

**IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,  
PESHAWAR**

C.M No. \_\_\_\_\_/2023

In

In re-Service Appeal No. 4274-2021

Humaira Bibi

Vs

Education Deptt

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Through

Petitioner

**Muhammad Ayub Khan Shinwari**

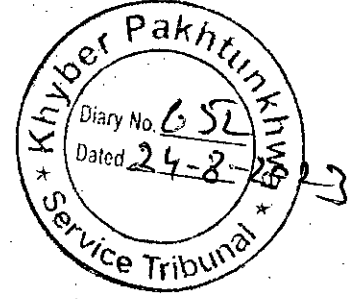
Advocate Supreme Court

0334-9032852

Dated: 24/08/2023

**IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

C.M No \_\_\_\_\_/2023  
in  
In re-Service Appeal No 4274/2021



Humaira Bibi Vs Education Deptt

**Application for placing on file additional documents**

**Respectfully Sheweth,**

The appellant submits as follows:

1. That the title Service Appeal is pending adjudication before this Honorable Tribunal and is fixed for hearing on 28-08-2023.
2. That in the Service Appeal, the appellant has impugned order dated 28-11-2017 whereby the appellant is struck off from the Education roll Khyber Agency on the allegation of fake PST. It is pertinent to mention here that the appellant was appointed as PST vide order dated 25-08-2009 along with five other candidates including one Uzma Noreen and Noshi Gul, the said Uzma Noreen and Noshi Gul are still performing their duties which fact is evident from their recent pay slips of June 2023, which makes it prima facie clear that the appellant was not fake PST and the impugned order is void as her colleagues are still performing her duties whereas the appellant is struck off. The appellant seeks permission to place on file the said pay slips which are necessary for fair adjudication of the title Service Appeal. (Copies of the Pay Slips are attached herewith and annexed as Annex-A)
3. That the appellant seeks permission to rely on other grounds and place on file additional documents in support of instant application.

It is, therefore, prayed that the attached pay slips may kindly be placed on file in order to arrive at just and fair decision in the title Service Appeal.

Through  
Appellant,  
Counsel

**IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

C.M No \_\_\_\_\_/2023

in

In re-Service Appeal No 4274/2021

Humaira Bibi

Vs

Education Deptt

**AFFIDAVIT**

I Humaira Bibi, Ex PST, R/o Madina Colony Street No 3, near Railway Station, Distt Mardan do hereby solemnly affirm and state on oath that the contents of accompanying application are true and correct to the best of my knowledge and belief and nothing is concealed from this Honorable Tribunal.



Deponent

3 Annex "A"

khyber

S#: 1

P Sec:001 Month:June 2023  
KH6111 -Govt Primary Schools (Fema  
GOVT PRIMARY SCHOOLS (FEM

Pers #: 00521856 Buckle:  
Name: UZMA NOREEN  
PRIMARY SCHOOL HEAD TEACH  
CNIC No.1710136900488  
GPF Interest Free

NTN:  
GPF #:  
Old #:

15 Active Temporary

KH6111 -0043

PAYS AND ALLOWANCES:

0001-Basic Pay	43,720.00
1001-House Rent Allowance 45%	3,524.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,500.00
1528-Unattractive Area Allow	1,000.00
2148-15% Adhoc Relief All-2013	583.00
2199-Adhoc Relief Allow @10%	358.00
2316-Teaching Allowance 2021	3,224.00
2341-Dispr. Red All 15% 2022KP	4,213.00
Gross Pay and Allowances	65,192.00

DEDUCTIONS:

IT Payable 0.00 Deducted	3,233.00	TAX: (3609)	284.00
GPF Balance 242,436.00		Subrc:	4,290.00
3501-Benevolent Fund			1,200.00
3990-Emp.Edu. Fund KPK			135.00
4004-R. Benefits & Death Comp:			600.00

Total Deductions 6,509.00  
58,683.00

D.O.B 27.09.1987 LFP Quota:  
13 Years 10 Months 001 Days HABIB BANK LIMITED UMERZAI BRANCH  
18570021173503

khyber

S#: 2

P Sec:001 Month:June 2023  
KH6111 -Govt Primary Schools (Fema  
GOVT PRIMARY SCHOOLS (FEM

