

F-1

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA, PESHAWAR CAMP COURT ABBOTTABD**

Service Appeal No: 22 /2024 clubbed with Service Appeals 18-A/2024

**Government of Khyber Pakhtunkhwa through Chief Secretary &
Others.....Appellants**

VERSUS

Mst Nazia Saddique.....Respondents

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Dated: ____/06/2024


District Education Officer (F)

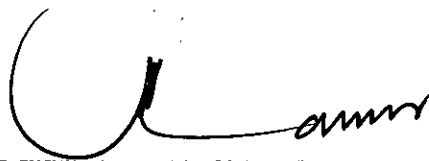
Abbottabad.

learned Tribunal proceeded ex parte against the respondents. (**Attested Copy of order dated 22/5/2024 annexed as Annexure "B"**).

GROUND:

- a. That order dated 22/5/2024, of this Honorable Tribunal is against the 35-A (2) CPC read with 43 (1) (d) CPC under Rule 7(2), KPK, Service Tribunal Rules 1974, give guide line that cost impose having accumulative effect rather than segregate in clubbed cases, and the amount of cost/fine shall not be acceded from the amount of Rs 25000/= while the impugned order dated 22/5/2024, exceed the limits and thus may kindly be remit rather then huge cost/fine.
- b. That respondents due to financial hardship, and low budget are not in financial position to pay the huge fine/cost, respondents may humbly requested to remit the huge fine/cost, so that reply/comments of respondents may kindly be submitted.
- c. That there are sufficient cause available regarding non-submission of reply/comments of respondents part, there are valuable rights rest in the case and huge loss to be respondents.
- d. That instant application may be treated as part and parsal of the application for setting aside ex parte. This application files well with in time.
- e. That others points shall be agitated at the time of arguments by the permission of this Honorable Tribunal.

Therefore, humbly Prayed that the instant application for remittance of cost/fine on behalf of respondents No 4,5, through respondent No. 6, may graciously be accepted, and remittance the cost amount accumulatively effect rather then segregate..



**MUHAMMAD TANVEER
DISTRICT EDUCATION OFFICER
(FEMALE) ABBOTTABAD
(APPELLANT NO: 6)**

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Service Appeal No: 22 /2024 clubbed with Service Appeals 18-A/2024

**Government of Khyber Pakhtunkhwa through Chief Secretary &
Others.....Appellants**

VERSUS

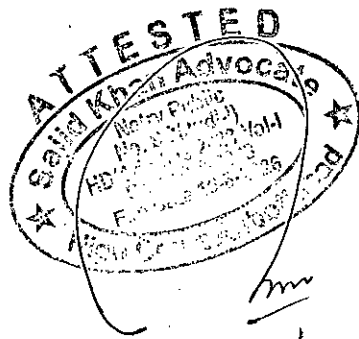
Mst Nazia Saddique.....Respondents

**APPLICATION FOR SUBMISSION OF REMETANCE OF ACOMULATIVE
EFFECT OF COST AS A HOLE ISNTEAD OF SEGRUGATE COST PER CASE
ON BEHALF OF RESPONDENTS, 4, 5 THROUGH RESPONDENT NO. 6.**

AFFIDAVIT

I, Muhammad Tanveer District Education Officer (Female) Abbottabad stated on oath that the contents of Para wise *application* are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.

DEPONENT



13/6/24

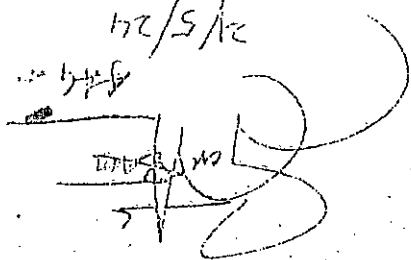
10/6/2024

Attested
/s/

ADDRESS ADDRESS CENTER
MAYBEE BUILDING
SECTION TECHNICAL PERSONNEL

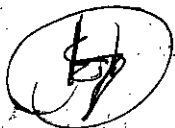
21/5/24

gth



Mr Syed Hq of Shah L.O DEO (F)
AID is expected before the site topic
Pakistan in connection with S.A No 18/24
of the Director Ashraf vs grant topic etc 31
411 affairs on 21/5/2024 for filling of
instant comments.

