

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

Service Appeal No: 640/2024

Mst: Aisha Kanwal, Ex-SST (B/C), Dir Lower.....Appellant

VERSUS

The Secretary E&SE Department & others.....Respondents.

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**SAMINA ALTAF
DIRECTOR**



**AUTHORIZED OFFICER
ABDUS SAMAD
DEPUTY DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar**

(1)

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA
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Service Appeal No: 640/2024

Mst: Aisha Kanwal, Ex-SST (B/C), Dir Lower.....Appellant

VERSUS

The Secretary E&SE Department & others.....Respondents

JOINT PARAWISE COMMENTS ON BEHALF OF RESPONDENTS No: 1 to 2.

Respectfully Sheweth,

The Respondents submit as under:-

PRELIMINARY OBJECTIONS.

- 1 That the Appellant has got no cause of action/locus standi to file instant appeal.
- 2 That the appellant is not an aggrieved person within the meaning of Section-4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of Islamic Republic of Pakistan 1973.
- 3 That the appellant has concealed material facts from the ambit of this Honorable Tribunal.
- 4 That the appellant has not come to this Honorable Tribunal with clean hands as she is an SST in BPS-16 & seeking for her reinstatement in service in violation of the Rules in vogue.
- 5 That the appeal in hand is barred by the relevant provisions of law of limitation Act, 1908.
- 6 That the appeal in hand is bad for mis-joinder and non-joinder of the necessary parties.
- 7 That the impugned Notification dated 15-12-2023 of the Respondent No. 2 is legal & liable to be maintained.
- 8 That the appellant has been found guilty of willful absence from duty, hence removed from service w.e.f 20-09-2021 till the impugned Notification as SST (B/C) under the law in field by the Respondent No. 2 after observing all codal formalities including Show Cause Notice & personal hearing opportunities to the appellant.
- 9 That the appellant is estopped by her own conduct to file the titled appeal before this Honorable Tribunal against the Respondents.

- 10 That no NOC for Ex-Pakistan from the Ministry of interior has been obtained by the Petitioner prior to leaving the country by the appellant on the pre-text of her PhD abroad.
- 11 That aggrieved from the Notification dated 15-12-2023, the appellant has filed a Departmental appeal which was regretted by the Respondent No.1 dated 23-05-2024.

REPLY TO THE FACTS OF THE APPEAL.

- 1 That Para-1 pertains to the service record of the appellant against the SST (B/C) in BPS-16 post inducted vide order dated 02-05-2014, however, has been found willful absence from duty w.e.f 04-02-2023 without any formal leave sanctioned order or approval of the competent authority in view of the absence from duty report received from the DEO (F) Dir Lower vide her office letter No. 1894 dated 10-04-2023 *attached as Annex-A.*
- 2 That Para-2 is mis-leading on the grounds that the appellant has applied for leave vide her application to the DEO (F) Dir Lower with no mention of University & Country of her PhD, wherefor, she is seeking leave & NOC accordingly allowed vide Notification dated 03-09-2019 w.e.f 20-09-2019 to 19-09-2021 (two years) by the Respondent No. 2 *attached as Annex-B & C.*
- 3 That Para-3 is also incorrect on the grounds that no reference in the order of leave grant dated 03-09-2019 in favor of the appellant w.e.f 20-09-2019 to 19-09-2021 (02) Years, hence, cannot be considered for NOC for her PhD as the said order has been obtained from the Respondent No. 2 on the basis of fraud & concealment of fact regarding her Ex-Pakistan study leave.
- 4 That Para-4 is incorrect as for the extension in leave, the arrival report for duty by an incumbent against the post he/she is holding in the Respondent Department violated by the appellant in the instant case during her submission of application for the extension in the said leave w.e.f 20-09-2021 to 30-06-2023, hence, the stand of the appellant is illegal & liable to be rejected as no leave sanctioned order has been passed by the Respondent No. 2 upon the application dated 24-09-2021 of the appellant & has thus found guilty of willful absence from official duty against the SST (B/C) post by the competent authority.
- 5 That Para-5 is correct that no leave sanctioned order has been passed by the Respondent No. 2 upon the application dated 24-09-2021 of the appellant & has thus found guilty of willful absence.
- 6 That Para-6 is incorrect as the DEO (F) Dir Lower is not competent to grant sanction of leave the kind due to the appellant as per under the Rules & Policy.
- 7 That Para-7 is correct that a Show Cause Notice dated 02-06-2023 was served upon the appellant in view of the absence from duty report of the appellant by the DEO concerned w.e.f 04-02-2023 without any formal leave sanction order & approval of the competent authority under the provision of

