


FORM OF ORDER SHEET

Court of _____

Appeal No. 2439/2024

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	11/11/2024	<p>The appeal of Mr. Sajida Aziz received today by registered post through Ch.Abdur Rauf Chohan Advocate. It is fixed for preliminary hearing before Single Bench at A.Abad on 27/11.2024. Counsel for the appellant has been informed telephonically.</p> <p style="text-align: right;">By order of the Chairman  REGISTRAR</p>

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

Service Appeal No. 2439 -A/2024

Sajida Aziz PST-12, Govt. Girls Primary School Kaghian, Tehsil Havelian
District Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary and Secondary
Education Department Khyber Pakhtunkhwa, Peshawar and others.

...RESPONDENTS

SERVICE APPEAL

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S. H. J. adler
...APPELLANT

Through

Dated: 8/11 /2024

(Ch. Abdur Rauf Chohan)
Advocate High Court, Abbottabad

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

Diary No. 17846

Dated 11/11/2024

Service Appeal No. 2439 -A/2024

Sajida Aziz PST-12, Govt. Girls Primary School Kaghian, Tehsil Havelian
District Abbottabad.

...APPELLANT

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Elementary and Secondary Education Department Khyber Pakhtunkhwa, Peshawar.
2. Director Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Abbottabad.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974, AGAINST THE NOTIFICATION
NO.4749-54 DATED 03/07/2024 ISSUED BY
RESPONDENT NO.3, WHEREBY THE
TRANSFER/ADJUSTMENT ORDER BEARING
ENDST NO.3667-70 DATED 07/06/2024 HAS BEEN
WITHDRAWN, WHICH IS ILLEGAL, UNLAWFUL,
AGAINST THE LAW, RULES AND POLICY ON THE
SUBJECT, DISCRIMINATORY, PERVERSE,
RESULT OF ILLEGAL EXERCISE OF POWERS,

Filed to day

Registrar

11/11/24

HENCE INEFFECTIVE UPON THE RIGHTS OF THE APPELLANT.

PRAYER: ON ACCEPTANCE OF THE INSTANT SERVICE APPEAL, THE IMPUGNED NOTIFICATION NO.4749-54 DATED 03/07/2024 ISSUED BY RESPONDENT NO.3 MAY KINDLY BE SET-ASIDE AND BY RESTORING THE ORDER BEARING ENDST NO.3667-70 DATED 07/06/2024, THE APPELLANT MAY PLEASE BE ALLOWED TO RENDER HER SERVICES AGAINST HER PREVIOUS POSITION AT GOVT. GIRLS PRIMARY SCHOOL KAGHAN DISTRICT, ABBOTTABAD. ANY OTHER RELIEF DEEMED FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE

Respectfully Sheweth;-

The facts giving rise to the instant petition are arrayed as under;-

1. That, the appellant is the bonafide resident of District Abbottabad and was appointed in the respondents' department. Copy of appointment order dated 06/12/2022 is annexed as Annexure "A".

2. That the appellant has served the department with best of her ability, devotion and dedication for the entire satisfaction of her superiors. .
3. That the appellant was posted and adjusted as PST in Govt. Girls Primary School Lari Syedan Tehsil Havelian District Abbottabad vide adjustment/transfer order dated 30/10/2023. Copy of transfer order dated 30/10/2023 is annexed as Annexure "B".
4. That just after 05 months of transfer and posting of the appellant, the appellant was against transferred from GGPS Basoot and posted at GGPS Pirkot Tajwal, District Abbottabad. Copy of order dated 22/03/2024 is annexed as Annexure "C".
5. That, thereafter, the respondent No.3 withdraw the order dated 22/03/2024 vide notification dated 17/04/2024 and the appellant was directed to report Govt. Girls Primary School Basoot Tajwal. Copy of Notification dated 17/04/2024 is annexed as Annexure "D".
6. That, again the petitioner was transferred/adjusted from GGPS Basoot to GGPS Kaghian, Tehsil Havelian District Abbottabad vide transfer/adjustment Endst No.3667-70 dated 07/06/2024. Copy of letter/order dated 07/06/2024 is annexed as Annexure "E".
7. That, just after 26 days of passing of order dated 07/06/2024 the respondent No.3 has withdrawn all transfer/posting orders of teachers recruited during

the year 2022 including the order of transfer/adjustment of appellant vide impugned Notification No.4749-54 dated 03/07/2024. Copy of impugned Notification dated 03/07/2024 is annexed as Annexure "F".

