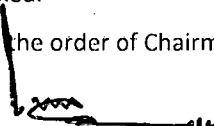


Form- A
FORM OF ORDER SHEET

Court of _____

Execution Petition No. 553/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	16.09.2022	<p style="text-align: center;">The execution petition of Mr. Israr Zaman submitted today by Mr. Ashraf Ali Khattak Advocate. It is fixed for implementation report before Single Bench at Peshawar on _____. Original file be requisitioned. AAG has noted the next date. The respondents be issued notices to submit compliance/implementation report on the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR</p>

Execution Petition No. 553 /2022

IN

SERVICE APPEAL No.1509/2018

Israr Zuman,..... Applicant/Petitioners.

Versus


The Inspector General,
Prison, Khyber Pakhtunkhwa and others Respondents.


INDEX

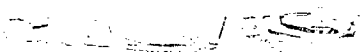
S.#	Description of Documents	Date	Annexure	Pages
1.	Application for Execution alongwith Affidavit.			1-3
2.	Copy of Order / Judgment of t his Hon'ble Tribunal passed in Service Appeal No.1509/2018	03-12-2021	A	4-6
3.	Wakalat Nama.			0-7


Applicant

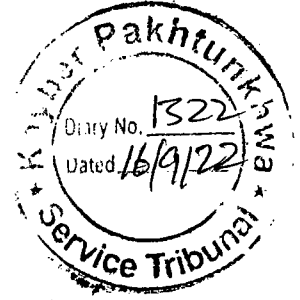
Through


Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

&

Ali Bakht Mughal
Advocate, Peshawar



Execution Petition No. 553 /2022
IN
SERVICE APPEAL No.1509/2018



Israr Zuman S/o Khan Zaman,
Ex-Warder, District Jail Lakki,
District Lakki Marwat.....Applicant/Petitioners.

Versus

1. The Inspector General, Prison, Govt. of Khyber Pakhtunkhwa.
2. The Superintendent, Circle H.Qs, Prison, Haripur.
3. The Superintendent, Sub-Jail, Dasso Kohistan, District Kohistan.
4. The Superintendent, Circle Head Quarter, Prison, Bannu.
5. The Superintendent, District Jail Lakki,
District Lakki Marwat.....Respondents.

APPLICATION FOR EXECUTION OF THE ORDER OF THIS
HONOURABLE TRIBUNAL DATED 03-12-2021 PASSED IN
SERVICE APPEAL NO. 1509/2018.

Respectfully Sheweth,

Facts giving rise to the present petition are as under:-

1. That the applicant filed the above titled service appeal before this Hon'ble Tribunal which was partially accepted by this Hon'ble Tribunal vide Order/Judgment dated 03-12-2021.
Copy of Order / Judgment dated 03-12-2021 is attached as Annexure-A.
2. That this Hon'ble Tribunal was pleased to partially allow the service appeal in following words:

“06. In view of the foregoing discussion, the instant appeal is partially accepted. The appellant is re-instated into service with direction to respondents to conduct de-novo inquiry in accordance with law by affording appropriate opportunity of defense. Needless to mention that the


issue of back benefits would be conditional with the outcome of de-novo proceedings. Parties are left to bear their own costs. File be consigned to record room.”

3. That after obtaining the attested copy of the order, applicant approached the respondents and requested to act upon the directions of this Hon'ble Tribunal but respondents not only failed to comply with the same but they ridiculed the order.
4. That the acts and actions of the respondents squarely fall within the ambit of the Contempt of the Court and as such they are liable to be proceeded for the Contempt and for the punishment under the law.

It is therefore, humbly prayed that on acceptance of this application, this Hon'ble Tribunal may graciously be pleased to direct the respondents to implement the Judgment of this Hon'ble Tribunal dated 03-12-2021 in its true spirit and submit the compliance report before the this Hon'ble Tribunal forthwith.


Applicant

Through


Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

&

Ali Bakht Mughal
Advocate, Peshawar

BEFORE THE KHYBER PAKHTUNKHEA SERVICE TRIBUNAL, PESHAWAR

Execution Petition No. _____/2022

IN

SERVICE APPEAL No.1509/2018

Israr Zuman,.....Applicant/Petitioners.

Versus

The Inspector General,
Prison, Khyber Pakhtunkhwa and othersRespondents.

