# BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL PESHAWAR

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S.A.No.2294/2023

Mst.Raham Bibi (SST) d/o Zamanat Khan R/o Brain, Tehsil Puran, District Shangla......Appellant Versus

- 1) District Education Officer Shangla (F) Shangla
- 2) Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3) Mst.Neelam Bibi (PST) BPS-12. R/o Village Ghwarband, Tehsil Alpuri District Shangla... Respondents

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**Applicant** 

Through

Fazal Hadi

Advocate,

Dated: 02.05.2024

## BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL <u>PESHAWAR</u>

S.A.No.2294/2023

Diary No. 1257

Mst.Raham Bibi (SST) d/o Zamanat Khan R/o Brain, Tehsil Puran, District Shangla......Appellant

Versus

- 1) District Education Officer Shangla (F) Shangla
- 2) Director Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
- 3) Mst.Neelam Bibi (PST) BPS-12. R/o Village Ghwarband, Tehsil Alpuri District Shangla... Respondents

**APPLICATION FOR GRANT** INJUNCTION TO THE EFFECT RESPONDENTS BE RESTRAINED FROM FILING UP THE VACANT POST OF SST (BIO CHEMISTRY) BPS-16.

### Respectfully Sheweth,

Applicant/ Appellant humbly submits as under:-

- That the titled appeal is pending before this Hon'ble Tribunal 1) wherein next date is yet to be fixed.
- 2) That the respondent No.3 Mst.Neelam Bibi has been transferred from GGHS Sanila, Puran District Shangla to GGHS Bar Shawar District Swat on her pay and scale vide notification dated 22.03.2024. (Copy of notification is attached).
- 3) That after the transfer of respondent No.3 the post of SST (Bio Chemistry) BPS-16 become vacant and the respondents are bent upon to fill the same.

- 4) That there shall be irreparable loss to applicant, if the post is filled.
- 5) That prima facie case exists in favour of applicant.
- 6) That balance of convenience also lies in favour of applicant.

It is, therefore, humbly requested that respondents may please be restrained from filling the post till decision of above titled appeal.

Applicant

Through

Fazal Hadi

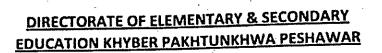
Advocate,

Dated: 02.05.2024

#### **AFFIDAVIT**

I, Raham Bibi (appellant), do hereby affirm and declare on oath that the contents of the accompanying Application are true and correct to the best of my knowledge and belief to the best of my knowledge and belief and nothing has been concealed from this Hon ble Tribunal.

Deponent



#### **NOTIFICATION**

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Consequent upon approval of the competent authority, Mst. Neelam, SST-B/C GGHS Sanila, Puran District Shangla is hereby transferred and adjusted against the vacant post of SST-B/C at GGHS Bar Shawar District Swat on her own pay & BPS in the best interest of public service with immediate effect.

#### Note:-

- 1. Charge report should be submitted to all concerned.
- 2. No TA/DA is allowed.
- 3. The promotion quota of district Swat shall not disturb of the said cadre.
- 4. The DEO(F) Swat is directed to check her original service documents before handing over charge to her.

Director Elementary & Secondary Education Khyber Pakhtunkhwa Peshawar

Endst. No. 364-68 A-17/Transfer/Swat

Dated Peshawar the 22/3/2024

Copy of the above is forward to the:-

- 1. District Education Officers (F) Shangla & Swat.
- 2. District Accounts Officers Shangla & Swat.
- 3. Mst: Neelam, SST-B/C GGHS Sanila, Puran District Shangla.
- 4. PA to Director (E& SE) Local Office.

5. Master file.

Deputy Director Establishment (F)
Elementary & Secondary Education
Khyber Pakhtunkhwa Peshawar