

**BEFORE THE HONORABLE CHAIRMAN SERVICES TRIBUNAL,**  
**KPK, PESHAWAR, AT DERA ISMAIL KHAN**

In Service Appeal no: 2038/2023

**Irshad Bibi**      **Versus**      **Govt Of KPK etc.**

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**Dated:**      23/10/2024

Appellant

**Irshad Bibi**

Through Counsel

**Muhammad Idrees Khan**

Advocate, High Court,  
Dera Ismail Khan.

**BEFORE THE HONORABLE CHAIRMAN SERVICES TRIBUNAL,**

**KPK, PESHAWAR, AT DERA ISMAIL KHAN**

Khyber Pakhtunkhwa  
Service Tribunal

In Service Appeal no: 2038/2023

**Irshad Bibi Versus Govt Of KPK etc.**

Diary No. 17035

Date 23-10-24

**Civil Miscellaneous Application to further document application for  
Condonation Of Delay already filed with main appeal.**

Respectfully sir,

1. That titled appeal is pending adjudication before this Honorable Tribunal, where in application for condonation of delay has already been filed, and contents of the application in hand be considered as part and parcel of the main condonation application.
2. That appellant filed main appeal on 26/09/2023, against impugned order dated. 21/02/2023, against which departmental appeal was filed well within time after the dae of communication i.e. 15/03/2023 on 27/03/2023, after which besides filling appeal after the laps of statutory period of 90 days, the appellant was trying time and again to communicate with the department for order on her appeal, for which the department/respondents were making verbal response with positive attitude, hence delay caused was beyond the control of the appellant and not deliberate which can be clearly ascertained from the letter communicated vide SO(P/F)/E&SED/5-19/reinstatement/irshad-bibi/24/3459, dated. 03/04/2024, where in the appellants application for communication of order on appeal has been communicated to the appellant on her application dated. 20/09/2023, which clearly demonstrates that the appellant was time and again asking the respondents for communication of final order. Copy of the communication and memo are annexed as annexure I and II to the application in hand.

In view of the submissions made above, it is humbly prayed that through acceptance of application in hand, application for condonation already filed be further documented, and application along-with documents annexed be considered as part and parcel of the main condonation application and the

delay occurred in filing service appeal in hand may graciously be condoned as not being deliberate, and beyond the control of the appellant.

Dated: 23/10/2024

Appellant

**Irshad Bibi**

Through Counsel

**Muhammad Idrees Khan**

Advocate, High Court,  
Dera Ismail Khan.

**AFFIDAVIT**

I, Muhammad Idrees (Counsel for the appellant), do hereby solemnly affirm and declare on oath that the contents of the application are true and correct and nothing has been concealed.

**Deponent**





**GOVERNMENT OF KHYBER PAKHTUNKHWA**  
**ELEMENTARY & SECONDARY EDUCATION DEPARTMENT**  
**CIVIL SECRETARITE PESHWAR**  
**(PHONE NO. 091-9223540)**

SO (P/F)/E&SE/15-19/reinstatement/irshad Bib/24/3459  
Dated Peshawar the, 3<sup>rd</sup> April, 2024

To

Annex-I

Mst. Irshad Bibi, Ex-PST,  
GGPS Chaghmalai District South Waziristan.

Subject -

APPLICATION FOR COMMUNICATION OF ORDER ON  
DEPARTMENTAL APPEAL DATED 27.03.2023.

With reference to your application dated 20.09.2023 on the subject noted above and to enclose herewith required copy of decision issued by Directorate of E&SE Khyber Pakhtunkhwa for information as desired, please.

Encl: as above.

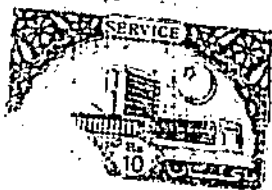
Attestd.  
T. M. Khan

  
SECTION OFFICER (PRIMARY/FEMALE)

Research  
Department  
of the  
United States  
Department of  
State

*[Handwritten signature]*

*[Handwritten initials]*





Mst. Irshad Bibi Ex: PST  
Govt: Girls Primary School Chagmalai  
District South Waziristan

Annex-II

Subject: - APPLICATION FOR COMMUNICATION OF ORDER ON  
DEPARTMENTAL APPEAL DATED 27-03-2023 & 20-09-2023

I am directed to refer to your Appeal on the subject cited above and to inform you that your appeal has been rejected due to prolong absence from duty.

(Bushra Begum)

Assistant Director Estab: (Female)  
Elementary & Secondary Education  
(Merged Areas) Khyber Pakhtunkhwa

27/02/2024

Endst No. \_\_\_\_\_

Copy to the:-

P.A to Additional Director (Estab :) Local Directorate.

Attested  
J. M. Khan

(Bushra Begum)

Assistant Director Estab: (Female)  
Elementary & Secondary Education  
(Merged Areas) Khyber Pakhtunkhwa