

Net 18500
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**BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.**

Khyber Pakhtunkhwa
Service Tribunal

Implementation Petition No.977/2023

in

Service Appeal No. 994/2016

Diary No. _____
Dated 24-09-24

Sanaullah

VS

Education Deptt:

**REPLY TO OBJECTION PETITION ON BEHALF OF
PETITIONER**

RESPECTFULLY SHEWETH:

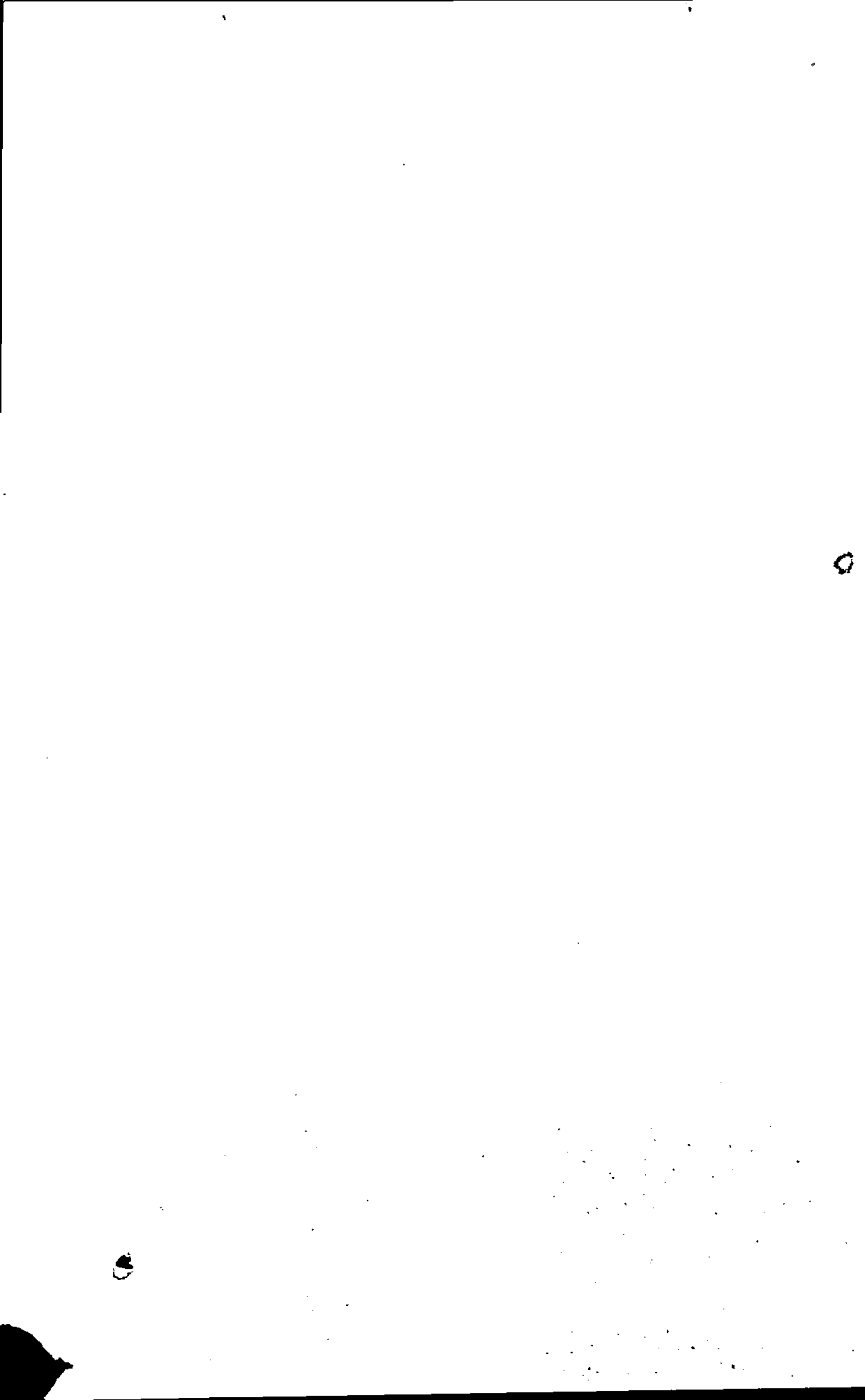
PRELIMINARY OBJECTIONS:

1. That the respondent department raise plea just to avoid the implementation and waste the time of court and petitioner.
2. That the objection petition filed by the respondents is clear contempt of court.
3. That the respondent giving verdicts against the judgment of the Honorable Tribunal, that by declaring the judgment as wrong.


REPLY TO FACTS:

- 1 Admitted correct.
- 2 Incorrect. The judgment of service tribunal is executable to the extent of payment of salaries till 2018; the work already done by the appellant.
 - i. That the petitioner is working without pay since 2014 till 2018 in education department thereafter, the appellant appointed in FC on contract basis, the petitioner start working due to financial crises, therefore not claiming the salaries of that period.
 - ii. Correct but the petitioner claiming salaries for the period the petitioner work done till 2018.
 - iii. Incorrect.

24-09-24



It is therefore, requested kindly reject the objection petition of the respondents and the petitioner may be granted salaries for the period, the petitioner work done was from stoppage of salaries from 2014 till 2018.


PETITIONER

Samaulah

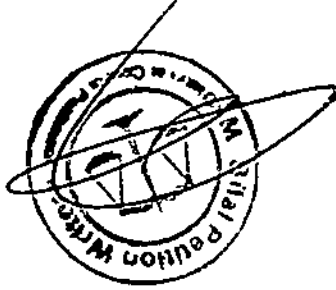
Through:

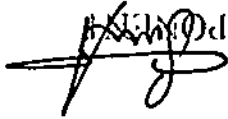


(SYED NOMAN ALI BUKHARI)
ADVOCATE, PESHAWAR.

AFFIDAVIT

It is affirmed and declared that the contents of reply to the implementation report are true and correct to the best of my knowledge and belief.




DEPARTMENT