AFFIDAVIT

I, Israr Zaman S/o Khan Zaman Ex-Warder District Jail, Lakky Marwat, do hereby solemnly affirm 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 the notice of this Hon,ble Tribunal.

Israr Zaman
DEPONENT,

ATTESTED

Gul Daraz Khan
Oath
Commissioner
Advocate High Court Peshawar

19/8



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

Service Appeal No. 1509/2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1757

Dated 14-12-2018

Israr Zuman S/o Khan Zuman,
Ex-Warder District Jail Lakki,
District Lakki Marwat

Appellant

Versus

1. The Inspector General Prison, Govt. of Khyber Pakhtunkhwa.
2. The Superintendent, Circle H. Qs, Prison, Haripur.
3. The Superintendent, Sub-Jail Dassu Kohistan, District Kohistan.
4. The Superintendent Circle Head Quarter Prison, Bannu.
5. The Superintendent District Jail Lakki, District Lakki Marwat Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 READ WITH RULE 19 OF THE KHYBER PAKHTUNKHWA GOVERNMENT SERVANTS (EFFICIENCY AND DISCIPLINE) RULES, 2011 AGAINST THE IMPUGNED FINAL REJECTION 'ORDER NO. Estb/Ward/Order/29039 DATED 04-10-2018 COMMUNICATED ON 20-11-2018 BY ASSISTANT SUPERINTENDENT DISTRICT JAIL LAKKI NAMELY RAIZ KHAN AT HIS OFFICE ON THE REQUEST OF THE APPELLANT; MADE/ISSUED ON THE DEPARTMENTAL APPEAL OF THE APPELLANT FILED AGAINST THE ORIGINAL IMPUGNED ORDER NO.1464 DATED 19-07-2018 OF RESPONDENT NO.2.

Israr Zuman
14/12/18

Israr Zuman
20/12/18

ATTESTED
[Signature]
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

ANX-11

4

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1509/2018

Date of Institution ... 14.12.2018

Date of Decision ... 03.12.2021

Israr Zaman S/o Khan Zaman Ex-Warder District Jail Lakki, District Lakki Marwat.
... (Appellant)

VERSUS

The Inspector General Prisons Government of Khyber Pakhtunkhwa and four others.
... (Respondents)

Ashraf Ali Khattak,
Advocate ... For Appellant

Muhammad Adeel Butt,
Additional Advocate General ... For Respondents

ROZINA REHMAN ... **MEMBER (JUDICIAL)**
ATIQU-UR-REHMAN WAZIR ... **MEMBER (EXECUTIVE)**

JUDGMENT

ATIQU-UR-REHMAN WAZIR MEMBER (E):-

Brief facts of the

case are that the appellant was initially appointed as Warder on 26-01-2015 in Prison Department. During the course of his service, the appellant was proceeded against on the charges of misconduct and was ultimately removed from service vide order dated 19-07-2018. Feeling aggrieved, the appellant filed departmental appeal dated 04-10-2018 which was dismissed, hence the instant service appeal with prayers that the impugned orders dated 19-07-2018 and 04-10-2018 may be set aside and the appellant may be re-instated in service with all back benefits.

02. Learned counsel for the appellant has contended that the respondents have not treated the appellant in accordance with law and have acted in violation of

Article-4 of the Constitution; that Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011 provides for a prescribed mechanism for proceeding against a civil servant, but such procedure has not been adopted by the respondents, therefore the order of removal from service is nullity in the eye of law and liable to be set aside; that malafide of the respondents is evident from the fact that the impugned order of removal from service was not communicated to the appellant and he has acquired the same through his personal efforts; that no inquiry was conducted nor any opportunity was afforded to the appellant to defend his cause, thus the appellant was condemned unheard; that departmental appeal of the appellant was rejected without any cogent reason.

03. Learned Additional Advocate General for the respondents has contended that the appellant was removed from service based on an inquiry conducted against him; that the appellant in a brawl with his co-warder on the issue of late coming to duty, snatched his rifle and had attempted to kill his co-warder in presence of witnesses, who however was rescued by other officials present on the spot; that the inquiry committee found him a habitual deserter and a problematic official and was recommended for major punishment; that charge sheet/statement of allegations was served upon the appellant, but he did not respond; that a proper show cause notice was also served upon the appellant and the appellant was afforded ample opportunity of defense, but the appellant failed to prove his innocence; that the appellant has been treated in accordance with law and all the codal formalities as required under the law have been fulfilled.

