


18.05.2022

Learned counsel for petitioner present. Mr. Muhammad Adeel Butt, Addl. AG for the respondents present.


Learned counsel for petitioner requested for adjournment on the ground that she has not gone through the record. Adjourned. To come up for implementation report on 22.07.2022 before S.B.

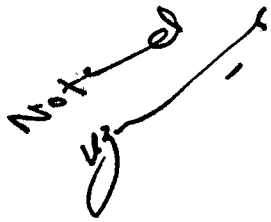

(Mian Muhammad)
Member (E)

22.07.2022

Nemo for the petitioner. Mr. Muhammad Adeel Butt, Additional Advocate General alongwith Mr. Faheem Khan, Assistant for the respondents present.

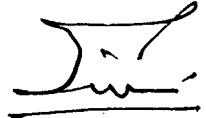
Implementation report not submitted. Representative of the respondents requested that time may be granted to him for submission of implementation report. Granted. To come up for implementation report on 19.09.2022 before S.B. Notice be also issued to petitioner and his counsel for the date fixed.


(Mian Muhammad)
Member (E)

Noted


10.01.2022

Petitioner in person present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present and stated at the bar that implementation of the judgment under execution is in process and sought time for submission of implementation report. Adjourned. To come up for submission of implementation report before the S.B on 19.01.2022.



(Salah-Ud-Din)
Member (J)

19.01.2022

None for the petitioner present. Mr. Muhammad Adeel Butt, Addl: AG alongwith Mr. Sohail, Assistant for respondents present.

Learned AAG stated at the bar that he is in touch with the petitioner and case pertaining to her arrears on account of salary is under process in the respondent-department and she feels quite satisfied with the outcome. He therefore, requested for short adjournment enabling him to submit the implementation report on next date. Request is acceded to. To come up for submission of final implementation report on 07.03.2022 before S.B.



(Mian Muhammad)
Member(E)

7-3-2022

Due to retirement of the Honble Chairman the case is adjourned to come up for the same as before on 10-5-2022


Reader

23.12.2021

Petitioner alongwith counsel and Mr. Muhammad Rasheed, DDA for the respondents present.

According to operative part of the judgment at credit of the petitioner, her appeal was allowed as prayed for with direction for her reinstatement in service with all back and consequential benefits. Learned counsel for the petitioner has stated at the bar that the judgment to the extent of reinstatement and back benefits relating to seniority has been executed. However, arrears of pay in pursuance to the reinstatement under the judgment at credit of the petitioner have so far not been paid to her. According to rough calculation furnished verbally by learned counsel, arrears of salary for a period of more than 40 months are still outstanding because of inaction of the respondents. Respondent No. 2 is directed to make appropriate arrangement for release of the arrears of salary of the petitioner through a single DDO or different DDOs where the petitioner remained posted. However, the respondent No. 2 in any case shall submit conclusive implementation report on the next date positively. Case to come up on 10.01.2022 before S.B.


Chairman



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

No: _____/F.No.A-17/PF/Azra Afridi/ASDEO.
Dated Peshawar the: 14/01/2022.

To

**The District Education Officer,
(Female) Buner.**

Subject: - **REQUEST FOR RELEASE OF BACKS CONSEQUENTIAL OF BACK
BENEFIT.**

Memo:

I am directed to refer to the subject order sheet dated 23-12-2021 of the Honorable Service tribunal in Execution Petition No.153/2021 in Service Appeal 17/2017 case titled Azra Afridi Vs Govt; & letter No. SO(S/F)E&SED/4-17/2021 dated 09-12-2021 of the section officer (S/F) E&SE Department Khyber Pakhtunkhwa Peshawar on the subject cited above & to state that as per direction of the competent authority with regard to the release of arrears & salaries of the Appellant in the titled case conditionally till the final disposal of the pending CPLA against the main Judgment dated 22-02-2019 of the Service Tribunal in the august Supreme Court of Pakistan filed by the Respondent Department/Petitioner.

It is here by intimated that the Appellant/ASDEO concerned be directed to submit/provide the exact period for which she is claiming her arrears & salaries in compliance of the aforesaid judgment of the Honorable Tribunal with further direction to provide Non-with drawl of salaries & arrears certificate dully countersigned by DEO (F) concerned of the Appellant /ASDEO concerned for the issuance of conditional order of her adjustment for the purpose of pay & arrases only in compliance of the order dated 23-12-2021 of the Honorable Court, conditionally in letter in sprite.

5964-69

AD I
18/01/22

-st-
Assistant Director (Estab-F)
E&SE Khyber Pakhtunkhwa,
Peshawar.

Endst: No. of Even No. & Date

Copy forwarded for information to the:-

1. Registrar Khyber Pakhtunkhwa Service Tribunal Peshawar.
2. SO Litigation E&SE Department Khyber Pakhtunkhwa, Peshawar.
3. Deputy Director (Legal), E&SE Department Khyber Pakhtunkhwa, Peshawar.
4. District Accounts Officer Buner.
5. Azra Afridi SDEO (OPS) Circle Daggar District Buner.
6. PA to Director, local Directorate.
7. Office copy.

Assistant Director (Estab-F)
E&SE Khyber Pakhtunkhwa,
Peshawar.

14/01/22

01.11.2021

Counsel for the petitioner and Mr. Kabirullah Khattak,
Addl. AG for the respondents present.

This application has been submitted for restoration of the Execution Petition in exercise of the liberty given to the petitioner vide order dated 05.11.2019 when the Execution Petition No. 170/2019 was consigned after production of reinstatement order of the petitioner with all back and consequential benefits. In the present application for restoration, the petitioner states that the department is refusing the grant of back benefits to the petitioner and for this reason the restoration of the Execution Petition No. 170/2019 is being sought. The Execution Petition mentioned before is restored. The respondents are directed to file their objections, if any, as to why the judgment as to grant of back benefits should not be executed against them. To come up for objections of the respondents on 16.12.2021 before the S.B.


