

F-1

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

Service Appeal No: 36 /2024 clubbed with Service Appeals 18-A/2024

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

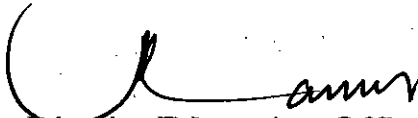
VERSUS

Mst Raswans Jabeen.....Respondents

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Dated: ____/06/2024


District Education Officer (F)

Abbottabad.

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
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**Government of Khyber Pakhtunkhwa through Chief Secretary &
Others.....Appellants**

VERSUS

Mst Raswans Jabeen.....Respondents

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 13667

Date 21/6/24

**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

13/12/54

DEFONENT

concealed from this Honorable Tribunal.

correct to the best of my knowledge and belief and nothing has been
approached stated on oath that the contents of Application are true and

I, Muhammad Tanveer District Education Officer (Female)

VERIDICAL

ON BEHALF OF RESPONDENTS & THROUGH RESPONDENT NO. 2
EFFECT OF COST AS A HOPE INSTEAD OF RESERVATE COST PER CASE
APPLICATION FOR SUBMISSION OF MEMORANDUM OF ACOGNITIVE

Mr. Nazam Jaffer..... Respondent

RESPONSE

Others..... Applicants

Government of Punjab, Pakistan through Chief Secretary &

Service Appal No: 30 13024 closed with Service Appals 18-13024

PAKHTUNKHWA, BESHAWAR SAMIY COURT ABOLISHED
BEFORE THE HONORABLE SERVICE TRIBUNAL KHAYBER

10/5/2024
SPECIAL EDUCATION SECTION
All school

ADMINISTRATIVE SERVICES
SCHOOL DISTRICT OF DENVER
GENERAL MANAGER

2/5/24
gth
[Signature]

Mr. Stuart Hays (aka L.O. DEO (E))
AID is approved before the site topic
behavior in connection with S.A. No 18/24
della Iannona Ashraf vs good reproductive
all efforts on 2/5/2024 for filling of
incident committee.

ALLIANCE CERTIFICATE - A

[Signature]

[Signature]

5

Attendance Certificate

My Zahid Khan L-O DEO (F) A/D appears & attended in case S.A No 18/24, Javeria Ashrafi vs govt kpk etc. clustered with (41) other's before the kpk STC postman on 22/5/2024.

Zahid Khan
22/5/2024

Attendance

Distric Public Works Officer
Kerla 6/5/2024

(7)

Attendance Certificate

(6)

Ms. Syed Hajjaj Shah, L.O DEO (F) A/P
is appear before the KPK SIC Peshawar in
connection of filling the Service appeal
No. 18/24 # Javeria Ashraf vs govt upk etc
clubbed with (41) other's similar on 27/5/2024

[Signature]
27/5/2024
Assistant Secretary General
Khyber Pakhtunkhwa
Services Tribunal Peshawar

Attested
for
District Education Officer
Female Staff College
10/6/2024

BEFORE THE SERVICE TRIBUNAL KPK
PESHAWAR

Diary No. 10093

Dated 1/1/24

Service Appeal No. 36 /2023

Rizwana Jabeen D/O Kala Khan (SPST) GGPS Malikpura No.3 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

[Handwritten signature]
01/01/24

[Handwritten signature]
13-8-24

S-A 36-A/24 ① Mumeru u. B. u
Govt or others vs Rizwan Jabeen

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

Aamir 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 *

Date of Presentation: 11-6-24
Number of: P-2
Copies: 15/-
Urgent: 15/-
Total: 15/-
Name of: _____
Date of: 13-6-24
Date of Delivery of copy: 20-6-24