

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,

PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Case No. 8388

Dated 18-10-23

S.A.No.15693/2020

Mst.Samina Khatoon APPELLANT

Versus

D.E.O and others RESPONDENTS

APPLICATION FOR PERMISSION OF FILE
AMENDED APPEAL.

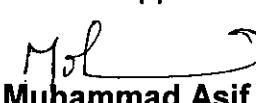
Respectfully Sheweth;

Petitioner/ appellant submits as under:

- 1) That the above noted appeal is fixed for today i.e. 18.10.2023.
- 2) That at the time of filing the appeal, petitioner contacted the advocate through servant.
- 3) That after preparing the appeal as petitioner was seriously ill, therefore, petitioner signed the appeal without reading the facts of appeal.
- 4) That as the advocate has also filed appeals for other teachers, therefore, inadvertently true facts have not been written in the appeal of petitioner.
- 5) That petitioner wants to add following facts in the appeal.
 - a) Petitioner was appointed in BPS-6 (Rs.315 fixed) plus usual allowances on 09.02.1981 and served the department for 2 ½ years. (Copy of order is Annexure "A").
 - b) Petitioner joined the service on Qari Post against leave post on 09.01.1996 in BPS-7 in Govt. Middle School Shareen Mela, FR, Kohat. (Photocopy of the order is Annexure "B" and charge report is Annexure "C").

- 6) That petitioner served the department on the said post for 10 months.
- 7) That on the recommendation of Village Education Committee petitioner was appointed against project post of PTC in BPS-7 in female communal school/ Govt. Girls School Sheikhi Maraj Gul Kili vide order dated 08.02.1999. (Photocopy of the order is Annexure "D").
- 8) That petitioner was regularized on the vacant post of PST in BPS-12. (Copy of order is Annexure "E").
- 9) That para-4 of the appeal, petitioner wants to correct to the extent "that on 03.12.2010 respondents circulated a circular that services of petitioner was terminated since 31.12.2010" but in fact services were not terminated and the teachers and students were attending the school and teachers including the petitioner was receiving the monthly pay regularly.
- 10) That during pendency of appeal before this Hon'ble Tribunal, petitioner has retired from service on 04.01.2020 due to superannuation of age. (Photocopy of the order is Annexure "F").
- 11) That in the prayer petitioner wants to add that the temporary service/ service against leave post and service on project post may kindly be calculated for the benefit of monetary benefits and the petitioner may kindly be granted pension and pensionary benefit.

It is, therefore, requested that the petitioner may kindly be allowed filed amended appeal.

Appellant
Through 
Muhammad Asif
Advocate
Supreme Court of Pakistan