Rules-2 (b), 3 (b) (d) & 5 of the E&D Rules, 2011 with the direction to submit reply of the said Show Cause Notice within (07) days from the receipt of the same, submitted accordingly by the appellant with no plausible substance & material, hence, resulted in the impugned Notification dated 15-12-2023 of the Respondent No. 2 on the grounds of guilty of mis-conduct & habitual absence from official duty by the appellant against the said post after due process of law including the grant of an opportunity of personal hearing on dated 28-11-2023 availed by the appellant which are *attached is Annex-D & E*.

- 8 That Para-8 is incorrect as the impugned order dated 15-12-2023 is legal in terms of the fore-made submissions by the Respondents in the instant reply.
- 9 That Para-9 is correct that a time barred Departmental appeal without any date of filing has been annexed with the titled appeal by the appellant with the plea that the same has been filed against the Notification dated 15-12-2023 which is illegal, without any record, hence, rejected vide order dated 23-05-2024 and also given personal hearing chance to the appellant by the Respondent No.1. *(Copies of the letters dated 23-05-2024 and 15-04-2024 are attached as Annexure-F & G).*
- 10 That para-10 is incorrect that the appellant is not an aggrieved person within the meaning of Section-4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of Islamic Republic of Pakistan 1973 has got no cause of action to approached this Honorable Tribunal in the titled appeal against the Respondents, therefore, the case in hand is liable to be dismissed on the following grounds inter alia: -

REPLY TO THE GROUNDS OF THE APPEAL.

- A. Incorrect & not admitted, the appellant has been treated as per law & rules by the Respondent Department vide Notification dated 15-12-2023, whereby, she has been removed from service against the SST post on account of her mis-conduct & guilty of willful absence from duty from the period as mentioned above.
- B. Incorrect & not admitted. The stand of the appellant is against the facts & legal proposition as formal chance of personal hearing to the appellant was provided on dated 28-11-2023 also attended by the appellant & the DEO concerned on the date fixed as evident from the Notification dated 15-12-2023 of the Respondent No. 2.
- C. Incorrect & not admitted. the appellant has been treated as per law as evident from the Show Cause Notice dated 02-06-2023, personal hearing of the appellant dated 28-11-2023 & reply to the said Show Cause Notice of the appellant are clear proofs regarding observing legal process by the Department in the instant case.
- D. Incorrect & not admitted. The act of the Respondent Department with regard to the Notification dated 15-12-2023, Show Cause Notice & its reply made it clear that the appellant has not denied the absence from duty report w.e.f 04-02-2023 till the Notification dated 15-12-2023 of the Respondent No. 2 & DEO till date, hence, her plea at such a belated stage is liable to be rejected.

