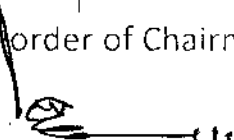


Form- A

FORM OF ORDER SHEET

Court of _____

Execution Petition No. 119/2023

S No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	01.03.2023	<p>The execution petition Mst. Rukhsana Hayat submitted today by Mr. Saadullah Khan Marwat Advocate. It is fixed for implementation report before Single Bench at Peshawar on _____. Original file be requisitioned. AAG has noted the next date. The respondents be issued notices to submit compliance/implementation report on the date fixed.</p>
		<p>By the order of Chairman</p>
		<p> REGISTRAR,</p>

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

E. P. No. 119/2023

Misc Pett: No. _____ / 2023

IN

S.A. No. 16435 / 2020

Rukhsana Hayat

versus

DEO (F) & Others

I N D E X

S.#	Description of Documents	Annex	Page
1.	Memo of Misc Petition		1-3
2.	Copy of Appeal dated 18-12-2020	"A"	4-9
3.	Copy of Judgment dated 24-11-2022	"B"	10-18
4.	Compliance letter dated 25-01-2023	"C"	19

Applicant

Through

Saadullah Khan Marwat

(Saadullah Khan Marwat)
Advocate

21-A Nasir Mension,
Shoba Bazar, Peshawar.

Ph: 0300-5872676

Dated: 24-02-2023

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

E. P. No. 119/2023

Misc Pett: No. _____ /2023

IN

S.A. No. 16435/2020

Rukhsana Hayat D/O Hayatullah Khan,
PTC, Lakki Marwat R/O Nar Raza Khan

Adam Zal, Lakki Marwat Applicant

VERSUS

1. District Education Officer (Female),
Elementary & Secondary Education,
Lakki Marwat.
2. Director of Education, Directorate of
Elementary & Secondary Education, KP,
Peshawar.
3. Secretary, Government of KP,
Elementary & Secondary Education
Department, Peshawar.
4. District Accounts Officer,
Lakki Marwat Respondents

**APPLICATION FOR IMPLEMENTATION OF THE
JUDGMENT DATED 24-11-2022 OF THE HON'BLE
TRIBUNAL, PESHAWAR:**

Respectfully Sheweth:

1. That on 18-12-2020, applicant filed Service Appeal before this hon'ble Tribunal for reinstatement in service with all consequential benefits with further prayer to pay monthly salaries withheld since 25-11-2012 and onward. (Copy as annex "A")

2. That the said appeal came up for hearing on 24-11-2022 and then the hon'ble Tribunal was pleased to hold that:-

"In view of the above discussion, the instant service appeal is allowed as prayed for". (Copy as annex "B")

3. That on 25-01-2023, applicant as well as Registrar of the hon'ble Service Tribunal remitted the judgment to respondents for compliance but the same was not honored in letter and spirit till date.
4. That the respondents are not complying with the judgment of the hon'ble Tribunal in letter and spirit and flouts the same with disregard, so are liable to be proceeded against the Contempt of Court Law for punishment.

It is, therefore, most humbly requested that the judgment dated 24-11-2022 of the hon'ble Tribunal be complied with hence forthwith.

OR

In the alternate, respondents be proceeded for contempt of court and they be punished in accordance with Law.

Rukhsana Hayat
Applicant

Through

Saadullah Khan Marwat
Saadullah Khan Marwat

Arbab Saif-ul-Kamal
Arbab Saif-ul-Kamal

Amjad Nawaz
Advocates

Dated: 24-02-2023

AFFIDAVIT

I, Rukhsana Hayat D/O Hayatullah Khan, PTC, Lakki Marwat R/O Nar Raza Khan Adam Zai, Lakki Marwat (Applicant), do hereby solemnly affirm and declare that contents of **Implementation Petition** are true and correct to the best of my knowledge and belief.

Rukhsana Hayat

DEPONENT

CERTIFICATE:

As per instructions of my client, no such like Implementation Petition has earlier been filed by the appellant before this Hon'ble Tribunal.

