

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

Appeal No. 1009/ 2024

Dr Abida Azeem Afridi Associate Professor Political Science GGDC
Dara Adam Khel, District Kohat.

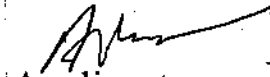
VERSUS

1. The Chief Secretary Khyber Pakhtunkhwa Peshawar.
2. The Secretary Higher Education, archives & Library department,
Civil Secretariat, Peshawar.
3. Mst. Sadaf Saeed Associate Professor of Philosophy BPS-19 Govt
girls degree college dara Adam Khel district Kohat

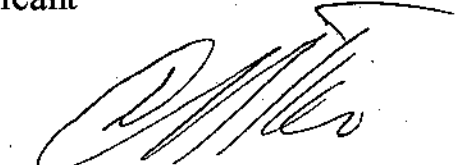
..... Respondents

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Applicant

Through:-


Kabir Ullah Khattak
Advocate High Court
Peshawar

①

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

Khyber Pakhtunkhwa
Service Tribunal

Appeal No. 1009/ 2024

District No. 17820

Dated 08-11-24

Dr Abida Azeem Afridi Associate Professor Political Science GGDC
Dara Adam Khel, District Kohat.

VERSUS

1. The Chief Secretary Khyber Pakhtunkhwa Peshawar.
2. The Secretary Higher Education, archives & Library department,
Civil Secretariat, Peshawar.
3. Mst. Sadaf Saeed Associate Professor of Philosophy BPS-19 Govt
girls degree college dara Adam Khel district Kohat

..... Respondents

**APPLICATION FOR IMPLEADMENT OF
RESPONDENT NO. 3 IN THE PENAL OF
RESPONDENTS IN THE INSTANT SERVICE
APPEAL BEEN NECESSARY PARTY.**

Respectfully Sheweth:

1. That the above mentioned service appeal is pending before this
Hon'able Tribunal which is fixed for 13.11.2024 for final hearing.
2. That the appellant has been challenged the transfer order dated
23.04.2024 whereby the appellant was transferred from GGDC Dara
Adam Khel Kohat to GGDC Sabir Abad Karak in the above mention
title service appeal, while the private respondent namely Sumaira
Anjum Associate Professor of Mathematics BPS-19 (in main appeal)
was transferred at the place of the appellant i.e from GGDC Paharpur
DI Khan to GGDC Dara Adam Khel Kohat.


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3. That this Hon' able Tribunal suspend the impugned transfer order dated 23.04.2024, it is pertains to mention here that despite suspension of impugned order dated 23.04.2024 the respondent departments without any legal justification a subsequent transfer order of respondent No. 3 namely Miss Sadaf Syed Associate Professor Philosophy BPS-19 was issued whereby private respondent namely Miss Sumaira Anjum Associate Professor Mathematics BPS-19 was transferred from GGDC Dara Adam Khel Kohat to GGDC Paharpur D.I Khan. While the instant private respondent namely Sadaf Syed was transferred from GGDC Gulshan rehman Peshawar to GGDC Dara Adam Khel. (Copy of posting / transfer order dated 01.11.2024 is attached as Annexure-A).
4. That now as per law and rules the respondent No 3 name:y Miss Sadaf Syed may be liable to make necessary party.
5. That there is no legal bar for acceptance of the instant application.

It is therefore, most humbly prayed that the application of the applicant may kindly be accepted as prayed for.

Dated 08.11.2024

Through:-


Applicant


Kabir Ullah Khattak

&


Roeeda Khan

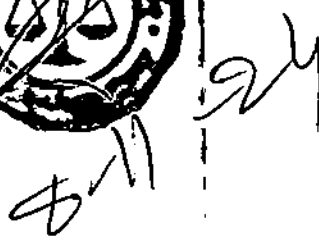
Advocates High Court Peshawar

AFFIDAVIT

I, Dr Abida Azeem Afridi Associate Professor Political Science GGDC Dara Adam Khel, District Kohat do hereby solemnly affirm on oath that the contents of this application are true and correct and nothing has been concealed from this Hon' able Tribunal.


Deponent





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

Appeal No. 1009/ 2024

Dr Abida Azeem Afridi Associate Professor Political Science GGDC
Dara Adam Khel, District Kohat.