Chairman

16.12.2021

Petitioner in person present. Mr. Kabirullah Khattak, Addl:
AG for respondents present.




Petitioner seeks adjournment as her counsel is not available today. To come up for further proceedings on 23.12.2021 before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

Form-A
FORM OF ORDER SHEET

Court of _____

E.P Restoration Application No. 153 /2021

S.No.	Date of order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	26.08.2021	<p>The application for restoration of Execution petition no. 170/2019 submitted by Syed Noman Ali Bukhari Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2		<p>This restoration application is entrusted to S. Bench to be put up there on <u>24/09/21</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	24.09.2021	<p>Counsel for the petitioner present.</p> <p>Notices be issued to the respondents. To come up for reply and arguments on restoration application on 01.11.2021 before S.B.</p> <p style="text-align: right;"> Chairman</p>

05.11.2019

Counsel for the petitioner and Addl. AG alongwith
Irfanullah, Assistant for the respondents present.

Learned counsel for petitioner states that in view of
reinstatement of petitioner in service he is under instruction to
request for consigning the instant proceedings to record with
reservation of right of petitioner to apply for restoration, if need
be.

Order accordingly.


Chairman

EP No. 170/2019


07.10.2019

Nemo for petitioner. Addl. AG alongwith Irfanullah, Assistant for the respondents present.

Representative of the respondents has produced copy of notification dated 12.09.2019 whereby the petitioner has been reinstated in service with all back ~~benefits~~ and consequential benefits subject to the final decision of the Apex Court in CPLA filed against the judgment under execution.

Due to non-availability of petitioner instant matter is adjourned to 05.11.2019 for further proceedings.

05.11.2019

Counsel for the petitioner and Addl. AG alongwith Irfanullah, Assistant for the respondents present  Chairman

Learned counsel for petitioner states that in view of reinstatement of petitioner in service he is under instruction to request for consigning the instant proceedings to record with reservation of right of petitioner to apply for restoration, if need be.

Order accordingly.

Chairman

*Def. raised on back
Page -
✓*

07.08.2019

Counsel for the petitioner and Mr. Muhammad Jan, DDA alongwith Mr. Muhammad Hayat, AD for the respondents present.

The representative of respondents states that CPLA against the judgment under implementation has been preferred before the Apex Court and also an application for early hearing has been submitted, however, no date of hearing has been fixed in the matter so far.

The respondents are required to produce on the next date any order of Apex Court suspending the judgment under execution or its setting aside altogether. Else, the implementation report be submitted positively on next date.

Adjourned to 12.09.2019 before S.B.


Chairman

12.09.2019

Petitioner alongwith counsel and Addl. AG alongwith Hayat Khan, AD and Sajid, Litigation Officer for the respondents present.

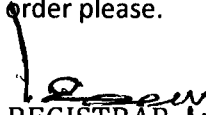



The representative of respondents once again requests for time to submit the implementation report which has not been provided despite clear order on 07.08.2019.

Instant matter is adjourned to 07.10.2019 on which date the requisite report shall positively be submitted failing which punitive action under the law will be taken.


Chairman

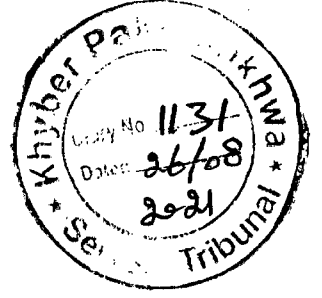
Form- A
FORM OF ORDER SHEET

Court of _____
Execution Petition No. 170/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	04.4.2019	<p>The execution petition of Mst. Azra Afridi submitted today by Syed Noman Ali Bokhari Advocate may be entered in the relevant register and put up to the Court for proper order please.</p> <p style="text-align: right;"> REGISTRAR 4/4/19</p>
2-	09/04/19	<p>This execution petition be put up before S. Bench on <u>06/05/19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
06.05.2019		<p>Counsel for the petitioner present. Notice be issued to the respondents for implementation report for 24.06.2019 before S.B.</p> <p style="text-align: right;"> (MUHAMMAD AMIN KHAN KUNDI) MEMBER</p>
24.06.2019		<p>Counsel for the petitioner present. Addl: AG for respondents present. Notices be issued to the respondents for submission of implementation report on the next date of hearing. Case to come up for further proceedings on 7.08.2019 before S.B.</p> <p style="text-align: right;"> (Ahmad Hassan) Member</p>

BEFORE THE K.P SERVICE TRIBUNAL, PESHAWAR.

C.M No: _____/2019
In
Execution petition no. 170/2019



Mst.AzraAfridi

vs

Govt of k.p etc

**SUBJECT: APPLICATION OF RESTORATION OF EXECUTION
PETITIONS NO.170/2019 IN SERVICE APPEAL NO.
17/2017**

RESPECTFULLY SHEWETH :-

1. That the service appeal of the appellant was accepted vide judgment dated 22.02.2019. And the appellant was reinstated into service with all back and consequential benefits.
2. That thereafter, files execution petition No.170/2019 for the implementation of judgment dated 22.02.2019 .
3. That during the pendency of execution petition the department brought order dated where by the appellant was re-instated into service with all back and consequential benefits.
4. That on the basis of above mentioned order the execution petition was consigned vide order dated 05-11-2019. Direction was given that petitioner is at liberty to apply for restoration of the proceedings in case any part of relief granted to her remained unsatisfied .
5. That now the department refusing the back benefits to the petitioner. So, there is no other remedy, therefore, appellant file application for restoration of execution petition.