Hayatullah Khan

ADVOCATE

A 4

BEFORE THE KPK, SERVICE TRIBUNAL, PESHAWAR

S.A No. _____/2020

Rukhsana Hayat D/O Hayatullah Khan,
Ex-PTC, GGPS, Textile Mills, Serai
Nourang, Lakki Marwat,
R/O Nar Raza Khan Adam Zai,
Lakki Marwat

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 16664

Dated 18/12/2020

Appellant

VERSUS

1. District Education Officer (F),
Elementary & Secondary
Education, Lakki Marwat.
2. Director of Education,
Directorate of Elementary &
Secondary Education, KP,
Peshawar.
3. Secretary, Government of KP,
Elementary & Secondary
Education Department, Peshawar.
4. District Accounts Officer,
Lakki Marwat
5. Controller of Examination, Board of
Intermediate & Secondary Education
Bannu

Respondents

Filed to-day
Registrar
18/12/2020

APPEAL U/S 4 OF THE SERVICE TRIBUNAL ACT, 1974
AGAINST OFFICE ORDER NO. 5800-806 DATED 27-07-
2012 OF R. NO. 01 WHEREBY SERVICES OF APPELLANT
ALONG WITH NUMEROUS COLLEAGUES WERE
TERMINATED OR OFFICE ORDER NO. 5394-98 / DD
/ESTAB: / F DATED 06-11-2019 OF R. NO. 02 WHO
REJECTED DEPARTMENTAL APPEAL OF APPELLANT AND
OFFICE ORDER NO. 6904-10 DATED 24-12-2019 OF R.
NO. 01 WHEREBY APPELLANT WAS DISMISSED FROM
SERVICE WITH IMMEDIATE EFFECT AND THAT
DEPARTMENTAL APPEAL DATED 21-01-2020 OF
APPELLANT IS PENDING DISPOSAL TILL DATE.

Respectfully Sheweth:

1. That numerous posts of PTC along with other disciplines were advertised on 11-05-2010 by R. No. 1 for appointment as such. Appellant; Shamim Begium, Jamshida Bibi, Fehmida Bibi, Nusrat Shaheen, Maimoona Bibi, Gul Rubani, Noreen Niazi, etc having the requisite qualifications, applied to the same in prescribed manner through Printed Form on 21-05-2010, wherein details of the academic qualifications and marks obtained were given. (Copies as annex "A" & "B")
2. That after going through the prescribed procedure of selection, appellant along with others was appointed as PTC Teachers on the recommendation of Departmental Selection Committee vide order dated 25-02-2011 on regular basis and then the charge was assumed on 26-02-2011. (Copies as annex "C" & "D")
3. That appellant used to attend the school daily wherein she along with others signed Attendance Register to show her performing her official duties. (Copy as annex "E")
4. That on 15-06-2012, genuine Certificates of appellant along with other female teachers were termed as fake by the respondents pretending therein that the same were verified from concerned Board. (Copy as annex "F")
5. That on 27-07-2012, services of appellant along with the aforesaid female Teachers were terminated on ground of bogus / fake and tempered documents but to clear the position, it is to bring into the notice of the hon'ble Tribunal that over and above appointments than the sanctioned posts were made and to escape the skins, respondents faked the documents in Computer and made changes in the Certificates by enhancing their marks to prove the same as fake. No covering letter of the same was available on the record. (Copy as annex "G")
6. That on 17-10-2012, appellant submitted representation before R. No. 02 against order of termination for reinstatement in service with all back benefits. (Copy as annex "H")