8. That, in the meanwhile, the respondent No.3 issued an office order Endst No.4938-41 dated 18/07/2024, whereby she directed one Laika Tahir PST GGPS Pasala to perform her duties at her previous station at GGPS Cham Rajpoot (Bandi Maira), Abbottabad. Copy of office order dated 18/07/2024 is annexed as Annexure "G".
9. That, the appellant preferred the departmental appeal against the impugned Notification dated 03/07/2024 and requested that she may also be retained in her previous position but in vain. Copy of departmental appeal dated 07/08/2024 is annexed as Annexure "H".
10. That during the pendency of departmental appeal, the appellant also filed a civil suit restraining the respondents not to transfer a take charge from the appellant which was dismissed vide order dated 08/10/2024.
11. That the appellant has approached the respondents by filing departmental appeal and application to redress her grievances but the respondents has failed to do the needful, thus the appellant seeks indulgence of this Honourable Court for setting aside the impugned notification dated 03/07/2024

and restoration of order dated 07/06/2024, inter-alia, on the following grounds:-

GROUND:-

- a) That, the impugned notification dated 03/07/2024 issued by the respondent No. 3 regarding withdrawal of transfer and posting order of the appellant is illegal, unlawful, without lawful authority, arbitrary, perverse, discriminatory and consequently of no legal effects upon the rights of appellant.
- b) That the appellant has served the department with zeal and zest and for the satisfaction of her superiors.
- c) That under the law codified in Section 10 of KPK Service Act 1973, Sub Section (v) of posting and transfer policy of provincial government the appellant has vested right to be posted at her domicile station, therefore, the impugned Notification is liable to be set-aside.
- d) That the impugned Notification is utter violation of the referred law.
- e) That, the impugned Notification dated 03/07/2024, whereby the transfer/adjustment order of appellant was withdrawn is against the posting transfer policy/rules, because the posting/transfer policy of the Provincial

Govt. clearly indicates this aspect that all the posting/transfers shall be strictly made be public interest shall not be abused/misused to victimize the govt. servants.

- f) That, the transfer/posting order of appellant was withdrawn through which the appellant has again posted at her previous position GGPS Basoot without allowing her to complete her tenure, which is highly unjust, unfair and unwarranted.
- g) That the transfer/posting order of the appellant is clear violation of posting and transfer policy and also the law laid down by the Superior Court.
- h) That even otherwise, there was no lawful justification with the respondent No.3 to withdraw the transfer/adjust of the appellant, this act of the respondents depicts sheer misuse of powers on their part. Hence, the impugned Notification is liable to be set-aside.
- i) That the appellant has served most of her service tenure at hilly and far flung areas. The GGPS Basoot is far away from the residence of present appellant, therefore, the appellant is unable to perform at the station again. Moreover, the appellant has a newborn baby girl (daughter) who is suffering from Asthma and needs proper

care and medication. Copy of medical record is annexed as Annexure "I".

- j) That the impugned Notification of respondent No.3 is against the law, rules and policy on the subject, hence, not maintainable and is liable to be set-aside.
- k) That the impugned posting/transfer order is premature, perverse and illegal. It has been settled by the Superior Courts in so many judgments that when law mandated a thing which is to be done in particular manner that should be done in that prescribed manner not otherwise. In case of violation of above proportion, the Honourable Superior Courts took a serious in case of such eventualities.
- l) That it is well settled by now that under the Constitution of Pakistan read with the law settled in Civil Servant Act 1973 in Aid of law, protect the rights of the citizens within frame work of the Constitution against infringement of law and constitution by the executive authorities, strike a rational compromise and fair balance between the rights of the citizens and action of the state functionaries, claimed to be larger interest of the society.
- m) That the appellant is a patient of

- n) That the impugned Notification if seen from any angle, both factually and legally is not maintainable, hence, liable to be set-aside.
- o) That the instant service appeal is well within the period of limitation.
- p) That the valuable rights of the appellant are involved.
- q) That other points shall be urged at the time of arguments.


Under the circumstances it is respectfully prayed that on acceptance of the instant service appeal, the impugned notification No.4749-54 dated 03/07/2024 issued by respondent No.3 may kindly be set-aside and by restoring the order bearing Endst No.3667-70 dated 07/06/2024, the appellant may please be allowed to render her services against her previous position at govt. Girls Primary School Kaghian District, Abbottabad. Any other relief deemed fit and proper in the circumstances of the case.

