2. Director Elementary and Secondary Education Khyber Pakhtunkhwa at Peshawar.
3. District Education Officer (F) Dir Lower.

.....Respondents

Filed to Day

Registrar

26/7/24

SERVICE APPEAL UNDER SECTION
4, OF THE KPK SERVICE TRIBUNAL
ACT, 1974, against the action &
inaction of the respondent No. 3
whereby the appellant not been obey
the order dated 27-06-2024 passed
by the respondent No. 2 and illegally
& unlawfully issued the order dated
01-07-2024, whereby the transfer
order of the appellant withdrawn
from GGHS Warak to GGHSS Nagrai
Payeen and illegally & unlawfully

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

Service Appeal No. 1049 /2024

Ba~~at~~ Zia Bibi W/o Latif Ur Rehma SPET Government Girls
High School Warsak Dir Lower R/o Ziarat Talash, Dherai,
Tehsil Timargara, District Dir Lower.

.....Appellant

Versus

1. Director Elementary and Secondary Education Khyber
Pakhtunkhwa at Peshawar.
2. District Education Officer Female Dir Lower.

.....Respondents

**SERVICE APPEAL UNDER SECTION
04, OF THE KPK SERVICE TRIBUNAL
ACT 1974, against the action &
inaction of the respondent No. 2
where by the appellant not being
obey the order dated 27-06-204
passed by the respondent NO. 1 and
illegally & unlawfully issued the
order dated 01-07-2024, whereby
the transfer order of the appellant
withdrawn from GGHS Warsak to
GGHSS Nagrai Payeen and illegally &
unlawfully**

Re-submitted to -day

Registrar

26/7/24.

not adjusted the appellant as SPET at GGHSS Nagri Payeen.

PRAYER

It is therefore humbly prayed that on acceptance of this appeal, to issue directions to the respondents.

- i) That the withdrawn order of the appellant dated 01-07-2024 passed by the respondent No. 3 may kindly be declared as illegal, void ab-initio, without legal authority, based on mala-fide intention and be set aside to the extent of adjustment of the appellant at the GGHSS Nagri Payeen.
- ii) To issue directions to the respondent department to transfer / adjust the appellant from GGHS Warsak to GGHS Nagrai Payeen as SPET (BPS-16) in the vacant post SPET.
- iii) Any other relief which this Honorable Court deems fit and proper in the circumstances may also be very kindly granted.

Respectfully Sheweth

That the appellant submits as under:-

- 1) That the appellant was appointed as PET-BPS-09 and posted at GGHS Baghdushkhel, Talash, Dir

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Lower on 24-01-2007. (Copy of appointment order is attached as annexure "A")

- 2) That there after the appellant was transferred from GGHS Baghdushkhel to GGHS Nagrai Payeen on 30-09-2010, and after that the appellant transfer from GGHS Nagrai Payeen to GGMS Sarai Bala. (Copies of service book record are attached as annexure "B")
- 3) That the appellant nowadays performed her duty in GGHS Warsak (BPS-16) and submitted application for plain order and mutual order as well but in vain. (Copies of relevant record are attached as annexure "B-1")
- 4) That the concerned authority issued an order of another candidate which is most junior then appellant, such a plain transfer order of a PET candidate with BPS-15 has been placed against the post of SPET BPS-16 which is a naked example of injustice and baseness. (Copies of orders dated 14-06-2024 are attached as annexure "C")
- 5) That the appellant aggrieved the same, filed an appeal before the respondent No. 2, which is accepted vide order dated 27-06-2024 for some directions. (Copy of appeal along with order dated 27-06-2024 are attached as annexure "D")
- 6) That after the respondent No. 3 illegally & unlawfully not been obey the order of the

4

respondent No. 2 and only withdrawn the transfer order of the appellant vide impugned order dated 01-07-2024, whereby the respondent No. 3 only withdrawn the order dated 14-06-2024 and not been adjusted the appellant in the School namely GGHSS Nagrai Payeen as SPET.. (Copy of impinged order dated 01-07-2024 is attached as annexure "E")

- 7) That the appellant is aggrieved from the impugned action & inaction of the respondents and seeks remedy from this Honorable Tribunal, inter alia on the following grounds.

Grounds:-

- A) That the impugned withdrawn order dated 01-07-2024 is illegal, unconstitutional, unjustified, based on mala-fide, without jurisdiction, void ab-initio, ineffective upon the rights of the appellant, and therefore needs the interference of this Honorable Tribunal.
- B) That the appellant has not been dealt with according to law, rather she has been treated illegally so, the act of respondent department is unlawful and is lack baking of law which requires interference of this Honorable tribunal.
- C) That all citizens are equal before law and entitled to equal protection under Article 25 of the Constitution of Islamic Republic of

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Pakistan, 1973, furthermore the Respondent No. 3 not been obey the order of the respondent No. 2 and illegally & unlawfully not adjusted the appellant in the school namely GGHSS Nagrai Payeen, hence not tenable in the eyes of law.

- D) That it is to be mention here that the post SPET in the school namely GGHSS Nagrai Payeen still vacant and the respondent No. 3 very astonishingly not order to adjusted the appellant in the same post. So, the act of the respondent No. 3 is illegal & unlawful, hence liable to be set aside.
- E) That as per the overriding principals of law, any authority vested with the powers to perform public functions to do something is the authority to undo the same. But the respondent department deprived the present appellant of her due rights according to law procedure hence the impugned orders of the respondent liable to be set a aside
- F) That the case of appellant is amounts to repeated transfer and under law no one is allowed to violate the principle of natural justice, rules & policy.

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- G) That the action of respondents are unlawful, against the law, arbitrary and against the norms of justice.
- H) That the present posting (GGHS Warsak) of appellant situated in a very far flung area and the appellant has some brutal domestic issues due to which it is not possible for appellant to continue her job.
- I) That any other grounds that will be taken at the time of arguments with the kind permission of this Honorable Court.

Prayer

It is therefore humbly prayed that on acceptance of this appeal, to issue directions to the respondents.

- i) That the withdrawn order of the appellant dated 01-07-2024 passed by the respondent No. 3 may kindly be declared as illegal, void ab-initio, without legal authority, based on mala-fide intention and be set aside to the extent of adjustment of the appellant at the GGHSS Nagri Payeen.
- ii) To issue directions to the respondent department to transfer / adjust the appellant from GGHS Warsak to GGHS

(17)


Nagrai Payeen as SPET (BPS-16) in the vacant post SPET.

- iii) Any other relief which this Honorable Court deems fit and proper in the circumstances may also be very kindly granted.


Appellant

Bakht Zia Bibi

Through counsel


MUHAMMAD SHAHID ULLAH

YOUSAFZAI

Advocate, High Court

CERTIFICATE:

(As per directions of my client) No such like Appeal earlier has been filed by the appellants on the subject matter before this Honorable Court.


ADVOCATE

2

**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR**

Service Appeal No. _____ of 2024

Bakht Zia BibiAppellant

VERSUS

Govt. of KP and others.....Respondents

ADDRESSES OF THE PARTIES

APPELLANT

Bakht Zia Bibi wife of Latifur Rahman resident of Ziarat
Talash, Dherai, Tehsil Timergara, District Dir Lower.

Cell No:

CNIC No:

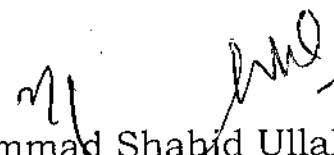
RESPONDENTS

1. Government of KPK through Secretary Education at
Peshawar.
2. Director Elementary and Secondary Education Khyber
Pakhtunkhwa at Peshawar.
3. District Education Officer (F) Dir Lower.

