

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

CM _____ In

Appeal No _____.

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 2721

Muhammad Rafiq Khattak Ex- Director Elementary and Secondary Education Khyber
Pakhtunkhwa Peshawar

Appellant

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariate Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Civil Secretariate Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department Civil Secretariate Peshawar.

..... **Respondents**

APPLICATION FOR PLACING ADDITIONAL DOCUMENTS ON RECORD AND TO BE READ AS PART AND PARCEL OF THE TITLED SERVICE APPEAL

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Petitioner

Through

Ahmad Farooq Khattak

Advocate Supreme Court

Date:23/01/2023

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

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Muhammad Rafiq Khattak Ex- Director Elementary and Secondary Education Khyber
Pakhtunkhwa Peshawar

_____ **Appellant**

Versus

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2. The Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Civil Secretariate Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department Civil Secretariate Peshawar.

..... **Respondents**

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DOCUMENTS ON RECORD AND TO BE READ AS PART
AND PARCEL OF THE TITLED SERVICE APPEAL

Respectfully Sheweth

1. That the above Service Appeal is pending adjudication before this Honourable Tribunal and is fixed for 05/01/2023
2. That the annexed documents are very essential for the judgement of the case and the documents are as follow:

I. That the appellant has applied for the provision of attested copies of the documents and submitted applications to Secretary E&SE and Secretary Establishment Government of Khyber Pakhtunkhwa under RTI Act. **Annexure A, B.**

II. That the appellant has applied for the provision of attested copies of the documents and submitted applications to Public Information Officer E&SE and Establishment Government of Khyber Pakhtunkhwa under RTI Act. **Annexure C, D.**

III. That Public Information Officer Establishment department also sent a letter and reminder to Section Officer E-1 Establishment department for provision of documents under RTI Act. **Annexure E.**

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL
PESHAWAR

CM _____ In
Appeal No _____.

Muhammad Rafiq Khattak Ex- Director Elementary and Secondary Education Khyber
Pakhtunkhwa Peshawar

_____ **Appellant**

Versus

1. Government of Khyber Pakhtunkhwa through Chief Secretary Civil Secretariate Peshawar.
2. The Secretary to Government of Khyber Pakhtunkhwa, Elementary and Secondary Education Civil Secretariate Peshawar.
3. The Secretary to Government of Khyber Pakhtunkhwa, Establishment Department Civil Secretariate Peshawar.

..... **Respondents**

APPLICATION FOR PLACING ADDITIONAL
DOCUMENTS ON RECORD AND TO BE READ AS PART
AND PARCEL OF THE TITLED SERVICE APPEAL

AFFIDAVIT

I, Muhammad Rafiq Khattak S/o Niaz Khamim solemnly declare and Verified on Oath that the contents of the **Application** in case titled Service Appeal, Muhammad Rafiq Khattak VS Government of Khyber Pakhtunkhwa and others are true and correct to the best of my knowledge and nothing has been concealed from this Honourable Tribunal either intentionally or otherwise.


Appellant

Muhammad Rafiq Khattak
S/o Niaz Khamim
CNIC No. 14202-1351240-7
Cell No. 03315763850

Identified by

Ahmad Farooq Khattak
Advocate Supreme Court

It is therefore most humbly prayed that on acceptance of this application the petitioner may very kindly be allowed to file the annexed documents before this Honorable Tribunal and be read as part and parcel of the Service appeal and may be treated accordingly.

It is also humbly prayed that the this hourable Tribunal may order the Secretary Establishment to provide the document to this hourable Tribunal.



Appellant

Through

Ahmad Farooq Khattak

Advocate Supreme Court

RTI Application Form (Optional)

RTI Form No: _____

The Secretary,
Establishment Department Establishment Department,
Government of Khyber Pakhtunkhwa
Address: Civil Secretariate Peshawar

Subject: Request for information under KP RTI Act 20113.

