

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 2946/2021

Date of institution 19.02.2021

Mehreen Zaman Daughter of Muhammad Anwar, R/o Shalkiwal Darra Adam Khel, Presently posted as Head Teacher, BPS-12, in Government Primary School Shalkiwal Darra Adam Khel.

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar and seven others.

ORDER
07.09.2021

Mr. Hassan U.K Afridi, Advocate, for the appellant present. Mr. Javed Iqbal, Steno as representative of the respondents alongwith Mr. Muhammad Rasheed, Deputy District Attorney for the respondents present.

Representative of the respondents stated at the bar that the grievance of the appellant has been redressed and her salary has been released. In this view of the matter, learned counsel for the appellant stated at the bar that as the grievance of the appellant has been redressed, therefore, he wants to withdraw the instant appeal. In this respect, written endorsement of learned counsel for the appellant obtained at margin of the order sheet.

In view of the above, the appeal in hand stands dismissed as withdrawn. Parties are left to bear their own costs. File be consigned to the record room.

ANNOUNCED
07.09.2021



(ATIQU-UR-REHMAN WAZIR)
MEMBER (EXECUTIVE)



(SALAH-UD-DIN)
MEMBER (JUDICIAL)

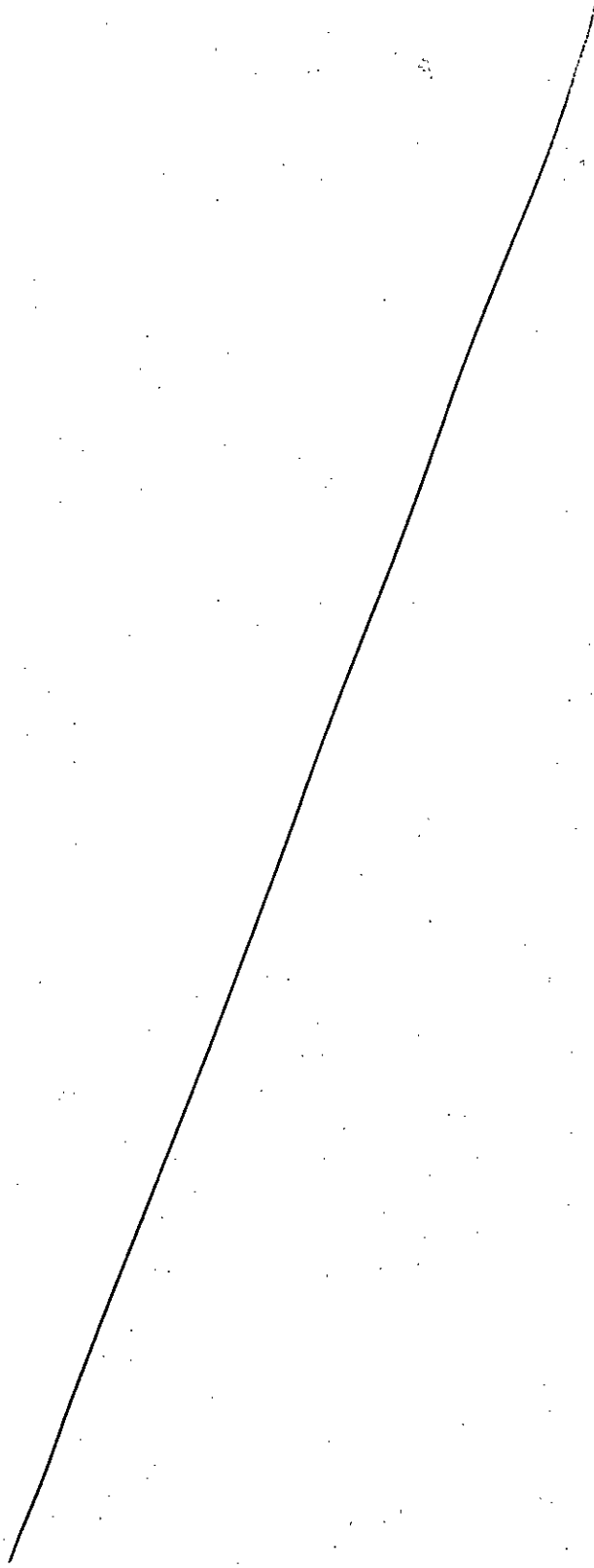
I want to withdraw the appeal
12/19/2021

29.07.2021

Learned Addl, A.G be reminded about the omission
and for submission of reply/comments within extended
time of 10 days.

Stipulated period passed reply not submitted.


Chairman



07.06.2021

The Worthy Chairman is on leave, therefore, case to come up for preliminary hearing on 25.06.2021 before S.B.



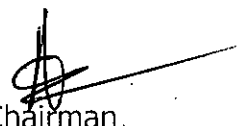
Reader

25.06.2021

Counsel for the appellant present. Preliminary arguments heard.