Appellant

Bakht Zia Bibi

Through Counsel


Muhammad Shahid Ullah
Yousafzai
Advocate, High Court

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**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR**

Service Appeal No. _____ of 2024

Bakht Zia BibiAppellant


VERSUS

Govt. of KP and others.....Respondents

AFFIDAVIT

I, Latif Ur Rahman (attorney for appellant), do hereby solemnly affirm and declare on oath that the contents of the above titled appeal is true and correct to the best of my knowledge and belief.


DEPONENT


26/7/24

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**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR**

Service Appeal No. _____ of 2024

Bakht Zia BibiAppellant

VERSUS

Govt. of KP and others.....Respondents

APPLICATION FOR SUSPENSION THAT
THE RESPONDENT NO. 3 MAY KINDLY
BE RESTRAINED TO FILL UP THE
VACANT POST SPET IN GGHSS NAGRI
PAYEEN TILL THE FINAL DISPOSAL OF
THE INSTANT SERVICE APPEAL.

Respectfully Sheweth:-

1. That the appellant / applicant being filed the instant service appeal in this Honorable court, where in no date is fixed so far.
2. That the appellant / applicant has a well prima facie case and hopeful about the successes of the instant appeal.
3. That the balance of conveyance lies in favor of appellant / applicant and the impugned order is

(11)

patently illegal passed lack backing of law and are not sustainable.

4. That if the respondent No. 3 not been restrained from fill up the vacant post in GGHSS Nagri Payeen the appellatant would suffer irreparable loss.

It is, therefore, humbly prayed, that on acceptance this application the respondent No. 3 be restrained not to fill up the said post till the final disposal of the instant service appeal.


Appellant

Bakht Zia Bibi

Through Counsel


MUHAMMAD SHAHID ULLAH
YOUSAFZAI
Advocate High Court

AFFIDAVIT

I, Latifur Rahman (attorney for appellatant), do hereby solemnly affirm and declare on oath that the contents of the accompany application is true and correct to the best of my knowledge and belief.


Deponent

E.T.C by M. U. M.

(12)

-A

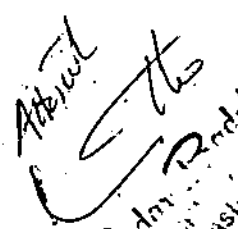
OFFICE OF THE EXECUTIVE DISTRICT OFFICER(S&L) DISTRICT DIR LOWER.
Office Order -

As per recommendations of the District Recruitment Committee, the following candidates are hereby appointed on PET in BPS-9 (2770-165-7720) plus usual allowances as due and admissible to them under the rules on Regular basis but without pension and gratuity in terms -19 of the Civil Servant Act 1973 as amended vide NWFP Civil Servants (Amendment) Act, 2005 with immediate effect under the provision of Establishment & Administration Department Circular bearing No. SOK-6(E&A/D)13-1/2005 on subject to the following terms and conditions in the interest of public service with immediate effect.

S#	Name, Father's Name & Residence	Qual.	Score	Proposed School	Remarks
1	Sadia Khan D/O Qarib Ullah Khan R/O Bandagai	BA	46.14	GGMS.Odigram	Against V:Post
2	Tawhid Begum D/O Hussain Ahmad R/O Gohargat	FA	46.14	GGMS.Zaimdara	Against V:Post
3	Khulqiat Begum D/O Fazli Rahman R/O Bandagai	BA	45.93	GGMS.Bandagai	Against V:Post
4	Aisha Manan D/O Abdul Manan R/O Ziarat Talash	BA	49.75	GGMS.Mandish	Against V:Post
5	Gul Zatoon D/O Mashoor Khan R/O Rehankot	BA	49.37	GGHS.Moranai	Against V:Post
6	Neghat Sema D/O Habib Said R/O Shekowlai	BA	46.18	GGHS.Hayaserai	Against V:Post
7	Robina Habib D/O Fazal Habib R/O Narai Shah	FA	45.30	GGMS.Hanfia	Against V:Post
8	Saira Naz D/O Habib said R/O Shekowlai	BA	44.54	GGMS.Dukrai	Against V:Post
9	Khalida Manan D/O Abdul Manan R/O Amlodara	FA	42.28	GGMS.Shalkondi	Against V:Post
10	Himayat Begum D/O Ahmadul Haq R/O Kolalano Shah	FA	41.40	GGHS.Manial	Against V:Post
11	Bibi Zinab D/O Taj Khan R/O Zizrat Talash	FA	41.19	GGMS.Danwa	Against V:Post
12	Nagina Bibi D/O Ghulam Rasool R/O Zaimdara	FA	41.16	GGMS.Beshigram	Against V:Post
13	Nagina Bibi D/O Am nur Rahman R/O Narai Shah	FA	41.04	GGHS.Munda	Against V:Post
14	Kausar Parvin D/O Habib Said R/O Shekowlai	FA	40.86	GGHS.Khazana	Against V:Post
15	Shamila Naz D/O Shkr Khan R/O Cham Samar Bagh	FA	40.56	GGMS.Badin	Against V:Post
16	Asia Bibi D/O Shamsur Rahman R/O Narai Shah	FA	40.36	GGMS.Miankalay	Against V:Post
17	Rehana Bibi D/O Khun Bahadar Khan R/O Badwan	FA	39.84	GGMS.Asbanr	Against V:Post
18	Jamila Begum D/O Zahid Dn R/O Bandagai Lalqela	FA	39.83	GGMS.Kotkay(M)	Against V:Post
19	Tajian Begum D/O Zahid Din R/O Bandagai Lalqela	FA	39.68	GGHS.Kumber	Against V:Post
20	Gul Tabasoom D/O Mohd Anwar Khan R/O Timergara	FA	39.22	GGMS.Gosum	Against V:Post
21	Azra Begum D/O Attaur Rahman R/O Narai Shah	FA	39.04	GGMS.Rani	Against V:Post
22	Nasrat Begum D/O Khairur Rahman R/O Shingrai	FA	39.02	GGMS.Shalqalam	Against V:Post
23	Bakht Zia Bibi D/O Gul Zaman Khan R/O Soghalay	FA	38.15	GGMS.Bagh(D)	Against V:Post
24	Shujat Saeed D/O Muhammad Saeed R/O Timergara	FA	38.08	GGMS.Biarai	Against V:Post
25	Khudija Bibi D/O Minmust R/O Timergara	FA	37.64	GGHS.Murjai	Against V:Post
26	Farzana Begum D/O Attaur Rahman R/O Soghalay	FA	35.35	GGMS.Soghalay	Against V:Post

TERMS & CONDITIONS:-

- 1 They will be governed by such rules and regulations as may be prescribed by the Govt: from time to time for the category of Govt: service to which they belong.
- 2 Their appointments are purely on temporary basis liable to termination at any time without notice. In case leaving the service, they will be required to submit one month prior notice, or deposit one month pay in Govt: treasury in lieu thereof.
- 3 The appointments of the candidates mentioned above are subject to the condition that they are domiciled in District Dir Lower
- 4 No TA/DA will be paid to them on joining the post.


 Sadia Rind Shah
 S&L
 Ziarat Talash Dir Lower

- 5 Charge reports should be submitted to all concerned.
6 Drawing & Disbursing Officers concerned are directed to check/verify their original documents
7 from the concerned Boards / Institutions, if not already verified, before handing over the charge to them.
8 The order is issued as errors and omissions excepted, as a notice only.
They are directed to take over charge w.e. from 1-3-2007.