- E. Incorrect & not admitted. The Notification dated 15-12-2023 is legal & even in accordance with the provision of Article-10-A of the constitution of 1973, hence, liable to be maintained.
- F. Incorrect & not admitted. The act of the Department with regard to the cited Notification is legal on the grounds that known facts are need not to be inquired, similarly, the appellant has also not denied her willful absence from duty against the SST post in the whole Departmental proceedings against her, therefore, taking shelter under the provision of Rules-5 & 9 of E&D Rules, 2011 is itself an illegality on the part of the appellant in the tilted matter.
- G. Incorrect & not admitted. The Notification dated 15-12-2023 is legal & even in accordance with the provision of Articles-4 & 25 of the constitution of 1973, hence, liable to be maintained.
- H. Incorrect & not admitted. The Notification dated 15-12-2023 is legal, hence, liable to be maintained as the cited Judgment reported as 2002 SCMR 1124 is not applicable upon the case of the appellant.
- I. Incorrect & not admitted. The appellant has left her duty station without formal leave sanction & approval of the competent authority; hence, she has been removed from service vide Notification dated 15-12-2023 which is legal.
- J. Incorrect & not admitted. The issue of unemployment of the appellant is falling within the domestic issues under the Rules & cannot be agitated before this Honorable Tribunal under the law.
- K. Incorrect & not admitted. The stand of the appellant is illegal as the act of the Department with regard to the Notification dated 15-12-2023 is legally competent as the appellant has been found guilty of mis-conduct & willful absence from duty against the noted post in the Respondent Department.
- L. Incorrect & not admitted, as the statement of the appellant is based on assumptions & presumptions, hence, liable to be rejected.
- M. Incorrect & not admitted as replied above.
- N. Incorrect & not admitted the Notification dated 15-12-2023 is legal with further submission that the appellant is not an aggrieved person within the meaning of Section-4 Khyber Pakhtunkhwa Service Tribunal Act 1974 read with Article-212 of the constitution of Islamic Republic of Pakistan 1973 However, the Respondents also seek leave to this Learned Bench to submit additional grounds record & case law at the time on date of hearing.

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Therefore, in view of the above made submissions, the appeal in hand may kindly be dismissed by maintaining the Notification dated 15-12-2023 in favor of the Respondent Department in the interest of justice.

**SAMINA ALTAF
DIRECTOR**



**AUTHORIZED OFFICER
ABDUS SAMAD
DEPUTY DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar
(Respondent No. 2)**

**MASOOD AHMAD
SECRETARY**



**AUTHORIZED OFFICER
FAIZ ALAM
ADDITIONAL SECRETARY (G)
E&SE Department Khyber
Pakhtunkhwa, Peshawar
(Respondent No. 1)**

6

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

Service Appeal No: 640/2024

Mst: Aisha Kanwal, Ex-SST (B/C), Dir Lower.....Appellant

VERSUS

The Secretary E&SE Department & others.....Respondents.

AFFIDAVIT

I, Samina Altaf, Director E&SE Department Khyber Pakhtunkhwa, do hereby solemnly affirm & declare on oath that the contents of the instant para wise Comments are true & correct to the best of my knowledge & belief. It is further stated on oath that in this appeal the answering Respondents have neither been placed Ex-Parte nor their defense has been struck off/cost.



**DEPONENT
SAMINA ALTAF
DIRECTOR**

**AUTHORIZED OFFICER
ABDUS SAMAD
DEPUTY DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar**

7

NOTICE (1) - The Post Office is not responsible in the case of inland registration



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

15



24

0945-9250083 DEO FEMALE DIR LOWER M mstaleofemalelower@gmail.com
NEAR POLICE LINE, EDUCATION COMPLEX BALAMBAT TEHSIL TIMERGARA DISTRICT DIR
LOWER.

No. 1894

Dated 10/10/2023

To

The Director,
Elementary & Secondary Education,
Khyber Pakhtunkhwa at Peshawar.

Subject: GRANT OF EXTRA ORDINARY LEAVE WITHOUT PAY.

Memo,

Reference your office letter No.1879- dated 29/03/2023 on the above cited subject it is stated for your kind information that Mst. Alsha Kanwal SST (Blo/Ch) GGHS Hayaseral Dir Lower was on extra ordinary leave w.e.f.20-09-2019 to 19-09-2021 which was sanctioned by your good office vide letter No 4884-86/A-17/Leave/Vol-III Dated 03/09/2019 annexed as (A).

After the expiry of leave she submitted another application on 06/09/2021 for extension of leave w.e.f. 20/09/2021 to 30-06-2023 and this office forwarded her application to your good office for extension of leave vide letter No. 17143 dated 24/09/2021 (Application are annexed as B & C), but the leave sanction is still awaited form or good self-office. Due to non-receiving extension or rejection of her application the Head Mistress GGHS Hayaseral Dir Lower submitted her absent report to this office on 04/2/2023 against the teacher and this office submitted a detailed report to your good self-office vide No.986 dated 04/03/2023 annexed as (D).