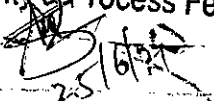
Points raised need consideration. The appeal is admitted to regular hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days of the receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, the office shall submit the file with a report of non-compliance. File to come up for arguments on 07.09.2021 before the D.B.

The appeal is accompanied by application for release of current salary of the appellant. Notice of the application be also given to the respondents.



Chairman

Appellant Deposited
Security & Process Fee

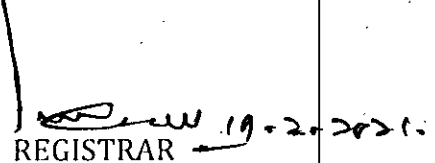





Form- A

FORM OF ORDER SHEET

Court of _____

Case No. - 2946 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	19/02/2021	<p>The appeal of Mr. Mehreen Zaman presented today by Mr. Hassan U.K Afridi Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR 19-2-2021</p>
2-		<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>16/03/21</u></p> <p> CHAIRMAN</p>
	16.03.2021	<p>Due to tour of Camp Court Abbottabad and shortage of Members at Principal Bench Peshawar, the case is adjourned to 23.06.2021 before S.B.</p> <p> Reader</p>
	20.04.2021	<p>Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 05.08.2021 for the same as before.</p> <p> Reader</p>
		<p>Application for early hearing allowed fixed for 07/08/21.</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Mehreen Zaman.....**Appellant**

V E R S U S

Government of Khyber Pakhtunkhwa through Secretary
E&SE Peshawar & others.....**Respondents**

I N D E X

S#	Description of Documents	Annex	Pages
1.	Service Appeal with affidavit		1-6
2.	Application for release of salary alongwith affidavit		7-9
3.	Addresses of parties		10-11
4.	Appointment letter dated 12.04.2007		12
5.	Service Record		13-16
6.	Deputation order dated 16.04.2014		17
7.	Transfer Order dated 02.11.2015		18
8.	Pay Slip		19
9.	Application/Appeal		20
10.	Wakalatnama		21


Appellant

Through

Dated 18.02.2021

Hassan U.K Afridi
Advocate
Supreme Court of Pakistan
Cell No. 0300-9151963

1

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. 2946/2021

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 2945

Dated 19/2/2021

Mehreen Zaman Daughter of Muhammad Anwar,
R/o Shalkiwal Darra Adam Khel,
Presently posted as Head Teacher, BPS-12
in Govt. Primary School Shalkiwal Dara Adam khel

.....**Appellant**

V E R S U S

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
2. Secretary to Government of Khyber Pakhtunkhwa, Finance Department, Peshawar
3. Director Elementary & Secondary Education, Peshawar
4. Director of Education (FATA) Khyber Pakhtunkhwa, Peshawar
5. District Education Officer (EDO), (Female), Kohat
6. District Education Officer, Tehsil Sub Division, Darra Adam Khel, Kohat
7. District Account Officer, Kohat
8. Deputy Director (Establishment) merged area, Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar

.....**Respondents**

Filed to-day

Registrar

19/2/2021

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT, 1974, WITH ALL AMENDMENTS FOR RELEASE/ RESTORATION OF SALARY STOPPED SINCE OCTOBER 2020 UPTILL NOW, WHILE THE DEPARTMENTAL APPEAL IS STILL UNANSWERED.

Prayer in Appeal:-

On acceptance of this service appeal, the respondents may kindly be directed to release the salary of the appellant from October 2020 uptil now and further in flume with all back benefit/allowance etc if any in accordance with law/Rules as announced by the government for governed servant/Civil Servant.

Any other relief, deemed fit and necessary in the given circumstances of the case may also be awarded in favour of the appellant was against respondents

Respectfully Sheweth:-

Facts of the case

1. That the appellant has been appointed as PTC female trained teacher (BPS-7) at Government Primary School Suni Khel No.2, F.R, Kohat on 12.4.2007 for a period of one year contract.
2. That later on the appellant was regularized and all the benefits of government servant/ Civil Servant have been awarding since now.
3. That now the appellant has performing her duty as head Teacher (BPS-12_ in Government Primary School Shpalkwal Darra Adam Khel.
4. That suddenly without any notice and intimation to the appellant, the respondents stopped the salary of the appellant since October 2020 uptil now.
5. That the appellant inquired the matter verbally but no satisfactory reply was received then the appellant filed application/appeal to the respondent on 10.11.2020 but no reply

was received, hence this Service Appeal on the following amongst the other grounds:

GRUNDS:

- A. That the stoppage of Salary of the appellant without any reason is against law and rules and liable to be released with all benefit/ allowance etc as announced by the Government.
- B. That the status of the appellant is a regular employee as she has been awarded all the incentives/benefits under the government rules, which is very much clear from the salary slip of the appellant and her service record.
- C. That the appellant is still performing her duty means still in service then how and under what provision of law, she has been deprived from her salary.
- D. That the appellant has the constitutional and legal rights to receive the salary and the respondents have no authority to

stop/withheld the salary of the appellant without any legal justification.