04. We have heard learned counsel for the parties and have perused the record.

05. Record reveals that the appellant was appointed as warder on 26-01-2015. During the course of his service, the appellant was proceeded against on the charges of misconduct and was removed from service, who however was re-instated in service and was deputed to serve on main gate of the jail. The appellant

ATTENDED

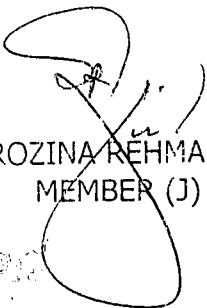
ADJUTANT GENERAL
Khyber Pakhtunkhwa
Service Commission
Peshawar


6

was supposed to replace his co-warder at 3.00pm sharp, but he turned up with delay of 32 minutes, which resulted into a scuffle between them and the appellant snatched rifle of his co-warder and loaded it and tried to open fire on him, but other officials present on the spot snatched rifle from the appellant and reported the issue to the high ups. Placed on record is charge sheet/statement of allegations, as well as show cause notice, but record is silent as to whether the same were served upon the appellant, or not. Placed on record is also an inquiry report, which shows that the appellant was called for personal hearing but he did not turn up, hence ex-parte action was recommended against him. We have observed that the incident took place in Sub-Jail Dasso, thereafter the appellant was transferred to Lakki Jail and it is not clear as to whether the appellant was associated with the proceedings or ex-parte action was concluded against the appellant. We are of the opinion that the appellant has not been treated in accordance with law and was not afforded appropriate opportunity to defend his cause.


06. In view of the foregoing discussion, the instant appeal is partially accepted. The appellant is re-instated into service with direction to respondents to conduct de-novo inquiry in accordance with law by affording appropriate opportunity of defense. Needless to mention that the issue of back benefits would be conditional with the outcome of de-novo proceedings. Parties are left to bear their own costs. File be consigned to record room.