It is therefore, requested if your good self-office has granted extension in Extra ordinary leave for the settlement of the case if otherwise.

Endst 1895-98.
Copy of the above is forwarded to the:-

1. District Monitoring Officer (EMA)Dir Lower.
2. Deputy Commissioner Dir Lower.
3. Head Mistress/Incharge GGHS Hayaseral Dir Lower.
4. Office Record.

o/c
District Education Officer (F)
Dir Lower

o/c
District Education Officer (F)
Dir Lower

Attested
[Signature]

9

Amal K C

To
The DEO (female)
Dir lower Timargara

Subject: Further extension as extra ordinary leave (without pay) for PHD.

Respected madam,

Reference to the above cited subject, it is to bring to your kind notice that, I was serving as SST (Science) at GGHS Hayaseri Dir Lower since May 2014.

I am already on extra ordinary leave (without pay) since 20-09-2019. Now I want to extend my leave further because my PHD will about to complete till June 2023.

In view of the above, extra ordinary leave (without pay) from 20-09-2021 to 19-06-2023 may please be sanctioned.

Regards: Aisha
Aisha Kanwal

SST (Science) GGHS Hayaseri

Attested
[Signature]

Attested
[Signature]

9

Annexure = 'A'

**DIRECTORATE OF ELEMENARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

10

NOTIFICATION

Sanction is hereby accorded to the grant of Extra Ordinary Leave in respect of Mst. Aisha Kanwal W/O Saced Ullah, SST (Bio/Chem) BPS-16 GGHS Hayasraai Dir Lower with effect from 20-09-2019 to 19-09-2021 (2 years without pay) as due and admissible to her under the Revised Leave Rules 1981.

**Director
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar**

Endst.No. 4884-86 A-17/Leave/Vol-III

Dated Peshawar the 3/9/2019

Copy forwarded for information to the:-

- 1- The District Education Officer (F) Dir Lower w.r to her letter No. 2355 Dated 31-08-2019.
- 2- District Accounts Officer Dir Lower.
- 3- PA to Director (E&SE) Local Office.

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

DL
3/9/19

Attested
D. G. I.



**DIRECTORATE OF ELEMENARY & SECONDARY
EDUCATION KHYBER PAKHTUNKHWA PESHAWAR**

No. _____ / A-17/PS/Aisha Karwal/SST/Dir Lower

Dated Peshawar 02/06/2023

SHOW CAUSE NOTICE

I, Dr Iqbal Khan, Director Elementary & Secondary Education Khyber Pakhtunkhwa as competent authority under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011, do hereby serve upon you Mst. Aisha Karwal SST-B/C GGHS Hayaseral Dir Lower as follows:-

1. That as per report of District Education Officer (Female) Dir Lower vide No. 1894 dated 10-04-2023, you have remained absent from duty w.e.f. 04-02-2023 without any proper sanction /approval of the competent authority.
2. That after going through material on record under Rule-5 (i)(a) and to dispense with the formal inquiry in accordance with Rule-7 (b) of the aforementioned Rules, I, Dr Iqbal Khan, Director Elementary & Secondary Education Khyber Pakhtunkhwa, as the competent authority, am convinced that you have committed acts/omissions specified in Rule-3 (b) & (d) i.e.
 - i. "Guilty of misconduct".
 - ii. "Guilty of habitually absenting yourself from duty without prior approval of leave".
3. That in exercise of powers conferred under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, I the Dr Iqbal Khan, Director E&SE Khyber Pakhtunkhwa as, the Competent Authority have tentatively decided to impose upon you any of the major penalties mentioned in Rule-4 (b) of the Ibid rules.
4. You are, therefore, required to show cause as to why the aforementioned penalty should not be imposed upon you and also intimate whether you desire to be heard in person.
5. If no reply to this show cause is received within 7 days of its receipt, it shall be presumed that you have no defense to put in and, in that case, an Ex-Parte decision will be taken against you.

Director
Competent Authority
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

32-34

End of Even No. & Date.