✠✠

 ...APPELLANT

Through

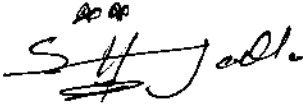
Dated: 8/11 /2024


 (Ch. Abdur Rauf Chohan)
 Advocate High Court, Abbottabad

VERIFICATION:-

Verified on oath that the contents of foregoing service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court

...APPELLANT

✠✠


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

Service Appeal No. _____ -A/2024

Sajida Aziz PST-12, Govt. Girls Primary School Kaghian, Tehsil Havelian
District Abbottabad.

...APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa through Secretary Elementary and Secondary
Education Department Khyber Pakhtunkhwa, Peshawar and others.

...RESPONDENTS

SERVICE APPEAL

AFFIDAVIT

I, **Sajida Aziz PST-12, Govt. Girls Primary School Kaghian, Tehsil Havelian District Abbottabad**, do hereby solemnly affirm and declare that the contents of foregoing service appeal are true and correct and nothing has been concealed therein from this Honourable Court.

Sajida
DEPONENT



Abdur Rauf Chohan
Ch: Abdur Rauf Chohan
Advocate High Court
Office 28 Lawyer's Plaza |
0347-3146975

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

Service Appeal No. _____ -A/2024

Sajida Aziz **VERSUS** Govt. of KPK & others.

SERVICE APPEAL

MISCELLANEOUS APPLICATION FOR
SUSPENSION OF IMPUGNED NOTIFICATION
NO.4749-54 DATED 03/07/2024 ISSUED BY
RESPONDENT NO.3 MAY GRACIOUSLY BE
STAYED/ SUSPENDED AND BY RESTORING THE
ORDER BEARING ENDST NO.3667-70 DATED
07/06/2024, THE APPELLANT MAY PLEASE BE
ALLOWED TO RENDER HER SERVICES AGAINST
HER PREVIOUS POSITION AT GOVT. GIRLS
PRIMARY SCHOOL KAGHIAN DISTRICT,
ABBOTTABAD TILL FINAL DISPOSAL OF THE
TITLED SERVICE APPEAL.

Respectfully Submitted; -

1. That the above titled service appeal is being filed before this Honourable Tribunal contents of this application may graciously be read and treated as integral part of the main appeal for the purpose of issuance interim relief/order.
2. That the impugned notification is clear violation of the policy regarding the transfer and posting set by the Govt. of KPK and the appellant has been subjected

Ch: Abdur Rauf Chohan
Advocate High Court
11, 12 & 13, Lawyers Plaza
Peshawar

from transfer with ulterior motive and malafide intention.

3. That, if the interim relief/restraining order as solicited in the heading of the application has not been passed, then the appeal of the appellant is become infructuous and the appellant will be under great hardship.
4. That the appellant has vested right that treated in accordance with law on the subject and policy set by the govt. for the purpose in here.

It is therefore, very humbly prayed that on acceptance of instant application, the interim/restraining order as solicited in the heading of application may graciously be issued till final disposal of the main appeal.

S. H. Jado

...APPELLANT

Dated: 8/4 /2024

Through

Ch. Abdur Rauf Chohan
(Ch. Abdur Rauf Chohan)
Advocate High Court, Abbottabad

AFFIDAVIT

I, Sajida Aziz PST-12, Govt. Girls Primary School Kaghian, Tehsil Havelian District Abbottabad, do hereby affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honourable Court.

S. H. Jado
DEPONENT



Attested
Ch: Abdur Rauf Chohan
Advocate High Court
Office 21, Sher's Plaza I
0347-3146975

Annexure A

13

**Office Of The District Education Officer
(Female) Abbottabad**

APPOINTMENT

Consequent upon the advertisement bearing No. INF (P) 6105/2021 and recommendations of Departmental Selection Committee held on 01-12-2022, the following candidates are appointed post of Primary School Teacher (PST) Female (Left over/Deferred cases) in BPS-12 (70-1420-63370) @19770 fixed plus usual allowances as admissible under the rules on adhoc contract under the existing policy of the Provincial Government, in Teaching Cadre, on the conditions given below with immediate effect.