- E. That some other ground may be adduced at the time of arguments with the permission of this Honourable Court.

It is, therefore most humbly prayed on acceptance of this service appeal, the respondents may kindly be directed to release the salary of the appellant from October 2020 upto now and further in full with all back benefit/allowance etc if any in accordance with law/Rules as announced by the government for governed servant/Civil Servant

Any other relief, deemed fit and necessary in the given circumstances of the case may also be awarded in favour of the appellant was against respondents


Appellant

Through


Hassan U.K. Afridi
Advocate
Supreme Court of Pakistan

Dated 22.10.2020

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

Mehreen Zaman.....**Appellant**

V E R S U S

Government of Khyber Pakhtunkhwa through Secretary
E&SE Peshawar & others.....**Respondents**

A F F I D A V I T

I, Mehreen Zaman Daughter of Muhammad Anwar, R/o Shalkiwal Darra Adam Khel, Presently posted as Head Teacher, BPS-12 in Govt. Primary School Dara Adam khel, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



D E P O N E N T

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M. No. _____/2021

In

Service Appeal No. _____/2021

Mehreen Zaman.....**Appellant**

V E R S U S

Government of Khyber Pakhtunkhwa through Secretary
E&SE Peshawar & others.....**Respondents**

APPLICATION FOR RELEASE OF PRESENT
SALARY OF THE APPELLANT

Respectfully Sheweth:

1. That the service appeal has filed with the application before this Hon'ble Tribunal, which has bright chance to succeed.
2. That the appellant has good prima facie case.
3. That balance of convenience also lies in favour of the appellant.
4. That if the present salary has not been release to the appellant then the appellant will suffer irreparable loss.

5. That the grounds in service appeal may be considered the integral part of this application.
6. That some other ground may be adduced at the time of arguments with the permission of this Honourable Court.

It is therefore, humbly prayed that on acceptance this application, the present salary of the appellant may kindly be released, till the final decision of the appeal.

Applicant/Appellant
Through

Dated 18.02.2021


Hassan U.K Afridi
Advocate Supreme Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No. _____/2021

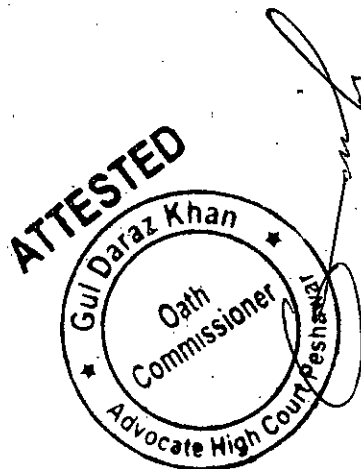
Mehreen Zaman.....**Appellant**

V E R S U S

Government of Khyber Pakhtunkhwa through Secretary
E&SE Peshawar & others.....**Respondents**

A F F I D A V I T

I, Mehreen Zaman Daughter of Muhammad Anwar, R/o Shalkiwal Darra Adam Khel, Presently posted as Head Teacher, BPS-12 in Govt. Primary School Dara Adam khel, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



D E P O N E N T

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

Service Appeal No: _____/2021

Mehreen Zaman.....**Appellant**

V E R S U S

Government of Khyber Pakhtunkhwa through Secretary
E&SE Peshawar & others.....**Respondents**

ADDRESSES OF PARTIES

APPELLANT:

Mehreen Zaman Daughter of Muhammad Anwar,
R/o Shalkiwal Darra Adam Khel,
Presently posted as Head Teacher,
BPS-12 in Govt. Primary School Dara Adam khel

RESPONDENTS:

1. Government of Khyber Pakhtunkhwa through Secretary Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar
2. Secretary to Government of Khyber Pakhtunkhwa, Finance Department, Peshawar
3. Director Elementary & Secondary Education, Peshawar
4. Director of Education (FATA) Khyber Pakhtunkhwa, Peshawar
5. District Education Officer (EDO), (Female), Kohat

6. District Education Officer, Tehsil Sub Division, Darra Adam Khel, Kohat
7. District Account Officer, Kohat
8. Deputy Director (Establishment) merged area, Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar

Appellant
Through

Dated 18.02.2021

Hassan U/K Afridi
Advocate
Supreme Court of Pakistan

APPOINTMENT.

Consequent Upon the Approval of Departmental Selection Committee , Mehreen D/O-Anwar, PTC Female Trained Candidate, is hereby Appointed in BPS.NO. 07 @ Rs.2555-140-6755 plus usual allowances as admissible under the rules at Govt: Girls Primary School Suni Khel No.2, F. R. Kohat against Leave Vacancy, ^{for a} Vids Rehan. Perveen PTC proceeded on Long Leave without pay, period of One year, on Contract basis in the interest of public Service with effect from the date of her taking over charge.