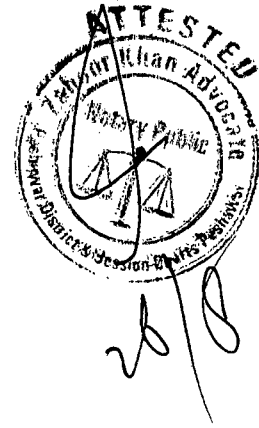
It is , therefore, most humbly requested that on acceptance of this application the execution petition No. 170/2019 may be restored

.Any other remedy which tribunal , deems fit & appropriate may also be awarded to petitioner .

Azra Afridi
APPLICANT
Mst. Azra Afridi

Through:

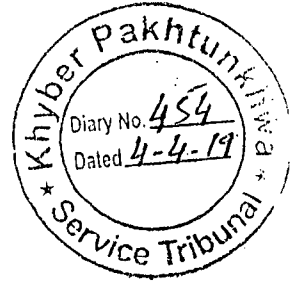
Syed Noman Ali Bukhari
(SYED NOMAN ALI BUKHARI)
Advocate High Court
Peshawar.



(1)

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.

Execution Petition No. 170 /2019
In Service Appeal No.17/2017



Mst. Azra Afridi
Ex- ASDEO(F) Circle, Tordher Swabi.

PETITIONER

VERSUS

1. The Secretary Education (E&SE) Department, KPK, Civil Secretariat, Peshawar.
2. The Director, Peshawar. of Education (E&SE), Department, KP, Peshawar.
3. The District Education Officer (female), Peshawar.
4. The Sub Divisional Education Officer Female lahor Swabi.

RESPONDENTS

.....

**EXECUTION PETITION FOR DIRECTING THE
RESPONDENTS TO IMPLEMENT THE
JUDGMENT DATED: 22.02.2019 OF THIS
HONORABLE TRIBUNAL IN LETTER AND
SPIRIT.**

.....

RESPECTFULLY SHEWETH:

1. That the applicant/appellant filed Service Appeal No.17/2017 in this august Tribunal against the order dated 13.09.2016 whereby the appellant has been dismissed from the service.
2. That the said appeal was finally heard by the Honorable Tribunal on 22.02.2019 and the Honorable Tribunal was kind enough to accept the appeal and penalty of dismissal from service is set aside and the appeal of the appellant was accepted as prayed for.. (Copy of judgment is attached as Annexure-A).
3. That the appellant also filed application to respondents for the implementation of judgment. The respondents were totally failed

EP No. 170/2019

07.10.2019

Nemo for petitioner. Addl. AG alongwith Irfanullah, Assistant for the respondents present.

Representative of the respondents has produced copy of notification dated 12.09.2019 whereby the petitioner has been reinstated in service with all back ~~benefits~~ and consequential benefits subject to the final decision of the Apex Court in CPLA filed against the judgment under execution.

Due to non-availability of petitioner instant matter is adjourned to 05.11.2019 for further proceedings.

05.11.2019

Counsel for the petitioner and Addl. AG alongwith Irfanullah, Assistant for the respondents present Chairman

Learned counsel for petitioner states that in view of reinstatement of petitioner in service he is under instruction to request for consigning the instant proceedings to record with reservation of right of petitioner to apply for restoration, if need be.

Order accordingly.

Chairman

*separation on back
page -*

05.11.2019

Counsel for the petitioner and Addl. AG alongwith
Irfanullah, Assistant for the respondents present.

Learned counsel for petitioner states that in view of
reinstatement of petitioner in service he is under instruction to
request for consigning the instant proceedings to record with
reservation of right of petitioner to apply for restoration, if need
be.

Order accordingly.


Chairman

VAKALATNAMA

NO. _____/20

IN THE COURT OF KP SERVICE TRIBUNAL PESHAWAR

Azra Afridi

Appellant
Petitioner
Plaintiff

VERSUS

Grant of KP

Respondent (s)
Defendants (s)

I/WE Azra Afridi

do hereby appoint and constitute the **SYED NOMAN ALI BUKHARI Advocate High Court** for the aforesaid Appellant(s), Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party to commence and prosecute / to appear and defend this action / appeal / petition / reference on my / our behalf and all proceedings that may be taken in respect of any application connected with the same including proceeding in taxation and application for review, to draw and deposit money, to file and take documents, to accept the process of the court, to appoint and instruct council, to represent the aforesaid Appellant, Petitioner(S), Plaintiff(s) / Respondent(s), Defendant(s), Opposite Party agree(s) ratify all the acts done by the aforesaid.

DATE _____/20

[Signature]

(CLIENT)

ACCEPTED

[Signature]
SYED NOMAN ALI BUKHARI
ADVOCATE HIGH COURT

CELL NO: 0306-5109438

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, S.P
PESHAWAR.

No.

Execution Petition Restoration
Appeal No. 153 of 2021

Mst. Azra Afendi Appellant/Petitioner

Versus

The Secy. Edu. ER DE UPK Respondent

Respondent No. 4

Copy

Notice to: the Sub Divisional Education Officer (Female) Lahore Swabi

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 11/11/2021 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Restoration of F.P
Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 27th

Day of SEP 20 21

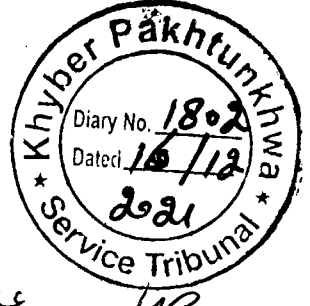
For Reply
Restoration
Application

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

خدمت صباح چیر میں صاحب سروس ڈیپوٹیشن

S.D.E.O (Female)
Daggar Buner



حکمانہ اپیل داد رسی
حکمانہ تحفظ
Against Corruption

صباح علی! بطور ASDEO ڈیپوٹیشن میں OPS
SDEO ڈیپوٹیشن میں اپنے فرائض ادا نہ کرنا اور کسی