Name	Father Name	CNIC	D.O.B	Total Score	Place of Posting	Union Council	Remarks
Ghazala Bibi	Gulab Khan	13102-0588392-2	1/8/1997	130.38	GGPS Lassan	Langrial	A.V.P
Falza Jamil	MUHAMMAD TARIQ	1310103890998	3/3/1995	122.25	GGPS Hiran Beeran Gall	Beeran Gall	A.V.P
Hajira Wirasat	Wirasat Saeed	13101-8064488-8	29-03-1998	122.07	GGPS Jabri Khan Kalan	Bakote	A.V.P
Bibi bakht sultana	Sajad Ali Khan	13102-0589891-8	30-06-1995	121.84	GGPS Hurnara	GHARI PHUL GRAN	A.V.P
Iqra Zaib	Raja Aurangzaib	82203-6515754-0	14-08-1995	120.51	GGPS Jaswal	Dhamtour	A.V.P
Kainat Ali vaiz	Ali Vaiz	13102-0600060-8	22-09-1996	120.15	GGPS Nalotha	DEWAL MANAL	A.V.P
Asma	Muhammad Sheraz	42401-6783462-9	31-01-1999	118.44	GGPS Jab Gran	GOREBNI	A.V.P
Madha Ashfaq	Ashfaq Khan	13101-3387741-4	2/4/1995	115.73	GGPS Pandu Thana	pawa	A.V.P
Sana Arif	Arif Mehmood	13102-0615870-6	1/3/1999	114.44	GGPS Garba	Majuhan	A.V.P
AYESHA NAZAR	NAZAR UR REHMAN	13102-0605868-2	19-11-1997	113.18	GGPS Baro Bagla	Nara	A.V.P

Attested
Ch: Abdul Wahid Chohan
Advocate High Court
Office 21, Ayer's Plaza I
6347 31469

Sl. No.	Name	Roll No.	Date of Birth	Age	Category	Post	Remarks
100	Saima	Maqbool Hussain	13101-3835002-2	21-04-1983	100.05	GGPS Chard	Phase
112	Sajida Aziz	Aziz ur rahman	13101-6327268-4	5/6/1995	100.43	GGPS Buzor	Tand
100	Rehana Bibi	Deedar Khan	37404-3217385-0	4/4/1985	99.99	GGPS Buzor	Phase

14

Terms and Conditions:-

- No TADA is allowed.
- Charge reports should be submitted to all concerned in duplicate.
- Appointment is purely on temporary & contract basis initially for one year with immediate effect.
- They should not be handed over charge if they exceed 35 years or below 19 years of age. Age relaxation case may be submitted to competent authority.
- If any meritorious candidate is deprived of appointment by this order, and the competent authority accepts his appeal, the appointment order of the low merit candidate will be with-drawn, and the adjustment order will be reviewed according to the merit.
- Appointment is subject to the condition that the certificates/documents must be verified from the concerned authorities by the DEO (concerned), anyone found producing bogus certificate will be reported to the law enforcing agencies for further action.
- Their services are liable to termination on one month's notice from either side. In case of resignation without notice their one month pay/allowances shall be forfeited to the Government.
- Pay will not be drawn until and unless a certificate provided by the DEO (concerned) to the effect that their certificates are verified & found correct & genuine.
- They should join their post within 15 days of the issuance of this notification. In case of failure to join the post within 15 days their appointment will expire automatically and no subsequent appeal shall be entertained.
- Health and Age certificate should be produced from the Medical Superintendent concerned before taking over charge.
- They will be governed by such rules and regulations as may be issued from time to time by the Govt.
- Their services shall be terminated at any time, in case their performance found unsatisfactory during the contract period.
- Their inter-se seniority will be determined with their counterparts appointed under advertisement No. INF (P) 6106/2021 as per their inter-se merit.
- The appointment is made on school based. They will have to serve at the place of posting, and their service is not transferable to any other station.
- Appointments are made against the advertised Post in ETEA.
- Before handing over charge, once again their documents may be checked by the Headmasters/Principal (Concerned) and if they do not acquired the relevant qualifications as per rules, they may not be handed over the charge of the post.
- The appointees shall take nine (09) months mandatory training at RITE Or PITE.
- The relaxation of upper limit for appointment is hereby granted 04 years 04 Month 10 days at serial No 11 & 13 under notification No. NO.SOE-III(E&AD)2-1/2007 Dated 01-03-2008. Category V & Category III being competent Authority.
- In case of regularization of their services, they will have to stay in the present school for three years.