TERMS & CONDITIONS:-

- 01:- Charge report should be submitted in duplicate to all concerned.
- 02:- The appointment are made purely on temporary basis and are liable to termination at any time without assigning any reason or prior notice in case the candidate wants to resign her duties they will have to give one month prior notice or forfeit one month pay.
- 03:- She should produce Health & Age Certificate from the Medical Superintendent concerned.
- 04:- The Pay scale and service rules should be subject to the revision in accordance with the order to be ~~xxx~~ issued by the Govt: of NWFP from time to time.
- 05:- She should not be handed over charge of the post if her age above 40-years or below 18-years.
- ~~06:- If she failed to take over charge within 10 days her appointment will automatically be considered as cancelled.~~
- 07:- No Candidate be handed over charge of the post of erroneously reported vacant by the AAEO concerned such cases immediately be detected and conveyed through Special messenger in such cases the appointment of the last candidate of the merit list will be considered as cancelled.
- 08:- No.TA/DA and transfer grant is allowed.
- 09:- After expiry of leave in r/o Rehana Perveen her services will be terminated subject to the condition of non-availability of any PTC Vacant Post.
- 10:- She will not claim her pay till the verification of her Completed documents awaited from the concerned institution/department are received.
- 11:- They will contribute CP Fund at the rate of 10% of the minimum of pay.

(HAJI IPTIKHAR HUSSAIN)
AGENCY EDUCATION OFFICER
F. R. KOHAT AT KDA KOHAT.

ENDST:NO. 236-40 APPTT:/PTC/(F). F.R. KOHAT. DATED 12.4./2007.

Copy to the:-

- 01:- Director of Education (FATA)'NWFP' Peshawar.
- 02:- District Accounts Officer Kohat.
- 03:- Candidate Concerned.
- 04:- AAEO(F) of the Local Offices
- 05:- Accountant of the Local Office.

Attested


Haji Iptikhar Hussain

1. Name (نام) Mehreen (13)
2. Nationality and Religion Islam
(قومیت اور مذہب)
3. Residence Shah Waliullah Park, Adawal, D.D.
(مستقل رہائش)
4. Father's Name and Residence Anwar
(والد کا نام اور پتہ)
5. Date of birth Christian era as nearly as can be ascertained 06-06-1985
(تاریخ پیدائش مطابق سن عیسوی)
6. Exact height by measurement 5'3"
(قد و قامت)
7. Personal mark of identification black mole on both cheeks
(نشانی شناخت)

8. Left hand/right hand thumb and finger impressions of (Non-gazetted officer)

(مرد کی صورت میں بائیں اور عورت کی صورت میں دائیں ہاتھ کی انگلیوں کے نشانات)

Little Finger (چھنگلیا) Ring Finger (چھنگلیا کے ساتھ کی انگلی) Middle Finger (انگشت میاں)

Fore Finger (انگشت شہادت) Thumb (انگوٹھا)

verified
Attested Thumb
impression

9. Signature of Govt. Servant (سرکاری ملازم کے دستخط)

10. Signature and designation of the Head of the Officer or other Attesting Officer

(تصدیق کنندہ افسر کے دستخط اور مہر)

Attested
Signature
A.P.O.F.

Note: The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken after every 5 years under this rule.

اس صفحہ کے مندرجہ کم از کم پانچ سال بعد تصدیق ہونا ضروری ہیں اور نمبر 9 اور 10 میں دستخطوں کے نیچے تاریخ لکھنی چاہیے۔
انگلیوں کے نشانات کے لئے ہر پانچ سال کے بعد تصدیق کی ضرورت نہیں۔

Attested

9 Signature and designation of the Head of the office or other attesting officer in attestation of column 1 to 8 دستخط افسر مجاز	10 Date of termination or appointment تاریخ انقطاع ملازمت	11 Reason of termination (such as promotion transfer, dismissal etc.) وجوہات انقطاع ملازمت ترقی تبادلہ یا برطرفی	12 Signature of the head of the office or other Attesting Officer دستخط افسر مجاز	13 Nature and duration of leave taken رضعت کی نوعیت ومعیار	13 Allocation of period of leave of average pay up to four months (or earned leave not exceeding 120 days) to which leave salary is debitable to another Government چار ماہ تک کی رضعت کے لئے اوسط تنخواہ کا تعین Period عرصہ Government to which debitable گورنمنٹ سے	14 Signature of the Head of the office other attesting officer دستخط افسر مجاز	15 Reference to any recorded punishment of censure, or reward, or praised or the Government servants سزایا جزایا غیر مناسب کارکردگی کا ریکارڈ
A. E. O. F.R. Kohat NA	30/11/08	A. E. O. F.R. Kohat	A. E. O. F.R. Kohat		Appointed against P.T.E Post in B.S. 7 on contract basis vide A.E.O. F.R. Kohat order No. 2536-40 dt 12/4/55	A. E. O. F.R. Kohat NA	
A. E. O. F.R. Kohat	30/11/08	A. E. O. F.R. Kohat	A. E. O. F.R. Kohat		Passed S.S.C. (A) Exam from BISE Peshawar under R/O No. 2188 obtained 417 marks out of 850. Grade 'D'	A. E. O. F.R. Kohat NA	
A. E. O. F.R. Kohat	30/11/08	A. E. O. F.R. Kohat	A. E. O. F.R. Kohat		Passed P.T.E Exam from A.I.C.E. Islamabad under R/O No. 2608097 obtained 544 marks out of 900 & Result declared on 22/6/08	A. E. O. F.R. Kohat NA	
A. E. O. F.R. Kohat	30/11/08	A. E. O. F.R. Kohat	A. E. O. F.R. Kohat			A. E. O. F.R. Kohat NA	
A. E. O. F.R. Kohat	30/11/09	A. E. O. F.R. Kohat	A. E. O. F.R. Kohat			A. E. O. F.R. Kohat NA	