VERSUS

1. The Chief Secretary Khyber Pakhtunkhwa Peshawar.
2. The Secretary Higher Education, archives & Library department,
Civil Secretariat, Peshawar.
3. Mst. Sadaf Saeed Associate Professor of Philosophy BPS-19 Govt
girls degree college dara Adam Khel district Kohat

..... Respondents

**APPLICATION FOR SUSPENSION OF THE
SUBSEQUENT TRANSFER ORDER DATED
01/11/2024 WHEREBY THE PRIVATE
RESPONDENT NAMELY MISS SADAF SYED
WAS TRANSFERRED FROM GGDC GULSHAN
REHMAN PESHAWAR TO GGDC DARA
ADAM KHEL KOHAT.**

Respectfully Sheweth:

- 1) That the above mentioned title appeal is pending before
this Hon' able Tribunal which is fix for 13.11.2024.
- 2) That prima facie case exist in favor of the Petitioner.


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- 3) That if the subsequent transfer notification as mention above as not suspended the Petitioner will suffer irreparable loss.
 - 4) That the balance of convenience is also lies in favor of the Petitioner and her quite sanguine of his success.
 - 5) That in the given circumstances the suspension of operation of the subsequent transfer notifications are indispension.

It is therefore to most humbly prayed that on acceptance of the instant petition the operation of the subsequent transfer notification as mention above may kindly be suspended till the final disposal of the accompanying appeal.

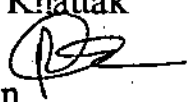
Any other relief not specifically asked for may also graciously be extended in favor of the Petitioner in the circumstances of the case.

Through:-


Applicant


Kabir Ullah Khattak

&


Roeeda Khan

AdvocateS High Court Peshawar



Anam (A) 5

**GOVT. OF KHYBER PAKHTUNKHWA
HIGHER EDUCATION, ARCHIVES &
LIBRARIES DEPARTMENT**

Dated Peshawar the 23rd April, 2024

NOTIFICATION

No.SO(C-III)/HED/1-3/2024/Placement Committee: Consequent upon recommendations of Placement Committee meeting held on 10.05.2023, posting/transfer of the following female teaching staff of college cadre in Higher Education Department are hereby ordered, with immediate effect, in the best public interest. This order would be subject to changes in light of the findings/recommendations of the placement committee working on rationalization of H.R/BS program in the public sector colleges:-

S#	Name/Designation/BPS	From	To	Remarks
1.	Fozia Memon Khattak, Associate Professor of Urdu (BS-19)	GGDC KDA, Karak	GCGC Peshawar	Vice Sr. No.14
2.	Beena Afsheen, Associate Professor of Statistics (BS-19)	GGDC Garhi Kapoora, Mardan	GGDC Chagarmati, Peshawar	Vice Sr. No.04
3.	Sadaf Bashir, Associate Professor of Physics (BS-19)	Under transfer from GFC (W), Peshawar to GGDC Tarkha, Nowshera	GGDC Garhi Kapoora, Mardan	Vice Sr. No.02
4.	Farhat Jabeen, Associate Professor of Economics (BS-19)	GGDC Chagarmati, Peshawar	GGDC Takht-e-Nasrati, Karak	AVP
5.	Tahira Gul, Associate Prof. of History (BS-19)	GGDC Rustam, Mardan	GGDC Chagarmati, Peshawar	Vice Sr. No.06
6.	Raheela Tabassum, Associate Prof. of Economics (BS-19)	GGDC Chagarmati, Peshawar	As Principal / Associate Prof. (BS-19) at GGDC Kakki Bannu	AVP
7.	Salma Rehman, Associate Professor of Home Economics (BS-19)	GGDC Sawaldher, Mardan	GFC (W), Peshawar	Vice Sr. No.08
8.	Shazia Noreen, Associate Professor of Zoology (BS-19)	GFC (W), Peshawar	GGDC Battagram	AVP
9.	Rabia Khan, Associate Professor of Mathematics (BS-19)	Under transfer from GGDC Khanpur Haripur to GGDC Mankarai, Haripur	Retained at GGDC Khanpur, Haripur	Vice Sr. No.10
10.	Noreen Naz, Associate Professor of Comp Sci. (BS-19)	GGDC Khanpur, Haripur	GGDC Mankarai, Haripur	Vice Sr. No.09
11.	Sadaf Syed, Associate Professor of Philosophy (BS-19)	Under transfer to GGDC Gulshan Rehman Colony, Peshawar	GGDC Gulshan Rehman Colony, Peshawar	Vice Sr. No.12
12.	Noreen Haleem, Associate Professor of Urdu (BS-19)	GGDC Gulshan Rehman Colony, Peshawar	GGDC Hangu	AVP
13.	Fouzia Naheed, Associate Professor of Maths (BS-19)	GGDC Hangu	GGDC Hayatabad No.2 Peshawar	Vice Sr. No.15
14.	Saima, Associate Professor of Pakistan Study (BS-19)	GCGC Peshawar	As In Charge Principal (BS-19) at GGDC Madyan Swat	AVP

