


FORM OF ORDER SHEET

Court of _____

Appeal No. 1486/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/9/2024	<p>The appeal of Mst. Shazia Qamar presented today by Mr. Muhammad Ashfaq Khan Advocate. It is fixed for preliminary hearing before Single Bench at Peshawar on 24/9/2024. Parcha Peshi given to counsel for the appellant.</p> <p>By order of the Chairman</p> <p> REGISTRAR</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

CM No...../2024

in

Service Appeal No. 1486 /2024

Mst. Shahzia Qamar Versus Director E&SE KP& Others

**APPLICATION FOR FIXATION AND HEARING OF THE
CAPTIONED APPEAL AT THE PRINCIPAL SEAT INSTEAD
OF THE CAMP COURT, MINGORA, SWAT**

Respected Sir,


The Appellant respectfully submits as under:

1. That the Appellant has filed the captioned appeal, along with an application for the suspension of operation of the impugned notification dated **12/06/2024**, before this Hon'ble Tribunal. However, the appeal has not yet been fixed for hearing.
2. That the Appellant has challenged the impugned notification dated **12/06/2024**, whereby the Appellant's mutual transfer order dated **22/02/2024** has been unjustly withdrawn under political pressure exerted by a Member of the Provincial Assembly (MPA) belonging to the ruling party. The purpose of this pressure appears to be the accommodation of their preferred candidate. Furthermore, the Respondents are actively coercing the Appellant to vacate the post of **SST (G)** under the pretext of the impugned notification. In view of these circumstances, equity and justice demand that the captioned appeal be fixed for early hearing at the Principal Seat, rather than referring the file to the Camp Court, Mingora, Swat.
3. That the Respondents' persistent efforts to enforce compliance with the impugned notification, in collusion with political actors, highlight the urgency of this matter. The vested interests at play necessitate the immediate intervention of this Hon'ble Tribunal to ensure that the principles of justice and equity are upheld.

In light of the foregoing, it is, therefore, most humbly prayed that on acceptance of this Application, the captioned appeal may kindly be fixed for hearing at principal seat for the reasons stated above

Through


Applicant/ Appellant


M. Ashfaq Khan Akhunkhail
Advocate,
Khalid & Law Associates
46-C, 2nd Floor Cantonment Plaza,
Peshawar Cantt
Email: Ashfaqkhan182@gmail.com

Cell No.0333-8522332

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1486/2024

Mst. Shazia Qamar

Versus

Director Elementary & Secondary Education KP & others

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Appellant 

Through


M. Ashfaq Khan Akhunkhail

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①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1486 /2024

Mst. Shahzia Qamar D/ O Qamar Zaman, Headmistress GGH School
Ramora, Tehsil Adenzai, District Dir Lower

.....Appellant

Versus

1. **Director** Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar
2. **Secretary**, Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar

.....Respondents

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED OFFICE ORDER/ NOTIFICATION NO.8246-48/A-17/POSTING/ TRANSFER/KPK/VOL-01 DATED 12/06/2024 PASSED BY RESPONDENT NO.2 WHEREBY APPELLANT MUTUAL TRANSFER ORDER/ NOTIFICATION NO.529-32 DATED 22/02/2024 ISSUED BY RESPONDENT NO.1 WAS WITHDRAWN AND AGAINST THE INACTION OF RESPONDENTS BY NOT DECIDING THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD

Respectfully Sheweth:

Brief facts giving raise to the Appellant to file the instant appeal are as under,

1. That the addresses of the parties have been correctly provided in the heading of this Appeal, which is sufficient for the service of summons, notices, or any other process required by this Hon'ble Tribunal from time to time.
2. That the Appellant is a permanent resident and domicile holder of Village Sehsadda, Tehsil Adenzai, District Dir (Lower).
{Copies of the CNIC and Domicile of the Appellant are annexed as Annexures A & B}
3. That the Appellant joined the Education Department in 2002 and, despite suffering from Sciatica, as evidenced by medical

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Respondents, has served the department with dedication and to the complete satisfaction of her superiors.
{Copies of Medical Reports are annexed as Annexure C}

4. That it is an undisputed fact that the Appellant's husband is employed as a Professor at Malakand University, located in Ramora, Chakdara, and that her children are currently studying in Ramora, Chakdara.
5. That the Appellant, on multiple occasions, declined promotion due to severe Sciatica. However, on 08/12/2023, the Respondents, upon the approval and recommendation of the Departmental Promotion Committee, promoted the Appellant to the post of SST(G) and subsequently adjusted her against a vacant post of SST at GGHSS Mayar, Dir Lower.

{Copy of Appellant's promotion order dated 8/12/2023 is annexed as annexure D}

6. That, pursuant to her promotion, the Appellant assumed charge as SST(G) at GGHSS Mayar. Subsequently, the Appellant, along with another SST(G), namely Mrs. HussanAra, obtained NOCs from their respective schools and submitted an application for mutual transfer to DEO (F) Dir Lower. Consequently, mutual transfer notification No. 529-32, dated 24/02/2024, was issued by the competent authority, i.e., DEO (F). In compliance with the mutual transfer order, the Appellant assumed charge as SST(G) at GGHSS Ramora and has been receiving her salary accordingly.
{Copies of mutual transfer notification dated 24/02/2024, and the teacher attendance register are annexed as Annexures E & F}

7. That just after 4 months, all of a sudden and without any prior notice or departmental appeal, Respondent No. 1/Director E&SE KP, under political pressure from the ruling party's MPA, Mr. Hamayun Khan, unjustly withdrawn/ cancelled the mutual transfer notification dated 24/02/2024 via the impugned notification No. 8246-48/A-17/Posting/Transfer/KPK/Vol-1 dated 12/06/2024

{Copy of the impugned notification No. 8246-48/A-17/Posting/Transfer/KPK/Vol-1 dated 12/06/2024 is annexed as Annexure G}

8. That, feeling aggrieved by the illegal withdrawn / cancellation of the mutual transfer, the Appellant submitted a departmental representation/appeal on 13/06/2024, outlining her grievances. However, despite the statutory period having passed, no response has been received. **{Copies of the departmental representation and letter dated 24/07/2024 are annexed as Annexures H &}**

9. That, having no other adequate remedy available and aggrieved by the Respondents' actions and inactions, the Appellant approaches this Hon'ble Court on the following grounds

GROUND

- A. That the Appellant has not been treated by the Respondent Department in accordance with the applicable law, rules, and policies on the subject, as noted above. As such, the Respondents have violated the Appellant's rights guaranteed under Articles 4 and 25 of the Constitution of the Islamic Republic of Pakistan, 1973.
- B. That the impugned Notification is ultra vires, issued in bad faith, illegal, discriminatory, and unfounded, and is based on political victimization. Hence, it is liable to be set aside.
- C. That the Appellant, being a female serving in the Education Department under the Spouse Transfer Policy as well as the Tenure Policy laid down by the Provincial Government, cannot be transferred to far-flung areas, especially when a nearby SST (G) post is lying vacant.
- D. That, above all, the Appellant, being a female, would not only face financial hardship but would also suffer mental and physical distress if compelled to serve at the impugned posting in a far-flung area.
- E. That the impugned office order/notification is coram non judice, illegal, and contrary to law and policy on the subject matter for, inter alia, the following reasons:
 - i. That, admittedly, on 24/02/2024, the Appellant was transferred through a mutual transfer order to GGSS Ramora. However, the impugned notification issued on 12/06/2024 is untenable under the Tenure Policy promulgated by the Provincial Government.
 - ii. That the mutual transfer, issued by the competent authority, cannot be lawfully challenged, particularly

without providing the parties concerned with an opportunity to be heard. On this score alone, the impugned notification is coram non judice and unsustainable in law.

- iii. That the Appellant's husband serves as a professor at Malakand University, Ramora, and her children are also studying in Ramora. Therefore, the impugned notification dated 12/06/2024 violates the Spouse Policy and is legally untenable.
- iv. That the impugned notification dated 12/06/2024 was issued by Respondent No.1, Director E&SE KP, under political pressure from the ruling party's MPA, Mr. Hamayun, to accommodate a favored individual, as evidenced by the letter dated 24/07/2024. This clear malice, apparent on the record, is sufficient to establish that the notification was not issued in accordance with law

10. That the impugned notification dated 12/06/2024 and the inaction of the Respondents in failing to decide the departmental appeal within the statutory period is against public interest, detrimental to the educational environment, and contrary to the principles of good governance. On this ground alone, the impugned notification and the inaction are liable to be set aside, and the mutual transfer order dated 24/02/2024 is liable to be restored, posting the Appellant as SST (G) at GGHSS Ramora, Dir Lower.

11. That the case of the Appellant may kindly be considered on humanitarian grounds, and the Appellant reserves the right to raise any additional grounds at the time of arguments.

In wake of above submission, it is, therefore, most humbly prayed that on acceptance of this appeal,

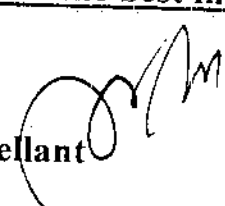
- i. **The impugned Notification No. 8246-48/A-17/Posting/Transfer/KPK/Vol-1 dated 12/06/2024 passed by Respondent No.2 may kindly be declared as wrong, illegal, coram non judice, void abinitio, colorable exercise of power, without jurisdiction, against law and APT Rules. Consequently, the office order/ Mutual transfer notification datet 24/02/2023 may kindly be restored for ends of justice.**
- ii. **The Respondents may kindly be directed to regularize the Appellant's service at her current post of SST (G) at GGHSS Ramora, ensuring continuity in salary,**

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benefits, and all other lawful entitlements without interruption. Consequently, the Respondents may kindly be restrained permanently from taking any further adverse or coercive actions against the Appellant, arising from or related to the impugned notification, or any other unlawful order.

OR

iii. Any other relief which this Hon'ble Tribunal deems appropriate in law, equity, and justice may also be granted to the Appellant in the best interest of justice.

Appellant 

Through


M. Ashfaq Khan Akhunkhail

Advocate,
Khalid & Law Associates
46-C, 2nd Floor Cantonment Plaza,
Peshawar Cantt
Email: Ashfaqkhan182@gmail.com
Cell No.0333-8522332

CERTIFICATE

As per instruction of my client prior to the present one, no such like appeal has been filed by the Appellant before this Hon'ble Court.