(DILSHAD BEGUM)
DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

Encl: 9334-39 Dated Abbottabad the 6/12/22

Copy forwarded for information and necessary action to the:

Director, E&SE, Khyber Pakhtunkhwa, Peshawar

Ch: Abdur Rauf Chohan
Advocate High Court
Office 260, Lawyer's Plaza I
0347-3146975



OFFICE OF THE DISTRICT EDUCATION
OFFICER (FEMALE) ABBOTTABAD

Amereture B3
15

0992-342311, 0992-342314

deofemale_abbottabad@yahoo.com

ADJUSTMENT/TRANSFER.

The undersigned is pleased to transfer the following PST teacher school noted against each their names in the intrest of public service with immediate effect.

S/No	NAME	FROM	TO	REMARKS.
1	Sajida Azia	GGPS Basot	GGPS Lari Syedian	AVP

NOTE:-

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

7743

Endst.No. /EB-VII Tr/Adjst PST

Sd
DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD.

Dated A-Abad the, 30 /2023

Copy for information to the:-

1. SDEO (F) Abbottabad.
2. EMIS Local Office.
3. DMO Abbottabad.
4. District Account Officer Abbottabad.

DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD

Ch: Abdur R. Chohan
Advoc in Court
Office 2nd Floor's Plaza 1
0347-3146975

Anexure C.
18



**OFFICE OF THE DISTRICT EDUCATION
OFFICER (FEMALE) ABBOTTABAD**

0992-342513, 0992-342314

deofemale_abbottabad@yahoo.com

TRANSFER/ADJUSTMENT

The undersigned is please to transfer the following teacher against vacant post on her own pay and scale in the school noted against her name in the interest of public service with effect from the date of taking over charge.

S.NO	NAME	FROM	TO	REMARKS
1.	SAJIDA AZIZ (PST)	GGPS BASOOT	GGPS PIRKOT TAJWAL	SCHOOL CLOSED AS PER REPORT BY SDEO(F) ATD

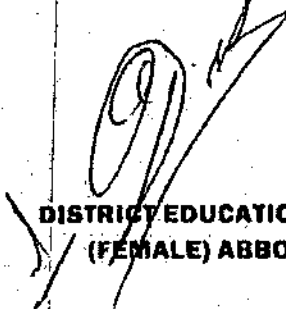
Note


1. No TA/DA Allowed
2. Charge report should be submitted to all concerned

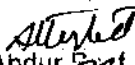
Endst: No 178-82 Dated 22 / 3 /2024

Copy forwarded for information and necessary action to the:

1. District Accounts Officer Abbottabad
2. DMO EMA Abbottabad
3. SDEOs Concerned
4. Head Teachers Concerned
5. EMIS Branch Local office
6. Officials Concerned
7. M/File


DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD


DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD


Ch: Abdur Razaq Chohan
Advocate High Court
Office: Lawyer's Plaza I
0347-3146975

17 Amerture 03



**OFFICE OF THE DISTRICT EDUCATION
OFFICER (FEMALE) ABBOTTABAD**

☎ 0992-342533

✉ deofemale_abbottabad@yahoo.com

NOTIFICATION

The undersigned is pleased to withdraw the order issued vide No. 1781-82 dated 22.03.2024 in R/O Mst. Sajida Aziz PST further she is directed to report GGPS Basant Tajwal with immediate effect.

**DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD**

Endst: No 281-94 / EB-VII PST Dated A.Abad the 17/4/2024

Copy to:-

1. The Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
2. District Accounts Officer Abbottabad.
3. Sub-Divisional Education Officer Female Abbottabad.
4. All Concerned.
5. Office file.

**DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD**

Attested
Ch. Abdur R. Chohan
Advocate High Court
Office Lawyer's Plaza
0347 346975

Anexure E 18



OFFICE OF THE DISTRICT EDUCATION OFFICER FEMALE ABBOTTABAD
0002-342533

TRANSFER/ADJUSTMENT

Consequent upon the approval of competent authority following teachers are hereby transferred against vacant posts in the interest of public with immediate effect.

S. No	Name of Official/ Designation	From	To	Remarks
1.	Ranwal Dawood Shah/ PST	GGPS Batnara	GGPS Phallah	A.V.P
2.	Sajida Aziz PST ✓	GGPS Banota Basoot	GGPS Kaghian	A.V.P.