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15.	Sarwat Wadood, Associate Professor of Home Economics (BS-19)	GGDC No.2 Hayatabad, Peshawar	GGDC Gulshan Rehman Colony, Peshawar	Vice Sr. No.56
16.	Jalwat Huma, Associate Professor of Mathematics (BPS-19)	GGDC Parhoti, Mardan	GGDC Nowshera	AVP
17.	Nasreen Nawab, Associate Professor of Chemistry (BPS-19)	GCGC Peshawar	GGDC Madyan, Swat	AVP
18.	Bibi Zahida, Associate Professor of Botany (BPS-19)	GGDC Qalandar Abad, Abbottabad	GGDC Lund Khwar, Mardan	AVP
19.	Sumera Anjum, Associate Professor of Mathematics (BPS-19)	GGDC Paharpur, D.I.Khan	GGDC Dara Adam Khel, Kohat	Vice Sr. No.25
20.	Sughra Bibi, Associate Professor of Pakistan Study (BS-19)	GGDC Battagram	As Principal at GGDC Balakot, Mansehra	AVP
21.	Robina Hussain, Associate Professor of English (BPS-19)	GGDC Rustam, Mardan	GGDC Nahaqi, Peshawar	Vice Sr. No.22
22.	Wahida Khan, Associate Professor of English (BPS-19)	GGDC Nahaqi, Peshawar	GGPGC Bannu	AVP
23.	Farzana Afridi, Associate Professor of Botany (BPS-19)	GGDC Ekka Ghund, Mohmand	GFC (W), Peshawar	Vice Sr. No.24
24.	Alia Aqeel, Associate Professor of Botany (BS-19)	GFC (W) Peshawar	GGDC Ekka Ghund, Mohmand	Vice Sr. No.23
25.	Dr. Abida Azeem, Associate Professor of Pakistan Study (BS-19)	GGDC Dara Adam Khel, Kohat	GGDC Sabir Abad, Karak	AVP
26.	Rukhsana Raheem, Principal /Associate Professor of Chemistry (BS-19)	GGDC Dargai, Charsadda	GCGC Peshawar	Vice Sr. No.27
27.	Noureen, Associate Professor of Mathematics (BS-19)	GCGC Peshawar	As Principal at GGDC Dargai, Charsadda	Vice Sr. No.26
28.	Saima Nosheen, Associate Professor of Mathematics (BS-19)	GGDC Takht Bhai, Mardan	GHEC Nowshera	AVP
29.	Zeenat Waris, Associate Professor of Chemistry (BS-19)	GGDC No.1 Hayatabad, Peshawar	GGDC Takht Bhai, Mardan	Vice Sr. No.28
30.	Ruqia Iqbal, Associate Professor of Zoology (BS-19)	GGDC Hangu	GFC (W), Peshawar	Vice Sr. No.31
31.	Gulalai, Associate Professor of Law (BS-19)	GFC (W), Peshawar	GGDC Hangu	Vice Sr. No.30
32.	Rahat Batool, Associate Professor of Maths (BS-19)	GGDC Tank	GGDC Kulachi, D.I.Khan	AVP
33.	Nazia Begum, Associate Professor of Physics (BS-19)	GGDC Mathra, Peshawar	GGDC Nowshera	Vice Sr. No.34
34.	Saltanat Jehan, Associate Professor of Physics (BPS-19)	GGDC Nowshera	GFC (W), Peshawar	Vice Sr. No.36
35.	Sadia Jabeen, Associate Professor of Sociology (BPS-19)	GGDC No.1 Hayatabad, Peshawar	GGDC Mathra, Peshawar	Vice Sr. No.33
36.	Naheed Hussain, Associate Professor of Pakistan Study (BS-19)	GFC (W), Peshawar	GGDC No.1 Hayatabad, Peshawar	Vice Sr. No.35
37.	Safia Qazi, Associate Professor of Urdu (BS-19)	GGDC Daggur, Buner	GGDC Katlang, Mardan	AVP