Attested

17

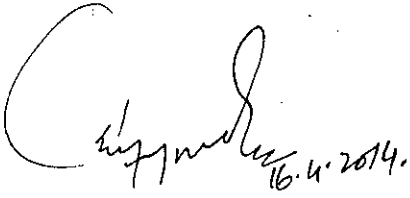
OFFICE OF THE AGENCY EDUCATION OFFICER FR KOHAT.

DEPUTATION ORDER

Miss. Mehrin PST BPS-12 Govt. Girls Primary School Zorh ^{Killi} Aktur FR Kohat is hereby deputed to Govt. Girls Primary School Shpalkiwal FR Kohat, till further order in the best interest of public service.

Note:-

1. Charge Report Should be Submitted to all Concerned.
2. No TA/DA is allowed.
3. She will draw her salary from her original school.


16.4.2014.
Agency Education officer
FR Kohat

Endst: 671-73 /FR Kohat Dated 16/4 /2014.

1. AAEO (E) ER Kohat.
2. Cluster Incharge concerned.
3. Head Teacher concerned.
4. Teacher concerned.

Agency Education Officer
FR Kohat.

Attested


18

OFFICE OF THE AGENCY EDUCATION OFFICER FR KOHAT.

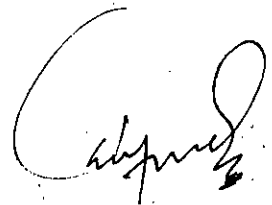
TRANSFER ORDER

The transfer of the following teachers is hereby ordered in their own pay and BPS to the schools noted against their names in the interest of the public service w.e.f the date of their taking over charge.

S.No	Name of Teacher	Desg:	From	To	Remark
1.	Mehreen	PST	GGPS Zorh Kalli	GGPS Shpalkiwal	Vice SNO
2.	Zareen Taj	PST	GGPS Shpalkiwal	GGPS Zorh Kalli	Vice SNO

Note:-

1. Charge Report Should be Submitted to all Concerned.
2. No T.A/D.A is allowed.




Agency Education Officer
FR Kohat

Endst: 503-6 /FR Kohat Dated 02/11 /2015.

Copy to the:-

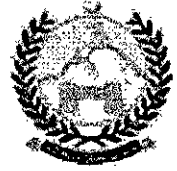
1. District Accounts Officer Kohat.
2. AAEO (F) FR Kohat.
3. EMIS Cell Local Office.
4. Accountant Local Office.
5. Headmistress/ Head Teacher concerned.
6. Teacher concerned.

Agency Education Officer
FR Kohat

Dist. Govt. KP-Provincial
District Accounts Office Kohat
Monthly Salary Statement (September-2020)

19



Personal Information of Miss MEHREEN ZAMAN d/w/s of MOHAMMED ANWAR

Personnel Number: 00367672 CNIC: 2240166928642 NTN:
Date of Birth: 06.06.1985 Entry into Govt. Service: 13.04.2007 Length of Service: 13 Years 05 Months 019 Days

Employment Category: Active Temporary

Designation: PRIMARY SCHOOL HEAD TEACH 80926253-DISTRICT GOVERNMENT KHYBE

DDO Code: KT6398-Khel

Payroll Section: 001

GPF Section: 008

Cash Center:

GPF A/C No:

Interest Applied: Yes

GPF Balance:

100,753.00

Vendor Number: -

Pay and Allowances:

Pay scale: BPS For - 2017

Pay Scale Type: Civil BPS: 12

Pay Stage: 10

Wage type		Amount	Wage type		Amount
0001	Basic Pay	22,920.00	1000	House Rent Allowance	1,961.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1528	Unattractive Area Allow	1,000.00	2148	15% Adhoc Relief All-2013	450.00
2199	Adhoc Relief Allow @10%	308.00	2211	Adhoc Relief All 2016 10%	1,674.00
2224	Adhoc Relief All 2017 10%	2,292.00	2247	Adhoc Relief All 2018 10%	2,292.00
2264	Adhoc Relief All 2019 10%	2,292.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription	-2,890.00	3501	Benevolent Fund	-600.00
3990	Emp.Edu. Fund KPK	-125.00	4004	R. Benefits & Death Comp:	-600.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance
------	-------------	------------------	-----------	---------

Deductions - Income Tax

Payable: 0.00 Recovered till SEP-2020: 0.00 Exempted: 0.00 Recoverable: 0.00

Gross Pay (Rs.): 39,545.00 Deductions: (Rs.): -4,215.00 Net Pay: (Rs.): 35,330.00

Payee Name: MEHREEN ZAMAN

Account Number: 7100011201

Bank Details: HABIB BANK LIMITED, 221663 DARRA ADAM KHEL, KOHAT. DARRA ADAM KHEL, KOHAT., KOHAT

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address:

City: VILL SHPALKI WAL FR KOHAT Domicile: NW - Khyber Pakhtunkhwa

Housing Status: No Official

Temp. Address:

City:

Email: mehreenafri786@gmail.com

Attested


حضرت صاحب دین و دنیا، اہل بیت علیہم السلام، رضوان اللہ علیہم اجمعین،
صاحبِ حال: ایمل

(20)

مؤدباً گزارش فی کسوف و حال (2002ء میں)
محبتِ نبویؐ کی ساری گورنمنٹ گزٹ میں شائع
نہجِ سنی میں اپنی آرا و خیالات میں نصیب کیا گیا
اور وقتاً فوقتاً مذکورہ کا مواد لکھواتا رہا۔ اور مذکورہ
کو گزٹ میں لکھا رہا۔ اب ڈسٹرکٹ ایجنٹ کی طرف
سے فزوری نئی آواز لکھوانے کے لیے اور لکھوانے میں
آج کی کسوف کی خبر کے جوڈے آج لکھوانے کے
لکھیں اس کے آج کو جائیں
اس کے درخواست کی آواز کے فزوری نئی
آواز لکھوانے اور فزوری نئی آواز میں
انتہائی سحر و جادو کا حکم صادر فرمایا
نوازشِ عظیمہ

نوع: حکم دستخط
س کو مستحق

السلامت
دعا گو میری زبان کی
جی جی بی ایس سیکولر
سب ڈیوٹن
رہ آج میں

Attested


ORDER

27.05.2021

Instant application has been submitted by the Reader alongwith the appeal.

On 20.04.2021 the appeal was adjourned to 05.08.2021 through Reader Note without any fault on the part of the appellant. The matter involved is stoppage of salary of the appellant and is at preliminary stage. Therefore, application is allowed and office is required to fix the appeal in the month of June, 2021.


Chairman

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PEHSAWAR

Put up to Hon'ble chair-man
along with appeal.

Recorder

C.M. No. _____/2021 26/5/21

In

Service Appeal No.2946/2021



Mehreen Zaman.....Appellant

V E R S U S

Govt. of KPK & others.....Respondents

**APPLICATION FOR FIXATION OF EARLY
DATE OF HEARING IN THE ABOVE TITLED
SERVICE APPEAL**

Respectfully Sheweth:

1. That the above titled Service Appeal was pending adjudication before this Hon'ble Court which is fixed for 05.08.2021.
2. That the appellant has been serving in the department of respondents since 12.04.2007 as PTC female trained teacher.
3. That the appellant recently is performing her duty as head teacher in government Primary School Shapalkiwal Darra Adam Khel.

4. That the salary of the appellant has been withheld/stop since October 2020 without any notice, while the appellant is still performing her duty, so she has been performing her duty without salary of about 6 months.
5. That the appellant also prayed for the interim relief in the shape of release of present salary.

It is, therefore humbly prayed that on acceptance of this application, the above title service appeal may kindly be fixed as early as possible.



Appellant

Through

Hassan U.K Afridi

Advocate

Supreme Court of Pakistan

Dated 26.05.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PEHSAWAR

C.M. No. _____/2021

In

Service Appeal No. _____/2021

Mehreen Zaman.....**Appellant**

V E R S U S

Govt. of KPK & others.....**Respondents**

A F F I D A V I T

I, Mehreen Zaman Daughter of Muhammad Anwar, R/o Shalkiwal Darra Adam Khel, Presently posted as Head Teacher, BPS-12 in Govt. Primary School Dara Adam khel, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



Identified by:-

DEPONENT

CNIC#: 22401-66928642

Cell #: 0336-9312505

Hassan U.K Afridi
Advocate Supreme Court



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PEHSAWAR

C.M. No. _____/2021.