ALLIANCE CERTIFICATE



3
4
Dams
A

10/5/2024

Handwritten signature

22/5/2024
Handwritten signature

performed on 22/5/2024.

my Zahid Khan (O DEOLF) AID appears in
attend in case S.A No 18/24, Javeria Ashraf vs govt
KPK etc checked with (1) officers before the KPK site

Attendant Certificate



②

Attendee Certificate

Mr. Syed Hanyal Shah, L.O DEO (P) A/P

is appear under the s/p/c sic perform in

connection & filling the Service appeal

Non 18/24# Javeria Ashraf vs govt up etc

checked with (41) other's similar on 27/5/2024

Uroqum

27/5/2024

Assistant Manager
Khyber Pakhtunkhwa
Services Tax Authority

10/6/2024
/m
Attended

BEFORE THE SERVICE TRIBUNAL KPK
PESHAWAR

Service Appeal No. 22 /2024

Nazia Siddique D/O M. Siddique (SPST) GGPS Havlian Village A Abad

...PETITIONER

VERSUS

1. Government of Khyber Pakhtunkhwa, through Chief Secretary Khyber Pakhtunkhwa, Peshawar.
2. Secretary Establishment Khyber Pakhtunkhwa, Peshawar.
3. Secretary Law & Justice, Khyber Pakhtunkhwa, Peshawar.
4. Secretary Elementary & Secondary Education, Peshawar.
5. Director Elementary & Secondary Education, Peshawar.
6. District Education Officer (Female), Abbottabad.

...RESPONDENTS

SERVICE APPEAL UNDER SECTION 4 OF KPK
SERVICE TRIBUNAL ACT, 1974 FOR
DECLARATION TO THE EFFECT THAT
IMPUGNED NOTIFICATION NO.
SO(POLICY)E&AD/1-312020, DATED 06/06/2023,
WHEREIN, RESPONDENTS' DEPARTMENT HAVE
MADE IT COMPULSORY FOR THE APPELLANT
TO GET PROMOTION TO THE NEXT RANK AND
SHALL AVAIL HER PROMOTION, FAILING
WHICH, DISCIPLINARY ACTION SHALL BE

A
01/01/24

ATTESTED
EX. SEC. 13/6/24
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

S.A. - 22-4/24

(7)

Amesuram

(B)

Gautz Awns Nazim Siddique

22nd May 2024 1. Junior to counsel for the appellant present. Mr. Umair Azam, Additional Advocate General for the respondents present.



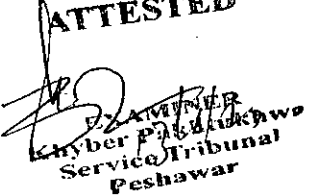
2. On the previous date, last opportunity was granted to the respondents for filing of written reply, but today no representative of the respondents is present nor they have submitted written reply, therefore, cost of Rs.5000/- is imposed upon the respondents to submit written reply/comments within three days. In case they failed to submit the same, they will be placed ex-parte. This case pertains to camp court Abbottabad, therefore, let it be fixed there. To come up for written reply/comments on 29.05.2024 before S.B at camp court Abbottabad. P.P given to the parties.

(Kalim Arshad Khan)
Chairman

Amir Shah, P.A.

29th May. 2024 1. Learned counsel for the appellant and Mr. Umair Azam, Additional Advocate General present.

2. Despite last chance and imposition of cost, reply on behalf of respondents has not been submitted nor anybody is present on behalf of respondents. Therefore, they are placed ex-parte. To come up for ex-parte arguments on 23.07.2024 before D.B at Camp Court, Abbottabad. P.P given to the appellant's counsel.

ATTESTED

Mutazem Shah
Kyber Pakhtunkhwa
Service Tribunal
Peshawar

(Kalim Arshad Khan)
Chairman

*Mutazem Shah *

Date of Presentation of Application 11-6-24
Number of Vols. 2-P
Copying Fee 10/-
Origin -
Total 10/-
Name of _____
Date of Copying 13-6-24
Date of Delivery of Copy 12-6-24