

1

BEFORE THE COURT OF WORTHY CHAIRMAN
SERVICES TRIBUNAL, PESHAWAR

CM No. _____/2023

IN

Appeal No.184/2023

Miss. Parveen Akhtar.....**Appellant**

V E R S U S

Secretary E & SE and others.....**Respondents**

APPLICATION FOR RELEASE OF
SALARY WHICH WAS STOPPED BY
ASDEO TOWN-III CIRCLE HAYATABAD
VIDE LETTER NO. 1089 DATED
25/01/2023

Respectfully Sheweth:

That the petitioner humbly submits as under;

1. That above titled service appeal is pending adjudication before this Hon'ble Tribunal which is fixed for 06/03/2023.
2. That this Hon'ble Tribunal after hearing the preliminary arguments, had granted ad-interim injunction in term of operation of suspension of impugned order dated 22/09/2022, vide order dated 16/02/2023.

- 2
3. That the petitioner had filed an application to the ASDEO, Town-III Circle Hayatabad for release of her salary but of no avail.

It is, therefore, most humbly prayed that on acceptance of this application, the respondents may kindly be directed to release the salary of the petitioner.

Parveen Akhtar

Petitioner

Through

[Signature]
Muhammad Furqan Yousafzai
Advocate, Supreme Court of
Pakistan

Date: 02/03/2023

AFFIDAVIT

I, **Miss. Parveen Akhtar**, PST, Govt. Girls Primary School, Islamia Collegiate, Peshawar, do hereby solemnly affirm and declare on oath that the contents of accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

Parveen Akhtar

DEPONENT

[Signature]
01/03/23

To,
The ASDEO,
Town III Circle, Hayatabad, Peshawar.

SUBJECT: APPLICATION FOR RELEASE OF SALARY IN THE LIGHT OF VALUABLE ORDER OF WORTHY KP SERVICE TRIBUNAL PESHAWAR WHEREIN STATUS QUO HAS BEEN GRANTED AGAINST THE IMPUGNED TRANSFER ORDER DATED 22-09-2022.

With utmost Respect, it is humbly submitted:

1. That vide letter No. 1089 dated 25-01-2023, you have stopped the salary of the applicant under transfer to GGPS-Hayatabad No.01 Peshawar.
2. That applicant filed appeal before the Worthy Khyber Pakhtunkhwa Service Tribunal Peshawar having appeal No. 184/2023 upon which the Worthy KP Service Tribunal suspended the impugned transfer order of applicant by granting status quo in favor of applicant on 16-02-2023. Copy of the status quo order is attached herein.

Therefore in light of valuable order of Worthy KP Service Tribunal, Peshawar dated 16-02-2023, salary of the applicant may kindly be released.

Thank You

Parveen Akhtar
Applicant,
Parveen Akhtar,
PST, Islamic Collegiate,
Govt Girls Primary School,
University of Peshawar.

Dated: 27-2-23