ANNOUNCED
03.12.2021

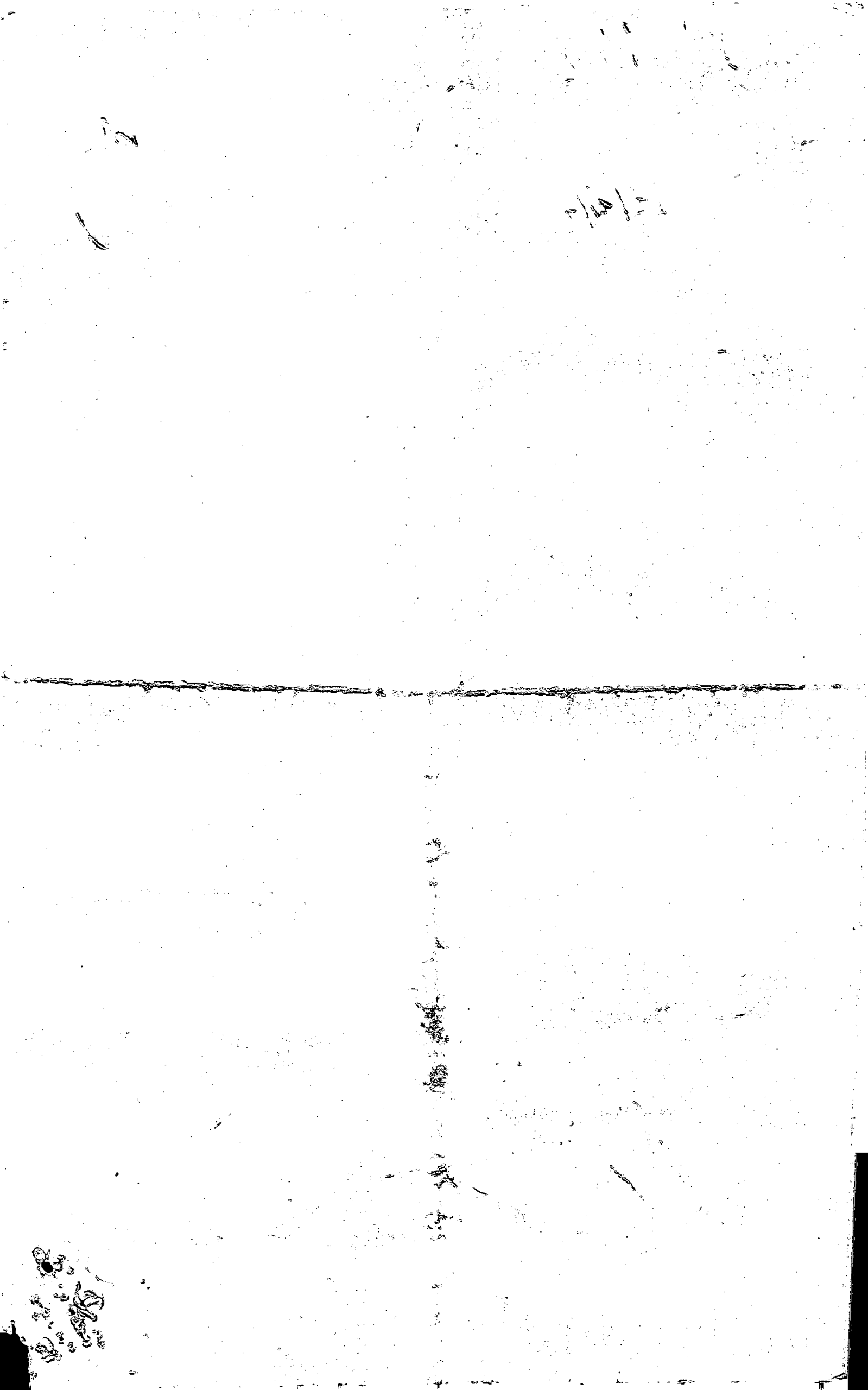

(ROZINA REHMAN)
MEMBER (J)


(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)
6/12/21
2000

22-
22


20/12/21
20/12/21


Chief of Police (J) (192 601)
Khyber Pakhtunkhwa
Government
Peshawar



WAKALAT NAMA

IN THE COURT OF Service Tribunal

Peshawar

Ishtay Zaman Appellant(s)/Petitioner(s)

VERSUS

The Inspector General

P

Respondent(s)

I/We _____ do hereby appoint **Mr. Ashraf Ali Khattak, Advocate Supreme Court of Pakistan, Mr. Ali Bakht Mughal, Advocate & Sadia Umar Advocate** Peshawar in the above mentioned case, to do all or any of the following acts, deeds and things.

1. To appear, act and plead for me/us in the above mentioned case in this Court/Tribunal in which the same may be tried or heard and any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions, appeals, affidavits and applications for compromise or withdrawal or for submission to arbitration of the said case, or any other documents, as may be deemed necessary or advisable by them for the conduct, prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may be or become due and payable to us during the course of proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from the prosecution of the said case if the whole or any part of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama hereunder, the contents of which have been read/explained to me/us and fully understood by me/us this _____

Attested & Accepted by

Ishtay Zaman

Signature of Executants

Ashraf Ali Khattak

Ashraf Ali Khattak,
Advocate,
Supreme Court of Pakistan

Ali Bakht Mughal

Advocate, Peshawar

Sadia Umar Advocate

AA₁G

BEFORE THE KHYBER PAKHTUNKHEA SERVICE TRIBUNAL, PESHAWAR

Execution Petition No. 553 /2022
IN
SERVICE APPEAL No.1509/2018

Israr Zuman S/o Khan Zaman,
Ex-Warder, District Jail Lakki,
District Lakki Marwat.....Applicant/Petitioners.

Versus

1. The Inspector General, Prison, Govt. of Khyber Pakhtunkhwa.
2. The Superintendent, Circle H.Qs, Prison, Haripur.
3. The Superintendent, Sub-Jail, Dassu Kohistan, District Kohistan.
4. The Superintendent, Circle Head Quarter, Prison, Bannu.
5. The Superintendent, District Jail Lakki,
District Lakki Marwat.....Respondents.

APPLICATION FOR EXECUTION OF THE ORDER OF THIS
HONOURABLE TRIBUNAL DATED 03-12-2021 PASSED IN
SERVICE APPEAL NO. 1509/2018.

Respectfully Sheweth.