Advocate

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2024

Mst. Shahzia Qamar Versus Director E&SE KP& Others

APPEAL U/S 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED OFFICE ORDER/ NOTIFICATION NO.8246-48/A-17/POSTING/ TRANSFER/KPK/VOL-01 DATED 12/06/2024 PASSED BY RESPONDENT NO.2 WHEREBY APPELLANT MUTUAL TRANSFER ORDER/ NOTIFICATION NO.529-32 DATED 22/02/2024 ISSUED BY RESPONDENT NO.1 WAS WITHDRAWN AND AGAINST THE INACTION OF RESPONDENTS BY NOT DECIDING THE DEPARTMENTAL APPEAL OF APPELLANT WITHIN THE STATUTORY PERIOD

Affidavit

I, Mr Arab Naaz son shah munir R/O Chakdara Dir Lower, presently serving as Professor at Malakand University (attorney for Appellant), do hereby solemnly affirm and declare on oath that the contents of accompanying application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Deponent

CNIC#15307-4509142-9

Identified by

M. Ashfaq Khan Akhunkhail
Advocates,
High Court, Peshawar



(7)

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2024

Mst. Shahzia Qamar **Versus** **Director. E&SE KP& Others**

ADDRESS OF PARTIES

APPELLANT:

Mst. Shahzia Qamar D/ O Qamar Zaman,
Headmistress GGH School Ramora, Tehsil Adenzai, District Dir Lower

RESPONDENTS:

1. **Director** Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar
2. **Secretary**, Elementary & Secondary Education Khyber Pakhtunkhwa at Peshawar


Appellant

Through


M. Ashfaq Khan Akhunkhail

Advocates,

High Court, Peshawar

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

CM NO...../2024

IN

Service Appeal No. _____/2024

Mst. Shahzia Qamar Versus Director E&SE KP& Others

APPLICATION FOR SUSPENSION OF THE OPERATION OF IMPUGNED NOTIFICATION NO. 8246-48/ A-17/ POSTING/ TRANSFER/ KPK/VOL-1 DATED 12/06/2024, PASSED BY DIRECTOR E&SE KP, OR IN THE ALTERNATIVE, FOR MAINTENANCE OF STATUS QUO UNTIL FINAL DISPOSAL OF THE INSTANT APPEAL

Respectfully Sheweth:

1. That the Appellant has filed the above-titled appeal before this Hon'ble Tribunal, which has yet to be fixed for hearing.
2. That this instant application may kindly be read as an integral part of the main appeal.
3. That the Appellant seeks the suspension of the operation of the impugned Notification No. 8246-48/A-17/Posting/Transfer/KPK/Vol-1 dated 12/06/2024, or alternatively, the maintenance of status quo until the final decision of the instant appeal, inter alia, on the following grounds:

GROUND:

- A. That the Appellant has a strong prima facie case with a high likelihood of success.
- B. That the balance of convenience lies in favor of the Appellant.
- C. That, admittedly, the Appellant is currently serving as SST (G) at GGHSS Ramora, and the Official Respondents, in active collusion with the ruling party's MPA, are attempting to vacate the post in order to accommodate a favored individual.
- D. That if the operation of the impugned Notification No. 8246-48/A-17/Posting/Transfer/KPK/Vol-1 dated 12/06/2024 is not suspended, or alternatively, if the status quo is not maintained, the Appellant's appeal will become infructuous, and the Appellant will suffer irreparable harm.

In wake of above submission, it is, therefore, most humbly prayed that on acceptance of this application, the relief as prayed for in the heading of application may kindly be granted in favour of Applicant/ Appellant against Respondents.

Applicant/ Appellant

Through

M.Ashfaq Khan Akhunkhail

Advocate,

High Court, Peshawar

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. _____/2024

Mst. Shahzia Qamar Versus Director E&SE KP& Others

APPLICATION FOR SUSPENSION OF THE OPERATION OF IMPUGNED NOTIFICATION NO. 8246-48/ A-17/ POSTING/ TRANSFER/ KPK/VOL-1 DATED 12/06/2024, PASSED BY DIRECTOR E&SE KP, OR IN THE ALTERNATIVE, FOR MAINTENANCE OF STATUS QUO UNTIL FINAL DISPOSAL OF THE INSTANT APPEAL

AFFIDAVIT

I, Mr Arab Naaz son shah munir R/O Chakdara Dir Lower, presently serving as Professor at Malakand University (attorney for Appellant), do hereby solemnly affirm and declare on oath that the contents of accompanying application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Deponent

CNIC#15307-4509142-9

Identified by

M. Ashfaq Khan Akhunkhail
Advocates,
High Court, Peshawar



PAKISTAN

Name: Shazia Qureshi

Residential Address:

Gender: Female

Religion: Muslim

Date of Birth: 05.09.1977

Identity Number: 1530716776224

Date of Expiry: 05.10.2018

Date of Issue: 05.10.2018

Signature: [Signature]

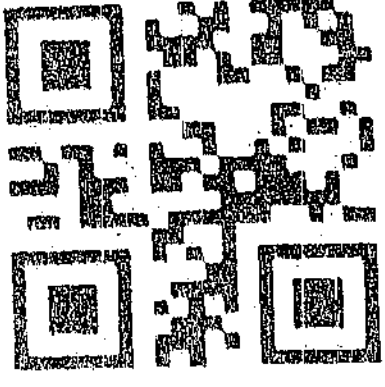
Attested to be true copy
[Signature]

(10) H PUA

تھمیل اون زئی، ضلع

کوئٹہ، چوک خانہ چکدرہ، سہ

15307-1672622-4



لوئر ڈیر

تھمیل اون زئی، ضلع
سنگھ پور ڈاک خانہ چکدرہ، سہ

لوئر ڈیر

101621160675
109-77-240350

Umar V. Memon

Registrar General of Pakistan

F. P. Khay

Attested to be True
Copy

گمشدہ کارڈ طے پرتز بی لیمز بس ٹیل ڈال دیں

AMX B (12) (2)
بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

NO 2409/KKXCI

Dated Dir the 29/6/1993

DOMICILE CERTIFICATE

I declare that I am born of parents who are permanently domiciled in N.W.F.P having been born in this province.

I was born at Village SEHSADDA Tehsil ADENZAI
Distt DIR Date of birth 6-9-1977 Sig Shazia Qamar
Pursuance to the declaration date 13.6.93
Filed by SHAZIA QAMAR son of QAMAR ZAMAN
Village SEHSADDA Tehsil ADENZAI Distt DIR
Section UTMANZAI Sub Section SHERGHKHAIL domiciled in N.W.F.P.
It is hereby certified that the said SHAZIA QAMAR

parents permanently domiciled in N.W.F.P
I have satisfied myself from the verification of Tehsildar ADENZAI

Given under my hand and the seal of the court.

THIS 15 DAY OF June 1993

Magistrate 1st Class
R. M. ENRIK...

COPIES SIGNED

Deputy Commissioner Dir
[Signature]

Attested to be True Copy
[Signature]

AMX "C"

(13)

Associate Professor
Brig Farhat Karim

MBBS, DGO, FCPS SI(M)

Classified Gynaecologist
& Obstetrician
CMH, Rawalpindi



دکتر فرحان کریم
اساتذہ عالیہ
اساتذہ عالیہ
اساتذہ عالیہ
اساتذہ عالیہ

Patient Name Shahzad Age 47 Date 27/11/20

Clinical Record

h.p. 130/80

Temp _____

Wt. 65 k

Hb % 6

BHCG - 9.0

LMP - 7-11-20 for today

TAH

LT adnexal simple cyst 3.7x3.7 CM

Ad

Cap tranexam 500

1 H-H x
Jho 2 carb 6 50

Tab Ibuprofen 1 x 50 x (30)

Next Appointment _____

menstrual calendar

[Signature]

For Appointment: 0315-5320383

Attested to be true
Copy [Signature]

Associate Professor
Brig Farhat Karim

MBBS, DGO, Fcps (M)

Classified Gynaecologist
& Obstetrician

Head of Department

C.M.H Rawalpindi



14

Handwritten signature and notes in Urdu script.

Patient Name: Sheraz

Age: 22 Date: 26

Clinical Record

B.P. 120/80

TEMP

Wt 70kg

W.P. = 21/3

B

TRUC

Triblocular ovum cast

5.4 x 4.7cm

ultra E CET

Ad

Tab Diane 35

21 x 21 x 21

CA-125

connected

Next Appointment

For Appointment: 0315-5320863

Attested to be true

Handwritten signature for attestation.

Associate Professor
Brig Farhat Karim

MBBS, DGO, FCPS
Classified Gynaecologist
& Obstetrician
CMH, Rawalpindi



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[Handwritten signature]

Patient Name Shazia

Age 43 yr Date

Clinical Record

B.P. 130/70
Temp _____
Wt 66 kg

DM ⊖
HTN ⊖

Menstrual cycle
(1-year)

Palat. adnexal cyst
5.6 x 3.4 cm

Adx

Bitca levels

Next Appointment

(1 yr)
Zekia
Katp 22/9
13/10
Menstru
2 year
10/12/10
3-4 post
dyopar

For Appointment: 0315-5320883

Attested to be True

[Handwritten signature]

Attested to be true
[Signature]

For Appointment: 0315-5120883

1870 X 32
This Head
1870 X 31
1870 X 35

Next Appointment
[Signature]

1870 X 32
1870 X 31
1870 X 35

3-3 X 3-9 au
Cultural (cm)

Temp = 9.0
Temp @

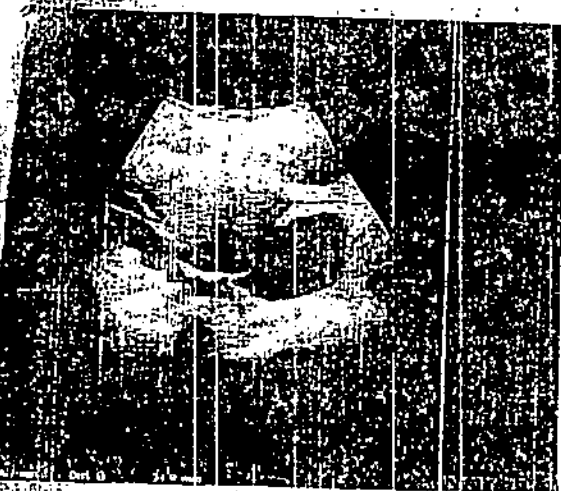
BP 120/80
Temp
66.0

Attested to be true
Date 01/17/11



1870 X 32
1870 X 31
1870 X 35

16



17

پروفیشنل سوسائٹی
پریکٹسنگ ڈاکٹر فرحت کریم
15700
پروفیشنل سوسائٹی
پریکٹسنگ ڈاکٹر فرحت کریم
پروفیشنل سوسائٹی
پریکٹسنگ ڈاکٹر فرحت کریم

Age 43 Date 16/10/2022

B.P. 130/70
Temp
Wt 65kg

in Menstrual
cycle
(2-3 years)

Age 43 yrs
13
(ACI 822)

HMC
HTN

740
Palat aduersal
eign
5.6 x 3.4 cm

LCR 10 yrs
Lab 22/9/20

Adh
Pitca
level

13/10/2022
Menstrual
- Deception
(2-3 years)
- 10/12 days
- 3-4 pads/day
- dyspareunia

Next Appointment

For Appointment: 0315-5320883

Attested by
Copy
True



Northwest General
Hospital & Research Centre

(18)

Dr. Mohammad Farid Khan

MBBS, FRCS
Diplomate EITS (France)

General & Laparoscopic Surgeon

Sector A-3, Phase-V, Hayatabad, Peshawar.