Dear Sir/Madam,

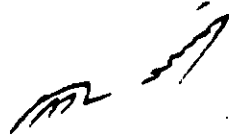
In accordance with the right of access to information granted to citizens under the Khyber Pakhtunkhwa RTI Act 2013, I would like to request for following information:

Photo Copies of "Complete file for Award of BPS -21 on Meritorious Services in respect of Muhammad Rafiq Khattak the then Director Elementary and Secondary Education Khyber Pakhtunkhwa submitted by Section Officer (Schools Male) Government of Khyber Pakhtunkhwa Elementary and Secondary Education vide No SO(S/M) E&SED1-1/2017/W. P of Rafiq Khattak dated Peshawar the 28/3/2017 received to Section Officer (E-1) Establishment Department, Government of Khyber Pakhtunkhwa one 28/3/2017".(Copy attached for ready Reference)

Please send the information to my below address by registered post within the stipulated time mentioned under section 11 of the KP RTI Act, 2013.

Yours faithfully,

Signature



Name **Muhammad Rafiq Khattak**

CNIC No. **14202-1351240-7.**

Phone No./Email **03315763850 Email rafiq_kk851@yahoo.com.**

Address **House No 155A Street No.6 Sector E-2
Phase-1 Hayatabad Peshawar**

Date: **7th October, 2022**

**Acknowledgement Receipt (To be
filled-in by FO)**

Date received _____ RTI Form/Ref No. _____

Short description of the information sought: **Complete file for Award of BPS -21
on Meritorious Services in respect of Muhammad Rafiq Khattak**

Expected Date of delivery of requested information _____

Receiving Officer _____ Signature: _____

Guidelines for Applicants

(Read carefully before filing an RTI request)

1. It is your fundamental right to access information from public bodies under Article 19-A of the Constitution as well as under the KP Right to Information Act 2013.
2. This form is optional. You can also submit a Right to Information (RTI) application on a plain paper by describing the information that you need and by providing your contact details.
3. It is a duty of the Public Information Officer (PIO) to assist you in writing your application if you are illiterate or disable or you find it difficult to describe in sufficient detail the information that you need.
4. The RTI application should be submitted to the Public Information Officer (PIO) of the public body from which you need the required information. For the name and contact details of the concerned PIO, please visit the website of relevant public body or of the KPIC website (www.kprti.gov.pk) or contact the public body personally or through phone.
5. If you submit your application personally, you must insist on getting a signed and dated acknowledgement from the concerned PIO. You may also submit your application through a registered mail or any other means as may be prescribed. The PIO shall acknowledge the receipt of application in the same manner it is received.
6. You are not required to pay any fee for submitting the application. However, after your application has been accepted, the PIO may ask you to pay actual charges of reproduction of information; as per the Schedule of Costs notified by the KP Information Commission on their website (www.kprti.gov.pk).
7. If your application is in accordance with the law, you should get the requested information within 10 or maximum 20 working days.
8. You are entitled to get certified copies of requested information.
9. In case of rejection of your application, it is a responsibility of the PIO to explain the reasons to you in writing referring to the section of the Act relied upon for such refusal.
10. If your application is rejected or if you do not get the requested information within the prescribed time duration or if you have another complaint in respect of the processing of your application, you can directly submit a complaint to the KP Information Commission.
11. It is a responsibility of the PIO to explain how you can submit a complaint to the Commission.

RTI Application Form (Optional)

RTI Form No: _____

The Public information Officer

**Establishment Department Establishment Department, Government of
Khyber Pakhtunkhwa**
Address: Civil Secretariate Peshawar

Subject: Request for information under KP RTI Act 20113.

Dear Sir/Madam,

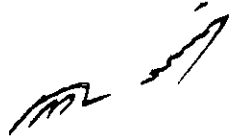
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Phone No./Email **03315763850 Email rafiq_kk851@yahoo.com.**

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RTI Form No: _____

**The Secretary
Elementary and Secondary Education Department,
Government of Khyber Pakhtunkhwa.**

Address: Civil Secretariate Peshawar

Subject: Request for information under KP RTI Act 20113.

Dear Sir/Madam,

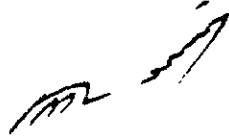
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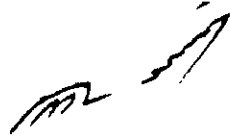
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