

F-1

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

Service Appeal No: 27 /2024 clubbed with Service Appeals 18-A/2024

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


VERSUS

Mst Fozia AyubRespondents

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Dated: ____/06/2024


District Education Officer (F)

Abbottabad.

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

Service Appeal No: 27 /2024 clubbed with Service Appeals 18-A/2024

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

**Appellants
Khyber Pakhtunkhwa
Service Tribunal**

VERSUS

Diary No. 13677

Dated 21/6/24

Mst Fozia Ayub .. Respondents

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

Respectfully Sheweth:

Application on behalf of respondents 4, 5 through respondent No. 6 is as under.

1. That the instant Service Appeals is fixed on 22/5/2024, the legal representative of respondent No, 4,5,6, appeared on 21/5/2024 for filling of comments/reply i-e (168 files) before the filling branch of this tribunal but the filling branch raised objection for better copies of annexure, very next day on 22/5/2024, legal representative along with AAG Service Tribunal appeared before Service Tribunal KPK, and requested to the Chairman, Service Tribunal, KPK, in the instant appeals to grant such a time to arrange better copies in (168 files), learned Tribunal granted three days for filling of comments/reply in compliance of order dated 22/5/2024, of this Tribunal. while legal representative of respondents No. 4,5,6, appeared on 27/5/2024, (exclusion of Saturday) before the filling branch of this Tribunal, refuse to file the comments/reply of respondents subject to pay cost/fine first. **(Photocopy of attendance certificate are annexed as Annexure "A")**.
2. That legal representative appeared along with AAG, Service Tribunal , KPK, on the next date 29/5/2024 and requested the learned Chairman to remit the huge cost/fine, so that reply may be submitted before the Tribunal, but the

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Service Appeal No: 27 /2024 clubbed with Service Appeals 18-A/2024

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

VERSUS

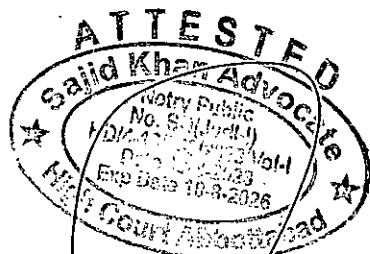
Mst Fozia AyubRespondents

**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.

Tanveer
DEPONENT



13/6/24

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ATTENDANCE CERTIFICATE

Amu

A.

Mr Syed Hajeef Shah L.O DEO (F)

AID is appeared before the STE repic

Peshawar in connection with S.A No: 18/24
Title Jamina Ashraf vs govt repic etc
41 others on 21/5/2024 for filling of
mutant comments.

21/5/24

Additional District General
Magistrate Peshawar
District Peshawar

Allotted

10/6/2024

5

Attendance Certificate

Mr Zahid Khan L.O DEO (F) AID appears & attend in case S-A No 18/24, Janoria Ashraf vs govt kpk etc. attended with (4) other's before the kpk STC Pakistan on 22/5/2024.

Signature
22/5/2024

Attended

u

20/5/2024
Female Subordinate

Attendance Certificate

(6)

Mr. Syed Hajjaj Shah, L.O DEO (F) A.P.
is appear before the &pk sic peshawar in
connection of filling the Service appeal
No. 18/24 # Javeria Ashraf vs govt upk etc
clubbed with (41) others similar on 27/5/2024

[Signature]
27/5/2024
Assistant Inspector General
Muzar Peshawar
Services Peshawar

Affixed
[Signature]
10/5/2024

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BEFORE THE SERVICE TRIBUNAL KPK
PESHAWAR

Service Appeal No. 27 /2023/

Fozia Ayub D/O Muhammad Ayub (SPST), GGPS Malikpura No.2 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.

Khyber Pakhtunkhwa
Service Tribunal

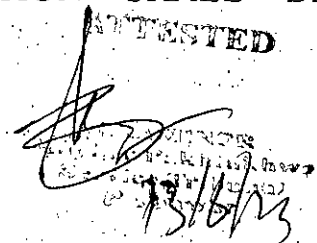
Entry No. 10110

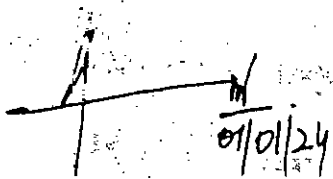
Dated 11/1/24

...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

ATTESTED


13/1/24


01/01/24

S.A 27-124 @
Govt & others vs Fozia Ayub - B-
Amir Khan

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

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

(Kalim Arshad Khan)
Chairman

*Mutazem Shah *