(ZARA YAR KHAN)
EXECUTIVE DISTT. OFFICER
(S&L) DISTRICT DIR LOWER.

Endst: No. 16324-83 / Dated: 34 / 01/2007

Copy of the above is forwarded to:-

- 1 The Distt: Coordination Officer Dir Lower at Timergara.
- 2 The Distt: Nazim Dir Lower at Timergara.
- 3 P.A to Secretary Schools & Literacy NWFP Peshawar.
- 4 P.A to Director Schools & Literacy NWFP Peshawar.
- 5 The Distt: Officers (F) Schools & Literacy Dir Lower at Timergara.
- 6 The Distt: Accounts Officer Dir Lower at Timergara.
- 7-33. The Principals, Headmasters/Headmistress & DDO concerned.
- 33-59. The candidates concerned.
60. DEMIS cell.

EXECUTIVE DISTT. OFFICER
(S&L) DISTRICT DIR LOWER.

Price: Rs. 20.00

ATTESTED

SPEET 8-16
 Page No. 143
 PPS No. - 36/1382
 C.N.I.E. - 15302-0850/95-8
 P = 34
 V = CP
 Ed. = 6

Mr. SPEET
 Guide Supcs.

OF

SECRET
ROOM
 V.P.C.P. 6
 P-35
 13
 B

Holds: ⑤ Passed B.Ed exam from Sarhad University of
Sci & Information Tech. Peshawar under Roll No. 11-SP-06210
Marks obtained 894/1200 Result Declared on 2013 verified

1. vide letter no. 9593 dt 22/11/2014.

① passed - MSc (HPE) exam from Sarhad

2. University Science & Information Technology Peshawar, under Roll No. 14-FA-7957
Session 2016 M/O 1118/1850 vide

3. ~~verified~~ No 5057 dt 09/10/07.

Verified No 5057 dt 09/10/07.

Distt: Education Officer
(F) Dir (L)

Distt: Education Officer
(Female) Dir (L)

Left Thumb-ImPRESSION

① Passed SSC exam from Sarhad University
PSE Saidul Khanif Svat Peshawar under Roll
under Roll No. 2594 session NO. 05-AE-0697

Qualifications 1994 (A) Date
M/O 37/850 verified

English
vide letter No. 452
Pushed dated 4/5/07

Qualifications M/O 655/1050
Result declared on 27/5/2006

First App
Verified vide letter
B.L. of M.O. 06-MSC-180107 dt 18/07

② Passed FA exam from PSE Saidul
Plan-Drawing Khanif Svat

Under Roll No. 202879
Finger Print
(Scrub) M/O 512/1100

Drill Instructing
Verified vide letter
No. 455 dt 4-5-07

Court Duties

Reserve Duties
Distt: Officer (F)
Dir Lower at Tigras.

Leadership examination
Distt: Officer (F)
Dir Lower at Tigras.

Training School Final Examination
④ passed B.D. Exam from
Other Qualifications:-
A.O. University under Roll.

0472554 M/O. 499/900 Result
Declared on 02-09-2008 verified
vide letter no. 0947
dated 06-01-2009

⑤ passed M.A Examination from
University of Malakand under Roll
No. 12419 Annual exam: 2010 Marks
obtained 495/1100 and verified under
NO. exam/UOM/ver/3398 dated 15-2-2012.

Distt: Officer Female
(E & S) Dir Lower

ATTESTED

Head Mistress
GHS Nagrai (P)
Distt: Dir (L)

14

ATTESTED

[Handwritten signature]

By Lower Officer

Dist. Officer (B)

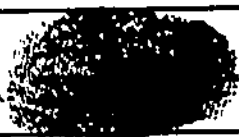
Signature and Designation of the Head of the Office, or other attesting Officer.

10

Signature of Government Servant

9

Thumb



Middle Finger



Fore Finger



Little Finger



Ring Finger



Left hand thumb and finger impression of (Non-Gazetted) Officer.

8

Personal marks for identification

7

A small scar on chin

Exact height by measurement

6

5-5"

Date of birth by Christian era as nearly as can be ascertained

5

17th March 1924 / 17th January 1924

Father's name and residence

4

Mr. E. L. Ramon, As above

Residence

3

Village Sengaloo P.O. Tuarat Talok
Tasul Tungkara Dist. Perak

Race

2

Muslim

Name

1

Bekwit Zie Baba

Note: The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

11

The entries in this page should be renewed or re-attested at least every five years and the Signature to lines 9 and 10 should be dated.

Handwritten notes on the right margin, including '15/1' and other illegible scribbles.

Vertical handwritten numbers on the left margin: 97, 96, 95, 94, 93, 92, 91, 90, 89, 88, 87, 86, 85, 84, 83, 82, 81, 80, 79, 78, 77, 76, 75, 74, 73, 72, 71, 70, 69, 68, 67, 66, 65, 64, 63, 62, 61, 60, 59, 58, 57, 56, 55, 54, 53, 52, 51, 50, 49, 48, 47, 46, 45, 44, 43, 42, 41, 40, 39, 38, 37, 36, 35, 34, 33, 32, 31, 30, 29, 28, 27, 26, 25, 24, 23, 22, 21, 20, 19, 18, 17, 16, 15, 14, 13, 12, 11, 10, 9, 8, 7, 6, 5, 4, 3, 2, 1.

(15)

1 Name of Post	2 Whether substantive or officiating and whether Permanent or temporary	3 If Officiating state (i) Substantive appointment, or (ii) Whether service counts for pension under Art. 371	4 Pay in substantive Post	5 Additional Pay for officiating	6 Other emolument falling under the term "Pay"	7 Date of Appointment	8 Signature of Government Servant
DET BAGI DASHKOR	PS	G.S.R. 2770-165-7720					16 B/2ia
	Temp	Temp	PS	2770		11/07	B/2ia
	-dr	-do	PS	3379		11/07	B/2ia
		Scale Revised w.e.f 1-7-07					B/2ia
		M.B.9 (3185-190-8885)					B/2ia
	-dr	Temp	Temp	PS	385	11/07	B/2ia
	-dr	-do	-do	PS	3379	11/07	B/2ia
		Scale Revised w.e.f 1-7-08					B/2ia
		M.B.9 (3820-320-10720)					B/2ia
	-dr	Temp	Temp	PS	4050	11/08	B/2ia ✓
	-dr	-do	-do	PS	4280	11/08	B/2ia ✓
		Entry Revised due to allowed					B/2ia
		BPS No. 15 of PS (4350-380-14820)					B/2ia
	-dr	Pay on 1-17-07					B/2ia
		Entry Revised due to allowed					B/2ia
		BPS No. 14 w.e.f 2-9-08 in					B/2ia
		BPS No. 14 (4920-380-16320)					B/2ia

DISTRICT OFFICER (F)
ELF
EDUCATION

ATTESTED

NOTION (U)

