

BEFORE THE KHYBER PAKHTUKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 1220/2024

Mst: Rajman Shaheen.....Appellant.

V/S

Director (E&SE) Department, Khyber Pakhtunkhwa,
Peshawar & Others..... Respondents.

(Reply on behalf of Respondent No. 3 & 4)

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Yami
Deponent
- 0346 9191985 -
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(Reply on behalf of Respondent No. 3 & 4)

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 16698

Dated 14-10-24

Respectfully Sheweth:-

Para 1 to 6:-

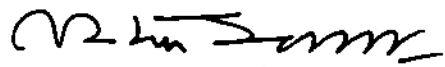
After detail scrutiny of the case, it is submitted that the matter in hand is administrative in nature and relates to Respondent No 1 & 2 and they are in better position to redress the grievances of the appellant. Besides, the appellant has raised no grievances against Respondent No. 3 & 4.

It is pertinent to mention here that Office Order dated: 31.03.2022 issued by Federal Directorate of Education, Office Order dated: 08.08.2023 issued by DEO District Jamrud and Letter No. 9236-37 dated: 31.07.2024 issued by Respondent No. 1 are very much clear (Annex-A, B & C).

In view of the above, it is humbly prayed that the names of Respondent No. 3 & 4 may kindly be deleted from the array of Respondents.


DISTRICT ACCOUNTS OFFICER
DISTRICT KHYBER

Fakhar Hussain


ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA

Nasrullah-Din Sarwar

**BEFORE THE KHYBER PAKHTUKHWA SERVICE TRIBUNAL
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(Reply on behalf of Respondent No. 3 & 4)

AFFIDAVIT

We do hereby solemnly affi'rm & declare that the reply submitted on behalf of Respondents No.3 & 4 is true and correct to the best of our knowledge and belief and nothing has been concealed from this honorable Court.

It is further stated on oath that in this appeal the answering respondents has neither been placed Ex-part nor there defense has been struck off.

F. Hussain
3/10/24
DISTRICT ACCOUNTS OFFICER
DISTRICT KHYBER

Naseer ud. Din Sarwar
ACCOUNTANT GENERAL
KHYBER PAKHTUNKHWA

Naseer ud. Din Sarwar.

Rakher Hussain



14-10-24

ANNEXURE A

No.F 9-16/13-D-S/EI(W) FDE
Government of Pakistan
Federal Directorate of Education

4

Islamabad the 31st March 2022

OFFICE ORDER

With immediate effect Ms. Rajman Shaheen, CT (BS-15), Elementary & Secondary Education Department, Government of KPK working on deputation basis against the post of TUGI - EST (HS-14) at Islamabad Model School for Girls (I-X) Sangjani (FA), Islamabad under Federal Directorate of Education, Islamabad is hereby repatriated (on her own request) with the direction to report back to her parent department i.e Elementary & Secondary Education Department, Government of KPK.

2. She stands relieved with immediate effect to report back to her parent department.
3. No F.A.D.A will be allowed in this connection.
4. This issues with the approval of Director General, FDE.



(ALI AZHAR)
Assistant Director Schools (F)

Copy to:

- The AGPR, Islamabad
- PS to DG, FDE
- AFO concerned
- The Head/DOO concerned, with the direction to relieve and stop her salary immediately and send a copy of her relieving report to this Directorate
- The Section Officer (Schools), Elementary & Secondary Education Department, Government of KPK.
- The teacher concerned.
- Office order file.

Approved
G. M. I.

(ALI AZHAR)
Assistant Director Schools (F)

~~ATTACHED~~



13/5

ANNEXURE C

**DISTRICT EDUCATION OFFICER
FEMALE DISTRICT KHYBER AT JAMRUD.**

Email: deofemalekhyber21@gmail.com

Phone No. 091-5620275

OFFICE ORDER.

Reference to this office adjustment order No. 181-68, dated 10.01.2023 & in the light of the recommendations of inquiry committee Dairy No. 8627, dated 04.02.2023 in respect of Mst: Rajman Shaheen CT BPS-15 GGHS Spelanokas Jamrud District Khyber, her absent period i.e. w.e.f. 01.04.2022 to 09.01.2023 (282 days) is hereby converted into leave without pay.

Necessary entry to this effect should be made in her service book.

**DISTRICT EDUCATION OFFICER
FEMALE KHYBER AT JAMRUD**

Endst: No. 5389-95

Dated 08/08/2023.

Copy forwarded to the

1. District Account officer Khyber at Jamrud.
2. PA to Additional Director E&SE Department Khyber Pakhtunkhwa at Peshawar.
3. Prindpol GGHS Spelanokas Jamrud.
4. ADEO Female concerned District Khyber.
5. Individual concerned.
6. Accountant local office.
7. Master File.

**DISTRICT EDUCATION OFFICER
FEMALE KHYBER AT JAMRUD**

Q. M. A.

*Approved
1/8/2023*

*Q. M. A.
08/08/2023*

~~**ATTN: STEI**~~



Directorate of Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar
 Merged Area Phone# 091-9390242
 (PST, SPST, PHT & Shuhada Package)
 No. _____
 Dated 31/07/2024

To

District Education Officer (Female)
 Khyber

(13)

Subject -

APPEAL FOR RELEASE OF PAY WITH EFFECT FROM 01-04-2022 TO 09-01-2023

I am directed to refer to your office letter No. 2343 dated 29-08-2024 on the subject cited above and to state that the appeal in respect of Mst. Rajman Shaheen Sr. CT (BPS-15) GHS Spilano Kas Tehsil Jampur District Khyber has been REJECTED on the basis of your office report. I am further directed to ask you to inform the teacher concerned accordingly please.

(Bushra Begum)
 Assistant Director Estab: (Female)
 Elementary & Secondary Education
 (Merged Areas) Khyber Pakhtunkhwa

Endst No. 9936-37
 Copy to the:-

1. ✓ Mst Rajman Shaheen Sr. CT (BPS-15) GHS Spilano Kas Tehsil Jampur District Khyber.
2. P A to Additional Director (Estab :) Local Directorate.

(Bushra Begum)
 Assistant Director Estab: (Female)
 Elementary & Secondary Education
 (Merged Areas) Khyber Pakhtunkhwa

[Handwritten signature]
 31/7/2024

[Handwritten signature]
 30/7/2024

[Handwritten signature]



Office of the
ACCOUNTANT GENERAL

Fort Road, Khyber Pakhtunkhwa
Peshawar Pakistan

AUTHORITY LETTER

Mr. Syed Tariq Shah, Senior Auditor (B-17) office of the Accountant General KP is hereby authorized to attend the Service Tribunal Peshawar on behalf of this office and Submit the reply in Service appeal No.1220/2024 titled Rajman Shaheen Versus Director Elementary & Secondary Education KP Peshawar & Others .


Accounts Officer

Feroz Durrani