27/06/24

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

SD
District Education Officer (F)
Abbottabad

Encl: No 3667-70 dated 07/06/2024

- Copy forwarded for information and necessary action to the
1. District Account office Abbottabad
 2. District Monitoring Officer EMA Abbottabad
 3. Principal Concerned
 4. Teachers Concerned
 5. Local Office

Amir
District Education Officer (F)
Abbottabad

Abdur
Ch: Abdur P. Chohan
Advoc, Court
Off. ce 28, ... Plaza I
05-3146975

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Amrature F



**OFFICE OF THE DISTRICT EDUCATION
OFFICER (FEMALE) ABBOTTABAD**

No. 1749-S/Ed 3/7 /2024

0992-342533, 0992-342314

deofemale_abbottabad@yahoo.com

NOTIFICATION

All transfer/Posting Orders of teachers recruited during the year 2022 are hereby withdrawn with immediate effect as issued in advertuntly against the regulatory act in field.

- Sd -

**DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD**

Copy to.

1. Worthy Director E&SED KPK Peshawar for information please.
2. PS to Secretary (E&SED) Department Govt. of Khyber Pakhtunkhwa Peshawar.
3. DMO/EMA Abbottabad.
4. District Account Officer Abbottabad.
5. All SDEOs Concerned for implementation please.

**DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD**

Attested
Ch: Abdur Chohan
Advoc gh Court
Office 7 yer's Plaza I
0347-3146975

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20.

Amrcture G/S

OFFICE OF THE DISTRICT EDUCATION OFFICER (F) ABBOTTABAD

OFFICE ORDER

Mst. Laiqa Tahir, PST GGPS Pasala is hereby directed to perform her duties at GGPS Chan: Rajpoot (Bandi Maira), Abbottabad till further orders in the interest of public service with immediate effect.

01. No TA/DA is allowed.

02. Charge reports be submitted to all concerned.

**DISTRICT EDUCATION OFFICER (F)
ABBOTTABAD**

Date: 18.07.2024

Handst No: 4938-41

Copy forwarded to

01. SDEO (F) Abbottabad.

02. PA to District Monitoring Officer (EMA) Abbottabad.

03. Teacher Concerned.

**DISTRICT EDUCATION OFFICER (F)
ABBOTTABAD**

Attested
Ch. Abdu... Chohan
Advoc... gh. Court
Office... Plaza

بخدمت جناب ڈسٹرکٹ ایجوکیشن آفیسر، زنانہ، ایبٹ آباد

جناب عالی!

میرا آرڈر (Order) نمبر 06-07-2024 پی پی ایس کا کیا گیا تھا اور میں پی پی ایس کا کیا گیا تھا۔
اپنی ذیویٹی سرانجام دے رہی تھی اور مجھے اس بات پر زور دیا گیا کہ میں پی پی ایس کا کیا گیا تھا اور اس میں انرا اسٹریٹوریو گروہ میں جو کہ پہلے
45 تھے۔ میں نے کوشش کی اور ایک ہفتے میں انرا ہونے سے 45 سے بڑھ کر 60 ہو گئی تھی۔ اس دوران ذیویٹیکیشن ہوا کہ 2022 میں کے پی
نمائندہ آرڈر ہیں وہ کنسل کر دیے گئے ہیں۔ اور میں جس سکول سے آئی تھی۔ وہ میرے گھر سے بہت دور تھا جہاں جانا بہت مشکل تھا
کیونکہ 3 گھنٹے چلنے اور 3 گھنٹے آنے میں لگتے تھے اور کئی قسم کی روڈ کی بھی کوئی سہولت نہیں تھی۔ جبکہ راستے میں ایک گہری ندی بھی ہے
جسے پار کرنے کے لیے انتہائی مشکل ہوتا تھا۔ غرض کہ آرڈر کنسل ہونے کے بعد میں نے اپنی ملحقہ SDEO اور EDO سے اپیل کی
مجھے اپنی سکول میں رہیں (Retain) کیا جائے مگر وہ کسی صورت اس بات پر رضامند نہیں ہو رہی۔ 2022 میں سے ساتھ کی ٹیچر تھی
میرے سرکس اسکا آرڈر 2022 Withdrawal Notification ساتھ لکھ ہے ہونے کے بعد لاؤٹ کیا۔ (GGPS)
چنانچہ سے چم راجپوت بانڈی میرا میں گئی تھی جس کا PST آرڈر ساتھ لکھ ہے اور اس کا آرڈر کنسل نہیں ہوا جو کہ غیر قانونی ہے اس کے
علاوہ سرکل اور سے شینہ (PST) جو کہ (GGPS) باڈی میں اپنی ذیویٹی سرانجام دے رہی اور وقت ملک (GGPS) دعوہ میں اپنی
ذیویٹی سرانجام دے رہی ہے آپ سے گزارش ہے میرا آرڈر بھی (Validate) کیا جائے تاکہ میں بھی اپنی ذیویٹی اچھے طریقے سے
سرانجام دے سکوں۔