Ph: 091-5838800, Fax: 091-5822620

Email: farid@nwgh.pk, Web: www.nwgh.pk

PM&DC Reg. No: 1590-W

Date: 29/9/07

Clinical Record

Shazia BB

4/0

Spontaneous
for

(R) Adrenal
Cyst

10 days

ago

Now 4/0

Central abdominal

Colicky pain

4/0 (N)

Bloods

Creatinine = (N)

For Contrast Abdomen
12/11/07

ادارہ معائنے کیلئے تیار کیا گیا ہے

by King 20 W

by Urocin (C)

by Gravimite (C)

Nexium
40mg = 125k

Meberine tab: 125k

101

Tram R Plus - 125k

141

King

1 Liter

120 mg

نارتھ ڈیسٹ، جنرل ہسپتال
پکڑاے 3، 5 جات آباد پشاور

ڈاکٹر محمد فرید خان
ایف ایف ایس، ایف آر سی ایس
جنرل ایڈمنسٹریٹو ہسپتال

A project of ALLIANCE HEALTHCARE (Pvt) Ltd.

Attested to be True
Copy

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Abdul Wakeel
M.B.B.S (RMP) R.D.M.S
Ultrasound Specialist
Color & Doppler Ultrasound

کراچی ایڈڈ واپلز اسٹریٹس اور سنٹر
Hcc. Reg: No: 18346

مہتمم
ایم پی بی ایس (آر ایم پی) آر ڈی ایم ایس
کراچی ایڈڈ واپلز اسٹریٹس اور سنٹر

Shazia
42 years. Female.

Ordering Consultant: ?

Date: 13/05/2022

ULTRASOUND FINDINGS: Abdomen/Pelvis

Uterus is having an ill-defined heterogenous texture mass of about 2.0x1.9cm in its anterior wall the sonographic appearance is suggestive of sub-serosal uterine fibroid.

Liver: is normal in size, shape and echogenicity having normal outer margins, hepatic veins, biliary channels and portal vein is normal.

Gall bladder: is normal in size, shape, having normal walls, no stone or growth is seen.

CBD: is within normal limits.

Pancreas: is normal in size, shape and having normal echogenicity, normal pancreatic duct, no solid or cystic mass.


Para-aortic region: normal splenic vein, no enlarged lymph node is seen.

Spleen: is normal in size, shape, and having normal echogenicity, no solid or cystic mass.

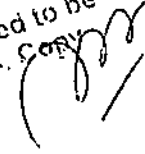
Both kidneys: are normal in size, shape, position, having normal echogenicity, no stone, or hydronephrosis is seen.

Urinary bladder: is well distended having normal walls, no stone or growth is seen.

Both ovaries: are normal.

Sign: 

03-11-6780000

Attested to be True
Copy 

Dr. Abdul Wakeel
M.B.B.S (RMP) R.D.M.S
Ultrasound Specialist

Color & Doppler Ultrasound

کراچی ڈیپارٹمنٹ آف سائٹو پاتھالوجی
Hcc. Reg. No: 16348

بیماریوں کے تشخیص اور علاج کے لیے
پروفیسر (آر ایم سی) آر ڈی ایم ایس

Shazia

42 years Female.

Ordering Consultant: Prof. Brig Farhat Karim (Gynaecologist)

Date: 11/09/2021

ULTRASOUND FINDINGS: Abdomen/Pelvis

A well defined cystic mass of about 10.8x5.7cm is seen in the pelvic suggestive of left adnexal simple cystic mass. Uterus is having an ill-defined heterogenous texture mass of about 2.2x2.1cm in its anterior wall the sonographic appearance is suggestive of sub-serosal uterine fibroid.

Liver: is normal in size, shape and echogenicity having normal outer margins, hepatic veins, biliary channels and portal vein is normal.

Gall bladder: is normal in size, shape, having normal walls, no stone or growth is seen.

CBD: is within normal limits.

Pancreas: is normal in size, shape and having normal echogenicity, normal pancreatic duct, no solid or cystic mass.

Para-aortic region: normal splenic vein, no enlarged lymph node is seen.

Spleen: is normal in size, shape, and having normal echogenicity, no solid or cystic mass.

Both kidneys: are normal in size, shape, position, having normal echogenicity, no stone, or hydronephrosis is seen.

Urinary bladder: is well distended having normal walls, no stone or growth is seen.

Right ovary is normal.

Sign:

کراچی ڈیپارٹمنٹ آف سائٹو پاتھالوجی
D.H.Q. ہسپتال
6347-87198/47-48

Attested to be True
Copy

21

05

Dr. Fervez Khan

M.B.B.S.
M.D. (Medicine)
M.S. (ENT)
ENT Surgeon



Lady Dr. Ayesha Pervez

M.B.B.S.
P.G. (Gynae / Obstetric)
P.G. (Medicine)



Name: *Rozia*

Sex: _____

Age: _____

Date: *29.11.18*

Clinical Record

ear pain
ear pain

1) TOR. Maligna Plus
1 + 1 for 20 days

2 sockets Cran Max
1 X 10 (10)

medical
R.P. 120180

urine RPE

Not Valid For Medicolegal Purpose

0345-9053276
0346-4753398

Attested to be True
[Signature]
Copy

Attested by Dr. [Signature]

115-1753278
115-1753298

Appendix:	
Uterus:	normal + fibroid
Left Kidney:	normal
Right Kidney:	1.5 cm dilation
Spleen:	normal
Pancreas:	normal
Gall Bladder:	normal
Liver:	very changes

ABDOMINAL ULTRASOUND

28-11-13



Gyna Specialist
General Physician

Graduate Gynaecology / Obstetrics (PG)

(M.D.) (M.B.B.S.) (Ayn Gun)

[Signature]

22

نتیجہ سونو گرافی

AYESHA PERVEZ
(M.B.B.S.)

(Gynaecologist)

(Medicine)

D.U. (Urology) (P.H.D.) Islamabad
Gynaecologist & General Physician

FAZLI HAQ

MEMORIAL POLY CLINIC

M.B.B.S. ---
M.D. (Medicine)

23

Name:	SHAZIA
P/LAB NO:	05
Consultant:	Dr. Ayesha Pervez (Gynaecologist)
Sex:	Female
Test Req:	URIN RE
Date:	25 / NOV / 2023

Urine Analysis

Test	Result
------	--------

PHYSICAL

Color: Pale Yellow
Quantity: 35 ml
Reaction (PH): (5.0)

CHEMICAL

Albumin: Nil
Sugar: Nil

MICROSCOPY

Pus Cells: 02 - 03 /HPF
RBC's: 00 - 01 /HPF
Epith. cells: 00 - 01 /HPF

OTHERS

Bacteria Cocci: Nil /HPF
Am. Urates: Nil /HPF
Ca. Oxalate: Nil /HPF
Mucus Threads: Nil /HPF

NOTE:

Please correlate clinically.
Test Done On MAP-LAB PLUS Semi-Automated Bio-Chemistry Analyzer.
For doubtful queries ask the Lib on the same day to repeat the test free of cost.

Naveed Khan
Lab Technician (Pathology)
F.P.M.A (Peshawar)

Sing: 

Contact: 0345-9053276
0346-4753898

ہمقابلہ پنجاب بینک یونیورسٹی روڈ چکدرہ

Attested to be True
Copy



Patient's Copy

24

Shifa International Hospital Ltd.

ہسپتال شیفہ انٹرنیشنل اسلام آباد پاکستان

H-8/4, Islamabad - Pakistan Ph: 051-846.3666 Fax: 051-486.3182

**** Patient Account Statement ****

MR Number : 23-11-60-74
Patient : Mrs. Shazia Qamar
 : W/O Arab Naz
Order By : Dr. Shahnaz Nawaz - IPO

Date: 24/11/23
Time: 15:15
Page: 01/03/01
CASHIER: SHAFIQ

Code	Description	STAT	Date Paid	Service Charges	Rem. Amt
	** Laboratory **				
HM23-01769	CBC Diff Profile (CS11)	normal	24/11/2023	1,500	1,500
HO3-01533	TSH	normal	24/11/2023	1,900	1,900
				Total:	3430

Rupees Three Thousand Four Hundred Thirty Only.

ORIGINAL M.T.N. 0713126-1

This is Computer GENERATED Receipt It DOES NOT require SIGNATURE OF PHYSICIAN

Receipt will be given after 7 days from the date of this receipt.
Attention: Diagnostic reports will be provided in print format only once to View Online Reports on E-IP Patient Portal. For more details visit our website.

Handwritten signature and date: 27/11/23

MR Number : 23-11-60-74
Patient : Mrs. Shazia Qamar
 : W/O Arab Naz
Order By : Dr. Shahnaz Nawaz - IPO

Office Copy
Not For Return

Date: 24/11/23
Time: 15:15

Code	Description	STAT	Date Paid	Service Charges	Rem. Amt
	** Laboratory **				
HM23-01769	CBC Diff Profile (CS11)	normal	24/11/2023	1,500	1,500
HO3-01533	TSH	normal	24/11/2023	1,900	1,900
				Total:	3430

Rupees Three Thousand Four Hundred Thirty Only.

ORIGINAL

Handwritten signature and date: 23/11/23



Handwritten signature and date: 23/11/23

25



Shifa International Hospital Ltd.