<p>18</p> <p>Reference to any recorded punishment or censure, or reward of the Government Servant</p>	<p>17</p> <p>Signature of the head of the office or other attesting officer</p>	<p>16</p> <p>Allocation of period of leave</p> <p>four months for which leave is payable to another Government</p> <p>Government to which debitable</p>	<p>15</p> <p>Date of termination of appointment</p> <p>Date of appointment</p> <p>Reason of termination (such as promotion, transfer, dismissal)</p>	<p>14</p> <p>Signature of the head of the office or other attesting Officer</p>	<p>13</p> <p>Nature and duration of leave taken</p>	<p>12</p> <p>Period for which Government is debitable</p>	<p>11</p> <p>Signature of the head of the office or other attesting Officer</p>	<p>10</p> <p>Reason of termination (such as promotion, transfer, dismissal)</p>	<p>9</p> <p>Signature of the head of the office or other attesting Officer</p>	<p>8</p> <p>Period for which Government is debitable</p>	<p>7</p> <p>Signature of the head of the office or other attesting Officer</p>	<p>6</p> <p>Reason of termination (such as promotion, transfer, dismissal)</p>	<p>5</p> <p>Signature of the head of the office or other attesting Officer</p>	<p>4</p> <p>Period for which Government is debitable</p>	<p>3</p> <p>Signature of the head of the office or other attesting Officer</p>	<p>2</p> <p>Reason of termination (such as promotion, transfer, dismissal)</p>	<p>1</p> <p>Signature of the head of the office or other attesting Officer</p>	<p>0</p> <p>Period for which Government is debitable</p>	<p>1</p> <p>Signature of the head of the office or other attesting Officer</p>
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17

Signature of Government Servant

Signature of Government Servant

Signature of Government Servant

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Signature of Government Servant

Handwritten notes and signatures in the table cells, including dates like 11/12/08, 1-3-2007, and various initials and stamps.

1	2	3	4	5	6	7	8
	Whether substantive or officiating and whether permanent or temporary	If Officiating state (1) Substantive or (2) Whether service found under Art. 371 C.S.R.	Pay in Post	Additional Pay for officiating	Other emolument under the term "pay"	Date of Appointment	Government
1	PEI		Rs 500/pm			1/29/10	
2	5th B grade	Temp	Rs 500/pm			1/10/2010	
3	1st	Temp	Rs 589/pm			1/12/2010	
4	do	do					
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Handwritten signature or initials

Scale Revised w.e-21-7-11
 in 805-189 C.R.S. (8000-610-29800)
 26300/-

11
 Head
 The
 Director

118

		10	11	12	13		14	15	
		Date of termination of appointment	Reason of termination. (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting Officer	Nature and duration of leave taken	Leave		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Period		
21)		30/11/2012	A/Bnc	Head Mistress GGHS Nagrai Payer Distt. Dir (L)		Service verified w.e. 2-1-2010 to 30/6/2011		Head Mistress GGHS Nagrai (P) Distt. Dir (L)	from the School record
22)		1/12/2012	P/Sade up hold.	Head Mistress GGHS Nagrai Payer Distt. Dir (L)		Service verified w.e. 1-7-2011 to 31-3-2012		Head Mistress GGHS Nagrai (P) Distt. Dir (L)	from the School record
23)		11/12/2012	A/Bnc	Head Mistress GGHS Nagrai Payer Distt. Dir (L)		Service verified w.e. 1-4-2012 to 31-12-2012		Head Mistress GGHS Nagrai (P) Distt. Dir (L)	from the School record
24)		3/3/2013	Transfered to another school	Head Mistress GGHS Nagrai Payer Distt. Dir (L)				Head Mistress GGHS Nagrai (P) Distt. Dir (L)	
25)		7/7/13	Annun'g 15 w.e.R						
26)		15/11/13	Annun'g 10 Rs 1716/-						
27)		28/13	Annun'g 10 Rs 1716/-						
28)		3-2013	Pay Action of 1x						2010
29)			Pay Action of 1x						2010
30)			Pay Action of 1x						2010
31)			Pay Action of 1x						2010
32)			Pay Action of 1x						2010
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District Officer (P) (Case) Dir (L)

Pd Action on S-2 on Middle side W.R.P. 4-2012

Service verified w.e. 1-1-2013 to 31-3-2013 from the School record

ATTESTED

Head Mistress GGHS Nagrai Payer Distt. Dir (L)

OFFICE OF THE ATTORNEY GENERAL
 FEDERAL BUREAU OF INVESTIGATION

1	2	3	4	5	6	7
Name of Post	Whether subordinate or officiating and Permanent or temporary	If Officiating: (1) Substantive appointment, or (2) Whether for service courts under Art. 371 C.S.R.	Pay in subordinate Post	Additional Pay for Officiating	Other enrollment falling under the term "Pay"	Date of Appointment

I have examined the above and certify that the same is correct and true to the best of my knowledge and belief.

Special Agent in Charge

Signature of the Special Agent in Charge of the Office of the Attorney General

(13-11-2013)

~~1~~
100

30-11-2013

from the office records

Service verified with 10/11/13

13/11/13

TNR N 527

8/11/13

AT 13/11/2013

Return/Drawn at 5/11/13

11/2 - 13-15
Payable 13400/00

W 2.7.8 to 3.11.8 2011 R57901/-

Part from 6/2/2014

8/12/2014

1969

4375-16. At 4-12-2014

By DBCR/DIR LUDIA (NO. 1)

At 30-5-2014 under approval

140-2007 & NO PD (505K-1) 2-22/2014

DEPT (NO. 50 CFR) 10-22 (8) 2005 AT

attended by B-14 with bank K.P. Finance

Sanction allowed by 15.07.2008

18 Reference to any records or certificate, or name or praise of the Government Service

14 Signature of the head of the office or other attaching officer

13 Allocation of period of leave on average pay upto four months for which Government is debitable to which Government is debitable

12 Nature and duration of leave taken

11 Signature of the head or other attaching officer

10 Reason of termination [such as promotion, transfer, etc.]

9 Date of appointment

8 Signature of the head or other attaching officer

7 Signature of the head or other attaching officer

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10	11	12	13		14	15
			Nature and duration of leave taken	Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government		
<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	30/6/2015	<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	<i>[Signature]</i>	Service Verified wer. 30-11-2016 from the office record.	<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	
<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	30/11/2015	<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	<i>[Signature]</i>	Service Verified wer. 30-11-2015 from the office record.	<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	
<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	30/6/2016	<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	<i>[Signature]</i>	Service Verified wer. 30-11-2015 from the office record.	<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	
<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	30/11/2016	<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	<i>[Signature]</i>	Service Verified wer. 30-11-2016 from the office record.	<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	
<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	30/6/2017	<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	<i>[Signature]</i>	Service Verified wer. 30-11-2016 from the office record.	<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	
<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	30/11/2017	<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	<i>[Signature]</i>	Service Verified wer. 30-11-2017 from the office record.	<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)	
<i>[Signature]</i> Distt. Education officer (F) Distt. Dir (L)						


ATTESTED

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S S A R E U - R S O A N

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Name of Post	Whether officiating and appointment (i) Substantive or (ii) Whether for pension or temporary	If Officiating state (i) Substantive or (ii) Whether service courts under Art. 371 C.B.R.	Pay in substantive Post	Additional officiating Pay for	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government servant	Place or other designation of the head of the department	Page 1 to 8
N			Temp	Temp		1-12-2008	4920/-		
N			Temp	Temp		1-12-2009	5300/-		
N			Temp	Temp		1-12-2010	5680/-		
N			Temp	Temp		1-12-2011	9220/-		
N			Temp	Temp		1-12-2011	9850/-		
N			Temp	Temp		1-12-2012	10440/-		
<p>Non Scale appointed by BPS No 15 W. E. 7-2-18-2015</p> <p>in BPS No 15 (B. 8500 - 9000 - 9500 - 10000 - 10500 - 11000)</p>									
N			Temp	Temp		2-12-2012	11300/-		
N			Temp	Temp		1-12-2013	12000/-		
N			Temp	Temp		1-12-2014	12700/-		
<p>Pay Scale Reverted to 10. E. 7-7-2015 em</p> <p>BPS No: 15 Ks 10985 - 905 - 38135</p>									
N			Temp	Temp		1-7-2015	16415/-		
N			Temp	Temp		1-12-2015	17320/-		
<p>Pay Scale Reverted to 11. E. 7-7-2016</p> <p>in BPS No - 15 (B) 13510 - 1120 - 47110</p>									
N			Temp	Temp		1-7-2016	21350/-		
N			Temp	Temp		1-12-2016	23470/-		
<p>Pay Scale Reverted to 12. E. 7-7-2017 em</p> <p>BPS No: 15 (B. 16120 - 1830 - 56220)</p>									
N			Temp	Temp		1-7-2017	26760/-		
N			Temp	Temp		1-12-2017	28090/-		
N			Temp	Temp		1-12-2018	29420/-		