7. That on 15/27-12-2012, appeals of appellant was accepted by department with all back benefits but monthly salaries were withheld till then for ulterior motive. (Copy as annex "I")
8. That on 21-03-2014, appellant preferred Appeal before the hon'ble Tribunal for release of salaries which came up for hearing on 28-02-2018 and then the Hon'ble Tribunal was pleased to accept the same with directions to the department to treat the appeals of appellants as departmental appeals and remitted the same to departmental appellate authority for decision through speaking order after examining the relevant record with in a period of sixty days positively. The departmental appellate authority was further directed to communicate the said order to the appellants and if any party is aggrieved from the order, the said party reserves right to file fresh appeal, subject to all just / legal objections. The judgment was scribed in Appeal No. 129/2014, "Mehnaz Bibi Vs DEO and Others" (Copy as Annexed "J" & "K")
9. That as respondents were not implementing order dated 28-02-2018 of the Hon'ble Tribunal in letter and spirit, so filed Execution Petition No. 236/2018 before the Hon'ble Tribunal on 18-07-2018 for release of monthly salaries. (Copy as Annex "L")
10. That on 21-01-2019, R. No. 01 issued office orders wherein pay of appellant was released from the date of appointment i.e. 25-02-2011, but in fact no penny was paid to her. (Copy as Annex "M")
11. That on 12-02-2019 R. No. 01 issued subsequent office order wherein order dated 21-01-2019 was modified and pay of appellant was released with effect from 01-08-2019 instead of date of appointment, i.e. 25-02-2011. (Copy as Annex "N")
12. That on 28-03-2019, R. No. 04 wrote letter to R. No. 01 to provide documents of appellant to proceed further in the matter. Despite the fact that on 21-01-2019 order of release of pay from 25-02-2011 was already issued by the department. The said letter was marked to SDEO Lakki Marwat to provide the documents as desired by Account Office, followed by subsequent letter dated 26-08-2019 of R. No. 04 to R. No. 01. (Copies as Annexed "O" & "P")

13. That on 28-09-2019, R. No. 01 served appellant with Show Cause Notice leaving aside other female teachers to the effect that Provincial Inspection Team (PIT) has conducted enquiry into the matter and their appointment orders were declared as illegal, so why they be not booked for Criminal proceedings. (Copy as Annex "Q")

Here it would be not out place to mention that PIT had conducted enquiry against R. No. 01 by appointing over and above strength than the sanctioned posts and not against appellant.

14. That the said Show Cause notice was replied on 07-10-2019 with cogent reason mentioned therein and denied the allegations by appellant. (Copy as Annex "R")

15. That on 09-10-2019, appellant submitted application to the Hon'ble Tribunal to restrain respondents from passing any adverse action against appellant in the matter and then the Hon'ble Tribunal was pleased to restrain respondents from passing any order vide order sheet dated 24-10-2019 against her. (Copies as Annex "S" & "T")

16. That on 06-11-2019, R. No. 02 passed unique order wherein services of appellant has been terminated on 27-07-2012. This order dated 27-07-2012 appellant was set aside by the competent authority through order dated 27-12-2012. (Copy as Annex "U")

17. That on 24-12-2019, R. No. 01 terminated appellant from service with immediate effect despite the fact that stay order was passed with direction to respondents to not take any adverse action against her. (Copy as Annex "V")

18. That on 21-01-2020 appellant submitted appeal before R. No. 02 for reinstatement in service which met dead response till date after supply of the impugned order to the hon'ble Tribunal. (Copy as Annex "W")

19. That on 19-11-2020, the Hon'ble Tribunal passed order sheet wherein Execution Petition of appellant was decided as per its contents. (Copy as Annex "X")

Hence this appeal, inter alia, on the following grounds:-

8

GROUNDS:

- a. That having the requisite educational qualification and by going through the prescribed procedure of appointment, appellant was selected as PST by R. No. 01 on the recommendation of the Departmental Selection Committee by the competent authority.
- b. That on 21-05-2010, appellant submitted Certificates to respondents office through Printed Form wherein correct details were given, yet the same were changed in the office of R. No. 01 to save skins from any adverse action as numerous appointments were made in lieu of bribe.
- c. That live example of taking bribe from the candidates was that R. No. 01, Mir Azam Khan DEO was killed by one of the affectee.
- d. That appellant performed here official duties at the said school by marking herself present in the School Register.
- e. That similarly placed colleagues mentioned in para No. 02 above of the appeal, they were paid monthly salaries by the department after heating their palms and those who refused, approached this Hon'ble Tribunal for release of their monthly salaries and then the Hon'ble Tribunal was pleased to direct the authority to pay them salaries and were paid from the date of their appointments in lieu of bribe.
- f. That as per law, rules and judgments of the Superior Courts, similarly and equally placed persons be treated similarly and equally to avoid discrimination.
- g. That Superintendent of the department, namely Dil Jan Khan demanded Rs. 2, 00,000/- from appellant. She offered one Lac but told her that it is not a case of one Lac but above. Recording / proof of the said conversation are with appellant.
- h. That as and when Show Cause Notice was served upon appellant, she submitted application to the hon'ble Tribunal to restrain respondents from passing any adverse order against her which relief was granted on 24-10-2019, so the Impugned order of termination from service is void and illegal.