Facts giving rise to the present petition are as under:-

1. That the applicant filed the above titled service appeal before this Hon'ble Tribunal which was partially accepted by this Hon'ble Tribunal vide Order/Judgment dated 03-12-2021.
Copy of Order / Judgment dated 03-12-2021 is attached as Annexure-A.
2. That this Hon'ble Tribunal was pleased to partially allow the service appeal in following words:

"06. In view of the foregoing discussion, the instant appeal is partially accepted. The appellant is re-instated into service with direction to respondents to conduct de-novo inquiry in accordance with law by affording appropriate opportunity of defense. Needless to mention that the


issue of back benefits would be conditional with the outcome of de-novo proceedings. Parties are left to bear their own costs. File be consigned to record room."

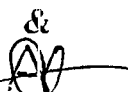
3. That after obtaining the attested copy of the order, applicant approached the respondents and requested to act upon the directions of this Hon'ble Tribunal but respondents not only failed to comply with the same but they ridiculed the order.
4. That the acts and actions of the respondents squarely fall within the ambit of the Contempt of the Court and as such they are liable to be proceeded for the Contempt and for the punishment under the law.

It is therefore, humbly prayed that on acceptance of this application, this Hon'ble Tribunal may graciously be pleased to direct the respondents to implement the Judgment of this Hon'ble Tribunal dated 03-12-2021 in its true spirit and submit the compliance report before the this Hon'ble Tribunal forthwith.


Applicant

Through


Ashraf Ali Khattak
Advocate,
Supreme Court of Pakistan

&

Ali Bakht Mughal
Advocate, Peshawar

Dated: _____ / 08/ 2022

BEFORE THE KHYBER PAKHTUNKHEA SERVICE TRIBUNAL, PESHAWAR

Execution Petition No. _____/2022

IN

SERVICE APPEAL No.1509/2018

Israr Zuman,.....Applicant/Petitioners.

Versus

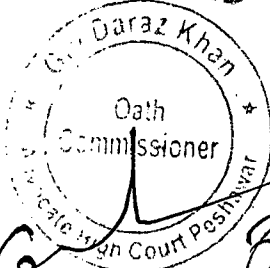
The Inspector General.

Prison, Khyber Pakhtunkhwa and othersRespondents.

AFFIDAVIT

I, Israr Zaman S/o Khan Zaman Ex-Warder District Jail, Lakky Marwat, do hereby solemnly affirm 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 the notice of this Hon,ble Tribunal.

Israr Zaman
DEPONENT,

ATTESTED

 19/8



BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1509/2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1757

Dated 14-12-2018

Israr Zuman S/o Khan Zuman,
Ex-Warder District Jail Lakki,
District Lakki Marwat

Appellant

Versus

1. The Inspector General Prison, Govt. of Khyber Pakhtunkhwa.
2. The Superintendent, Circle H. Qs, Prison, Haripur.
3. The Superintendent, Sub-Jail Dassu Kohistan, District Kohistan.
4. The Superintendent Circle Head Quarter Prison, Bannu.
5. The Superintendent District Jail Lakki, District Lakki Marwat Respondents

SERVICE APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTUNKHWA SERVICE TRIBUNALS ACT, 1974 READ WITH RULE 19 OF THE KHYBER PAKHTUNKHWA GOVERNMENT SERVANTS (EFFICIENCY AND DISCIPLINE) RULES, 2011 AGAINST THE IMPUGNED FINAL REJECTION 'ORDER NO. Estb/Ward/Order/29039 DATED 04-10-2018 COMMUNICATED ON 20-11-2018 BY ASSISTANT SUPERINTENDENT DISTRICT JAIL LAKKI NAMELY RAIZ KHAN AT HIS OFFICE ON THE REQUEST OF THE APPELLANT; MADE/ISSUED ON THE DEPARTMENTAL APPEAL OF THE APPELLANT FILED AGAINST THE ORIGINAL IMPUGNED ORDER NO.1464 DATED 19-07-2018 OF RESPONDENT NO.2.