کے ساتھ انجام دے رہی ہوں۔ اس لیے ASDEO
سالہ 2011 میں پبلک سروس کمیشن سے بطور ASDEO

Mangmar Mangmar
Caddes کے ساتھ اپنے ماتحت ڈیپوٹیشن سے جوئے
جوئے ساتھ اپنے ماتحت ڈیپوٹیشن سے جوئے

73 ہے۔ ان سے غیر حاکم ٹیپنگ
فندی سے خریدی، کنڈیشنل گرانٹ سے خریدی

وسیع پیمانے پر اور علم دراز سے بند کونہ میں سے
جا کر ساتھ نام بند کونہ اور جن سے جا فور

بندھے ہوئے ہے ان کونہ کامیاب حکمانہ
ماتحت ٹیپنگ لے رہا تھا جسے خلاف حکمانہ

لئے کی دیورٹ ٹیپنگ کے ساتھ ساتھ حکمانہ طور پر
ذاتی طور پر اپنی انتظامیہ کامیاب ہم سے وار اس

شروع ہوا۔ جوں در جھوٹے FIR ساتھ
سند کے معقولہ طور پر ساتھ کو ضلع بدر کر

کر پتھر حکمانہ انکوائری کے ساتھ کو ضلع بدر کر
دی گیا اور ساتھ کو ضلع بدر کر بھی گیا

مقررہ اپیل 8 صفحہ پر مشتمل ہے

عذ کوہ FIR ضلع درہ کوہ میں سرک ٹائل لگانے
 مونیٹری سے لیا گیا جو کہ راج پور پونڈ میں
 Topper ہے۔ اس میں اس سال کی پہلی راج پور
 کی۔ جو دھوکہ دہی کی کہ ہم نے محکمہ سر سے لے کر
 ماڈرن ٹیک بائڈھو دیا ہے۔ ہم دیکھیں گے تم کیسے

S.D.E.O (Female)
 Daggar Buner

ایجنڈا سے نام کرنا ہے۔
 سہ ماہی 2015 کو ضلع ہوا ہے اس میں ایسا نام کھیل
 گھوٹا راج میں بطور ASIAC سرکل ٹور ڈھوکہ

شروع کیا اور بعد میں کرڈوں میں کنڈیشنل گرانٹ
 میں فریڈ اور ایڈیٹو سکول کی کلاس فور USmain

کو عہدہ پانچ سال سے غیر حاضر ہے اور اور
 کنڈیشن فریڈ کے خلاف رپورٹ دینے پر

دوبارہ دسمبر 2015 کو سائٹ کو OSI بنا کر
 نسخواہ بند کر دیا گیا۔

سائٹ کو اسٹور زینی اڈے دی گئی کہ سائٹ
 محکمہ طور پر ڈائریکٹر کا چیف سیکریٹری ہے

ساتھ چیف منسٹر پرینڈنگ صاحب اور وزیر
 سابقہ چیف کے نوٹس میں تمام حالت لڑنے

سین سائٹ کے کسی مسئلہ کو حل نہیں کیا گیا۔

اسٹیٹ سائٹ نے اپنے مسائل کے لئے اسٹیٹ 2016 کو

جبرین PTI محمد عمران خان کے پاس بیٹھی لیکن
انہی جبریں وہ ضییر غنیو خواہ میں کرشن کے خلاف

S.D.P.O (Female)
Daggur Bune

پاس کانٹوس کور سے

سین ویاں پر جی مری شنوا کاٹے ہوئے۔ اور

محکمہ نسیم کے صفحے کا سائٹ پر ویڈیو

clips اور Tube اور موجود ہیں At woman

ان کے بعد سابق ڈائریکٹر ایجوکیشن دہلی
Protest woman when Press Conference

ضد ہو کر کرشن کا سردار قاضی نے بنیاد ڈالنے کے
لگا کر سائٹ کو نوڈس سے ہر طرف کے ڈرا۔

سائٹ سے سرور ڈیویوئل شیامو میں اپیل دائر
کا جی پر محتج عدالت سے 2019-2-22 کو سائٹ کو

نہم سوائے کے سائٹ نوڈس پر بحال کیا۔
سائٹ کو 16 ستمبر 2019 کو دوبارہ

ضلع پر راجہ میں سابقہ سرکل معیر عالم

سما ہرے دیا گیا۔ سائنس اپنے ماتحت سکول لہاں
 سرکل ہیرالہ کے گزرا ہوا سکول چیک کرنے کے لیے
 13 اکتوبر 2019 کا 13 اکتوبر 2020 کا ماہانہ وزر
 پر مندرجہ ذیل سکولوں میں وسیع پیمانہ کا فرد پر رپورٹ

کنڈریشنل گرانٹ جو کہ سکول کا صیغہ ٹیم میٹر کرتے
 ہیں Poners نے وہ وہ کامیابیوں کے حسیوں
 میں کا۔

(1) غنی کرہ جامعہ - 8 لاکھ - 2 لاکھ 16 لاکھ

(2) گورد لڈین

60000 روپے

(3) وار پور

2 لاکھ روپے

(4) بیروں وال

2 لاکھ 10 روپے

(5) جلی

10000 روپے

(6) رے ایریا

20000 روپے

سائنس مذکورہ گرانٹ میں فرد پر اس کے لئے
 33 لاکھ نشان کے رپورٹ 1500 روپے
 اظہار ہر طور کو در۔

- 1 گورد لڈین سکول لڈین
- 2 گورد لڈین
- 3 جلی



4۔ کڑھوتہ 2۔ دے کھی۔ رما، بیلی رگن سیم پور
 وعینہ وعینہ صبر ۱۵۴۵ مدیم کٹنہ الطاب سانا کو
 DSD بناکر ڈائریکٹر کے Disposal پر 13 جنوری 2016
 کو صرف تین ماہ گزرتے کے بعد بھی دیا کہ میں اس کا
 سے ممکن نہیں ہوں، اور تنخواہ بند کر دے