- i. That in some of the order sheets of the Execution Petition respondents admitted the fact that Pay Bill of the appellant has been submitted to the Account Office for payment of the withheld salaries.
- j. That as and when academic qualifications of appellant as well as of her colleagues mentioned in para No. 02 of the appeal above were termed faked through the Board, then how such documents of her colleagues were declared as genuine from fake. The same were declared genuine by respondents extracting money in millions from them. No record of its genuineness is available either with the department or with the Board.
- k. That PIT never conducted enquiry in the case against appellant but R. No. 01 who made appointments over and above than the required strength and in such scenario, NAB case is pending disposal against R. No. 01.
- l. That the act of the respondents by terminating appellant from service and by not paying monthly salaries to her was based on ulterior motive and wish of bribe.

It is, therefore, most humbly prayed that on acceptance of the appeal, orders dated 27-07-2012 (if any), 06-11-2019 and 24-12-2019 of the respondents be set aside and appellant be reinstated in service with all consequential benefits with further prayer to pay monthly salaries withheld since 25-11-2012 and onward, with such other relief as may be deemed proper and just in circumstances of the case.

Rukhsana Hayat
Appellant

Saadullah Khan Marwat
Through
Saadullah Khan Marwat

Arbab Saiful Kamal
Arbab Saiful Kamal

Miss Rubina Naz
Miss Rubina Naz

Amjad Nawaz
Amjad Nawaz

Dated: 17-12-2020

Advocates

B 10



BEFORE THE MEMBER, KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
LAKKI MARWAT

Service Appeal No: 16435/2020

BEFORE: MRS. ROZINA RUFHMAN
MISS FAREEHA PAUL

MEMBER (F)
MEMBER (E)

Rukhsana Hayat D/O Hayatullah Khan, Ex-PTC, GGPS, Textile Mills, Serai Naurang, Lakki Marwat. R/O. Nar Raza Khan Adam Zai, Lakki Marwat. (Appellant)

Versus

1. District Education Officer (F), Elementary & Secondary Education, Lakki Marwat.
2. Director, Directorate of Elementary & Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. Secretary, Government of Khyber Pakhtunkhwa, Elementary & Secondary Education, Peshawar.
4. District Accounts Officer, Lakki Marwat.
5. Controller of Examination, Board of Intermediate & Secondary Education, Bannu. (Respondents)

Arbab Saiful Kamal,
Advocate

For appellant

Mr. Kabirullah Khattak,
Addl. Advocate General

For respondents

Date of Institution..... 18.12.2020
 Date of Hearing..... 24.11.2022
 Date of Decision..... 24.11.2022

ATTACHED

MEMBER
 Khyber Pakhtunkhwa
 Service Tribunal
 Peshawar

JUDGEMENT

FAREEHA PAUL, MEMBER (E): The service appeal in hand has been instituted under Section 4 of the Khyber Pakhtunkhwa Service Tribunal

AK

11

Act, 1974 against the order dated 27.07.2012 of respondent No. 1 whereby services of the appellant were terminated and against the order dated 06.11.2019 of respondent No. 2 whereby departmental appeal of the appellant was rejected and against order dated 24.12.2019 of respondent No. 1 whereby appellant was dismissed from service with immediate effect with the prayer that all the orders might be set aside and the appellant be reinstated in service with all consequential benefits with further payer to pay monthly salaries withheld since 25.11.2012 onwards.