(26)

1	2	3	4	5	6	7	8
Name of Post	Whether substantive or officiating and whether Permanent or temporary	If Officiating state (i) Substantive appointment, or (ii) Whether service counts for pension under Act 1957	Pay in substantive Post	Additional Pay for officiating	Other emolument falling under the term "Pay"	Date of Appointment	Signature of Government Servant
PET POST Lilim's Sarai Bala	BPS No. 1038 PS Temp.	(16120-1330-56020) Temp.	30750/-	-	-	12/2018	
M	u	u	32080/-	-	-	12/2020	
r	-	-	Rs 33410/pm			12/2021	
Pay Scale Revised w.e.f. 1-7-2022							
B-15 PS (23320-1980-83320)							
	Temp	Temp	Rs 49660/pm			12/2021	
	r	r	Rs 51650/pm			12/2021	
 ATTESTED							

Signature of Government Servant

Sarai Bala

1-12-2018

20/07/19

Sarai Bala

1-12-2018

20/07/19

(29)

Signature of Government Servant	Signature and Position of the head of office or other attesting officer in Section 1 to 8	Date of termination of appointment	Reason of termination (such as promotion, transfer, dismissal etc.)	Signature of the head of the office or other attesting officer	Nature and duration of leave taken	Leave 1.		Signature of the head of the office or other attesting officer	Reference to any recorded punishment or censure, or reward or praise of the Government Servant
						Allocation of period of leave on average pay upto four months for which leave salary is debitable to another Government	Government to which debitable		
	<i>[Signature]</i> District Education Officer (F) District Lower Dir	20/11/2020		<i>[Signature]</i> District Education Officer (F) District Lower Dir				<i>[Signature]</i> District Education Officer (F) District Lower Dir	Service notified 12/12/2017
	<i>[Signature]</i> District Education Officer (F) District Lower Dir	30/11/2020		<i>[Signature]</i> District Education Officer (F) District Lower Dir				<i>[Signature]</i> District Education Officer (F) District Lower Dir	Service notified 12/12/2017
	<i>[Signature]</i> District Education Officer (F) District Lower Dir	30/11/2020		<i>[Signature]</i> District Education Officer (F) District Lower Dir				<i>[Signature]</i> District Education Officer (F) District Lower Dir	Service notified 12/12/2017
	<i>[Signature]</i> District Education Officer (F) District Lower Dir	30/11/2020		<i>[Signature]</i> District Education Officer (F) District Lower Dir				<i>[Signature]</i> District Education Officer (F) District Lower Dir	Service notified 12/12/2017
	<i>[Signature]</i> District Education Officer (F) District Lower Dir	30/11/2020		<i>[Signature]</i> District Education Officer (F) District Lower Dir				<i>[Signature]</i> District Education Officer (F) District Lower Dir	Service notified 12/12/2017

Service notified on 1-12-2020 to 30-11-2021 from office hand.

Recovery of overpay must be notified to the Govt by 31-07-2022 amounting to Rs. 87279/-(Eighty Seven Thousand Two Hundred & Seventy nine only/-) Recovery 22 Equal instalments w/e 1-8-2022 to 31-05-2024.

31-12-2022
Work Office hand.

Service verified with pay order @ 49660/- w/e 1-8-22 that from 01-12-2021 to 30-11-2022 from the office hand.

DISTRICT EDUCATION OFFICER (F) DIR LOWER
4-9-22
4-8-22
ATTACHED

1	2	3	4	5	6	7	8
Name of Post	Whether officiating and substantive or (i) Substantive or (ii) Whether service counts for pension C.S.R.	Whether officiating and substantive or (i) Substantive or (ii) Whether service counts for pension C.S.R.	Pay in Post	Additional Pay for officiating	Other emolument falling under "Pay"	Date of Appointment	Signature of Head and other Government of
SDET Post							
Rights -							
Revised entry due to transfer from DET Post to SDET Post 16-10-2023							
Pay on 01-09-2023 provided to							
Pay on 01-08-2023 DET 18-15							
55190/-							
55190/-							
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ALISTED

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 Stage + one promotion 2
 Pay on 01-09-2023 provided to
 Pay on 01-08-2023 DET 18-15
 55190/-
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 55190/-

Revised entry due to transfer from DET Post to SDET Post 16-10-2023

55190/-

18	Reference to any recorded punishment or censure, or reward or praise of the Government Servant	Signature of the head of the office or other attesting officer	Allocation of period of leave	Nature and duration of leave taken	Signature of the head of the office or other attesting Officer	Reason of termination (such as promotion, transfer, etc.)	Date of appointment	Signature of the head of the office or other attesting officer	Signature of the head of the Government
17			Government to which debtable	Period which debtable					

*Promoted from
 P.T. B-15 to S.P.T. B-16
 vide Director's Memorandum
 & Secondary Memorandum
 for P.T. B-15
 Order No. 4256-60
 A-25, P.T. B-15
 Further submission note
 (copy to S.P.T. B-16)
 Order No. 3381-86
 dated 12/08/2003
 (Posted at GHS Wansak)*


*HEAD MISTRESS
 GHS, WANSAK
 Dist. Dir (Lower)*

*HEAD MISTRESS
 GHS, WANSAK
 Dist. Dir (Lower)*

*1901-
 16
 16*

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(31)


PAKISTAN National Identity Card
 ISLAMIC REPUBLIC OF PAKISTAN

Name: Bakht Zia Bibi


Husband Name: Latif Ull Rahman

Gender: Female
 Country of Origin: Pakistan

Identity Number: 15302-0850195-8
 Date of Birth: 17-03-1974
 Date of Issue: 02-07-2020
 Date of Expiry: 01-07-2030

Holder's Signature

15302-0850195-8



101621196609
 109-74-293694

گمشدہ کارڈ ملنے پر قریبی لیٹر بکس میں ڈال دیں

ATTESTED

C.T.C
M/ M/

B I
Riazuddin A (32)
24/03/2024

To

The District Education officer (F)

Lower Dir at Timergara

Subject:

Mutual transfer

R/Madam,

With deep sense of reverence, it's stated that we both the undersignedes are willing to be mutually transferred as per proposal given below. This will enable each of us to have access for duties conveniently in the best interest of the students.

If you kindly issue orders for mutual transfer, the undersigneds with remain grateful to you.

Proposal

S.no	Name of teacher	From	To
1	Taj Begum SPET	GGHSS Nagria payeen	GGHS Warsak
2	Bakhtzia Bibi SPET	GGHS WARSAK	GGHSS Nagria payeen

Thank you.

G. Begum
1. Taj Begum
NIC # 15302-0826172-8
Mobile no: 03459511139
0346806454

B. Bibi
2 Bakhtzia Bibi
NIC# 153020850195-8
Mobile no: 03459863511

ATTESTED

C.T.C. M. W. W. W.