اور جو عام مراعات کا مراسلہ ۱۵۴۵ لیا اور
 کے جواباً ڈی آر کورٹ کے مفیل کے مطابق اور آرڈر
 کا ڈائریکٹر کے حکام کی وہ ڈالے بنا کر دوں
 دیا اور ماہانہ تنویش الاؤنس 15000 دیا دسمبر 2016
 بھی دوں دیا۔

S.D.E.O (Female)
 Daggar Bunde

ساکہ کوسٹیکل BPS 16 کو دورانہ دورہ ڈسٹریکٹ
 پوسٹل میں بھیج دیا گیا۔ جیسا کہ سادت ذیل، عالی
 صبا کی اذیت کے لئے ک غریبوں 2020 کا 2021 تک
 اپنے فرائض ایڈمنسٹریٹو اور ایڈمنسٹریٹو سہ سہ سہ
 دی رہی ہے۔

سانا کو ذیل اذیت اس قدر دی گئی کہ سانا
 2017 میں دفاعی طور پر منلوئے ہوئی رہی ہے
 By Poles بیماریاں کا شکار ہوں اور تین ماہ

آغا خان انٹرنیشنل ہسپتال کراچی سے عورت اور زندگی
کے حالت سے رہی۔

S.D.E. of Female
Daggar Bune

صبا کا لایا

میں ایونڈار اور فرض شناسیوں

میں میرے حکم نیکم حجاز افران نے میرے ماح
کا عرصہ شہری گاڑے۔ میرا ایونڈار کو میرا
پریم بنا رہا تھا۔

میں اور میرا خاندان منعت ذہنی اور مال

ازیت کا شکار ہیں۔ چھوٹی FIR ماکے کے

میرے بچے کا منتقلی داؤد پر لگا رہا تھا۔

تہ فتح میرے T.A دیا گیا ہے۔

سکون کے ساتھ ایونڈار کے ساتھ ساتھ دیا گیا

آر سے گزارش ہے کہ ساتھ کو اپنے وسیع اختیار
کا استعمال کے لیے عملی طور پر تحفظ فراہم
کیا جائے۔

میرا SDEO
BPS-17 سے رہو شہری۔ میرا

میں 13 جنوری

میری ACR کو Exempt کرنے کے احکامات (16)

رکھے جائیں۔ کیونکہ ضلع برابور اور ضلع صواب میں وہ لوگ ہیں جنکی واپس سے میں تھوڑے سے ہر طرف

423
S.D.E.O (Female)
Daggar Bunc

سورج

میرے بجایے کورٹ کے آڈو رائے خلاف محکمہ

طور پر CPLA میں اپیل ہوئی ہے جسے میں سال گذشتہ

کے باوجود بھی سرگرم کورٹ سے کوئی نوٹس نہیں ملا۔

میرے order سے conditionally کو فٹم کرایا ہے۔

میرے ساتھ فراہم ہے جو کہ عدالت نے یہاں ہی

میں اور DED راہروار نے ذاک عنار اور

رکھی ہیں جسے دواک جہاں تھوڑے 23 داک

ساکہ کورکبیر 2019 کے کنڈرسی ارادتی راہروار

سے دلوانا ہے۔

سکریٹری ایجوکیشن، ڈائریکٹر ایجوکیشن اور

DEO میڈم گنہ الطاف اور DED سدیم عنتر

راہروار اور کورٹ کے ساتھ میں کیا گیا

ذاتی طور پر بلدا ہے۔

اور جواب طلبی کی ہے کہ جب وہ

محکمہ نسیم کے ساتھ ایجنڈا اور غیر جانبدار کے
ساتھ میں حل کیے تو ان ذمہ دار پوسٹوں پر

4211
S.D.E.O (Female)
Daggar Buner

کیوں سمجھے ہوئے ہیں

ساتھ اور اسے صاحبان معقول بحوں
کو امن اور سلامتی کے ساتھ اپنے ذرائع کی
انجام دی گئے وہاں تاکہ تاکہ تاکہ
خاندان امن سکون میں رہے۔

اور یہ ہے آج کے حق اور سچ کا ساتھ دینا
محکمہ نسیم کے کمالی عملیوں کے فائدے حاصل
رہے انڈیا کے انسانی کے نام سے ایجنڈا
اور فرض شاہی امن میں شاکتیں
مستحق ہوئے۔

03368413404

غیر قواہ

عزرا آفریں

MIC - 13302-6198709-2

4211

S.D.E.O (Female)
Daggar Buner

STDEO OPS

ڈیگر پوسٹر 16

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (F) DISTRICT HARIPUR

NO 874 DATED 23/11/2019

TO,

The District Education Officer (F)

District Hari Pur

SUBJECT:- DEMOND OF SALARY BUDGET & REGULAR ALLOWENCES

Memo :- An application alongwith other sporting papers in respect of Mst, Azra Afridi ASDEO (F) Circle pharrala Haripur is requested for arrear of regular pay & allowences w.e.f 01/05/2016/ to 30/09/2019 ammounted Rs,23,36,420 /- (Rs, Twenty Three Lac Thirty six Thousands Four Hundered & Twenty only)

It is stated that the above mentioned grant ^{request} may please be ^{submitted to} allotted for the authority financial year 2019 - 20.

Concerned in connection with the allocation of budget for the financial year 2019-20. Please

Sub Divisional Education Officer (F)

SDEO(F) District HariPur
HARIPUR

OFFICE OF THE SUB DIVISIONAL EDUCATION OFFICER (FEMALE) DAGGAR BUNER

No. 1082 /

Dated 17-11 /2021

To,

**The secretary Education
E&SE Peshawar KPK**

Subject: **Request for Releasing Back Benefit & Consequential**

Respected Sir,

Undersigned re-instated through service tribunal Peshawar KPK on Dated 22-02-2019 with all back benefit and consequential and Director of Education E&SED issued letter to DEO (F) Haripur on dated 31-12-2019 recording release amount, But side amount has not released up till now from DEO (F) Haripur.

It requested to directed DEO (F) Haripur release my back benefit notification.

Copy of affidavit and notification is herewith attached.

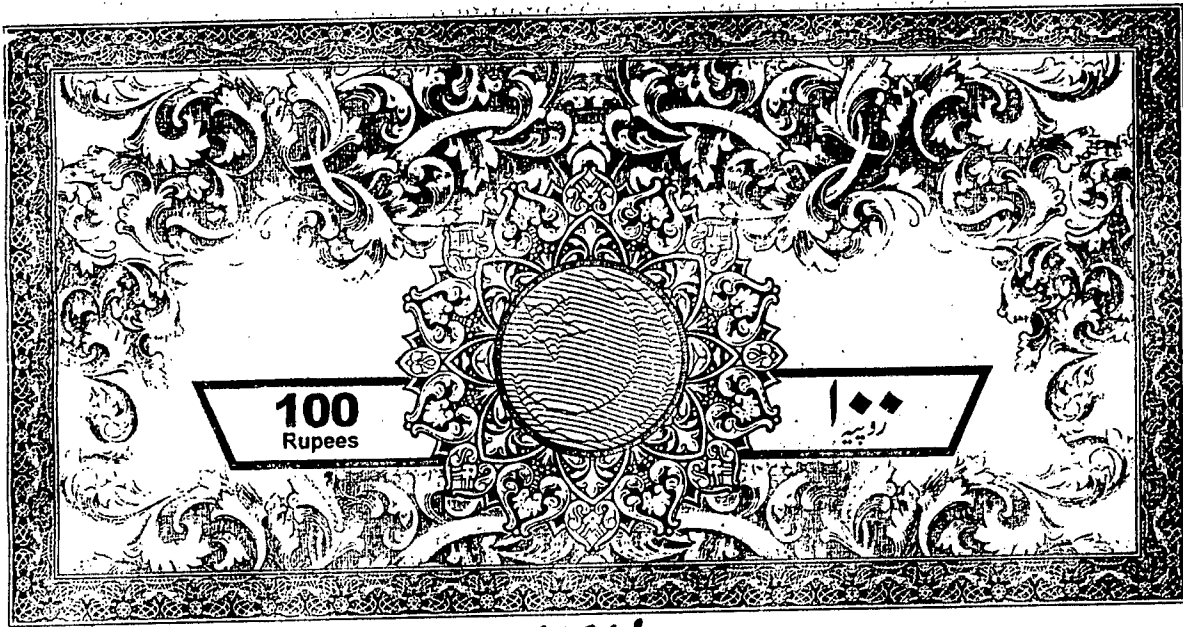
SOC (PE)

please put up along with original file.

Azra Afridi SDEO (F) Daggarr OPS BPS -16



**SUB DIVISIONAL EDUCATION OFFICER
(FEMALE) DAGGAR BUNER**



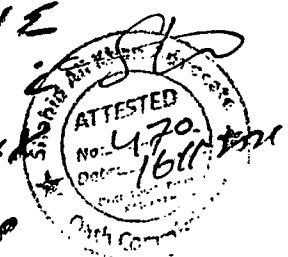
بیان صحتی

بخدمت جناب سیکرٹری ایجوکیشن **EASE** جسپر چٹوڑ خواہ
Relieve my back Benifit AND

Consequential
According
To Court
resilience
جناب عالی!

سائیکل بکچر SDEO ڈاکٹر پونیر OPS اپنے

غرائض سرانجام اور اپیل کیا۔ سائیکل کو سسر و سسر ٹریبونل پیشاوردن مورخ
22/02/2019 کو سابقہ تمام مہمان کے ساتھ نوکری پر بحال کیا گیا۔ سائیکل
کے بقایا جان رقم بیا 230000 روپے بنتے ہیں۔ صحت خلاف ڈائریکٹری ایجوکیشن
CPLA میں صحت مندرجہ کے خلاف اپیل جمع کرائی گئی ہے۔ مبینہ دو سال
واہیات کے ادا نہیں کیے گئے۔ اگرچہ کوئی نوٹس نہیں ملا سائیکل کے
پری پور ایجوکیشن زمانہ کو 30/12/2019 کو جاری کر دیا گیا۔ مبینہ سائیکل کا 11/01/2019
اپنے صحت سے فرم کیا۔ سائیکل کو تمام واہیات کے ادا نہیں کیے گئے۔
زمانہ مورس پوری پور کو یہ آریات جاد کی جائے۔ اگر مندرجہ CPLA
سائیکل خلاف آگے تو سائیکل تمام واہیات حکم کو واپس کر
گی یا ہنز پونگی۔ بیان صحتی پورا صحتی کو ہی اصرار ہے یا پوسٹوٹ
رکھی ہے۔ بیان صحتی پورا
سینر گورنمنٹ مندرجہ پور ڈائریکٹری ایجوکیشن
13302-6198709-2



SHAFIQ HUSSAIN
Wasiq No. 02
No. 02
S.D. (Female)
District Officer

District Commissioner (Ops) Manipal.

Subject-

Request to issue the
Notification of Back

Benefits & Consequential

Dear Madam


I am performing my duty as DCEO (Ops),
Daggey Buni.

Service Tribunal Peshawar has reinstated
me in service with all back benefits &
Consequential & Director Education
& SEU has issued the letter to
DCEO (F), Manipal Madam Sami ilaf
for granted my all benefits but
not only she stopped my legal right
my monthly Conveyance allowance for the
month of December 2019 (15000) but also
stopped my releasing benefits notification
I have approached to Service Tribunal
& to Secretary Education - I have also
submitted my affidavit if case annexed
against me I will back all benefits.
It is humbly requested that my
amount as per rule & court decision

Because Director Education issued this
notification on 31-12-2019 under
Order No. 8474/A-17/P-F/12019/10/1/EX
ASDEO - Vol-1.

Copies are here with attached

- 1) Reinstatement Order from Secretary Edu
- 2) Adjustment order from Director Edu
- 3) Letter to Director from DCO (F) Haripur
No 14941-42 Dated 02-12-2019
- 4) Letter from Director Edu with
remarks for ~~approval~~ granted in
said amount -


S.D.E.O (Female)
Daggar Buner

Your Faithfully

Azra Afaidi
S.D.E.O Daggar
Buner - Ops,



(14)

GOVERNMENT OF KHYBER PAKHTUNKHWA
ELEMENTARY AND SECONDARY EDUCATION DEPARTMENT
Block-"A" Opposite MPA's Hostel, Civil Secretariat Peshawar
Fax # 091-9211419

Dated Peshawar the September 12th, 2019

NOTIFICATION

No. SO(S/F)E&SED/4-17/2016/Mst. Azra Afridi/Ex-ASDEO(F): In pursuance of Khyber Pakhtunkhwa Service Tribunal Judgment dated 22-02-2019 delivered in Service Appeal No. 17/2017; the Competent Authority has been pleased to conditionally re-instate Mst. Azra Afridi (BS-16) Ex-ASDEO (F) Circle Tordher Swabi, in service with all back and consequential benefits, subject to final decision of the Supreme Court of Pakistan into the CPLA filed by E&SE Department against the said judgment of the Service Tribunal.

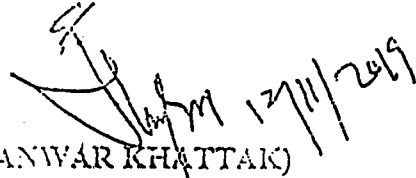
Consequent upon above her services are placed at the disposal of Directorate of E&SE for further posting/ adjustment.

SECRETARY
ELEMENTARY & SECONDARY EDUCATION
DEPARTMENT

Distt: of even No. & date:

Copy forwarded to the:

1. Accountant General Khyber Pakhtunkhwa, Peshawar.
2. Director E&SE Khyber Pakhtunkhwa, Peshawar.
3. District Education Officer (Female) Swabi.
4. District Accounts Officer Swabi.
5. Section Officer (Litigation-II) E&SE Department.
6. In charge EMIS, E&SE Department for uploading at official website.
7. PS to Secretary E&SE Department.
8. ASDEO concerned.
9. Office order file.


(JAVED ANWAR KHATTAK)
SECTION OFFICER (SCHOOLS FEMALE)

P.A.:
Please provide to
Mst. Azra Afridi
12-5



(14)

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

NOTIFICATION

In pursuance to the Secretary to Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No.SO(S/F)/E&SED/4-17/2016/Mst. Azra Afridi/Ex-ASDEO(F) in light of Khyber Pakhtunkhwa Service Tribunal Judgment dated: 22-02-2019 delivered in service appeal No. 17/2017, Mst. Azra Afridi BPS-16 Ex-ASDEO(F) conditionally reinstated into service with all back and consequential benefits, subject to the final decision of the Supreme Court of Pakistan into the CPLA filed by E&SE Department against the said judgment of the Service Tribunal, Mst. Azra Afridi ASDEO (F) BPS-16 Management Cadre, is hereby posted against the vacant post of ASDEO (F) Circle Pharala District Haripur.

Note:-

- i. Charge report should be submitted to all concerned.
- ii. No TA/DA is allowed.

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst No. 1972-77 /A-17/P.F/Azra Afridi/Vol-I

Dated Peshawar the 15/9/ 2019

Copy of the above is forward to the:-

1. Secretary E&SE Khyber Pakhtunkhwa w/r to his Notification No.& dated cited above.
2. Accountant General Khyber Pakhtunkhwa Peshawar .
3. District Education Officer (F) Swabi and Haripur.
4. District Account Officer Swabi and Haripur.
5. PA to Director (E&SE) Khyber Pakhtunkhwa.
6. M/ File.

Hawa
Deputy Director Establishment (F)
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

15/9/2019



18

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

(Office Phone No. 0995-920154 Fax No. 0995-920155)

No: 14941-42 Dated: 02/12/2019

To

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

Subject:- **RELEASE OF BACK AND CONSEQUENTIAL BENEFIT**

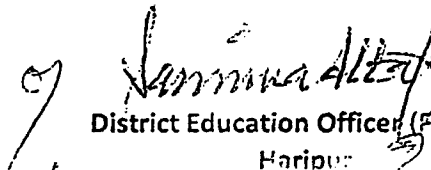
Memo:

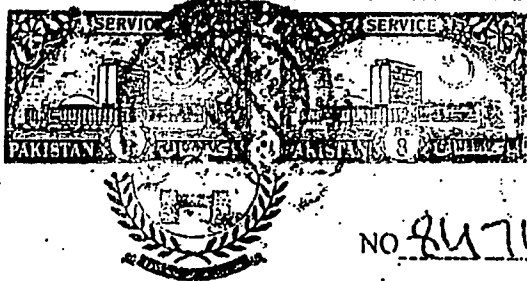
The notification of Mst. Azra Afridi (Ex-ASDEO(F) BPS-16 office of the District Education Office, Haripur "in pursuance to the Secretary to Government of Khyber Pakhtunkhwa Elementary & Secondary Education Department Notification No.SO(S/F)/E&SED/4-17/2016/Mst. Azra Afridi/Ex-ASDEO(F) in light of Khyber Pakhtunkhwa Service Tribunal Judgment Dated: 22/02/2019 delivered in service appeal No.17/02/2017, Mst Azra Afridi BPS-16 Ex-ASDEO (F) conditionally reinstated into service with all back and consequential benefits, subject to the final decision of Supreme Court of Pakistan into CPLA filed by E&SE Department against the said judgment of the Service Tribunal" (Copy of Notification Attached)