العارضہ

ساجد عزیز

PST-12

پی پی ایس کا کیا گیا

07-08-2024 مورخہ



Ch: Abdur Rauf Chohan
Advocate High Court
Office 27/Chohan's Plaza
0311-3146975

بخدمت جناب ڈائریکٹر ای اینڈ SE ڈیپارٹمنٹ پشاور

جناب عالی

سائلہ کا مدفعہ 12-12-16 کو PS آڈیو سے GPS بسوس میں
 نقیثات میں اور تقریباً 069 اسی سکول میں ڈیویڈی مہرا انجام دی گئی
 اس کے بعد سائلہ کو مدفعہ 23-8-30 کو GPS لٹری سیراں ٹرانسفر
 کر دیا گیا لٹری سیراں میں سائلہ کو جاری نہیں لینے دیا گیا اور دوبارہ
 GPS بسوس ٹرانسفر کر دیا گیا اس کے کچھ عرصہ بعد سائلہ کو GPS
 بسوس سے مدفعہ 24-3-22 کو GPS پیر کورٹ (ماہیوال) تبدیل
 کر دیا گیا لیکن سائلہ کو GPS پیر کورٹ میں وینسٹون میں
 کرنے دی گئی اور سائلہ کا آرڈر 24-3-22 مدفعہ 17/04/24
 کو withdraw کر لیا اور سائلہ کو ایک بار GPS بسوس
 بھیج دیا گیا اس کے بعد مدفعہ 24-6-7 سائلہ کا آرڈر GPS
 کا گیاں کر دیا گیا جیسا کہ سائلہ نے کچھ عرصہ کا گیاں میں ڈیویڈی مہرا انجام دی اور
 سائلہ کو کیا گیا کہ ٹرنڈنٹ زیادہ کرو سائلہ نے ایک دفعہ میں ڈیویڈی مہرا
 کر ٹرنڈنٹ 50 کر دی لیکن پھر بھی سائلہ کو ٹوری نہیں رکھا گیا اور
 سائلہ کو مدفعہ 24-7-3 کو GPS کا گیاں سے واپس بسوس بھیج
 دیا گیا۔

A جناب عالی بسوس پٹری علاقہ دور دراز بغیر آبادی کے ہے اور جنگل
 جانوروں کی رفتار ہے جن سے ہر وقت خطر رہتا ہے کوئی سڑک
 نہ ہے آنے جانے میں 1/3 گھنٹہ لگ جاتے ہیں اور پیدل چلنا پڑتا ہے
 راستے میں ٹری آتی ہے اور سائلہ کے لیے سکول پہنچنے میں بہت دشواری ہے
 مزید یہ کہ سائلہ دل کی حالت ہے اور سائلہ کو ڈاکٹر نے پیدل چلنے سے
 منع کیا ہے سبب کھلی لٹ ہے۔ اور سائلہ کی نوکری بھی ہے۔ سائلہ کے
 لیے نوکری کرنا اجازت بنا دیا گیا ہے۔

Abdul
 Ch: Abdur Rauf Chohan
 Advocate High Court
 Off. of Lawyer's Plaza
 0347-3146975

(2)

یہ آئندہ اس بارے میں سائلہ کا ٹرانسفر آرڈر 3-7-2024 منوفی (2) کے
سائلہ کو دیا گیا گاڑیاں میں لینا سب سے

صفحہ 02/08/2024

سائلہ صاحبہ کو ٹرانسفر آرڈر دیا گیا گاڑیاں ٹرانسفر اس کے پاس

Ajida

Attested
Ch: Abdur Rauf Chohan
Advocate High Court
Office 28 Lawyer's Plaza |
0347-3146975

22A

662 For Insurance Notices see reverse. Rs. Ps.

RGL 142983089 of 60

the initial weight prescribed in the Post Office Guide or on which no acknowledgement is due. 22A

received a registered acknowledgement

Addressed to Dr. A. K. Chohan Date Stamp 10/10/2014

Initials of Receiving Officer AKC Write here "letter", "postcard", "packet" or "parcel" with the word "insured" before it when necessary.