2. Facts of the case, as per memorandum of appeal, are that numerous posts of PTC alongwith other disciplines were advertised on 11.05.2010 by respondent No. 1. The appellant, alongwith others, having the requisite qualification applied for the same in prescribed manner through printed form on 21.05.2010 wherein details of the academic qualifications and marks obtained were given. After going through the prescribed procedure of selection, appellant, alongwith others, was appointed as PTC on the recommendations of Departmental Selection Committee vide order dated 25.02.2011 on regular basis and she assumed the charge on 26.02.2011. On 15.06.2012, certificates of appellant, alongwith other female teachers, were termed as fake by the respondents on the ground that the same were verified as fake from the concerned Board. On 27.07.2012, services of the appellant, alongwith other teachers, were terminated on the ground of bogus/fake and tampered documents. On 17.10.2012, the appellant submitted representation

ACCEPTED
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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before respondent No. 2; against the order of termination, for reinstatement in service with all back benefits which was accepted on 27.12.2012 by the department with all back benefits but monthly salaries were withheld. On 21.03.2014, appellant preferred an appeal before the Service Tribunal for release of salaries which came up for hearing on 28.02.2018. The appeal, alongwith other appeals, was accepted with the directions to the department to treat those as departmental appeals and remitted the same to the departmental appellate authority for decision through speaking order after examining the relevant record within a period of sixty days positively. The departmental appellate authority was further directed to communicate the said order to the appellants and if any party was aggrieved from the order, the said party reserved the right to file fresh appeal, subject to all just/legal objections. (Appeal No. 129/2014 titled Mehnaz Bano Vs. DEO and others). The respondents failed to implement the order dated 28.02.2018 in letter and spirit, and hence an Execution Petition No. 236/2018 was filed before the Service Tribunal on 18.07.2018 for release of monthly salaries. On 21.01.2019 respondent No. 1 issued office order for the release of pay of the appellant from the date of appointment i.e. 25.02.2011, but in fact no penny was paid to her. On 12.02.2019 respondent No. 1 issued another order modifying the earlier order of 21.01.2019 for release of pay of the appellant w.e.f. 01.08.2019; instead of date of appointment which was 25.02.2011. On 28.03.2019, respondent No. 4 (District Accounts Officer, Laska Marwat) wrote a letter to respondent No. 1, with a copy to Sub-Divisional Education

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Officer (Female) Serai Naurang to provide documents of the appellant to proceed further in the matter despite the fact that order dated 21.01.2019 for release of pay from the date of appointment (25.02.2011) was already endorsed to the District Accounts Officer, Lakla Marwat.

3. On 28.09.2019 respondent No. 1 served a show cause notice upon the appellant, leaving aside other female teachers, in pursuance of an inquiry conducted by the Provincial Inspection Team in the matter of appointment orders which were declared as illegal. The Provincial Inspection Team had conducted the inquiry against respondent No. 1 for appointments made over and above the sanctioned strength of the posts. The appellant replied to the show cause notice on 07.10.2019 with cogent reasons and denied the allegations. On 09.10.2019, appellant submitted an application to the Service Tribunal to restrain the respondents from passing any adverse action against the appellant in the matter, on which Tribunal was pleased to restrain the respondents from passing any order against her vide order sheet dated 24.10.2019. On 06.11.2019 respondent No. 2 passed an order in pursuance of judgment of Service Tribunal dated 28.02.2018, and rejected the departmental appeal of the appellant by maintaining the termination from service order dated 27.07.2012. On 24.12.2019 respondent No. 1 once again terminated the services of appellant with immediate effect despite the fact that a stay order was passed by the Service Tribunal with the direction to the respondents not to take any adverse action against her. On 21.01.2020 the

ATTACHED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
PESHAWAR


[Handwritten signature]

appellant submitted an appeal before respondent No. 2 for her reinstatement in service which was not responded. On 19.11.2020 the Service Tribunal passed its order wherein execution petition of the appellant was decided as per its contents. Feeling aggrieved from the response of respondent department, the appellant submitted the present service appeal on 18.12.2020.