- Therefore, undersigned request to you please May be provide gaudiness regarding weather she deserved for the back benefits now or waiting for the CPLA filed by the E&SE Department.
- Mst Azra Afridi ASDEO (F) Pharala, District Haripur working and she submitted her file for all back benefits budget release for the period 01/05/2016 to 30/09/2019 an amounting Rs. 2336420/= (Twenty Three Lac Thirty Six Thousand Four Hundred & Twenty only) (Copy Attached)

Encl:

- Application (copy)
- Service Tribunal Judgment (copy)
- Notification by the Director E&SE KPK Peshawar (copy)
- Arrival/Charge Report (copy)


District Education Officer (Female)
Haripur



O.P.S.S.

DESPATCHER
Director (E&SE)
KPK Peshawar.

MINISTRY OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR

NO 8474 /A-17/PF/Azra Afridi/Ex-ASDEO/Vol-I

Dated Peshawar the 20-12 /2019

(23)

To
District Education Officer
(Female) Haripur.

SUBJECT:- RELEASE OF BACK AND CONSEQUENTIAL BENEFIT.

Memo:-

I am directed to refer to your letter No. 14941-42 dated: 02-12-2019 on the subject cited above and to state that Mst. Azra Afridi ASDEO (F) Circle pharala District Haripur, has been reinstated in the service along with all back benefits till the decision of pending CPLA against the judgement dated-22-02-2019 of Hon'ble Service Tribunal Peshawar in August Supreme Court of Pakistan.

I am further directed to ask you that the instant case is returned with the remarks that back date service benefits has already been granted to the ASDEO (F) concern vide Notification No.SO(S/F)E&SED/4-17/2016/Mst.Azra Afridi/Ex-ASDEO (F) Dated:12-09-2019.

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

Signature

Copy forwarded for information to the:-

1. District Account Officer Haripur.
2. Mst. Azra Afridi ASDEO (F) Circle pharala District Haripur.
3. PA to Director E&SE Local office.

*Mr Saleem,
CW Account
Blame -
21/12/20*

16
02/12/2019

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

To

The Secretary (Elementary & Secondary Education)
Govt of Khyber Pakhtunkhwa Peshawar.

Through proper channel:

SUBJECT: DEPARTMENTAL APPEAL FOR EXEMPTION OF THE INTERVENING PERIOD I.E DISMISSAL 31.08.2016 TO REINSTATEMENT 16.09.2019 FROM ACR FOR THE PURPOSE OF PROMOTION TO THE POST OF SDEO BPS-17.

Prayer in APPEAL:

ON ACCEPTANCE OF THIS DEPARTMENTAL APPEAL THE APPELLANT MAY BE EXEMPTED FROM ACR OF 10 YEARS OR MAY BE EXEMPT FROM INTERVENING PERIOD I.E DISMISSAL 31.08.2016 TO REINSTATEMENT 16.09.2019 MAY BE EXEMPT FROM ACR FOR THE PURPOSE OF PROMOTION TO THE POST OF SDEO BPS-17 WITH ALL BACK AND CONSEQUENTIAL BENEFITS.

RESPECTFULLY SUBMITTED:

The few lines are submitted for your kind and sympathetic consideration as under:

1. That the appellant was serving as ASDEO BUNIR. She had performed her duties assigned to her with zeal and devotion and there was no complaint, what so ever regarding her performance.
2. That the Department starts personal grudges with the appellant due to such actions of appellant i.e complain regarding embezzlement etc. at

last the appellant was removed from service on baseless allegation vide order 31.08.2016.

3. That the applicant/appellant filed Service Appeal No.17/2017 in this august Tribunal against the order dated 13.09.2016 whereby the appellant has been dismissed from the service.
4. That the said appeal was finally heard by the Honorable Tribunal on 22.02.2019 and the Honorable Tribunal was kind enough to accept the appeal and penalty of dismissal from service is set aside and the appeal of the appellant was accepted as prayed for.
5. That in compliance appellant was re-instated in to service with all back- benefits subject to outcome of he CPLA. Now the appellant was service as SDEO Bunnir In OPS basis.
6. That now the deptt going to conduct DPC for promotion to the post of SDEO BPS-17 but not considering he appellant for promotion due to the reason of ACR for the period of litigation i.e 2016 to 2019. The appellant requested to deptt for exemption of the ACR for the said period but in vain.
7. That therefore now the appellant filling this departmental appeal for exemption of the ACR for last 5 years on the following grounds.

GROUND:

- A. That the appellant have never committed any act or omission with bad or malafide intentions which could be termed as misconduct, albeit the appellant have been awarded the penalty but the later on the said penalty was set-aside by the Service Tribunal and the appellant was re-instated into service with all back and consequential benefits..
- B. That the appellant have a long 20 years and spotless service career at my credit, not considering he appellant for promotion is very harsh and the appellant 20 years service has not been taken in consideration.
- C. That the appellant remained in the long litigation due to the unlawful attitude of the deptt: and now it is unjust to deprive the appellant from promotion for no fault on her behalf.

D. That previous baseless allegations were washed away by the Service Tribunal and the appellant re-instated in to service with all abck and consequential benefits. So there is not ground remained to deprive the appellant from promotion.

E. That according to natural justice the intervening period served by the appellant in litigation from dismissal to removal should be exempted from the ACR.

It is, therefore, humbly prayed that the appeal of the appellant may be accepted as prayed for.


S.D.E.O. (Female)
Daggār Buner

Yours obediently,
(Mst. Azra Afridi) (MC)
SDEO(F) OPS Bunnir.

Daggār
ops - B/OS
16