Copy of the above is forwarded for information to the: -

1. District Education Officer (F) Dir Lower w/r to her letter No and date cited above.
2. Principal GGHS Hayaseral Dir Lower with remarks to inform the teacher concerned.
3. Mst. Aisha Karwal SST-B/C GGHS Hayaseral Dir Lower
4. PA to Director E&SE, Peshawar.
5. Office Copy.

Attested
[Signature]

[Signature]
Director
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar
20/6/23



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DIRECTORATE OF ELEMENARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

NOTIFICATION

- 1 WHEREAS, Miss Aisha Kanwal SST (B/C) GGHS Hayaseri Dir Lower was proceeded against under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011 for unauthorized absence w.e.f 20-09-2021.
- 2 AND WHEREAS, the DEO (F) Dir Lower submitted her absence report that the teacher concerned remains absent from her duty w.e.f 20-09-2021 till date by proceeding abroad without any prior approval of the Competent Authority on dated: 07-03-2023.
- 3 AND WHEREAS, this office issued a show cause notice vide No. 32-34 dated: 01-06-2023. The teacher concerned submitted the reply of the showcase notice on 20-10-2023.
- 4 AND WHEREAS, This office grants her an opportunity of personal hearing on 28-11-2023 and she attended the said meeting on scheduled date along with DEO (Female) Concerned.
- 5 AND WHEREAS, after going through the material on record, the report of DEO (F) Dir Lower, and the teacher concerned did not satisfy/convinced the personal hearing committee, and the committee has come to the conclusion that charges against the above teacher has been partially proved.
- 6 NOW THEREFORE, in exercise of powers conferred under the Khyber Pakhtunkhwa Government Servants (Efficiency and Discipline) Rules, 2011, the Director E&SE Khyber Pakhtunkhwa as the Competent Authority is pleased to impose the major penalty of "Removal from service" upon Miss; Aisha Kanwal SST (B/C) GGHS Hayaseri Dir Lower, as specified in Rule-4 (b) (iii) of the Rules ibid with effect from the date her absence in the interest of public service.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 7608-10 /A-17/PF/Aisha Kanwal /SST/Dir Lower.

Dated: 5/12/2023.

Copy forwarded for information and necessary action to the: -

1. District Education Officer (F) Dir Lower with reference to her letter No.4201 dated 09-10-2023.
2. District Accounts Officer Dir Lower.
3. Principal/HM GGHS Hayaseri Dir Lower.
4. Miss Aisha Kanwal SST (B/C) GGHS Hayaseri Dir Lower.
5. Master file.

Attested
[Signature]

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



GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIAT PESHAWAR
(PHONE NO. 091-9223540)

SO (P/F)/E&SED/5-19/Removal from Service Aisha Kanwal /2023
Dated Peshawar the, 23rd May, 2024

To,

The Mst. Aisha Kawal,
Ex-SST (Bio-Chem) GGHS Hayasari,
Dir Lower.

Through

District Education Officer (F),
Dir Lower.

Subject:

DEPARTMENTAL APPEAL AGAINST THE IMPUGNED ORDER DATED 16-12-2023 WHERE BY THE APPELLANT HAS BEEN REMOVED FROM SERVICE WITH RETROSPECTIVE EFFECT IN UTTER VIOLATION OF LAW, RULES, PRINCIPLES OF NATURAL JUSTICE HENCE THE IMPUGNED ORDER DATED 16-12-2023 IS VOID AB INITIO, CORAM NON-JUSTICE AND NOT SUSTAINABLE IN THE EYES OF LAW.

I am directed to refer to the subject and to state that after having you heard in person and examining all the record, your appeal for re-instatement into the service has been regratted by the Competent Authority having no legal grounds.

1117

(IMRAN ZAMAN)
SECTION OFFICER (P/F)

Copy forwarded to the: -

1. Director E&SE, Khyber Pakhtunkhwa Peshawar.
2. PS to Secretary E&SE, Khyber Pakhtunkhwa.

SECTION OFFICER (P/F)

ANNEX 2

M/23/5



DD-I



Attested
Bgl's

23/5/24

works

23/5/24

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT
CIVIL SECRETARIATE PESHAWAR
 (PHONE NO. 091-9223540)

No. SOP.D/E&SE/5-19/Reinstatement/Alsha Kanwal/2024
Dated Peshawar the 15th April, 2024

To,

Mst. Alsha Kanwal W/o Saeedullah (Ex-SST (B)to/Chem),
 GGHS Hayasri Dir Lower.