4. Respondents were put on notice who submitted written replies/comments on the appeal. We have heard the learned counsel for the appellant as well as the learned Additional Advocate General for the respondents and perused the case file with connected documents in detail.

5. Learned counsel for the appellant presented the detail of the case and apprised the bench that similarly placed colleagues of the appellant were being paid monthly salaries by the department on regular basis but the same had been refused to the appellant for which she approached the Service Tribunal which was pleased to direct the authority to pay the salaries from the date of her appointment. He invited the attention to the judgments of Superior Courts wherein it had been clearly directed that similarly and equally placed persons be treated similarly and equally to avoid discrimination. On the inquiry conducted by the Provincial Inspection Team the learned counsel clarified that the said inquiry was conducted against respondent No. 1 who made appointments over and above the sanctioned strength of the posts and it was not against the appellant. He further

ATTESTED


Khushi Chaudhary
Service Tribunal
Punjab



informed that a case in N.A.B was also pending disposal against respondent No. 1 in the same matter. He requested for acceptance of the appeal as prayed for.

6. Learned Additional Advocate General contended that the appellant applied with bogus S.S.C certificate which was sent for verification from the concerned Board and the same was declared as fake and bogus. He further contended that departmental appeal of the appellant was decided by the competent authority/departmental appellate committee after the facts which were brought to its notice that the appellant's PFC certificate was also bogus. On the matter of inquiry by the Provincial Inspection Team, the learned AAG stated that inquiry was conducted in respect of documents of almost all the concerned appointees along with the appellant and in the same report the P.I.T had recommended show cause notice to be served upon the appellant along with other beneficiaries for fraudulent appointment. He further argued that the appellant obtained the restraining order from the Service Tribunal by referring the execution petition which was also based on mala fide and misrepresentation of the appellant referring therein that the Tribunal had passed the judgment in favour of the appellant. According to him the appellant was aware of the decision of the departmental appellate committee and as per order dated 28-02-2018 of Service Tribunal she was directed to file fresh appeal before the Service Tribunal against the said speaking order of departmental appellate authority but she failed to do so

ATTESTED

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

and therefore, she was alleging wrong facts to cover limitation of her instant time barred appeal. He requested that the appeal of the appellant was time barred and therefore liable to be dismissed. The Additional A.G. further contended that the appellant was never reinstated or adjusted on any post after her termination from service on 27.02.2012 nor she had performed any duty in any school. He requested for dismissal of the service appeal.

7. After hearing the arguments and going through the record presented before us, it transpires that the appellant applied for the post of P.T.C through a printed application form to the EDO Elementary & Secondary Education District Lakki Marwat. She had clearly mentioned her educational qualification marks in that form according to which she secured 626 marks in Matric and 557 marks in F.A/E.Sc. Her P.T.C marks have been shown as 563. Two certificates, SSC and Intermediate examinations have also been attached showing the same marks as mentioned in her application form. After getting appointed, the appellant joined the service by submitting her arrival report and started her attendance in the school where she was posted. One of the conditions of her appointment was that the Executive District Officer (EDO) Elementary & Secondary Education, Lakki Marwat would check and verify the certificates/degrees of the appointed candidates from concerned Board/Universities before the drawl of their pay. Accordingly their educational testimonials were forwarded to the respective institutions for necessary verification. A point noted in the record as well as in the

ATTESTED
EXAMINER
Secretary, Education
Lakki Marwat

17

arguments was that the Secondary School Certificate of the appellant forwarded by the E.D.O. BISE to the concerned board shows her marks as 780. Similarly a Detailed Marks Certificate of Higher Secondary School Examination indicates her marks obtained as 777. Both these certificates have been declared bogus by the Board of Intermediate and Secondary Education, Bannu. On a question raised by the bench for the learned AAG and departmental representative of Elementary & Secondary Education Department to produce the application form alongwith enclosures including the educational testimonials submitted by the appellant both of them were silent. No such document is attached with the reply also. It is therefore hard to understand that from where the two certificates that were forwarded to the BISE Bannu came, as the same were denied by the appellant and it was supported by the application form that she submitted to the respondent department, a copy of which is attached with her appeal also.