شفا انٹرنیشنل ہسپتال اسلام آباد

Sector: H-8/A, Islamabad - Pakistan
Ph: 051-464646
Fax: 051-4683182



Dr. Shahnaz Nawaz

Consultant Obstetrician & Gynaecologist
MBA (Paed), MRCPG (UK), FRCSG (UK), CC FRCOG
Certification in Colonoscopy (UK)
Diploma in Accutone Oestrogen Replacement (NCCO) (UK)
UKA
Examination in Gynaecology
Examination in Laparoscopy, UK, Germany

MR#	Name	Age	Sex	BMI	Height	Weight	Visit Date
23-11-60-74	Mrs. Shazia Qamar	46y 2m	Female	29.05 kg/m ²	153 Cm	68 Kg	24-NOV-23 03:05 PM

Drug Allergies:
NKDA

Diagnosis
N/A

Vital Signs :
BP: 120/60 mmHg, Temperature: 97.8 F, RR: 18 Per
Min, Pulse: 63 Per Min, SpO2: 98%, Pain Scale: 0
BSA: 1.70 m², Falls Risk Screening No. BMI:
29.05 kg/m², Fall Assessment: Functional
Assessment: Negative, Nutritional Score: 0

Investigation Ordered:
Radiology
PELVIS SCAN WITH VAGINAL
PROBE (ULTR)

Laboratory
 1: CBC DIFF PROFILE (CS1) (HBM23)
 2: TSH (CH03)

F.O

15/Dec/2023
11:00 / 10:30

0518464646 (2)

برایات زودتر مشورت پائی بروائی نہ تمام ہا تہریش نہ کریں

*Make an appointment before visit. Followup: 15-DEC-23



دیکھنے کے لئے آپ کو اپنا وقت کرنا چاہئے۔ ہر ماہی اور ماہی کے ممالک ہیں۔ ہر ماہی کو دیکھیں کریں۔
ہر ماہی کو دیکھنے کے لئے آپ کو اپنا وقت کرنا چاہئے۔ ہر ماہی اور ماہی کے ممالک ہیں۔ ہر ماہی کو دیکھیں کریں۔
☎ 0146-4553841

0345-9515917

(SBC)
Attestor to be True
Copy

نوٹ: فوٹو کاپی یا تاش قبول ہوگی۔

26

Patient's Copy

Shifa International Hospital Ltd.

شفا انٹرنیشنل ہسپتال اسلام آباد پاکستان

H-8/4, Islamabad - Pakistan Ph: 051-846.3666 Fax: 051-866.3182

Transfer To Dr: _____

DR's Fee Letter

Or Donate To Shifa Foundat: _____

0 1 2

Dr's Signature

**** Patient Account Statement ****

PH Number: 23-11-60-74

Patient: Mrs. Shazia Qamar
W/O Arab Naz

Order By: Dr. Shannaz Nawaz - IPO

Date: 24/12/2023
Time: 12:56
Receipt # 02708
Shifa International Hospital

Code	Description	STAT	Date Part	Service Charges	Remark
01-19015	Shannaz Nawaz - OPD Initial V sit.	normal	24/12/2023	700	CASH
01-01946	Registration Fee	normal	24/12/2023	300	CASH

Rs Four Thousand Seven Hundred Only.

Total: 700

This is Computer GENERATED Receipt It DOES NOT require any SIGNATURE or STAMP

To be given after 1 days from the use of this receipt

TECHNOLOGIST : Amjad Ali (24804)

Dr. Ghazanfer Abbas
Consultant Chemical Pathologist
Assistant Professor of Pathology
MBS, FCP, FRCR
E-13840

Dr. Muhammad Anwar
Consultant Chemical Pathologist
Professor of Pathology
MBS, CHPE, FRCR
E-13763

Attested to be True Copy



International Hospitals Ltd.

شفق آباد ہسپتال، ہسپتال اسلام آباد

PATHOLOGY

Chemistry

MR No..... : 23-11-60-74
 Patient..... : Mrs. Shazla Qamar
 Age/Gender..... : 46 Yrs 03 Months 08 Days /Female
 Ordered By..... : Dr. Shahnaz Nawaz - IPO
 Ordered On..... : 24/11/2023 15:18
 Specimen No..... : 23013567595
 Received in Lab. : 24/11/2023 15:22
 Verified On..... : 24/11/2023 17:27

RESULTS HISTORY REFERENCE RANGE

1.91 uIU/ml

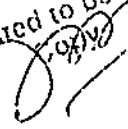
2-4 days 20-40 uIU/ml
 2-20 weeks 1.7-8.1 uIU/ml
 21 weeks-20 years 0.7-8.4 uIU/ml
 21-64 years 0.4-4.2 uIU/ml
 65-87 years 0.5-8.9 uIU/ml

TECHNOLOGIST : Amjad Ali (24604)

Md. Iqbal MD
 Advisor Pathology
 Eng. D.C.P. London
 CAP FASC

Dr. Ghuznfar Abbas
 Consultant Chemical Pathologist
 Assistant Professor of Pathology
 MBBS, FCPH,
 EML2649

Dr. Muhammad Amir
 Consultant Chemical Pathologist
 Professor of Pathology
 MBBS, CHF, FCPB
 Ext 3765

Attested to be True




98

ISO 9001 Certificate No. 2955

International Hospitals Ltd.

شففا انٹرنیشنل ہسپتال اسلام آباد

PATHOLOGY

MR No..... : 23-11-60-74
Patient..... : Mrs. Shazia Gammar
Age/Gender..... : 46 Yrs 03 Months 09 Days / Female
Ordered By..... : Dr. Shahnaz Nawaz - IPD
Ordered On..... : 24/11/2023 15:18
Specimen No..... : 23410274059
Received in Lab.: 24/11/2023 15:22
Verified On..... : 24/11/2023 17:10

ematology

TEST	RESULTS	HISTORY	REFERENCE RANGE
HM23-CBC Diff Profile (CS11)	24/11/23		
WBC Total.....	5770	10 ⁹ /L	(4000/L - 10000/L)
RBC Total.....	5.41	m/μl	(3.8 - 5.0)m/μl
Hemoglobin.....	10.5	g/dL	12.5 - 16.0g/dL
HCT.....	35.2	%	(37 - 47)%
MCV.....	65.1	fL	(78 - 100)fL
MCH.....	19.4	pg	(27 - 31)pg
MCHC.....	29.8	g/dL	(32 - 36)g/dL
Platelet Count.....	379000	/μL	(150,000 - 400,000)/μL
Neutrophils.....	46	%	(54 - 62)%
Lymphocytes.....	40	%	(25 - 33)%
Monocytes.....	9	%	(1 - 4)%
Eosinophils.....	3	%	(1 - 3)%
Basophil.....	0	%	(0 - 0.75)%
RDW.....	15.1	%	(11.5 - 14.0)%

TECHNOLOGIST : Muhammad Tofail Noor (23051)

TECHNOLOGIST : Muhammad Tofail Noor (26051)

Fazal Hani MC
Path Engg

Dr. Avesha Juma

Dr. Ghazala Shahid

True Copy



Shifa International Hospitals Ltd.

29

INPATIENT RESERVATION

(All Admissions are subject to availability of required bed category)


INSTRUCTIONS

- 1. Please type or print information
- 2. Give this form to patient and forward him/her to the admission office
- 3. Patients are requested to submit white copy to the Admission Office

Please Note: Illegible incorrect and / or incomplete information does delay admissions.

23-11-60-70

SHIFA CANON

Patient 

Age _____ Years _____ Days _____ Gender _____

Admitting Physician & Specialty

Dr. Suleman Nadeem

Referring Physician

Provisional Diagnosis at time of Admission

Heavy Menstrual Bleeding

Type of Bed Required

Day Care

Regular Bed

(Ward, SIP, Post, VIP, Executive)

Regular Bed with Telemetry

MICU

SICU

CCU

NICU

Stroke Unit / Neuro SD

MICU-SD

SICU-SD

CCC Ward

Isolation Advice

Contact Isolation

Respiratory Isolation

Neutropenic Isolation

Private Room Required Yes / No

Any other important remarks or admission instructions

Admitted in Day care

Proposed Date of Admission 01/01/2024

Proposed Date of Surgery / Procedure 01/01/2024

Estimated Length of Stay 1 Days

Proposed Time of Surgery / Procedure

Medical / Surgical Procedures Planned (if any)

Hysteroscopy + Endometrial biopsy + Mucosa resection
60-21 + 60-27

In case of surgery, Please fill and attach Surgery estimate form (F-AD-1008)

Name & ID of Consultant (or Stamp)

Date & Signature of Consultants

Remarks if any

To be filled by Admission Representative

Name & ID Admission Representative

Signature & Date

Shifa International Hospital Islamabad
Form AD-1004 Rev 01 30-03-2017

Attested to be True
Copy

30

Worksheet for Estimating Hospitalization Charges F-AD-1008

AD

Patient's Identification

Name: Amal Kumar

M.R. No.: 25123

Date: 15/11/29

Diagnosis: H. pylori

Proposed Date of Admission/Surgery: 1/11/29

Admitting Surgeon/Physician must provide following information:

1. Surgical/Treatment Procedure planned:

Code	Description	IF Day
6021	Laparoscopy + endometrial biopsy	
6097	Wireless surveillance	

- Expected Operating Room Time?
- Expected Laparoscopy/Arthroscopy time?
- What type of anesthesia is required?
- Expected Number of Days in Hospital?
- Does patient require stay in ICU?
- Is there a need of Special Surgical supply, item? (e.g. Stent, Prothesis, Mesh?)
- Any need for Inpatient Consultation from other Clinical Services?
- Any Need for Special Radiology Test?
- Any need for Special Laboratory Test or Blood Transfusion?

Consent for Acknowledgment of Receipt of Information

I/the patient (Name: _____), hereby state that estimated Hospitalization cost has been explained to me in detail. I have read and understand this information. All questions about the expected and unexpected charges have been answered to my satisfaction. I agreed to abide by financial policies of Shifa International Hospital and acknowledge to clear all my dues in advance, which may go up or come down with respect to estimation.

Although I am confident that the staff of Shifa International Hospital will exercise competent professional judgement in treating me/the patient, I am aware that no guarantees have been made as to the result of treatment nor I shall hold the Hospital or its medical staff and management responsible as to the failure of my medical treatment or any surgical procedure performed upon me.

NOTE: Change in price will effect this estimate.

Signature of Patient/Patient's Representative _____ Date: _____

Business Office Representative _____ Time: _____

Shifa International Hospital Islamabad.

13-03-0076

Worksheet for Estimating Hospitalization Charges

Must be kept as Copy

31



Patient's Copy

Shifa International Hospital Ltd.