33

To

The District Education Officer (Female)
District Lower at Timergum.

Subject: Application for Transfer against the vacant post of SPET at GGHS Nagrai in respect of Bakhtzia Bibi SPET GGHS Warsk.

Respected Sir/ Madam,

With extreme veneration, it is stated in your kind honor that I have been performing my duties as SPET at GGHS Warsak am eager to be transferred to a nearby school GGHS Nagri Payeen vacant post w.e.f 05-05-2024 where the same post is going to be vacated upon the retirement of Miss Taj Begum SPET.

GGHS Warsak is not easily accessible the teacher concerned non-availability of routine transportation means/ vehicles. Also, it causes extreme fatigue and mental distraction which affect teaching learning process.

You are, therefore, requested for the duly consideration of my application and for issuing orders of my transfer to GGHS Nagri Payeen Talash.

I will be grateful.

Yours Obediently

Bakhtzia Bibi SPET BPS-16
GGHS Warsak Dir Lower

To ADEO (Secondary)

For n/a please.
M

24/4/2024

Riazuddin S

ATTEST
24/04/2024

C.T.C.M. Mrs

134

EMPLOYEE NAME	PERSONNEL NUMBER	DESCRIPTION	BPS	OPEN/FILLED	TOTAL
					44
		Certificated Teacher			4
MS RIZWANNA	920664	Certificated Teacher	15	FILLED	1
ALIA SHOAB	264466	Certificated Teacher	15	FILLED	1
SHAISTA BEGUM	352953	Certificated Teacher	15	FILLED	1
	0	Certificated Teacher	15	OPEN	1
		CERTIFIED TEACHER IT			1
RABIA AFTAB	895539	CERTIFIED TEACHER IT	12	FILLED	1
		CHOWKIDAR			2
BAKHT AHMAD	263345	CHOWKIDAR	03	FILLED	1
MUHAMMAD IBRAHI	879120	CHOWKIDAR	03	FILLED	1
		INSTRUCTOR PHYSICAL EDUCATION			1
FARZANA BEGUM	267662	INSTRUCTOR PHYSICAL EDUCATION	17	FILLED	1
		JUNIOR CLERK			1
MUHAMMAD REHMA	267957	JUNIOR CLERK	11	FILLED	1
		LABORATORY ASSISTANT			1
SONIA AKRAM	995965	LABORATORY ASSISTANT	07	FILLED	1
		LABORATORY ATTENDANT			2
ABDULLAH	264553	LABORATORY ATTENDANT	03	FILLED	1
BACHA EZAR	879119	LABORATORY ATTENDANT	03	FILLED	1
		NAIB QASID			2
AZIZ ULLAH KHAN	756009	NAIB QASID	03	FILLED	1
NAWAB ZADA	725010	NAIB QASID	03	FILLED	1
		PRINCIPAL			1
	0	PRINCIPAL	18	OPEN	1
		QARIA			1
MUNIBA BIBI	912320	QARIA	12	FILLED	1
		SECONDARY SCHOOL TEACHER			17
HADIA BEGUM	263963	SECONDARY SCHOOL TEACHER	16	FILLED	1
RASHIDA	268134	SECONDARY SCHOOL TEACHER	16	FILLED	1
NAHEED BEGUM	263300	SECONDARY SCHOOL TEACHER	16	FILLED	1
	0	SECONDARY SCHOOL TEACHER	16	OPEN	1
ASMAT ARA	264451	SECONDARY SCHOOL TEACHER	16	FILLED	1
FAUZIA SHAHEEN	263051	SECONDARY SCHOOL TEACHER	16	FILLED	1
ABIDA BIBI	263644	SECONDARY SCHOOL TEACHER	16	FILLED	1
KALSOOM BEGUM	263626	SECONDARY SCHOOL TEACHER	16	FILLED	1
SADAQAT BEGUM	263584	SECONDARY SCHOOL TEACHER	16	FILLED	1
MUSSARRAT BEGUM	264109	SECONDARY SCHOOL TEACHER	16	FILLED	1
	0	SECONDARY SCHOOL TEACHER	16	OPEN	1
REEMA BIBI	861492	SECONDARY SCHOOL TEACHER	16	FILLED	1
ANUM IMRAN	923852	SECONDARY SCHOOL TEACHER	16	FILLED	1
GHAZALA ROOHI	802606	SECONDARY SCHOOL TEACHER	16	FILLED	1
MS ASMA	901061	SECONDARY SCHOOL TEACHER	16	FILLED	1
AYSHA BIBI	916664	SECONDARY SCHOOL TEACHER	16	FILLED	1
NAJ MUSSAMA	1009302	SECONDARY SCHOOL TEACHER	16	FILLED	1
		SECONDARY SCHOOL TEACHER IT			1
RABIA AKHTAR	987249	SECONDARY SCHOOL TEACHER IT	16	FILLED	1
		SENIOR ARABIC TEACHER			1
ALIA	358986	SENIOR ARABIC TEACHER	16	FILLED	1
		SENIOR CERTIFIED TEACHER			2
MINHAJ BEGUM	263693	SENIOR CERTIFIED TEACHER	16	FILLED	1
FARIDA BIBI	265164	SENIOR CERTIFIED TEACHER	16	FILLED	1
		SENIOR CLERK			1
SAHADAR ZEB	265011	SENIOR CLERK	14	FILLED	1
		SENIOR DRAWING MASTER			1
NIGHAT BEGUM	264111	SENIOR DRAWING MASTER	16	FILLED	1
		SENIOR PHYSICAL EDUCATION TEACHER			1
	0	SENIOR PHYSICAL EDUCATION TEACHER	16	OPEN	1
		SENIOR THEOLOGY TEACHER			1
KHALIDA	259870	SENIOR THEOLOGY TEACHER	16	FILLED	1
		SUBJECT SPECIALIST			2
AISHA HASSAN	1008333	SUBJECT SPECIALIST	17	FILLED	1
SHABINA BIBI	566838	SUBJECT SPECIALIST	17	FILLED	1
		SWEEPER			1
JMMI KALSOOM	980197	SWEEPER	03	FILLED	1

C.T.C M. J. J.

(35)

- C



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
DISTRICT LOWER DIR AT TIMERGARA



OFFICE ORDER.

Mst: Bakht Zia SPET, GGHS Warsak, is hereby transferred to GGHSS Nagrai Paycen, against the vacant post of (SS(Urdu)) in the interest of public service with immediate effect.

Note:

- 1.No TA/DA is allowed.
- 2.charge report should be submitted to all concerned.
- 3.In case of arrival of the original teacher of the post ,then the post should be vacated.

{ MEHRUN NISA)
DISTRICT EDUCATION OFFICER (F)
DIST: LOWER DIR AT TIMERGARA.

Endst No: 2016-21 Dated Timergara the. 14 / 06 / 2024.

Copy of the above is forwarded for information to the:

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer Lower Dir.
3. District Accounts Officer Lower Dir.
4. Principal / Head Mistress concerned.
5. Accountant local office.
6. Teacher concerned.

DISTRICT EDUCATION OFFICER (F)
DIST: LOWER DIR AT TIMERGARA.

ATTESTED

C-T-C M



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
DISTRICT LOWER DIR AT TIMERGARA



OFFICE ORDER.

Mst: Seema Ghufraan PET, GGMS Garra, is hereby transferred to GGHSS Nagrai Payeen, against the vacant post of SPET, in the interest of public service with immediate effect.

Note:

- 1.No TA/DA is allowed.
- 2.charge report should be submitted to all concerned.