8. On the point of reinstatement of the appellant vide order dated 27.12.2012 whereby she was reinstated on the grounds that she possesses the minimum qualification so required for appointment as PST, the respondent department failed to provide the relevant record to ascertain whether she came in the ambit of being appointed on merit or not.

8. In view of the above discussion, the instant service appeal is allowed as prayed for. Parties are left to bear their own costs. Consign.


ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Services Tribunal
Peshawar



10. Pronounced in open court in Peshawar and given under our hands and seal of the Tribunal this 24th day of November, 2022.


(FARID HAR PAUL)
Member (E)


(ROZINA ARSHAD)
Member (J)

Certified to be true copy
EXAMINED
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application	23-01-2023
Number of Pages	Page 9-9
Copying Fee	65/-
Urgent	-
Fee	65/-
State of	-
Date of Copy	24-01-2023
Date of Delivery of Copy	24-01-2023

C 19

To

1. District Education Officer (Female),
Elementary & Secondary Education,
Lakki Marwat.
2. Director of Education, Directorate of
Elementary & Secondary Education,
KP, Peshawar.
3. Secretary, Government of KP,
Elementary & Secondary Education
Department, Peshawar.
4. District Accounts Officer,
Lakki Marwat

**Subject: - COMPLIANCE OF JUDGMENT DATED 24-11-2022 OF
THE HON'BLE SERVICE TRIBUNAL PASSED IN
SERVICE APPEAL NO. 16435/2020 IN LETTER AND
SPIRIT.**

Respected Sir,

Please comply with the judgment dated 24-11-2022 of
the Hon'ble Service Tribunal, KP, Peshawar passed in the
said Service Appeal in letter and spirit and obliged.
(Certified copy attached)

More so, my this letter be also treated as my arrival
report.

RECEIVED
25 JAN 2023
District Education Officer
(Female) Lakki Marwat

Humble Appellant

Rukhsana Hayat
Rukhsana Hayat
D/O Hayatullah Khan,
R/O Nar Raza Khan
Adam Zai, Lakki Marwat.
PTC Teacher Lakki Marwat.
Cell No: 0301-8755670

DA (Lit)

Dated 25-01-2023

[Signature]
25/01/23

RECEIVED
25 JAN 2023
District Education Officer
(Female) Lakki Marwat

کعدالت جناب سرسٹریٹ ٹریبونل صوبہ سندھ پشاور

مستجاب ایڈوائس

مخبرہ کھلم

رضانہ حیات

دعویٰ اپیل Exeaud

باعضرت محترمہ ایڈوائس

مقررہ مندرجہ عنوان بالا اپیل اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام پشاور
کیسٹ نمبر ۱۸۱۳۳ خان سردانے ایڈووکیٹ، ہائی کورٹ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب
مرد معروف کو مقدمہ کی کل کاروائی کا کابل اختیار ہوگا نیز وکیل صاحب کو کرنے دعویٰ نامہ و آفٹرنالٹ و انیساہ برصاف
یہیے جواب دہی اور اپیل دعویٰ اور بھرتی ڈگری کرنے اجراء اور وصولی چیک در پیہ اور رضی دعویٰ اور درخواست
پر قسم کی تقدیر اور اپیل پر مقررہ کرانے کا اختیار ہوگا نیز بھرتی عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی
اور مستحق فی فیئر وار کرنے اپیل نگران و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بھرتی ضرورت مقدمہ منکرہ
کے کل یا بھرتی کاروائی کے واسطے اور وکیل یا نثار قانونی کو اپنے ہمراہ یا اپنی بجائے تفریکہ اختیار ہوگا
اور اس پر مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا سامنے پرواغت منظر اور
قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوا مقدمہ کے متعلق ہوگا اس کے مستحق وکیل صاحب
مرد معروف ہوں گے نیز بغایا و فریب کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تارتخ پیشی مقام روزہ
پر ہو یا ہدیتے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں۔
لہذا رکالت نامہ رکھ دیا کہ سند ہے۔

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