شفا انٹرنیشنل ہسپتال اسلام آباد پاکستان

H-8/4, Islamabad - Pakistan Ph: 051-846.3666 Fax: 051-486.3182

**** Patient Account Statement ****

MR Number: 23-11-6074

Dated: 15/12/23

Patient: Mrs. Shazia Qamar
W/O Arab Naz

Time: 17:49:27

Order By: Dr. Shahnaz Nawaz - IPO

Code	Description	STAT	Date Paid	Service Charges	Rem
** Discount **					
DS25-21780	Discount-Evening Clinic Lab	normal	15/12/2023	-143	OK
DS25-21780	Discount-Evening Clinic Lab	normal	15/12/2023	-81	OK
DS25-21780	Discount-Evening Clinic Lab	normal	15/12/2023	-90	OK
DS25-21780	Discount-Evening Clinic Lab	normal	15/12/2023	-254	OK
DS25-21780	Discount-Evening Clinic Lab	normal	15/12/2023	-477	OK
** Laboratory **					
BB01-01376	Abo Group & Rh	normal	15/12/2023	1,430	OK
CR12-01594	SGPT (ALT)	normal	15/12/2023	810	OK
CR20-01602	Creatinine Serum	normal	15/12/2023	900	OK
CR55-05323	HBA1C (HS16)	normal	15/12/2023	2,840	OK
CS29-14168	Pre-Op Screening Profile (HBsAg & AntiHCV)	normal	15/12/2023	4,770	OK

Rupees Nine Thousand-Six Hundred Seventy-Five Only.

Total 9675

This is Computer GENERATED Receipt It DOES NOT require any SIGNATURE or STAMP.

(ORIGINAL) N.T.N 0712126.1

ID:

In case of diagnostics, Sample must be provided within 72 hours of the issuance of original receipt. No refunds will be given after 7 days from the date of this receipt.

This is a Computer Generated Receipt. It Does Not Need A Signature. This is a Course.

Our valued patients are advised to avail diagnostic/pharmacy services from to ensure that quality is not being compromised.

Cashier: Mujeeb_27688

F-RS-0005

Receipt# 04343

Attested to be true Copy

32

Shifa International Hospital Ltd.

شفا انٹرنیشنل ہسپتال اسلام آباد

Dr. Shahnaz Nawaz

Sector: —R-4, Karimnagar - F-6/33th
Ph: 351-2653182
Fax: 351-2653182



MR #	Name	Sex	BMI	Height	Weight	Visit Date
23-11-60-74	Mrs. Shazia Qamar	46y 3m Female	29.46 kg/m ²	153 Cm	69 Kg	15-DEC-23 05:21 PM

Drug Allergies:

NKOA

Diagnosis

N/A

Vital Signs :

SP: 126-66 mm Hg, Temperature: 97.8, RR: 14
Min, Pulse: 90 Per Min, SpO2: 98 %, Hapt Serm: 1
BSA: 1.71 m², Falls Risk Screening: 0-24
29.46 kg/m², Fall Assessment: Functional
Assessment: Negative Nutritional Score: 2

Rx:

Retol-Vit. Ferrous
Sulfate Caps: B1, B2, Nicotin. Co. P. A)
150 Mg
(1 Cap/s) orally Once Daily For 3 Month(s)

Plan:

Anesthesia pre assessment today.

Laboratory

1. ABO GROUP & RH (5501)

Other instructions:

Option of hysteroscopy and endometrial biopsy
with mirena insertion discussed.

Make an appointment before visit. Follow up



Attested to be true
[Signature]

Patient's Copy

33

Shifa International Hospital Ltd.

شفا انٹرنیشنل ہسپتال اسلام آباد پاکستان

H-8/4, Islamabad - Pakistan Ph: 051-846.3666 Fax: 051-486.3182

Transfer To Dr _____
 Donate To Shifa Foundat:

Dr's Fee Level
0 1 2 3

Dr's Signature

**** Patient Account Statement ****

MR Number: 23-11-60-74
Patient: Mrs. Shazia Qamar
W/O Arab Naz

Dated 15/12/23
Time 17:59:36
Receipt# 04337
Cashier Mujtab_27581

Order By : Dr. Anesthesia Pool - 21Y

Code	Description	STAT	Date Paid	Service Charges	Remarks
	** Consultation **				
DC01-27777	Pre Anesthesia Consultation - OPd Inl	normal	15/12/2023	3,900	CASH

Rupees Three Thousand Nine Hundred Only.

Total: 3900

(ORIGINAL) N.T.N. 0712126-1

This is Computer GENERATED
Receipt It DOES NOT require any
SIGNATURE or STAMP.

ID:

No refund will be given after 7 days from the date of this receipt.

X

Attested True Copy



Patient's Copy

34

Shifa International Hospital Ltd.

ڈائریشنل ہسپتال اسلام آباد پاکستان

H-8/4, Islamabad - Pakistan Ph: 051-846.3666 Fax: (051-486.3182

- Transfer To Dr
- Donate To Shifa Foundat:

DR's Fee Level
 0 1 2 3

Dr's Signature

** Patient Account Statement **

MR Number: 23-11-60-74
 Patient: Mrs. Shazia Qamar
 W/O Arab Naz
 Order By: Dr. Shahnaz Nawaz - IPO

Dated: 15/12/23
 Time: 14:27:32
 Receipt #: 03040
 Cashier: Saadullah

Code	Description	STAT	Date Paid	Service Charges	Remarks
DC02-19616	Shahnaz Nawaz - OPD Follow-up Visit	normal	15/12/23	3300	OPD
				Total:	3300

Rupees Three Thousand Three Hundred Only

(ORIGINAL) H.T.N. 0212126-1

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No refund will be given after 7 days from the date of this receipt.

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Patient's Copy

35

Shifa International Hospital Ltd.

شفا انٹرنیشنل ہسپتال اسلام آباد پاکستان

H-8/4, Islamabad - Pakistan Ph: 051-846.3666 Fax: 051-486.3182

**** Patient Account Statement ****

MR Number : 23-11-60-74
Patient : Mrs. Shazia Qamar
 W/O Arab Naz
Order By : Dr. Shahnaz Nawaz - IPO

Dated: 15/12/23
Time 11:03:29
Receipt# 01406
Cashier Inam_29563

Code	Description	STAT	Date Paid	Service Charges	Remark
	** Radiology **				
01353	Pelvis Scan With Vaginal Probe	normal	15/12/2023	7,170	CASH

is Seven Thousand One Hundred Seventy Only.

Total: 7170

INAL), N.T.N. 0712126-1

This is Computer GENERATED
Receipt It DOES NOT require any
SIGNATURE or STAMP.

und will be given after 7 days from the date of this receipt.

SHIFA
11:00

MR Number : 23-11-60-74
Patient : Mrs. Shazia Qamar
 W/O Arab Naz
Order By : Dr. Shahnaz Nawaz - IPO

Office Copy
Not For Refund

Dated 15/12/23
Time 11:03:29

Code	Description	STAT	Date Paid	Service Charges	Remark
	** Radiology **				
01353	Pelvis Scan With Vaginal Probe	normal	15/12/2023	7,170	CASH

es Seven Thousand One Hundred Seventy Only.

Total: 7170

GINAL)

Attested to be True
[Signature]

Copy to be made

The following report is for your information only and should not be used for clinical purposes.

CONCLUSION

The uterus is anteverted and anteflexed with a fundus at the level of the umbilicus.

The ovaries are normal in size and position.

Left ovary: 10 x 10 x 10 mm with volume of 2.5 ml.

Right ovary: 10 x 10 x 10 mm with volume of 2.5 ml.

UTERUS

The uterus is anteverted and anteflexed with a fundus at the level of the umbilicus.

UTERUS

The uterus is anteverted and anteflexed with a fundus at the level of the umbilicus.

The ovaries are normal in size and position.

Perform By: Dr. Savita Arora @ 15/12/2023 14:20

Service: Pelvic Scan With Vaginal Probe (01353)

Order By: Shabnaz Akhtar @ 15/12/2023 14:03

Accession#: 2312150397

Name: SHAZIA QAMAR - Female 48 Y

MR#: 23116074



RADIOLOGY

36



UNIVERSITY OF MALAKAND

(Pay Slip For The Month Of May/2024)

Printed On: 2024-May-29 08:54 AM

Name	Prof. Dr. Arab Naz	SPS	21
Personal Number	0345-9537500	Bank Account #	122-7
Designation	Professor	Status	Permanent
Cnic No	15307-4509142-9	Interest Applied	
Email	arab_naz@yahoo.com	Bank Name	
Entry Into University	2012-10-04	GPF A/C No	88
Length Of Services	11Y 8M 00	GPF Balance	1499796.0
Department	Sociology		

Allowances		Deduction	
Description	Amount	Description	Amount
Basic Salary	195410.0	Group Insurance	-398.0
ARA 2023	56397.0	Benevolent Fund	-100.0
Additional Duties Allowance	12000.0	GP Fund	-11725.0
ARA 2022	18258.0	Safe Donation	0.0
Chairman Allowance	0.0	UPS Monthly Fee Deduction	-1356.0
Conveyance	9000.0	Recovery of GP Fund Advance	-23417.0
Entertainment	700.0		
House Rent	17469.0		
Medical Allowance	8320.0		
Orderly Allowance	25000.0		
Ph.D Allowance	10000.0		
Special Allowance 2021/Teaching Allowance 20% 2021	15344.0		
Special Incentive	18000.0		
Senior Post Allowance	1350.0		
Un-Attractive Area	2000.0		
Gross Pay	389248.0	Total Deductions	-36906.0
Net Salary			352343.0

Three Hundred And Fifty-Two Thousand, Three Hundred And Forty-Three Rupee

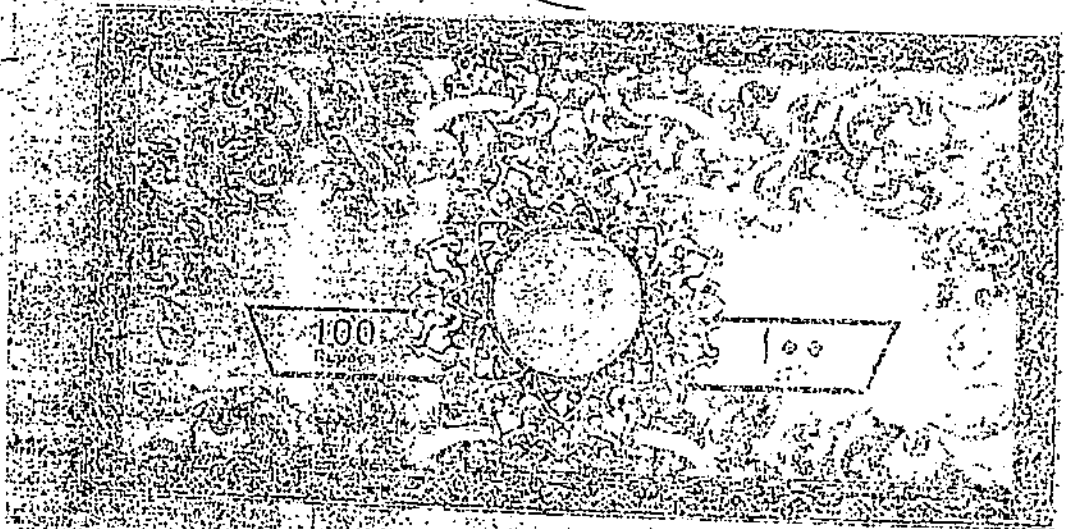
[Directorate Of IT | University Of Malakand]

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38

NO. 10 PERKASA 2011/2012 BUKU KERJA 2011/2012

22



AFFIDAVIT FOR NOT AVAILING OF PROMOTION

I, Shazia Qamar D/O Qamar Zaman hereby submit in writing that I have been contacted by the office of the Education Department at Timergara for sending documents to avail promotion to the next grade. However, it is impossible for me to avail promotion at this stage due to my health condition and family matters at the station which is out of my town. In this regard, your office is allowed to provide a chance of promotion to the next candidate on the list and I will have no objection to the promotion of the next candidate. Thank you very much for your consideration.