In

Service Appeal No.2946/2021

Mehreen Zaman.....Appellant

V E R S U S

Govt. of KPK & others.....Respondents

**APPLICATION FOR FIXATION OF EARLY
DATE OF HEARING IN THE ABOVE TITLED
SERVICE APPEAL**

Respectfully Sheweth:

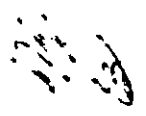
1. That the above titled Service Appeal was pending adjudication before this Hon'ble Court which is fixed for 05.08.2021.
2. That the appellant has been serving in the department of respondents since 12.04.2007 as PTC female trained teacher.
3. That the appellant recently is performing her duty as head teacher in government Primary School Shapalkiwal Darra Adam Khel.



4. That the salary of the appellant has been withheld/stop since October 2020 without any notice, while the appellant is still performing her duty, so she has been performing her duty without salary of about 6 months.

5. That the appellant also prayed for the interim relief in the shape of release of present salary.

It is, therefore humbly prayed that on acceptance of this application, the above title service appeal may kindly be fixed as early as possible.



Appellant

Through

Hassan Ullah Afridi
Advocate

Supreme Court of Pakistan

Dated 28.02.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PEHSAWAR

C.M. No._____/2021

In

Service Appeal No._____/2021

Mehreen Zaman.....**Appellant**

VERSUS

Govt. of KPK & others.....**Respondents**

AFFIDAVIT

I, Mehreen Zaman Daughter of Muhammad Anwar, R/o Shalkiwal Darra Adam Khel, Presently posted as Head Teacher, BPS-12 in Govt. Primary School Dara Adam khel, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court:



Identified by:-

DEPONENT

CNIC#: 22401-66928642

Cell #: 0336-9312505

Hassan U.K Afridi
Advocate Supreme Court



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PEHSAWAR

*Put up to the court with
relevant appeal.*

C.M. No. _____/2021

17/3/2021

Service Appeal No.2946/2021



Readw

Mehreen Zaman.....Appellant

V E R S U S

Govt. of KPK & others.....Respondents

**APPLICATION FOR FIXATION OF EARLY
DATE OF HEARING IN THE ABOVE TITLED
SERVICE APPEAL**

Respectfully Sheweth:

1. That the above titled Service Appeal was fixed on motion before this Hon'ble Tribunal on 16.03.2021 but adjourned due to absence of Hon'ble Members to the next date as 23.06.221.
2. That the appellant has been serving in the department of respondents since 12.04.2007 as PTC female trained teacher.

*At the interim
stage. May be accor-
evated to a date in
3rd week of April, 2021.
19/04*

22/3/21

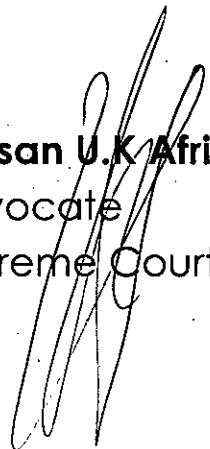
3. That the appellant recently is performing her duty as head teacher in government Primary School Shapalkiwal Darra Adam Khel.
4. That the salary of the appellant has been withheld/stop since October 2020 without any notice, while the appellant is still performing her duty, so she has been performing her duty without salary of about 6 months.
5. That the appellant also prayed for the interim relief in the shape of release of present salary.

It is, therefore humbly prayed that on acceptance of this application, the above title service appeal may kindly be fixed as early as possible.



Appellant

Through



Hassan U.K. Afridi

Advocate

Supreme Court of Pakistan

Dated 17.03.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PEHSAWAR

C.M. No. _____/2021

In

Service Appeal No. 2946/2021

Mehreen Zaman.....**Appellant**

V E R S U S

Govt. of KPK & others.....**Respondents**

A F F I D A V I T

I, Mehreen Zaman Daughter of Muhammad Anwar, R/o Shalkiwal Darra Adam Khel, Presently posted as Head Teacher, BPS-12 in Govt. Primary School Dara Adam khel, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



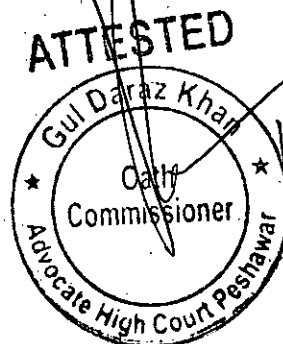
Identified by:-

D E P O N E N T

CNIC#:

Cell # :


Hassan U.K. Afridi
Advocate Supreme Court



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PEHSAWAR

C.M. No. _____/2021

In

Service Appeal No.2946/2021

Mehreen Zaman.....**Appellant**

V E R S U S

Govt. of KPK & others.....**Respondents**

**APPLICATION FOR FIXATION OF EARLY
DATE OF HEARING IN THE ABOVE TITLED
SERVICE APPEAL**

Respectfully Sheweth:

1. That the above titled Service Appeal was fixed on motion before this Hon'ble Tribunal on 16.03.2021 but adjourned due to absence of Hon'ble Members to the next date as 23.06.221.
2. That the appellant has been serving in the department of respondents since 12.04.2007 as PTC female trained teacher.

