

F-1

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

Service Appeal No: 43 /2024 clubbed with Service Appeals 18-A/2024

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

VERSUS

Mst Bushara Parveen.....Respondents

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Dated: _____/06/2024


District Education Officer (F)

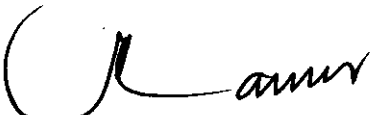
Abbottabad.

huge cost/fine, so that reply may be submitted before the Tribunal, but the 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)

**BEFORE THE HONORABLE SERVICE TRIBUNAL KHYBER
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Service Appeal No: 43 /2024 clubbed with Service Appeals 18-A/2024

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

VERSUS

Mst Bushara Parveen.....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 Application are true and
correct to the best of my knowledge and belief and nothing has been
concealed from this Honorable Tribunal.


DEPONENT



13/6/24

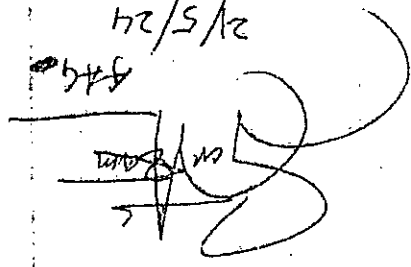
10/5/2024

Attended

Additional Advocate General
Khyber Pakhtunkhwa &
Service Tribunal Peshawar

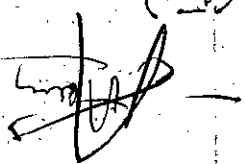
21/5/24

5449



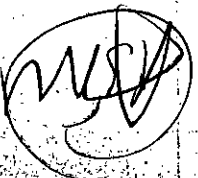
AIID is appeared before the SIA wpc
Petitioner in connection with S.A No 18/24
file the Jamara Ashraf vs govt wpc etc in
41 orders on 21/5/2024 for filling of
instant commeth.

Mr Syed Hayat Shah L.O DBO (F)



ALLIANCE CERTIFICATE

4



5

Presented to
6/22/2024
Female Ambassador

Attended

22/5/2024
M. Khan

my Zahid Khan L-O DEOLFID appear 4
attend in case S.A No:18/24, Javeria Ashraf us girl
KPK etc. checked with @11 attend before the KPK site
perform on 22/5/2024.

Attendance Certificate

⑤



10/6/2024
A. Alford

ASSISTANT ATTORNEY GENERAL
STATE OF CALIFORNIA
27/5/2024
A. Morgan

Mr. Syed Hanyal Shah, L.O DECPAID
is appear before the Dept SIC perform in
connection to filling the Service appeal
Non 18/24 Jarama Ashraf vs govt upk etc
checked with (41) other's similar on 27/5/2024

Attendee Certificate



15/10/50
100

WHICH DISCIPLINARY ACTION SHALL BE
SHALL HAVE HER PROMOTION: BEING
TO GET PROMOTION TO THE NEXT RANK AND
MADE IT COMPULSORY FOR THE APPELLANT
WHEREIN RESPONDENTS DEPARTMENT HAVE
SO (LOGICALLY) ADVI-313050 DATED 04.09.50
IMPOSED NOTICE OF
DECLARATION TO THE EFFECT THAT
SERVICE TRIBUNAL ACT 1974 FOR
SERVICE APPEAL UNDER SECTION 4 OF KVK

15/10/50

RESPONDENTS

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

VERGUS

BEHAWAR

Buzurg Balesar D/O Muhammad Ijaz (SPT) CBS School Khyber

Service Appeal No. 153/50

BESHAWAR

BEFORE THE SERVICE TRIBUNAL KVK

15/10/50

100

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

Amim 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

(Kalim Arshad Khan)
Chairman

Mutazem Shah

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 11-6-23
Number of W. 820
Copying to 101
Urgent 101
Total 101
Name of 13-6-23
Date of Copy 13-6-23
Date of Delivery of Copy 13-6-23