Best Regards

Shazia Qamar
SCT GGHS Ramora Serari

Handwritten notes:
e.T.C
As per information
of my...
Obvious



Ann "D"

39

1 Senior Cadre to SST Dir Lower

Directorate of Elementary and Secondary Education Khyber Pakhtunkhwa Peshawar

NOTIFICATION

Consequent upon the recommendation of Departmental Promotion Committee in its meeting held on 10-10-2023 and in pursuance of the Govt of Khyber Pakhtunkhwa Elementary & Secondary Education Notification NO:SO(B&A)/1-18/E&SED/2012 Dated 11.7.2012 and Finance Department Endst: No:SO(FR)/FD/10-22(E) 2010 dated 16.7.2012, the following SCT, CT, PST, PSST, SPST) AT, SAT, TT, STT, DM, SDM, Qaria Senior Qaria (Female) are promoted to the post of SST (G) SST (B/C) BPS -16 (Rs 28070-2260-95870) respectively, usual allowances as admissible under the rules on regular, ACB basis under the existing policy of the provincial Government on the terms & conditions given below with immediate effect
Their Services are placed at the disposal of DEO (F) Concerned for further adjustment

A Promotion to SST (G)

ITEM NO.1: PROMOTION OF CT/SCT TO SST (General) BPS-16 ON REGULAR BASIS

S.No	Sen. No	Name	School	Date of Birth
1.	2	Chudija Bibi	GGHS Osakai	01-01-1974
2.	10	Ghazia Qamar	GGHS Rankom	05-09-1977
3.	13	Shafia Naz	GGCMHS Timergara	15/04/1974
4.	19	Aftab Saeed	GGHS Munda	01-01-1982
5.	20	Nishat Begum	GGCMHS Timergara	05-07-1976
6.	21	Shahnaz Begum	GGHSS Sadde	01-04-1979
7.	22	Enamida Jan	GGHSS Koto	05-06-1977
8.	23	Kausar Bibi	GGHS Moranai	04-12-1985
9.	24	Shakila Begum	GGHS Paito	28-04-1981

A Promotion to SST (G)

ITEM NO.2: - PROMOTION OF DA/SDM TO SST (GENERAL) BPS-16 ON REGULAR BASIS

S.No	Sen. No	Name	School	Date of Birth
1	2	Nasreen Begum	GGHSS Sadde	11-9-72

A Promotion to SST (G)

ITEM NO.3: PROMOTION OF TT/ST TO SST (G) BPS-16 ON REGULAR BASIS

S.No	Sen. No	Name	School	Date of Birth
1	1	Shabnam Begum	GGHS Shamshi Khan	07-04-1976

A Promotion to SST (G)

ITEM NO.4: - PROMOTION OF QARIA/S QARIATO SST (General) BPS-16 ON REGULAR BASIS

Sen. No	Name	School	Date of Birth
10	Ishrat Begum	GGHS Ramora	15/5/1985

B Promotion to SST (B/C)

ITEM NO.5: PROMOTION OF CT/ACT TO SST (Bio:Ch) BPS-16 ON REGULAR BASIS

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CS CamScanner

40

Senior Cadre to SST Dir Lower

	Sen. No	Name of Official	School	Date of Birth
3.	94	SHARINAM	GGHS Khodagzai	09-04-1983
4.	97	NAZMA SHAHID LN	GGHS Quak	01-01-1987
5.	98	BARTU ROUSHAN	GGHS Naori	01-05-1987
6.	100	Sofia Nuzam	GGHS Gullbadaly	27-9-81
7.	101	AMNA HADHI	GGHS Handogai	03-01-1991
8.	102	MILAYAT BIBI	GGHS Mbrayal	09-01-1989
9.	104	AZRA YOUSAF	GGHS Janay	07-01-1986
10.	105	NADIA BIBI	GGHS DARIDA TALASHI	26/02/1992

B Promotion to SST (B/C)

ITEM NO.6: PROMOTION OF DM/SHM TO SST (Bio:Ch) BPS-16 ON REGULAR BASIS

No	Sen. No	Name	School	Date of Birth
1	60	ASMA GUL	GGHS Haraf Tangi	22/06/1991

B Promotion to SST (B/C)

ITEM NO.7: PROMOTION OF AT SAT TO SST (Bio:Ch) BPS-16 ON REGULAR BASIS

No	Sen. No	Name	School	Date of Birth
1	45	Sumail Sami	GGHS Danwa	10-01-92

B Promotion to SST (B/C)

B Promotion to SST (B/C)

ITEM NO.8: - PROMOTION OF PST/PSHT-SPST TO SST (B/C) BPS-16 ON REGULAR BASIS

S.No	Sen. No	Name	School	Date of Birth
1	119	Roshni Riaz	GGPS Qazi Abad	1-3-99

Note: Mst; Roshni Riaz PST promoted to SST B/C appointed adjusted on ACB

Terms and Conditions:-

1. They would be on probation for period of one year extendable for another one year.
2. They will be governed by such rules and regulations as may be issued from time to time by the Govt.
3. Their services can be terminated at any time, in case their performance is found unsatisfactory during probationary period. In case of misconduct, they shall be proceeded under the rules framed from time to time.
4. Charge report should be submitted to all concerned
5. Their inter-se-seniority on lower post will remain intact.
6. No TAVDA is allowed for joining their duty.
7. They will given an under taking to be recorded in their service books to the effect that if any over payment is made to them in the light of this order will be recovered and if they are wrongly promoted they will be reversed.
8. Before handing over charge their documents may be checked, if they have not the required relevant qualifications as per rules, they may not be handed over charge of the post.
9. Any error and omissions will be accepted.

Dr. Iqbal-Khan
Director

Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

4 Encls; NO: 4737-41 File No Dir Lower Senior cadre to SST Dated 08-12-2023

Copy forwarded for information and necessary action to the:-

1. Account General Khyber Pakhtunkhwa Peshawar.
2. District Education Officer (Female) Dir Lower
3. District Accounts Officer Dir Lower
4. Officials concerned
5. PS to Secretary to Govt Khyber Pakhtunkhwa E&SE Department
6. PA to the Director E&SE Khyber Pakhtunkhwa Peshawar.
7. M/File.

Deputy Director (Estab./Female)
Elementary and Secondary Education
Khyber Pakhtunkhwa Peshawar.

Attest to be True
COPY

CS CamScanner

Annex

E (41)



OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE DIR LOWER



emisdeofdilower@gmail.com



DEO Female Dir Lower



@DECFemaleDir (LI)

Phone# 0945-8250083

Fax# 0945-824083

OFFICE ORDER

Mutual transfer is hereby ordered in respect of the following SSTs Mistress on their own pay and grade in the interest of public service with immediate effect.

S.No	Name & Designation	From	To	Remarks
1.	Shazia Qamar SST (G)	GGHSS Mayar	GGHS Ramora	Vice No.2
2.	Husan Ara SST (G)	GGHS Ramora	GGHSS Mayar	Vice No.1

Note:-

1. No T.A/DIA is Allowed
2. Change report should be submitted to all concerned.

(MEHRUN NISA)

District Education Officer (F)
Dir Lower

Endst No. 529-32

Dated 24 / 2 / 2024

Copy forwarded to:-

1. The District Account Officer Dir Lower
2. The Principal GGHSS Mayar.
3. The HM GGHS Ramora.
4. Teachers Concerned.

District Education Officer (F)
Dir Lower at Timergara

Attested to be True
Copy
[Handwritten signature]

Approved to CTC
 With copy
 Date: _____

Sl. No.	Name of Teacher	Date						
		1	2	3	4	5	6	7
1	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
2	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
3	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
4	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
5	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
6	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
7	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
8	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
9	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
10	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
11	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
12	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
13	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
14	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
15	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
16	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
17	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
18	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
19	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
20	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
21	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
22	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
23	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
24	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
25	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
26	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
27	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
28	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
29	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30
30	Bhambhani	7:30	7:30	7:30	7:30	7:30	7:30	7:30

Teacher's Attendance Register
 For the Month of MARCH 2024

Signature F (42)

Sl. No. Name of Teacher Date

(43)

12

Teacher's Attendance Register
For the Month of APRIL 2024

ATT	SA	DES	SP	ATT	SA	DES	SP	ATT	SA	DES	SP	ATT	SA	DES	SP
7:30 A		12:15 P		Buss				7:30 P		12:45 P		7:10 P			
X		X		X				X		X		X		X	
SUNDAY		SUNDAY		SUNDAY		SUNDAY		SUNDAY		SUNDAY		SUNDAY		SUNDAY	
7:30	P	1:35	A	7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
7:30	P		P	7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30
				7:30	Ⓢ	1:30	Ⓢ	7:30	Pana	1:30	Pana	7:30	1:30	11:30	11:30

C/O
 [Handwritten signature]
 attested to be True Copy

(44)



Teacher's Attendance Register

For the Month of MAY 2024

Table with columns for Date, Day, and multiple rows of attendance entries. The entries include times (e.g., 7:30, 11:30) and status indicators (e.g., P, C/L, S, and various symbols).

Date	Day	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun
					LABOUR DAY										
7:30		11:30			?	?	?								
C/L		C/L			7:30	11:30			7:30	11:30			7:30	11:30	
7:30		11:30			7:30	11:30			7:30	11:30			7:30	11:30	
[The table continues with many rows of similar attendance entries, including various times and status codes like P, S, and C/L.]															