ATTESTED

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Israr Zuman
14/12/18

Israr Zuman
20/11/18

HAKKI

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1509/2018

Date of Institution ... 14.12.2018

Date of Decision ... 03.12.2021



Israr Zaman S/o Khan Zaman Ex-Warder District Jail Lakki, District Lakki Marwat.
... (Appellant)

VERSUS

The Inspector General Prisons Government of Khyber Pakhtunkhwa and four others.
... (Respondents)

Ashraf Ali Khattak,
Advocate ... For Appellant

Muhammad Adeel Butt,
Additional Advocate General ... For Respondents

ROZINA REHMAN ... **MEMBER (JUDICIAL)**
ATIQ-UR-REHMAN WAZIR ... **MEMBER (EXECUTIVE)**

JUDGMENT

ATIQ-UR-REHMAN WAZIR MEMBER (E):- Brief facts of the

case are that the appellant was initially appointed as Warder on 26-01-2015 in Prison Department. During the course of his service, the appellant was proceeded against on the charges of misconduct and was ultimately removed from service vide order dated 19-07-2018. Feeling aggrieved, the appellant filed departmental appeal dated 04-10-2018 which was dismissed, hence the instant service appeal with prayers that the impugned orders dated 19-07-2018 and 04-10-2018 may be set aside and the appellant may be re-instated in service with all back benefits.

02. Learned counsel for the appellant has contended that the respondents have not treated the appellant in accordance with law and have acted in violation of

ATTESTED

ATTESTATION OFFICER
Khyber Pakhtunkhwa Service Tribunal Peshawar

Article-4 of the Constitution; that Khyber Pakhtunkhwa Government Servant (Efficiency & Discipline) Rules, 2011 provides for a prescribed mechanism for proceeding against a civil servant, but such procedure has not been adopted by the respondents, therefore the order of removal from service is nullity in the eye of law and liable to be set aside; that malafide of the respondents is evident from the fact that the impugned order of removal from service was not communicated to the appellant and he has acquired the same through his personal efforts; that no inquiry was conducted nor any opportunity was afforded to the appellant to defend his cause, thus the appellant was condemned unheard; that departmental appeal of the appellant was rejected without any cogent reason.

03. Learned Additional Advocate General for the respondents has contended that the appellant was removed from service based on an inquiry conducted against him; that the appellant in a brawl with his co-warder on the issue of late coming to duty, snatched his rifle and had attempted to kill his co-warder in presence of witnesses, who however was rescued by other officials present on the spot; that the inquiry committee found him a habitual deserter and a problematic official and was recommended for major punishment; that charge sheet/statement of allegations was served upon the appellant, but he did not respond; that a proper show cause notice was also served upon the appellant and the appellant was afforded ample opportunity of defense, but the appellant failed to prove his innocence; that the appellant has been treated in accordance with law and all the codal formalities as required under the law have been fulfilled.

04. We have heard learned counsel for the parties and have perused the record.

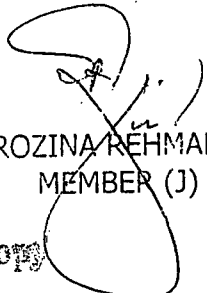
05. Record reveals that the appellant was appointed as warder on 26-01-2015. During the course of his service, the appellant was proceeded against on the charges of misconduct and was removed from service, who however was reinstated in service and was deputed to serve on main gate of the jail. The appellant


U

was supposed to replace his co-warder at 3.00pm sharp, but he turned up with delay of 32 minutes, which resulted into a scuffle between them and the appellant snatched rifle of his co-warder and loaded it and tried to open fire on him, but other officials present on the spot snatched rifle from the appellant and reported the issue to the high ups. Placed on record is charge sheet/statement of allegations, as well as show cause notice, but record is silent as to whether the same were served upon the appellant, or not. Placed on record is also an inquiry report, which shows that the appellant was called for personal hearing but he did not turn up; hence ex-parte action was recommended against him. We have observed that the incident took place in Sub-Jail Dasso, thereafter the appellant was transferred to Lakki Jail and it is not clear as to whether the appellant was associated with the proceedings or ex-parte action was concluded against the appellant. We are of the opinion that the appellant has not been treated in accordance with law and was not afforded appropriate opportunity to defend his cause.

06. In view of the foregoing discussion, the instant appeal is partially accepted. The appellant is re-instated into service with direction to respondents to conduct de-novo inquiry in accordance with law by affording appropriate opportunity of defense. Needless to mention that the issue of back benefits would be conditional with the outcome of de-novo proceedings. Parties are left to bear their own costs. File be consigned to record room.

