

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

SERVICE APPEAL NO 872 OF 2022

MST. ARSHIA LATIF Daughter of Abdul Latif, Muryali DIKhan. **Appellant**

VS

Government of Khyber Pakhtunkhwa,
District Education Officer (Female) D.I.Khan.

10363

S-1-2024

Respondent

APPLICATION FOR SUSPENSION OF FINE

RESPECTFULLY SHEWETH:

1. That these humble servants are Law abiding citizens and are observing sole obedience to the orders passed by this Honourable Tribunal and/ or other Courts of Law and show no indolence or lethargy in performance of their assigned duties and other tasks.
2. That these servants know that direction of this Honourable Tribunal on submission of reply is of immense importance for respondents to avail treatment of *audi alteram partem* as bestowed by this Honourable Tribunal upon them to foster productive discussions in adjudication.
3. That these humble civil servants may generously be allowed to humbly state that they were not sent any copy of the Service Appeal before the defense was ordered "*struck off*" in the above titled Service Appeal, so as to draft reply and submit it timely.
4. That the Litigation Representative arrived at office of the computer operator, Khyber Pakhtunkhwa Service Tribunal, Peshawar, for scanning and submission of the reply but it was refused by the computer operator due to the defense *struck off* order of this Honourable Tribunal.
5. That these humble civil servants were totally ignorant from the legal method to be adopted in case the defense of respondents is ordered "*struck off*".
6. That this office having scarcity of male staff, is yield to hiring services of Dr. Muhammad Imran Shah, Senior SS Statistics, as their Litigation Representative for this office, who has been efficiently performing his duties of drafting comments/ replies and representing before the Honourable Tribunal and The Honourable Peshawar High Court DIKhan Bench **in addition to attending his two classes at the School** (and having almost 100% result in HSSC Examinations for every year), and that he has not received a single Rupee in terms of TADA since his start of work with this office in 2018.
7. That these servants are having the lump-sum salary which hardly suffices a hand-to-mouth run of their household expenditures; hence, with such penury (yet thanking God), these servant cannot afford payment of the fined amount for submission of comments.
8. That the fine as ordered dated 21.12.2023, to be deducted from the personal account, may generously be alleviated as this is unbearable for these servants.

The Humble Respondent

Shahida Perveen
Shahida Perveen
DISTRICT EDUCATION OFFICER
(FEMALE) DERA ISMAIL KHAN

The Deponent

Dr. Muhammad Imran Shah
Dr. Muhammad Imran Shah
12101-2797412-1
Subject Specialist (BS 18)
As
Litigation Representative
O/o DEO (F), D.I.Khan