Pers #: 00521856 Buckle:  
Name: UZMA NOREEN  
PRIMARY SCHOOL HEAD TEACH  
CNIC No.1710136900488  
GPF Interest Free

NTN:  
GPF #:  
Old #:

15 Active Temporary

KH6111 -0043

PAYS AND ALLOWANCES:

2347-Adhoc Rel Al 15% 22(PS17)	4,214.00
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**ATTESTED**  


Charsadda

S#: 1

P Sec:001 Month:June 2023  
CA6019 -DEPUTY DISTRICT OFFICER (F  
GOVT PRIMARY SCHOOLS (FEM

Pers #: 00521858 Buckle:

Name: NOSHI GUL  
PRIMARY SCHOOL TEACHER

NTN:  
GPF #:  
Old #:

CNIC No.1710169544688  
GPF Interest Applied  
12 Vocational Permanent

CA6019

PAYS AND ALLOWANCES:

0001-Basic Pay	42,650.00
1001-House Rent Allowance 45%	2,940.00
1210-Convey Allowance 2005	2,856.00
1300-Medical Allowance	1,500.00
2148-15% Adhoc Relief All-2013	583.00
2199-Adhoc Relief Allow @10%	358.00
2316-Teaching Allowance 2021	2,664.00
2341-Dispr. Red All 15% 2022KP	2,809.00
2347-Adhoc Rel Al 15% 22(PS17)	2,809.00
Gross Pay and Allowances	59,169.00

DEDUCTIONS:

IT Payable	0.00	Deducted	4,040.00	TAX:(3609)	508.00
GPF Balance	73,240.00			Subrc:	3,300.00
6505-GPF Loan Principal Instal		Bal:	40,000.00		5,000.00
3501-Benevolent Fund					1,200.00
3990-Emp.Edu. Fund KPK					135.00
4004-R. Benefits & Death Comp:					600.00

Total Deductions 10,743.00

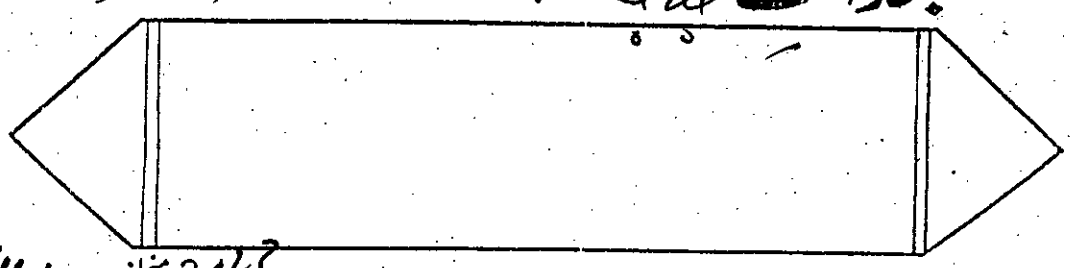
48,426.00

D.O.B  
04.10.1985  
13 Years 10 Months 001 Days

LFP Quota:  
ALLIED BANK LIMITED UMERZAI TEHSIL CHARS  
0010076939410012

ATTESTED

بعد التجدد فیہ فیصلہ مستحق کوا - بعد اس کے سر بیٹوں کے ساتھ



تاریخ 2 جنوری 1920ء بمقام  
سرکاری دفتر

حمید علی

موزعہ  
مقدمہ  
دعویٰ  
جرم

### باعث تحریر آنکھ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کارروائی متعلقہ میں سر بیٹوں کے  
آن مقام سرکاری فرسٹ کلاس کیلئے محمد علی صاحب کے لئے

مقررہ کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز  
وکیل صاحب کو راضی نامہ کرنے و تقرر ثالت ہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور  
بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ عرضی دعویٰ اور درخواست ہر قسم کی تصدیق  
زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی  
نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور  
کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار  
ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ  
پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانتا اتوائے مقدمہ کے سبب سے وہ ہوگا۔

کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب صاحب ہوں گے کہ پیروی  
مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سند ہے۔

محمد علی صاحب

*(Signature)*  
ماہ

المرقوم ۹۳۰۰

کے لئے منظور ہے۔

Appellants