3. That the appellant recently is performing her duty as head teacher in government Primary School Shapalkiwal Darra Adam Khel.
4. That the salary of the appellant has been withheld/stop since October 2020 without any notice, while the appellant is still performing her duty, so she has been performing her duty without salary of about 6 months.
5. That the appellant also prayed for the interim relief in the shape of release of present salary.

It is, therefore humbly prayed that on acceptance of this application, the above title service appeal may kindly be fixed as early as possible.



Appellant

Through

Hassan U.K Afridi
Advocate

Supreme Court of Pakistan

Dated 17.03.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PEHSAWAR

C.M. No. _____/2021

In

Service Appeal No. 2946/2021

Mehreen Zaman.....**Appellant**

VERSUS

Govt. of KPK & others.....**Respondents**

AFFIDAVIT

I, Mehreen Zaman Daughter of Muhammad Anwar, R/o Shalkiwal Darra Adam Khel, Presently posted as Head Teacher, BPS-12 in Govt. Primary School Dara Adam khel, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



Identified by:-

DEPONENT

CNIC#:

Cell # :

Hassan U.K Afridi
Advocate Supreme Court



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PEHSAWAR

C.M. No. _____/2021

In
Service Appeal No.2946/2021.

Mehreen Zaman.....Appellant

V E R S U S

Govt. of KPK & others.....Respondents

**APPLICATION FOR FIXATION OF EARLY
DATE OF HEARING IN THE ABOVE TITLED
SERVICE APPEAL**

Respectfully Sheweth:

1. That the above titled Service Appeal was fixed on motion before this Hon'ble Tribunal on 16.03.2021 but adjourned due to absence of Hon'ble Members to the next date as 23.06.221.
2. That the appellant has been serving in the department of respondents since 12.04.2007 as PTC female trained teacher.

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PEHSAWAR

C.M. No. _____/2021

In

Service Appeal No.2946/2021

Mehreen Zaman.....Appellant

V E R S U S

Govt. of KPK & others.....Respondents

**APPLICATION FOR FIXATION OF EARLY
DATE OF HEARING IN THE ABOVE TITLED
SERVICE APPEAL**

Respectfully Sheweth:

1. That the above titled Service Appeal was fixed on motion before this Hon'ble Tribunal on 16.03.2021 but adjourned due to absence of Hon'ble Members to the next date as 23.06.221.
2. That the appellant has been serving in the department of respondents since 12.04.2007 as PTC female trained teacher.

3. That the appellant recently is performing her duty as head teacher in government Primary School Shapalkiwal Darra Adam Khel.
4. That the salary of the appellant has been withheld/stop since October 2020 without any notice, while the appellant is still performing her duty, so she has been performing her duty without salary of about 6 months.
5. That the appellant also prayed for the interim relief in the shape of release of present salary.

It is, therefore humbly prayed that on acceptance of this application, the above title service appeal may kindly be fixed as early as possible.



Appellant

Through

Hassan U.K Afridi
Advocate

Supreme Court of Pakistan

Dated 17.03.2021

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PEHSAWAR

C.M. No. _____/2021

In

Service Appeal No. 2946/2021

Mehreen Zaman.....Appellant

VERSUS

Govt. of KPK & others.....Respondents

AFFIDAVIT

I, Mehreen Zaman Daughter of Muhammad Anwar, R/o Shalkiwal Darra Adam Khel, Presently posted as Head Teacher, BPS-12 in Govt. Primary School Dara Adam khel, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



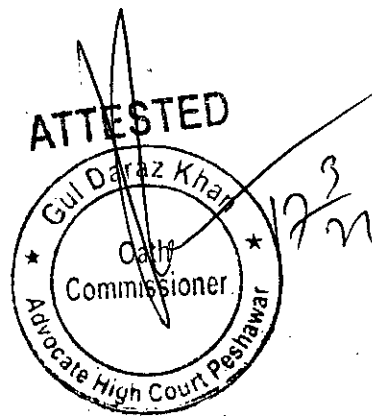
Identified by:-

DEPONENT

CNIC#:

Cell # :

Hassan U.K Afridi
Advocate Supreme Court



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PEHSAWAR

C.M. No. _____/2021

In

Service Appeal No. 2946/2021

Mehreen Zaman.....**Appellant**

VERSUS

Govt. of KPK & others.....**Respondents**

AFFIDAVIT

I, Mehreen Zaman Daughter of Muhammad Anwar, R/o Shalkiwal Darra Adam Khel, Presently posted as Head Teacher, BPS-12 in Govt. Primary School Dara Adam khel, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



Identified by:-

DEPONENT

CNIC#:

Cell # :

Hassan U.K Afridi
Advocate Supreme Court

