

189/23

**BEFORE THE KP, SERVICE TRIBUNAL,**

**PESHAWAR** Appeal NO 1324/11  
Restoration Application # 189/2023  
Syeda Munazza Andleeb PTC, BSC. Teacher, resident of  
Sheik-ul-Bandi, Tehsil and District Abbottabad.

Khyber Pakhtunkhwa  
Service Tribunal

..... Applicant 4518

**Versus**

Date: 22/3/2023

Executive District Officer School & Literacy, Abbottabad

.....Respondent

**APPLICATION FOR RESTORATION OF  
SERVICE APPEAL NO.1324/11 WHICH WAS  
DISMISSED ON DEFAULT VIDE ORDER  
DATED 16-04-2018.**

**RESPECTFULLY SHEWETH!**

1. That I lodged my appeal before your honor for adjustment and release of salary.
2. That my case was dismissed on 16-04-2018 without my consent and knowledge which is an ex-party decree, against the rule of law.
3. That the applicant asked the counsel got the update of the appeal from time to time but was dodged. The copy of order sheet dated 12-11-2021 is attached.
4. The prime facie that my case/appeal for the redressal was dismissed in applicant absent/absencia.

5. And because of this the applicant has become patient of B.P. The pandemic also added to her misery; the misinformation and dodging are the reasons the applicant could not peruse the case.

6. Finally I request your honor to re-activate my case 1324/11 to fulfil the justice obliged.

That the applicant has good prime facie case if decided on merits.

**It is therefore most humbly prayed that on acceptance on this application the appeal may kindly be restored which was dismissed in default due to non-prosecution and decides the same on merit, any other remedy which this august tribunal; deems fit and appropriate that may also be rewarded in favor of applicant.**

Applicant *S Munza*

Syeda Munaza Andleeb

Through

*Bina Babar*

*B. Babar*  
Advocate

Abbottabad.

**AFFIDAVIT:**

It is affirmed and declared that the contents of the application are true and correct to the best of my knowledge and belief.

*S Munza*

**Deponent.**

22-03-2023



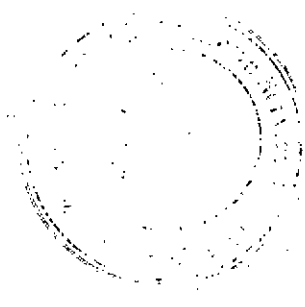
22 MAR 2023

P-①

**BEFORE THE SERVICE TRIBUNAL K.P.K.  
PESHAWAR**

*Appeal No. 1324/11*

Syeda Munazza Andleeb PTC, BSc. Teacher, resident  
of Sheikh-ul-Bandi, Tehsil and District Abbottabad.  
.....Appellant



VERSUS

**A.V.F. PESHAWAR**  
**1222**  
**18/6/11**

Executive District Officer, Schools & Literacy,  
Abbottabad.....Respondent

**APPEAL U/S 4 OF SERVICE TRIBUNAL ACT**  
**1974 FOR A DECLARATION THAT THE**  
**APPELLANT IS A BONAFIDE TEACHER (PTC)**  
**AND THE RELUCTANCE/REFUSAL OF**  
**RESPONDENT TO ADJUST HER AND TO**  
**RELEASE HER SALARY IS ARBITRARY,**  
**FANCIFUL WITHOUT LAWFUL AUTHORITY**  
**AND MALAFIDE.**

Respectfully Sheweth!

*18/6/11*

1. That the appellant joined service as a PTC Teacher in the year 1986 and since then the appellant has been serving in the department devotedly to the best satisfaction of higher officials. **(Copy of service record is annexed as Annexure "A")**.

as submitted to-  
and filed.

Registered

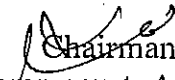
2. That one Mst.Naveeda Jadoon belonging to Jadoon tribe got herself adjusted against the post of appellant and the appellant brought this matter before the E.D.O. Abbottabad.

19.03.2018



Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Shujaa Ali, ADO (Litigation) for the respondents present. Departmental representative submitted report regarding payment of salary etc. The learned counsel for the appellant seeks time for seeking instructions from his client. To come up for further proceedings on 16.04.2018 before D.B at camp court, Abbottabad.

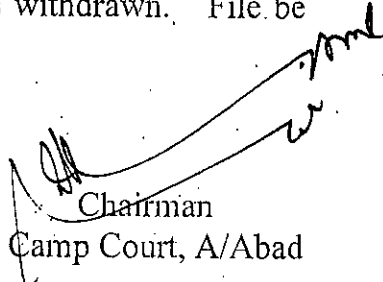
  
Member

  
Chairman  
Camp court, A/Abad

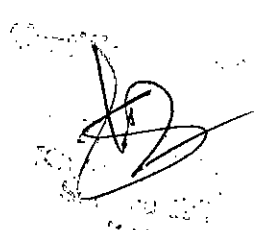
16.04.2018

Counsel for the appellant and Mr. Usman Ghani, District Attorney alongwith Shujaa Ali, ADO for the respondents present. Counsel for the appellant stated at the bar that the grievance of the appellant has been redressed and he wants to withdraw the present appeal. Request is accepted and the present appeal is dismissed as withdrawn. File be consigned to the record room.

  
Member

  
Chairman  
Camp Court, A/Abad

ANNOUNCED  
16.04.2018



9200  
94/-  
94/-

11-11-21

12-11-21  
12-11-21