

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

C.M No. _____
IN
Service Appeal No. 1760/2023

Ayesha Qureshi Ex-Assistant Public Library Mansehra.

...PETITIONER/APPELLANT

VERSUS

Govt. of KP through Secretary Higher Education Archives & Libraries
Peshawar and others.

...RESPONDENTS

APPLICATION

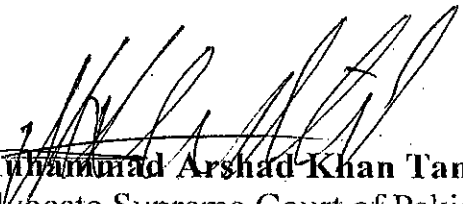
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S.#	Description	Page No.	Annexure
1.	Application along with affidavit	1 to 4	
2.	Copy of impugned letter of the respondent No. 2 dated 16/05/2023	5	"A"

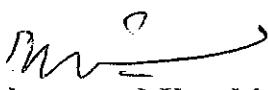

... PETITIONER/APPELLANT

Through

Dated: _____/2023


(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

&


(Muhammad Ibrahim Khan)
Advocate High Court

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BEFORE THE CHAIRMAN KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M No. _____
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Service Appeal No. 1760/2023

Ayesha Qureshi Ex-Assistant Public Library Mansehra.

...PETITIONER/APPELLANT

VERSUS

1. Govt. of KP through Secretary Higher Education Archives & Libraries Peshawar.
2. Director Archives and Libraries, Peshawar.
3. Librarian Public Library, Mansehra.

...RESPONDENTS

SERVICE APPEAL

APPLICATION FOR RESTRAINING THE
RESPONDENTS NOT TO VACATE THE GOVT.
OFFICIAL ACCOMMODATION FROM THE
PETITIONER SITUATED AT CIRCUIT HOUSE
MANSEHRA AND STATUS QUO MAY BE
ORDERED TO BE MAINTAINED TILL FINAL
DISPOSAL OF MAIN SERVICE APPEAL.

Respectfully Sheweth:-

1. That Service Appeal is pending adjudication and the instant application may be treated as part and parcel of the main service appeal.

2. That the Applicant has illegally dismissed the petitioner/appellant from service on 28/04/2023 and the petitioner/appellant is residing in the Govt. Official residence situated in the vicinity of circuit house Mansehra.
3. That respondent No. 2 issued a letter NO. 458/310/DA dated 16/05/2023 wherein, the petitioner/appellant was directed to vacate the official residence. That the petitioner/appellant has already filed service appeal No.1760-A/2023 before this Honourable Tribunal on 19/08/2023 which is still pending for adjudication by the Honourable tribunal. Copy of impugned letter issued by respondent No. 2 dated 16/05/2023 is attached as Annexure "A".
4. That there is likelihood of success of the petitioner/appellant in the lis. The petitioner/appellant has brought a good prima facie case and balance of convenience also lies in favour of the petitioner/appellant.
5. That, valuable rights of the petitioner/appellant to retain official accommodation till final disposal of the main service appeal are involved.
6. That, employees of respondents' department are constantly trespassing the residence of

the petitioner which is the permanent source of trouble.

7. That the petitioner solemnly affirmed on oath that in case, she could not succeed in the lis then, the petitioner/appellant shall deposit rent of the official accommodation on standard rates in the capacity of private tenant.

In view of above it is prayed that impugned vocation order dated 16/05/2023 of official accommodation from the petitioner/appellant may be suspended and status quo may be ordered to be maintained till final disposal of the main service Appeal.

... PETITIONER/APPELLANT

Through

Dated: 4/9 2023

(Muhammad Arshad Khan Tanoli)
Advocate Supreme Court of Pakistan

&

(Muhammad Ibrahim Khan)
Advocate High Court

BEFORE THE CHAIRMAN KHYBER
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APPLICATION

AFFIDAVIT

I, *Ayesha Qureshi Ex-Assistant Public Library Mansehra*, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed therein from this Honourable Court.



Ayesha Qureshi
DEPONENT

4/9/23

DIRECTORATE OF ARCHIVES & LIBRARIES,
KHYBER PAKHTUNKHWA, PESHAWAR.
Phone: - 091-9210100 Website: www.kpdal.gov.pk,
www.facebook.com/kparchivesandlibraries
No. 458/3/2023 Dated: 16/05/2023.

Annex-A

To

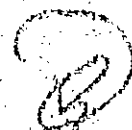
The Librarian,
Public Library, Mansehra.

Subject:-

ISSUES RELATED TO THE PENALTY OF REMOVAL FROM
SERVICE IMPOSED UPON MRS. AYESHA QURESHI, EX-
ASSISTANT, PUBLIC LIBRARY, MANSEHRA.

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With reference to telephonic conversation on the issues on 15-05-2023, you are directed to stop salary of the former employee immediately, vacate official residence from her with taking possession of keys and take over all official record and items from her under proper lists with submission of compliance report within 07 days positively. You are further directed to forward detailed report regarding all payments (including pay & allowances) made to the said Ayesha Qureshi since her appointment to the post of Assistant.



(Rebeca Hafiz)
Director, Archives & Libraries,
Khyber Pakhtunkhwa, Peshawar.