STATEMENT OF LEAVES TAKEN

Attested to be true
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[Signature]

(45)



Teacher's Attendance Register

For the Month of June 2014

Name	Designation	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
1		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
2															
3		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
4		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
5		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
6		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
7		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
8		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
9		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
10		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
11		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
12		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
13		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
14		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
15		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
16		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
17															
18															
19															
20		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
21		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
22		CL	CL	CL	CL	CL	CL	CL	CL	CL	CL	CL	CL	CL	CL
23															
24		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
25		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
26		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
27		7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30	7:30	1:30
28															
29															
30															

STATEMENT OF LEAVES TAKEN

Attested to be True
 [Signature]
 [Name]
 [Title]

(47)

Teacher's Attendance Register

For the Month of August 2014

Date	SARITA DEBBI				SARITA DEBBI				SARITA DEBBI				
	Arr.	Sig.	Dep.	Total	Arr.	Sig.	Dep.	Total	Arr.	Sig.	Dep.	Total	
01/08/14													
02/08/14													
03/08/14													
04/08/14													
05/08/14													
06/08/14													
07/08/14													
08/08/14													
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25/08/14													
26/08/14													
27/08/14													
28/08/14													
29/08/14													
30/08/14													
31/08/14													
Total	Sick	Canv	PNV	Total	Sick	Canv	PNV	Total	Sick	Canv	PNV	Total	

Teacher's

For the Month

Date	SARITA DEBBI				SARITA DEBBI				SARITA DEBBI				
	Arr.	Sig.	Dep.	Total	Arr.	Sig.	Dep.	Total	Arr.	Sig.	Dep.	Total	
01/08/14													
02/08/14													
03/08/14													
04/08/14													
05/08/14													
06/08/14													
07/08/14													
08/08/14													
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25/08/14													
26/08/14													
27/08/14													
28/08/14													
29/08/14													
30/08/14													
31/08/14													
Total	Sick	Canv	PNV	Total	Sick	Canv	PNV	Total	Sick	Canv	PNV	Total	

Attested to be True Copy



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CTC

Deputy Director (b)
Ministry of Secondary Education
Khyber Pakhtunkhwa, Peshawar

- 1. Director, Education Officer (F) D/Lower
- 2. District Secretary, District Director
- 3. Teacher (General)
- 4. PA to Director, I.R.S.I., Peshawar

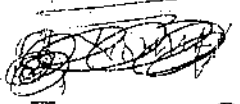
Copy provided for information to the:

Encls. No. 8246-48
Date of Release: 12/17/2024

Director
Ministry of Secondary Education
Khyber Pakhtunkhwa, Peshawar

NOTIFICATION
Consequent upon approval of the Competent Authority, the notification issued vide DED (Ministry) Dir. Lower Sec. Edu. No. 239-11-Dur. 22-03-2024 in respect of Mr. Shajir Gani, S.T. O. GHS, Lower Sec. Edu. No. 239-11-Dur. 22-03-2024 is hereby withdrawn with immediate effect in the best interest of public.

MINISTRY OF SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR



6/13/2024 at 12:42 PM

You

6/25/24, 10:34 AM

Amnare 5 (49)

(49/1)

BETTER COPY

ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR

NOTIFICATION

Consequent upon approval of the Competent Authority, the Notification issued vide DEO (F) Dir Lower office Endst, No.529-32 Dated 22,02-2024 in respect of Mst Shazia Qamar SST(G) GGHS Mayar Dir Lower and Mst. Hussan Ara SST(G) GGHS Ramora Dir Lower is hereby withdrawn with immediate effect in the best interest of public.

Director

Elementary & Secondary Education

Khyber Pakhtunkhwa Peshawar

Endst. No. 8246-48/A-17/ Posting/ Transfer//KPK/Vol-1

Dated Peshawar 12-6/2024

Copy warded for information to the-

1. District Education Officer (F) Dir Lower.
2. District Accounts Officer Dir Lower.
3. Teacher Concerned.
4. PA to Director E &SE Peshawar.

Deputy Director Establishment (F)

Elementary & Secondary Education

Khyber Pakhtunkhwa Peshawar

AND

I

51

(Better Copy)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION KHYBER
PAKHTUNKHWA PESHAWAR

NO. 8277 /A-17/posting /Transfer-KPK Vol-1

Dated Peshawar 24-7-2024

To

The Section Officer (Primary /F)
Elementary & Secondary Education Department,
Khyber Pakhtunkhwa Peshawar

SUBJECT: APPEAL FOR CANCELLATION OF NOTIFICATION BEARING
ENDOSEMENT NO.8246-48 DATED 12-06-2024

I am directed to refer to your letter No. SO (PE)E&SED 2-1 Transfer Shazia Qamar SST-
G/2024 dated 26-04-2023 on the subject cited above and to state

1. That the transfer order issued from DEO female DIR Lower Vide Endst No.529-32 dated 22-02- 2004 in respect of Mst Shazia Qamar SST and Mst: Hussan Ara SST
2. That the Do.letter received From Member Provincial Assembly khyber Pakhtunkhwa Mr Hamayun Khan with the direction to cancel the above transfer order
3. That this office has been issue cancellation Notification under vide Endst No 8246-48 dated: 12-06- 2024 on the approval of the competent authority

Hence, the report is hereby submitted to your kind perusal and further necessary action please

Deputy Director Establishment (F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Copy forwarded for information to the:

1 PA to Director E&SE Local office

Deputy Director Establishment (F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Annexure "H" (50)

To

The Secretary
Elementary Education & Secondary Education
Khyber Pakhtunkhwa Peshawar

Subject: APPEAL FOR CANCELLATION OF NOTIFICATION BEARING ENDORSEMENT NO: 8246-48/A-17/POSTING/TRANSFER/KPK/VOL-I DATED 12-06-2024, ISSUED FROM THE OFFICE OF THE DEPUTY DIRECTOR ESTABLISHMENT (F) ELEMENTARY & SECONDARY EDUCATION KHYBER PAKHTUNKHWA

Respected Sir,

With due reverence and humble respect, it is to state that the appellant is currently working as SST (G) posted at Government Girls High School Ramora (Seari) Chakdara Dir Lower. I am also a permanent resident of Chakdara Seh sadda Dir Lower, which is adjacent to my working station (neighboring to the University of Malakand).

I was posted against the vacant post at GGHS Mayar and during the month of February 2024, I was mutually transferred through notification No. 529-32, Dated 24-02-2024. Some details regarding my case are as under:

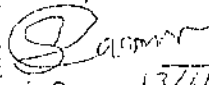
1. The transfer made through Notification No. 529-32, dated 24-02-2024 was mutually agreed upon by the two parties i.e. Mrs. Husan Ara (SST-G at Ramora) and Mrs. Shazia Qamar (SST-G, the applicant) and the mutual transfer application of the above parties was also signed and endorsed by the principals of the concerned schools in the best interest of the public and local community (Annexure-A).
2. Similarly, the mutual transfer application was also endorsed by the authorities, and Office Order No. 529-32 Dated 24-02-2024 was issued by the Office of The District Education Officer Female Dir Lower, and accordingly, the relieving made by the applicant and joining of the applicant was accepted by the headmistress on 25-02-2024 at GGHS Ramora (Dir Lower).
3. Similarly, the case of joining was reported to the concerned finance section for record and release of salaries therein on the station of joining, whereby the same was performed by the District Education Office at Timergara and the applicant has received all the salaries on the said stations (Pay slip attached as Annex-B).
4. However, astonishingly without giving any intimation to the appellant and order No. 529-32, dated 24-02-2024 has been withdrawn through No: 8246-48/A-17/posting/transfer/KPK/Vol-I dated 12-06-2024, issued from the office of the Deputy Director Establishment (F) Elementary & Secondary Education Khyber Pakhtunkhwa
5. It is worth mentioning that besides issues related to my children education, I have severe Sciatica (and my medical leave can be confirmed from my office file record) due to which I have been strictly advised by my physician to avoid long traveling and due the reason, I have not availed any promotion during the last 05 Years.
6. Besides, it is to bring to your kind knowledge that my husband is also working as a Professor and Dean at the University of Malakand, Chakdara (Situating at Ramora, providing me Pick and Drop to home and duty station), therefore the instant case is justified in the wedlock policy.

Given the above submission, it is therefore very humbly prayed that on acceptance of the present appeal, the office ORDER/NOTIFICATION NO: 8246-48/A-17/POSTING/TRANSFER/KPK/VOL-I DATED 12-06-2024, issued from the Office Of The Deputy Director Establishment (F) Elementary & Secondary Education Khyber Pakhtunkhwa my very kindly be set aside being illegal and unjustified.

INTERIM RELIEF: By way of interim relief, the operation impugned ORDER/NOTIFICATION NO: 8246-48/A-17/POSTING/TRANSFER/KPK/VOL-I DATED 12-06-2024, issued from the office of the Deputy Director Establishment (F) Elementary & Secondary Education Khyber Pakhtunkhwa may please be suspended till the final disposal of the present appeal.

With Profound Regard

Yours Truly


Shazia Qamar 13/6/24
SST-G (Ramora, Chakdara)
C.C
Head Mistress GGHS Ramora (for information and intimation not to accept any joining case on the post)

Cell No: 03469392154 & 03459537500

Copied to

ETC
Attested to be True Copy
HEAD MISTRESS
GGHS RAMORA
CHAKDARA
Dir Lower
Forwarded to Secretary Dir Lower
to

(15307-1672622-4)

15307-1672622-4

Handwritten signature/initials

Official Account, Office Director
30 AUG 1971
T. J. S. V. V. V.