Subject: - DEPARTMENTAL APPEAL FOR REINSTATEMENT INTO
SERVICE/PERSONAL HEARING THEREOF.

I am directed to refer to your appeal No. nil dated nil on the subject noted above and to state that date for personal hearing has been fixed on 18th April, 2024 at 11:00 AM in the office of Deputy Secretary (AB) E&SE Department, therefore, you are directed to attend the said personal hearing on date, time and venue mentioned above.

[Signature]
 SECTION OFFICER (PRIMARY/F)

Copy forwarded to the:

1. Director, E&SE Khyber Pakhtunkhwa, Peshawar w/ to his letter even No. & dated 19.03.2023 with the request to attend the said personal hearing on date, time & venue as mentioned above alongwith complete record of the case.
2. The DDC (Female) Dir Lower to attend the personal hearing with relevant record if any and also inform the appellant to attend personal hearing.
3. PS to Secretary, E&SE Department, Khyber Pakhtunkhwa.
4. PA to DS (AB), E&SE Department, Khyber Pakhtunkhwa.

[Signature]
 SECTION OFFICER (PRIMARY/F)

DD-I

934-
 16/4/24

16/4/24

ADD (E)

16/5

899
 16-4-24

2024/17/4/2024

Attested
 Page 1



(14)

**DIRECTORATE ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.**

AUTHORITY LETTER

I, Samina Altaf, Director (E&SE) Khyber Pakhtunkhwa Peshawar do hereby authorized Mr. Behramand Khan, Assistant Director (Litigation-II) of this Directorate for submission of Joint Para Wise Comments in Service Appeal No. 640/2024 case titled Mst. Aisha Kanwal, Ex-SST (B/C) Dir Lower District Vs Government of Khyber Pakhtunkhwa & others, hence, an authority letter is hereby issued in favor of the above-named officer.

**(SAMINA ALTAF)
DIRECTOR**



**AUTHORIZED OFFICER
(ABDUS SAMAD)
DEPUTY DIRECTOR**

**E&SE Department Khyber
Pakhtunkhwa, Peshawar.**

**DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT KHYBER PAKHTUNKHWA PESHAWAR**

NOTIFICATION

I, Samina Altaf, Director Elementary & Secondary Education Department Khyber Peshawar do hereby authorize, Mr. Abdus Sammad, Deputy Director (Legal) Directorate of Elementary & Secondary Education to sign parawise comments, replies, implementation report, objection petitions, civil miscellaneous application etc on my behalf for onward submission before the courts of law/tribunals as the case may be, with immediate effect in the interest of public service.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar

Endst. No. 9.1.33-413 /F.No. AD(Lit-II)/E&SED/Office Correspondence/Vol-11/2024
Dated Peshawar the 26/07/2024.

Copy of the above is forwarded for information & n/action to the:

1. Chief Secretary Khyber Pakhtunkhwa.
2. Advocate General Khyber Pakhtunkhwa.
3. Secretary Law Department Khyber Pakhtunkhwa.
4. Learned Registrar High Court Peshawar (with one each spare copy for the Honorable Judges).
5. Learned Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar (with one each spare copy for the Honorable Chairman/Members).
6. All Section Officers E&SE Department Khyber Pakhtunkhwa, Peshawar.
7. All District Education Officer (Male/Female) Khyber Pakhtunkhwa.
8. PS to Secretary E&SE Department Khyber Pakhtunkhwa, Peshawar.
9. PA to Additional Secretary (General) E&SE Khyber Pakhtunkhwa, Peshawar.
10. PA to Director E&SE Department Khyber Pakhtunkhwa, Peshawar.
11. Master File.

Attested
Dgla

Samina Altaf
(SAMINA-ALTAF)
DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar