

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

Appeal No. 1471/2022

Mst. Mumtaz Bibi.....APPELLANT

VERSUS

Govt. of Khyber Pakhtunkhwa, through Health Secretary.....RESPONDENTS

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DEPONENT

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(Para wise reply on behalf of Respondent No 3)

Preliminary Objection:-

- A. That the APPELLANT has no cause of action.
- B. That the APPELLANT has no locus standi.
- C. That the APPELLANT has not come to this court with clean hands.
- D. That the instant petition is barred by law.
- E. No comment.

Respectfully Sheweth:-

- 1. Relates to record, however, liable to be proved by the appellant.
- 2. Relates to record, however, liable to be proved by the appellant.
- 3. That Respondent No. 3 is bound to follow the rules and instruction issued by the Provincial Govt. of Khyber Pakhtunkhwa from time to time. Hence it is pertinent to mention here that as the appellant was regularized w.e.f 01-07-2012 and her time period of regular service is less than ten years, she is not entitled for pension under the pension rules.
- 4. No comments.

Grounds:-

- A. That respondent No. 3 is bound to follow the rules and instructions issued by the Provincial Govt. of Khyber Pakhtunkhwa from time to time and not violated any rule of Laws.
- B. Correct to the extent that after to Promulgation of an Act 2012, the APPELLANT was regularized w.e.f 01.07.2012 and after her regular service till the age of superannuation i.e. 10.07.2020 according to the office order hereby No. 4154-58/LHW dated 10.07.2020 her services is less than ten years. Hence she is not entitled for pension under the rules.
- C. No Comments.
- D. As mentioned in Para "B" above.
- E. As mentioned in Para "B" above.
- F. No Comments.

Keeping in view the above mentioned facts it is, therefore, humbly prayed that the appeal in hand having no merits may be dismissed with cost.


**DISTRICT ACCOUNTS OFFICER
HANGU**

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AFFIDAVIT

I Amjad Ur Rehman Sub-Accountant office of the District Accounts Officer, Hangu do hereby solemnly affirm that the contents of Para wise Comments/reply submitted on behalf of respondent No.03 are true and correct to the best of my Knowledge and belief and nothing has been concealed from this honorable court.



DEPONENT

CNIC # 17301-7313492-7

CELL#0333-9077305

Identified by

Advocate General
Khyber Pakhtunkhwa
Peshawar.



AUTHORITY

Mr. Amjad Ur Rehman of this office is hereby authorized to submit the Para wise Comments/reply in the Honorable Service Tribunal Peshawar appeal **No. 1471/2022** titled Mst. Mumtaz Bibi VS Govt. of Khyber Pakhtunkhwa through Health Secretary.


**DISTRICT ACCOUNTS OFFICER
HANGU**