

①

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

CM No. _____ /2023 in Service Appeal No: 2611/2023

Muhammad Asad Khan, Computer Operator (BPS-16), Office of the DEO (Female) BattagramAppellant.

VERSUS

- 1. The Secretary E&SE, Khyber Pakhtunkhwa, Peshawar.**
- 2. The Director E&SE Khyber Pakhtunkhwa, Peshawar.**
- 3. The District Education Officer (Female) BattagramRespondents**

INDEX SHEET

S/#	Description of Documents	Annexure	Pages No.
1	Application for the suspension of the order dated 08-09-2023 along with affidavit.		1-2
2	Copy of the office order dated 08-09-2023	A	3
3	Authority letter		4


(Samina Altaf)
DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar.

Today

②

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

CM No. /2023 in Service Appeal No: 2611/2023

Muhammad Asad Khan, Computer Operator (BPS-16), Office of the DEO (Female) BattagramAppellant.

VERSUS

- 1. The Secretary E&SE, Khyber Pakhtunkhwa, Peshawar.**
- 2. The Director E&SE Khyber Pakhtunkhwa, Peshawar.**
- 3. The District Education Officer (Female) BattagramRespondents**

REPLY TO THE APPLICATION FOR THE SUSPENSION OF THE ORDER DATED 08-09-2023 ON BEHALF OF THE RESPONDENTS NO. 1-3.

Respectfully Sheweth: -

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 10980

Dated 02-02-2024

The Respondents No. 1-3 submit as under: -

- 1. That Para-1** is correct that the titled appeal is pending adjudication before this Honorable Tribunal for submission of joint para wise comments on behalf of the Respondents No. 1 to 3.
- 2. That Para-2** is incorrect, however, reply to the facts & grounds of the main appeal may also be treated as part & parcel to the reply of the titled application on behalf of the Respondents in the interest of justice
- 3. That Para-3** is also incorrect as the factor of balance of convenience is also lies in favor of the Respondents instead of the applicant in the titled matter.
- 4. That Para-4** is incorrect on the grounds that the Respondents have got a good prima facie case in their favor whose chances of success are bright/sanguine in favor of the Replying Respondents.
- 5. That Para-4** is incorrect on the grounds that if the operation of the order dated 08-09-2023 is not maintained, then the Respondents shall suffer irreparable losses.

Therefore, it is most humbly prayed that this Honorable Tribunal may kindly be pleased to dismiss the instant application by maintaining the operation of the order dated 08-09-2023 in favor of the Respondents in the interest of justice please.


(SAMINA ALTAF)
DIRECTOR

E&SE Department Khyber
Pakhtunkhwa, Peshawar
(Respondents No: 1-3)

**BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.**

CM No. _____ /2023 in Service Appeal No: 2611/2023

**Muhammad Asad Khan, Computer Operator (BPS-16), Office of the DEO
(Female) BattagramAppellant.**

VERSUS

- 1. The Secretary E&SE, Khyber Pakhtunkhwa, Peshawar.**
- 2. The Director E&SE Khyber Pakhtunkhwa, Peshawar.**
- 3. The District Education Officer (Female) BattagramRespondents**

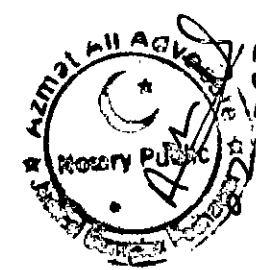
AFFIDAVIT

I, Samina Altaf, Director (E&SE) Khyber Pakhtunkhwa Peshawar, do hereby solemnly affirm & declare on oath that the contents of the instant application are true & correct to the best of my knowledge & belief. It is further stated on oath that in this appeal the answering Respondents have neither been placed Ex-Parte nor their defense has been struck off/cost

Samina Altaf
**DEPONENT
 (SAMINA ALTAF)
 DIRECTOR**

E&SE Department Khyber
Pakhtunkhwa, Peshawar
(Respondents No: 1-3)

ATTESTED





(4) (10) 96

DIRECTORATE OF ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA PESHAWAR.
Phone: 091-9225344 Email: ddadmn.ese@gmail.com

OFFICE ORDER.

Consequent upon approval of the competent authority, the services of Mr. Asad Computer Operator office of DEO (F) Battagram is hereby placed at the disposal of DEO (M) Battagram for further adjustment in his own pay and BPS in the interest of public service with effect from the date of his taking over charge.

Note:

1. Charge report should be submitted to all concerned.
2. NO TA/DA etc is allowed.

P

DIRECTOR
Elementary & Secondary Education
Khyber Pakhtunkhwa, Peshawar

Endst: No. 4251-53 /F.No.101/A-23/MS/Battagram/Vol-V

Dated Peshawar the 8-9/2023

Copy forwarded to the: -

1. District Education Officer (female) Battagram w/r to her letter no. 2616 dated 29-08-2023
2. District Education Officer (M) Battagram.
3. District Accounts Officer Concerned
4. Official concerned.
5. PA to Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar.
6. Master File.

Assistant Director (Admn)
Directorate of Elementary & Secy: Education
Khyber Pakhtunkhwa, Peshawar

Attended

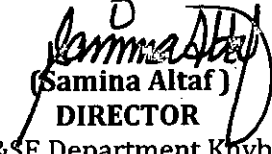


⑤

**DIRECTORATE ELEMENTARY & SECONDARY EDUCATION
KHYBER PAKHTUNKHWA, PESHAWAR.**

AUTHORITY LETTER

I, Samina Altaf, Director (E&SE) Khyber Pakhtunkhwa Peshawar do hereby authorized Mr. Muhammad Rizwan, Assistant Director Litigation-II of this Directorate for submission of **CM application in Service Appeal No. 2611/2023 case titled Muhammad Asad Khan, Computer Operator, office of the DEO (F) Battagram Vs Government of Khyber Pakhtunkhwa & others**, hence, an authority letter is hereby issued in favor of the above-named officer.


(Samina Altaf)
DIRECTOR
E&SE Department Khyber
Pakhtunkhwa, Peshawar