ANNOUNCED
03.12.2021



(ROZINA REHMAN)
MEMBER (J)


(ATIQ-UR-REHMAN WAZIR)
MEMBER (E)
6/12/21
2000

Identified to be true copy

22-

22


20/12/21
20/12/21

MEMBER
Social Tribunal
Peshawar

WAKALAT NAMA

IN THE COURT OF Service Tribunal

Peshawar

ISTAY Zaman Appellant(s)/Petitioner(s)

VERSUS

The Inspector General

P

Respondent(s)

I/We _____ do hereby appoint
Mr. Ashraf Ali Khattak, Advocate Supreme Court of Pakistan, Mr. Ali
Bakht Mughal, Advocate & Sadia Umar Advocate Peshawar in the
above mentioned case, to do all or any of the following acts, deeds and
things.

1. To appear, act and plead for me/us in the above mentioned case in
this Court/Tribunal in which the same may be tried or heard and
any other proceedings arising out of or connected therewith.
2. To sign, verify and file or withdraw all proceedings, petitions,
appeals, affidavits and applications for compromise or withdrawal
or for submission to arbitration of the said case, or any other
documents, as may be deemed necessary or advisable by them for
the conduct. prosecution or defence of the said case at all its stages.
3. To receive payment of, and issue receipts for, all moneys that may
be or become due and payable to us during the course of
proceedings.

AND hereby agree:-

- a. That the Advocate(s) shall be entitled to withdraw from
the prosecution of the said case if the whole or any part
of the agreed fee remains unpaid.

In witness whereof I/We have signed this Wakalat Nama
hereunder, the contents of which have been read/explained to
me/us and fully understood by me/us this _____

Attested & Accepted by

ISTAY Zaman
Signature of Executants

Ashraf Ali Khattak
Ashraf Ali Khattak,
Advocate,
Supreme Court of Pakistan

& Ali Bakht Mughal
Ali Bakht Mughal
Advocate, Peshawar

Sadia Umar Advocate

DBI

1

BEFORE THE KHYBER PAKHTUNKHEA SERVICE
TRIBUNAL, PESHAWAR



put up to the court with
relevant appeal.

Misc: Application No...../2021

IN

SERVICE APPEAL No.1505/2018

13/9/2021
Israr Zuman,
Ex-Warder.....Applicant/Petitioners.

Versus

The Inspector General,
Prison, Khyber Pakhtunkhwa and othersRespondents.

APPLICATION FOR EARLY HEARING.

Respectfully Sheweth,


Facts giving rise to the present application are as under:-

1. That the titled service appeal has been pending before this Honorable Court, which has been fixed for 03-12-2021.
2. That appellant has been removed from service vide order dated 19-07-2018 and till than he is jobless.
3. That applicant is very poor fellow and is with burden of 03 minor school going children and wife.
4. That applicant has been pursuing his remedy before this Hon'ble Tribunal since, 2018 and number of times final arguments were adjourned.
5. That applicant cannot afford lengthy adjournments because of un-employment.

For the aforesaid reasons, it is therefore, humbly prayed that on acceptance of this application/petition, this Hon'ble Tribunal may graciously be pleased to fix the titled service appeal at earliest possible date.


Applicant/Petitioner

Through


Ashraf Ali
Advocate,
Supreme Court of Pakistan.

Dated: _____ / 09 / 2021

NPA
22/9/2021

Reader

**BEFORE THE KHYBER PAKHTUNKHEA SERVICE
TRIBUNAL, PESHAWAR**

Misc: Application No...../2021

IN

SERVICE APPEAL No.1505/2018

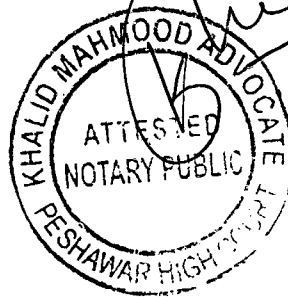
Israr Zuman,
Ex-Warder.....Applicant/Petitioners.

Versus

The Inspector General,
Prison, Khyber Pakhtunkhwa and othersRespondents.

Affidavit

I, Israr Zaman S/o Khan Zaman Ex-Warder District Jail, Lakky Marwat, do hereby solemnly affirms 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 the notice of this Hon,ble Tribunal.



Israr Zaman?
Deponent