Insured for Rs. (in figures) 2000 (in words) Two thousand

Insurance Fee Rs. 10 Ps. 00 Weight 100 Kilo 00 Grams

Name and Dr. A. K. Chohan

Attested
 Jh Abdur R. Chohan
 Advocate in Court
 Office 28 L. L. S. Plaza I
 0347 346974

Treatment

R Ventolin Nebulizer

11 100
 7 100
 2 Solocort 200

21 Nebulizer 400
 5
 10 Forminid

Name of Doctor:

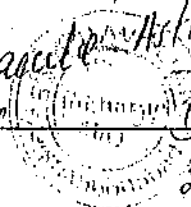
Signature:

Refer To:
(Reasons)

16 Cop Nebulizer
 100
 100

walking on hilly area
 exertions

Avoid dust, pollen
 smoke and cold
 to prevent acute
 Asthmatic
 attack in future



23/09/24

Attested
 Ch: Abdur Raheem
 Advocate
 Office 28
 0346-3146975

Date: 23/9/2024

DHIS-02(F)

Sent To:

OUT DOOR PATIENT TICKET

District ATD

CRP No: 6690

Facility Name TDH Havalica

Name Sajida Aziz D/O Aziz ur Rehman Age: Sex: F

Fathers's / Husband's/ Self CNIC / Reg. No. 131016327268-4

Monthly OPD Serial No.

Provisional Diagnosis: Asthma

Clinical findings/ Investigations/ Treatment/ Referred

Chief Complaint		<u>SOB cough for</u>		
Clinical Findings	Temperature:	<u>99°</u>	Chest:	<u>CX P Wheez</u>
	Pulse:	<u>112/M</u>	Abdomen	
	B.P:	<u>90/60</u>	CVS:	
	Chest:		Others:	
Investigations	X-Ray	<u>CX ray CBC</u>	MRI	<u>CRP</u>
	U/S		FBC	
	CT Scan		Others	



DHIS
DISTRICT HEALTH
INFORMATION SYSTEM



PATHFINDER

S.No. 239986 Mob: 03473146975

Name of Advocate Ch: Abdul Rauf Chohan

DBA NO. 292 TBA NO. _____

BC No.

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R.s.200/=

وکالت نامہ
SAIRA JAVED
Finance Secretary
District Bar Association
Abbottabad

24

بعدالت ضاب سروس ٹرانسپورٹ

عنوان: سابقہ سروس نام گوانٹ کپا سروس

منجانب: نوٹیت مقدمہ سروس اپیل

باعث تحریر آنکہ

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے بیرونی و جو باہری برائے پیشی یا تصفیہ مقدمہ بمقام Abbottabad کے لیے

Ch: Abdul Rauf Chohan Advocate AFD

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو رو بعدالت حاضر ہوتا ہوں گا اور بروقت پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہوا اور مقدمہ میری غیر حاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل بیرونی کرنے کے ذمہ دار نہ ہوں گے اور مقدمہ پکھری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا مختانے کو اپس کرانے کے بھی صاحب موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پرداخت صاحب موصوف مثل کرد ذات منظور و مقبول ہوگا اور صاحب موصوف کو عرض دعویٰ یا جواب دعویٰ اور درخواست اجرائے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرانے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور اس پر ثالثی و راضی نامہ و فیصلہ بر طرف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے میری نجات از پکھری صدر اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یا کٹرفر درخواست حکم اختتامی یا ترقی یا گرفتاری قبل از گرفتاری و اجرائے ڈگری بھی صاحب موصوف کو بشرط ادا جنگی علیحدہ و مختانہ بیرونی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ مذکور یا اس کے کسی جز کی کارروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی بیرونی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے برخلاف نہیں ہوگا۔

مورخہ: 2024/11/08

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ دن ماہ سال

نوٹ: وکالت نامہ کی فوٹو کاپی قابل قبول نہ ہوگی

Accepted

Handwritten notes and signatures on the right margin.