(MEHRUN NISA)
DISTRICT EDUCATION OFFICER (F)
DIST: LOWER DIR AT TIMERGARA.

Endst No: 1935-40 / 1 . Dated Timergara the 16 / 06 / 2024.

Copy of the above is forwarded for information to the:

- 1. Director E&SE Khyber Pakhtunkhwa Peshawar.
- 2. District Monitoring Officer Lower Dir.
- 3. District Accounts Officer Lower Dir.
- 4. Principal GGHSS Nagrai (P)
- 5. Accountant local office.
- 6. Teacher concerned.

DISTRICT EDUCATION OFFICER (F)
DIST: LOWER DIR AT TIMERGARA.

Attested

15/06/2024

DISTRICT EDUCATION OFFICER (F)
DIST: LOWER DIR AT TIMERGARA

Attested
ATTESTED

36

To,

The Directorate,
Government of Khyber Pakhtunkhwa,
Elementary and Secondary education department,
Peshawar

Subject: Appeal against the unjustice transfer order of PET -15 position on SPET 16 position.

Respected Sir,

Respectfully, It is stated in your kind honor that I, BakhtziaBibi, SPET, performing my duty at GGHS Warsak. I have submitted my application for plain order and mutual order as well but in vain. The concerned authority issued an order of another candidate which is most junior than me. Such a plain transfer order of a PET candidate with BPS-15 has been placed against the post of SPET BPS-16 which is a naked example of unjustice and baseness. We deem ourselves duly deserved to be transferred mutually to our respective schools due to the following reasons.

1. We submitted a timely application for placement transfer which deserved foremost to be addressed properly.
2. Both the posts at GGHS Warsak and GGHSS Nagri Payeen are SPET BPS-16 and there seemed no technical/legal issue with the mutual transfer of the respective teachers.
3. In this regard the transfer of PET candidate has been issued against the vacant post of SPET which is a naked example of injustice with us.
4. The applications/ claims of other candidates for transfer can be addressed by transferring them to other nearest centers. They should be/ can be adjusted at other centers.

Your kind honor is, therefore, requested for the duly consideration of the appeal and for ensuring justice by issuing order of our placement order to the respective schools.

We will be grateful.

Yours Obediently,

BakhtziaBibi SPET GGHS Warsk

2.
ATTES TED

~~10/01/2024~~

10 ADEO (Secondary)

Cancel the order immediately.

DEO (F) Dirlower

Cancel order and adjust against SPET

11/2/2024

27/06/24



(37) = E =

**OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
DISTRICT LOWER DIR AT TIMERGARA**

OFFICE ORDER.

This office order issued against SS/Head Mistresses in respect of the following SSTs are hereby cancelled / with drawn in the best interest of public.

S#	Name of teacher with designation	From	Name of school where adjusted	Order Endst: No. & date
1	Kawsar Bibi SST(G)	GGHS Makhai	GGHSS Nagri (P) against SS(Eng)	Endst: No. 2011-15 dated 14-06-2024
2	Bakht Zia SPET	GGHS Warsak	GGHSS Nagri (P) against SS(Urdu)	Endst: No. 2016-21 dated 14-06-2024
3	Rozina SST(G)	GGMS Toorqila	GGHSS Ziarat against SS(PS)	Endst: No. 2027-32 dated 14-06-2024

Note:


- 1.No TA/DA is allowed.
- 2.charge report should be submitted to all concerned.

(MEHRUN HISA)
DISTRICT EDUCATION OFFICER (F)
DIST: LOWER DIR AT TIMERGARA.

Endst No: 2217-211 Dated Timergara the 01/07/2024.

Copy of the above is forwarded for information to the;

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer Lower Dir.
3. District Accounts Officer Lower Dir.
4. Principals/Head Mistresses concerned.
5. Teacher concerned.


DISTRICT EDUCATION OFFICER (F)
DIST: LOWER DIR AT TIMERGARA.


ATTESTED

38



OFFICE OF THE DISTRICT EDUCATION OFFICER (FEMALE)
DISTRICT LOWER DIR AT TIMERGARA

OFFICE ORDER.

In compliance of the direction given by the competent authority the Director E&SE Khyber Pakhtunkhwa Peshawar, transfer orders of the following teachers issued by this office are hereby with drawn / Cancelled, in the best interest of public service with immediate effect.

S#	Name of teacher with designation	From	Name of school where adjusted	Order Endst: No. & date
1	Seema Gufran PET	GGMS Garra	GGHSS Nagrai (P) against vacant post SPET	Endst: No. 1935-40 dated 14-06-2024
2	Salma Ali PET	GGMS Darmal Bala	GGMS Garra SL#.3 of the order	Endst: No. 1929-34 dated 14-06-2024
3	Azia Begum PET	GGHS Lajbook	GGMS Darmal Bala SL#.4	Endst: No. 1929-34 dated 14-06-2024

Note:

- 1.No TA/DA is allowed.
- 2.charge report should be submitted to all concerned.

(MEHRUN NISA)
DISTRICT EDUCATION OFFICER (F)
DISTT: LOWER DIR AT TIMERGARA.

Endst No: 2222-271 Dated Timergara the. 01 / 07 / 2024.

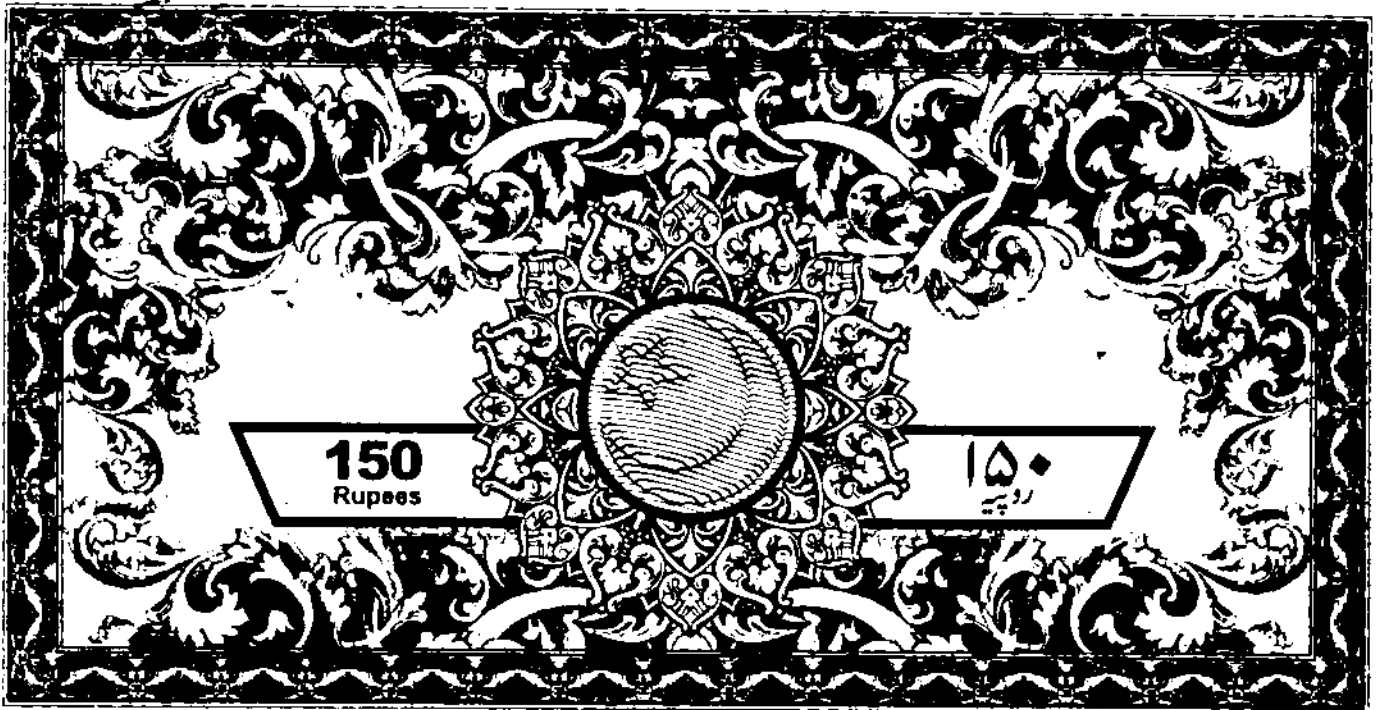
Copy of the above is forwarded for information to the;

