

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL**

**PESHAWAR**

C. M. No \_\_\_\_\_/2024

In

Execution Petition No 143/2024

<sup>In</sup>  
Appeal No 939/2015

Mohammad Sohail, Deputy Secretary (BPS-18), Industries, Commerce & Technical Education Department Khyber Pakhtunkhwa Peshawar.

...

.....**Appellant**

**V E R S U S**

1. Government of Khyber Pakhtunkhwa through chief Secretary, Khyber Pakhtunkhwa, civil Secretariat Peshawar.
2. Secretary to Govt. of Khyber Pakhtunkhwa, Commerce and Industries Department Peshawar.
3. Secretary to Govt. of Khyber Pakhtunkhwa, Environment Department Peshawar.

.....**Respondents**

**Application for Directing the respondents to release the salaries of the appellant from 18-11-2022 till date.**

**Respectfully Submitted:-**

1. That the accompanying Execution Petition is pending before this honorable Tribunal which is fixed for today, i.e 27-08-2024.
2. That the Petitioner earlier filed titled Service Appeal No.939/2015 before this honorable Tribunal for his re-instatement in service wherein the penalty of removal from service was converted into that of compulsory retirement by this honorable Tribunal vide judgment dated 13-04-2016.
3. That the petitioner then approached this honorable Tribunal by filling Review Petition No.444/2019, which was accepted, the judgment of this honorable Tribunal was set-aside by reviewing the same and the petitioner was re-instated in service for the purpose of denovo inquiry vide Judgment dated 01-02-2022, consequently the petitioner was re-instated by the respondents for the purpose of denovo inquiry, vide Notification dated 18-11-2022.

4. That since re-instatement in service the salaries of the appellant have not been release till date due to which the appellant faces financial crises.

It is therefore prayed that on acceptance of this application, the respondents may kindly be directed to release the salaries of the appellant from 08-11-2022 till date.

Dated:-27-08-2024

M. I. [Signature]  
Applicant/Appellant

Through

[Signature]  
Fazal Shah Mohmand

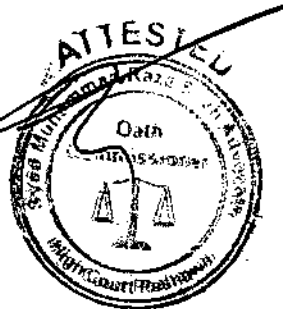
Advocate,

Supreme Court of Pakistan

**AFFIDAVIT**

I Mohammad Sohail Deputy Secretary BPS-18 Industries, Commerce & Technical Education Department Khyber Pakhtunkhwa Peshawar (the appellant), do hereby solemnly affirm and declare on oath that the contents of this **Application**, are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.

N. I. [Signature]  
DEPONENT



27 AUG 2024