

BEFORE THE KHYBER PAKHTUNKHWA,
SERVICE TRIBUNAL PESHAWAR.

SCANNED
KPST
Peshawar

Service appeal No. 2413/2021

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 1838
Dated 2/11/2022

Syed Hussain Ali Shah Appellant.

Versus

District & Sessions Judge Shagla and others Respondents.

SERVICE APPEAL

Written reply of above captioned appeal from respondent No.3, SARTAJ

Respect fully sheweth:

1. That para No. 01, is not about respondent No. 03 and need no reply.
2. That seniority list prepared by respondent No. 02 was against Law and Rules because respondent No. 03 was appointed on 09.09.1996 while appellant was appointed on 13.03.2004.
3. That the order of respondent No. 02, dated 04.09.2020 vide which objection petition of respondent No. 03 was dismissed, was not according to law and rules, rest of the para is correct.
4. That para No. 04 is correct.
5. That para No. 05 needs no reply.
 - A. Para 'A' is incorrect hence denied.
 - B. Para 'B' is incorrect hence denied.
 - C. Pare 'C' is incorrect hence denied.

D. Para 'D' is incorrect hence denied.

E. Para 'E' is incorrect respondent No. 03 was appointed on 09.09.1996 while appellant was appointed on 13.03.2004, so respondent No. 03 is senior than appellant hence, para E is denied.

F. Para 'F' has no concerned with respondent No. 03 hence needs no reply.

G. Para 'G' needs no reply from respondent No. 03.

It is therefore most humbly prayed that, on acceptance of this written reply, the above mentioned service appeal may kindly be dismissed with cost.

[Signature]

Respondent No. 03

Sartaj

15504-2231315-3

02-11-022

Affidavit :-

I do hereby solemnly affirm & declare on oath that the contents of instant written reply are true & correct to the best of my knowledge & belief.

Deponent
Sartaj *[Signature]*