15307-4509/142-8



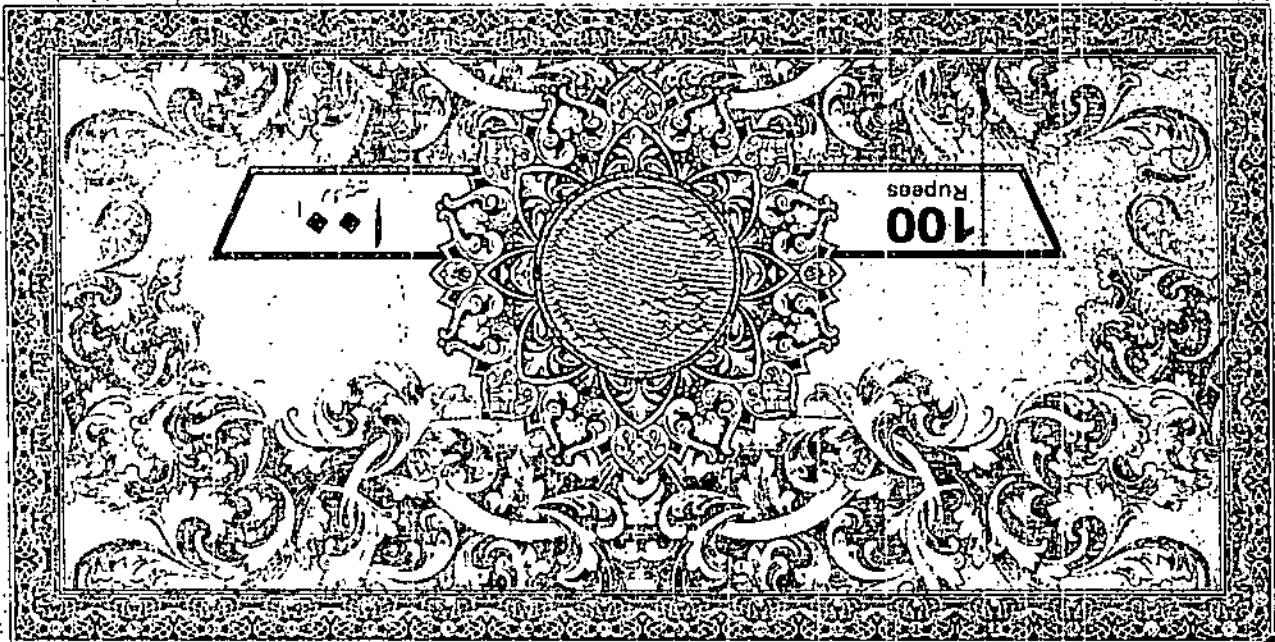
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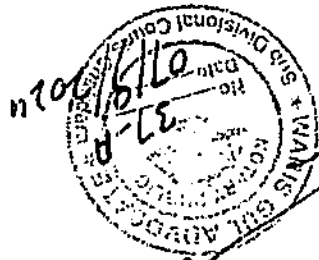
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Official Account (Grade Directly)
30 AUG 2021
Treasury Wing



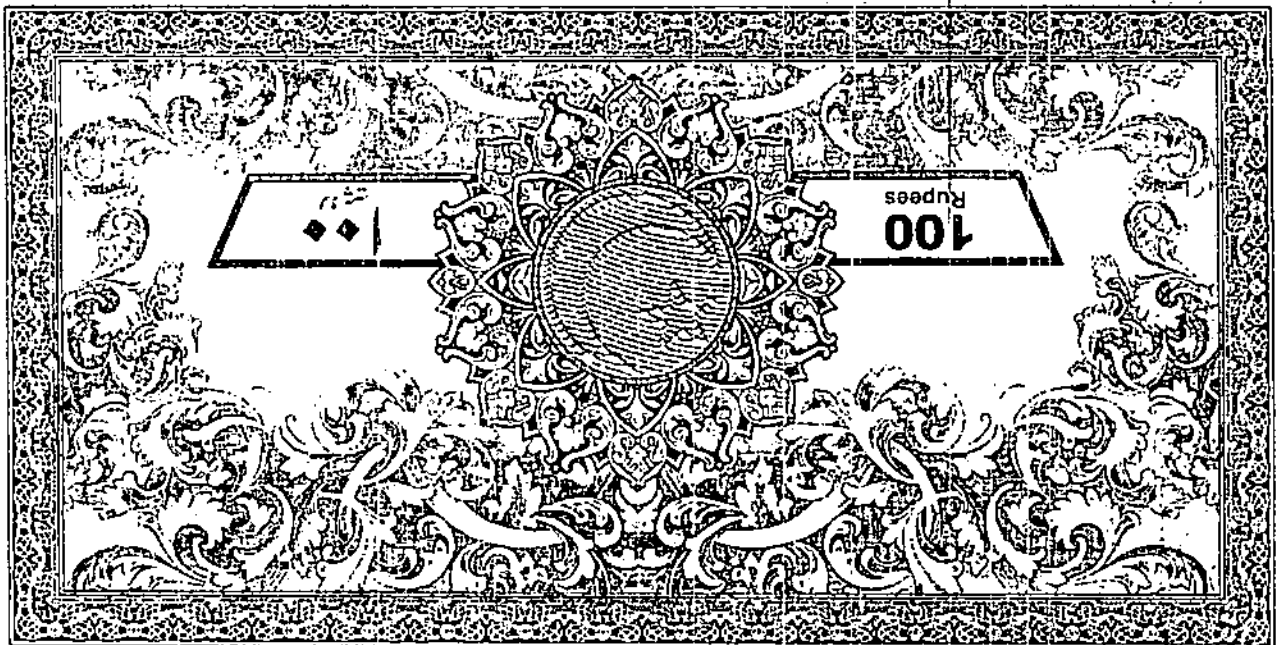
NOTARIZED

15302-0830866-3

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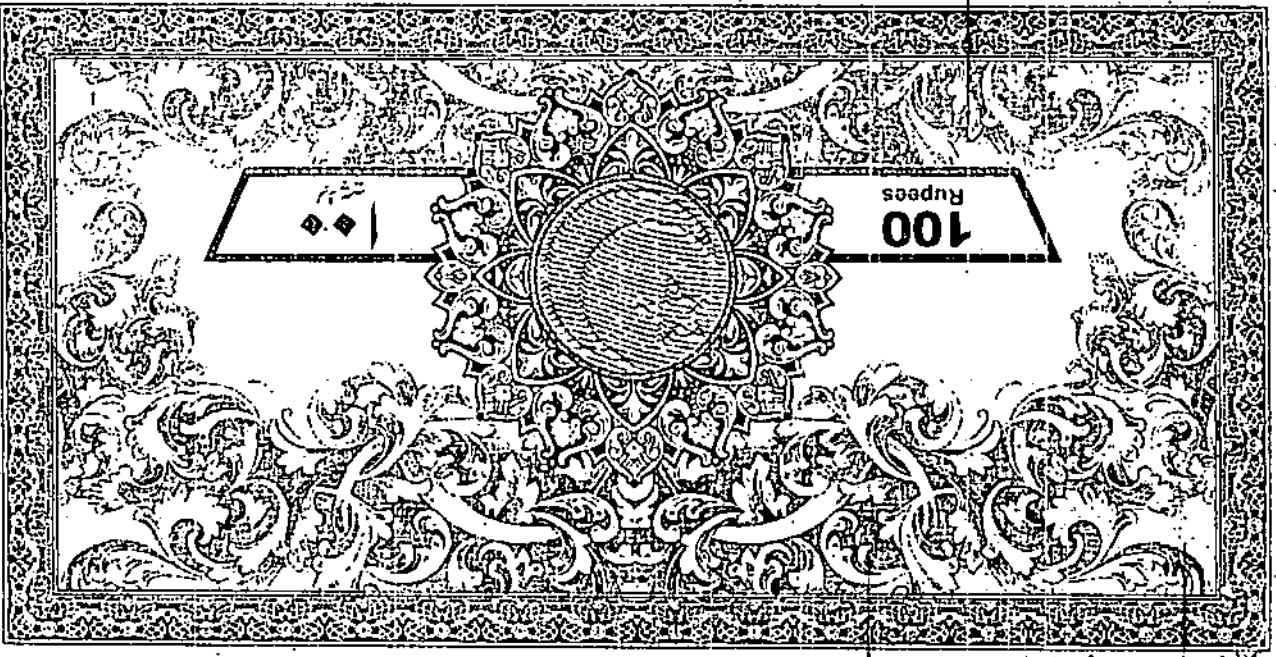
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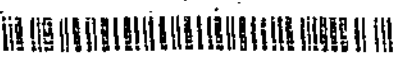
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1640726

District Accounts Office Bir (1)
30 AUG 1974
Treasury Wing



1640727



﴿ وگالت نامہ ﴾

بعدالت فیسریختو غوہ سہرو میں سر بیونل سٹار

دعویٰ

علت

موری

جرم

تھانہ

منجانب: اسٹیلانٹ

باعث تحریر آنکہ

سماہ سٹار بہتر بنام ڈی ای او عشرہ دم اول

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیروی وجواب دہی بمقام سٹیلانٹ کیلئے محمد اشفاق خان اٹوٹیل ایڈوکیٹ ہائی کورٹ، پشاور کو بدین شرط وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختیار خاص رو برو عدالت حاضر ہوتا رہوں گا اور بوقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دیکر حاضر عدالت کرونگا۔ اگر پیشی پر من مظہر حاضر نہ ہوا اور مقدمہ میری حاضری کی وجہ سے کسی طور میرے برخلاف ہو گیا تو صاحب موصوف اس کے کسی طرح ذمہ دار نہ ہوں گے۔ نیز وکیل صاحب موصوف صدر بمقام پکھری کسی اور جگہ یا پکھری مقررہ اوقات سے پہلے یا پیچھے یا بزور تعطیل بیروی کرنے کے ذمہ دار نہ ہوں گے۔ اگر مقدمہ کے علاوہ صدر بمقام پکھری کسی اور جگہ ساعت ہونے یا بزور تعطیل یا پکھری کیلئے اوقات کے آگے کے پیچھے پیش ہونے پر من مظہر کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا اختیار نامہ واپس کرنے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخلہ صاحب موصوف مثل کردہ ذات خود منظور قبول ہوگا۔ اور صاحب موصوف کو عرضی دعویٰ وجواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل و نگرانی ہر قسم کی درخواست پر دستخط تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری یا اجراء کرانے اور ہر قسم روپیہ وصول کرنے یا رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور سپرد وراثی وراثی نامہ کو فیصلہ برخلاف کرنے، اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت اپیل و درآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم استثنائی یا قرتی یا گرفتاری قبل از اجراء ڈگری بھی موصوف کو بشرط ادا ہوگی علیحدہ اختیار نامہ بیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو بھی اختیار ہوگا یا مقدمہ مذکورہ یا اس کے کسی جزوی کارروائی کے واسطے یا بصورت اپیل، اپیل کے واسطے کسی دوسرے وکیل یا ہیر سٹر کو بجائے اپنے یا اپنے ہمراہ مقرر کریں اور ایسے مشیر قانون کو ہر امر میں وہی اور ویسے ہی اختیارات حاصل ہوں گے۔ جیسے کہ صاحب موصوف کو حاصل ہے اور اس دوران مقدمہ میں جو کچھ ہر جہان التواء پڑیگا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کر دیا تو صاحب موصوف کو پورا اختیار ہوگا کہ مقدمہ کی بیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔ لہذا مختار نامہ لکھ دیا تاکہ سند رہے۔ مورخہ _____ مضمون مختار نامہ منسلک ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے

Arab Nazir s/o Shah Munir R/o Charada, Peshawar
(Cattorney for Plaintiff)

المقوم: _____ ہاہ _____ 20

Attested & Accepted
محمد اشفاق خان اٹوٹیل
ایڈوکیٹ ہائی کورٹ پشاور
BC No. 13-4379
رابطہ نمبر 0333-8522332

Shah Saood
BC- No- 22-5022
0304-5950616