1. Director E&SE Khyber Pakhtunkhwa Peshawar.
2. District Monitoring Officer Lower Dir.
3. District Accounts Officer Lower Dir.
4. Principals/Head Mistresses concerned.
5. Accountant local Office.
6. Teacher concerned.

DISTRICT EDUCATION OFFICER (F)
DISTT: LOWER DIR AT TIMERGARA.

ATTESTEE

39



SPECIAL POWER OF ATTORNEY

I, Bakht Zia Bibi wife of Latifur Rahman resident of Ziarat Talash, Dherai, Tehsil Timergara, District Dir Lower, do solemnly declared I as a appellant and want to filed a service appeal titled Bakht Zia Bibi VS Govt. of KP & others in the Before The Service Tribunal Khyber Pakhtunkhwa at Peshawar. I cannot attend the court personally. I give attorney to my husband Latif Ur Rahman, to represent my case as "Special Attorney". As a special attorney he may represent my case through lawyer, Barrister in the said court and Supreme Court of Pakistan on my behalf, he can attest the wakalatnama / attorney, give petition, appeal, attestation and other necessary legal documents required by the court. Moreover, he is permitted to represent compromise, withdrawal of case through mediation lawyer or personally. He is authorized to deposit fee for witnesses and file execution, petition etc all the proceeding required by law. This is a given testimony for all the proceedings required by law.

EXECUTANT

31
Bakht Zia Bibi

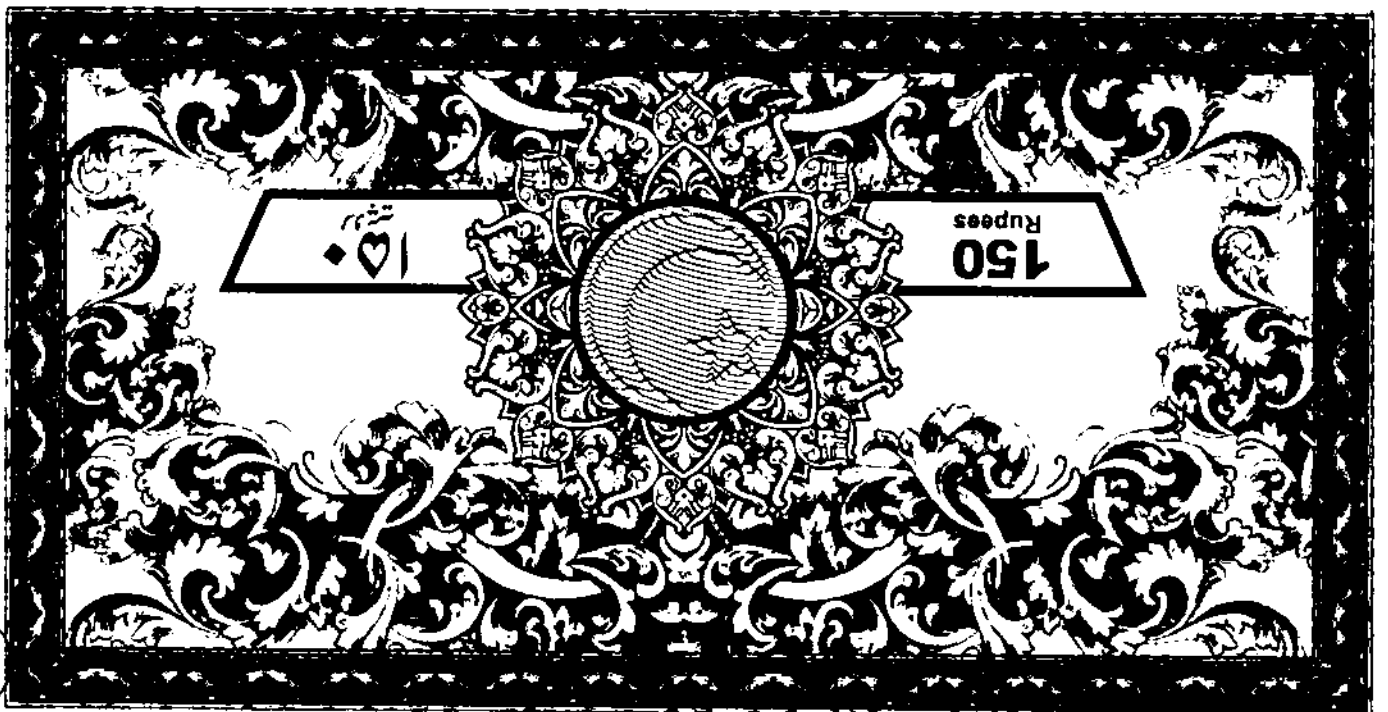
CNIC No: 15302-0850195-8

Witnesses

1. Latifur Rahman
15302-5061346-7

2. Khalid mehmood
15302-6130185-5

Handwritten text: 26/12/94
Handwritten signature: WAF



Handwritten number: 40

THE NATIONAL ARCHIVES

8658340

384/2024
26/07/24

District Comptroller of Accounts
23 JUL 2024
(Tresury Wing) Peshawar

Handwritten signature and stamp

قیمت 50 روپے	48518	پشاور بار ایسوسی ایشن، خیبر پختونخواہ	
ایڈریس: <u>حمیر سائبر سٹیٹ</u>		PESHAWAR BAR ASSOCIATION	
بار کونسل ایسوسی ایشن نمبر: <u>16-7151</u>			
رابطہ نمبر: <u>03415257453</u>			

ShehdAdvocet102@gmail.com: بعدالت جناب:

مخاطب: <u>اسلام آباد</u>	دعویٰ: <u>سروس ایبل</u>
مکتبہ ضیاء جی بی بنام حکومت	علت نمبر: _____
	مورخہ: _____
	جرم: _____
	تھانہ: _____

باعت تحریر آگے

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ
 آن مقام سیا در کیلئے حمیر سائبر سٹیٹ ڈائریکشنل سروسز
 کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کال آف اختیار ہوگا، نیز وکیل صاحب کو
 راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق
 زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز
 دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی
 کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب
 مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر راختہ منظور و قبول ہوگا
 دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیش مقام دورہ یا حد سے
 باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

مکتبہ ضیاء جی بی مندرجہ مختار صاحب

المرقوم: 26/7/2024
 PESHAWAR BAR ASSOCIATION
 KHYBER PAKHTOONKHWA
 Hamir Cyber State
 Dangs Khan
 ATAC

وہ شہد العبد

سیا در کے لیے منظور ہے۔

حمیر سائبر سٹیٹ ڈائریکشنل سروسز
 Hamir Cyber State
 Dangs Khan
 ATAC