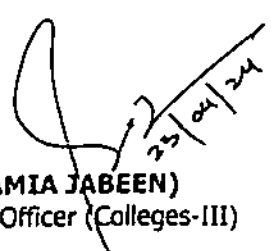
38.	Humera Rani, Associate Professor of Law (BPS-19)	GGDC Matta, Swat	GGPGC Saidu Sharif, Swat	Vice Sr. No.39
39.	Shagufta Sardar, Associate Professor of Statistics (BPS-19)	GGPGC Saidu Sharif, Swat	GGDC Matta, Swat	Vice Sr. No.38
40.	Fozia Noreen, Associate Professor of History (BPS-19)	GGDC Nowshera	GGDC Takht-e-Nasrati, Karak	AVP
41.	Sajila Gul, Associate Professor of Zoology (BPS-19)	GGDC Maneri Swabi	GGDC Nowshera	Vice Sr. No.40
42.	Saira Bibi, Associate Professor of English (BS-19)	GGDC Julagram, Malakand	GGDC Batkhela, Malakand	Vice Sr. No.43
43.	Neelam Kalsoom, Associate Professor of Political Science (BS-19)	GGDC Batkhela, Malakand	GGDC Julagram, Malakand	Vice Sr. No.42
44.	Robina Gul, Associate Professor of Urdu (BPS-19)	GGDC No.1, Mansehra	GGDC Nawan Shehr, Abbottabad	Vice Sr. No.45
45.	Sobiya Tirmizi, Associate Professor Urdu (BPS-19)	GGDC Nawan Shehr, Abbottabad	GGDC No.1, Mansehra	Vice Sr. No.44
46.	Hina Mahmood, Associate Professor of Botany (BPS-19)	GGPGC Mardan	GGDC Rustam, Mardan	AVP
47.	Tahira Naz, Associate Professor of Geography (BPS-19)	GGDC Maneri, Swabi	GGPGC Mardan	Vice Sr. No.48
48.	Gule Sumbal, Associate Professor of Chemistry (BPS-19)	GGPGC Mardan	GGDC Lund Khwar, Mardan	AVP
49.	Rehana Rasool, Principal / Associate Prof. of Law (BS-19)	GGDC Miranshah, North Waziristan	GGDC No.1, D.I.Khan	Vice Sr. No.50
50.	Shamshad Bano, Associate Professor of Economics (BS-19)	GGDC No.1, D.I.Khan	As Principal at GGDC Miranshah, North Waziristan	Vice Sr. No.49
51.	Dr. Neelam, Associate Professor of Urdu (BS-19)	GCGC Peshawar	GFC (W), Peshawar	Vice Sr. No.53
52.	Irum Naz, Associate Professor of Urdu (BS-19)	GGDC Zaryab Colony, Peshawar	GCGC Peshawar	Vice Sr. No.51
53.	Ishrat Jabeen, Associate Prof. of Economics (BS-19)	GFC (W), Peshawar	GGDC Zaryab Colony, Peshawar	Vice Sr. No.52
54.	Rukhsana Naz, Associate Professor of Biology (BS-19)	GGDC Rustam, Mardan	GGDC Pir Pai, Nowshera	Vice Sr. No.55
55.	Saltanat Begum, Associate Prof. of Islamiyat (BS-19)	GGDC Pir Pai, Nowshera	GGDC Rustam, Mardan	Vice Sr. No.54
56.	Chand Abbas, Associate Professor of Maths (BS-19)	GGDC Gulshan Rehman, Peshawar	GGDC Hangu	AVP




-Sd-
SECRETARY

ENDST: NO. & DATE EVEN:

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director Higher Education, Khyber Pakhtunkhwa, Peshawar.
1. Directors, Regional Directorates of Higher Education, concerned.
3. Director-IT, HEMIS Cell, Higher Education Department.
4. Principals of all Govt. Colleges, concerned.
5. District Accounts Officers, concerned.
6. PS to Secretary Higher Education Department.
7. Associate Professors concerned.
8. Master File.


 (SAMIA JABEEN)
 Section Officer (Colleges-III)

تعداد 50 روپے	64432	پشاور بار ایسوسی ایشن، خیبر پختونخواہ
ایڈریس:		PESHAWAR BAR ASSOCIATION
بار کونسل ایسوسی ایشن نمبر:		
رابطہ نمبر:	03339268955	
		

بعدالت جناب: *محمد اسحاق صاحب*

منجانب: <i>ایڈووکیٹ</i>	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:
بابت تحریر آگہ	

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ آن مقام *محمد اسحاق صاحب* کیسے *کیسڈ ایڈووکیٹ* کو وکیل مقرر کیا گیا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کال اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقررات فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری ایک طرف یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظریاتی و پیروی کرنے کا اختیار ہوگا اور بصورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخست منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانب التوا ہے مقدمہ کے سبب سے ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: 8/11/2024
PESHAWAR BAR ASSOCIATION
KHYBER PAKHTOONKHA

المواشد العبد
مقام *محمد اسحاق صاحب* کے لیے منظور ہے۔

Accepted
134
محمد اسحاق صاحب