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RECORDED  
2022/11/15  
PESHAWAR

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

C.O.C No 675 /2022  
In 1413  
Service Appeal No. ~~478~~/2022

Mst. Neelam W/o Salman Khan R/o House No. 1, Subhan  
Khwar, Shabqadar, District Charsadda

.....**Petitioner/**  
**Appellant**

VERSUS

1. Dr. Shahzad Bangash, Chief Secretary, Government of  
Khyber Pakhtunkhwa, Civil Secretariat, Peshawar
2. Muhtasim Billah, Secretary, Elementary and Secondary  
Education Department Block-A, Opposite MPAs Hostel,  
Civil Secretariat, Peshawar
3. Hafiz Ibrahim, Director Elementary and Secondary  
Education Department Near GHSS No. 1, G.T Road,  
Peshawar
4. Abida Shaheen, District Education Officer (Female),  
Mohmand
5. Mst. Riyaz Begum, Principal (BS-18) Directorate  
elementary and Secondary Education Department Near  
GHSS No. 1, G.T Road, Peshawar

.....**Respondents**

**AMENDED PETITION TO INITIATE CONTEMPT OF COURT  
PROCEEDINGS AGAINST RESPONDENTS/CONTEMNORS.**

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**Respectfully Sheweth**

Brief facts giving rise to petition are as under;

1. That the Hon'ble Provincial Service Tribunal vide Order dated 06.10.2022 suspended operation of the impugned Order dated 29.08.2022. Copy of the suspension order dated 29.08.2022 is available on main case file.
  
2. That the Order dated 06.10.2022 was communicated to all the official respondents No. 1 to 4 and private respondent No. 5 but the same has not been implemented, therefore through instant petition the petitioner/ appellant seeks to initiate Contempt of Court proceedings against the official respondents and private respondent No. 5 to give effect to the order dated 06.10.2022. (Relevant documents alongwith postal receipts are enclosed with this petition). It is pertinent to mention here that instead of implementing the order dated 06.10.2022 in its letter and spirit, the official respondents No. 1 to 4 have illegally stopped the salary of the petitioner/ appellant, which has further aggravated the matter, which indicates that the official respondents have no regard to the order passed by this Hon'ble Tribunal.

**It is, therefore, humbly prayed that Contempt of Court proceedings may kindly be initiated against the Official Respondents No. 1 to 4 and Private Respondent No. 5 with further directions to implement and give effect to the order dated**

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06.10.2022 with further directions to official respondents to forthwith release the salary of the appellant.

Any other relief which this Hon'ble Tribunal deems appropriate may also be granted in favour of the petitioner/ appellant.

*Nulam*

Petitioner/ Appellant

Dated: 10.11.2022

Through



**Inayat Ullah Khan**

Advocate Supreme Court  
of  
Pakistan  
LLM (U.K)

**AFFIDAVIT:**

Stated on Oath that the contents of Amended Petition are true and correct and nothing has been concealed from this Hon'ble Tribunal.



*Nulam*

Deponent