# BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

In Re S.A No. 613/2023.

. A.

Zaheer Ahmad S/o Basheer Ahmad Ex-Constable No.4792 of KPK Hazara Range R/o Sikandarpur District Hari Pur.

Appellant

#### VERSUS

1. IGP Khyber Pakhtunkhwa Central Police Office Peshawar.

2. Commandant FRP Khyber Pakhtunkhwa Peshawar.

3. Superintendant of Police FRP Haripur

۶Į

Respondents

	 <u>INDEX</u>	ţ
-		

S#	Description of Documents	Annexure	Pages
1.	Application for amendment along with affidavit		1-2
2.	Copy of service appeal and objection.		3-6
3.	Order sheet		
4.	Wakalatnama	·	7-9

Through

APPELLANT

Muhammad Ishaq Batagami Advocate, High Court Hari Pur Cell: 0305-8742022

Dated: 08/05/2023

## BEFORE THE HON'BLE SERVICE TRIBUNAL PESHAWAR

In Re S.A No. 613/2023

Zaheer Ahmad S/o Basheer Ahmad Ex-Constable No.4792 of KPK Hazara Range R/o Sikandarpur District Hari Pur.

### Appellant

#### VERSUS

- 1. IGP Khyber Pakhtunkhwa Central Police Office Peshawar.
- 2. Commandant FRP Khyber Pakhtunkhwa Peshawar.
- 3. Superintendant of Police FRP Haripur

14

Respondents

## APPLICATION FOR AMENDMENT IN SERVICE APPEAL NO.613/23 AND TO PERMISSION TO ARAY AS PARTY IN RESPONDENT SECRETARY HOME AND TRIBAL AREA PESHAWAR AND DPO HARIPUR

## Respectfully Sheweth,

- 1. It is submitted that the above cited service appeal is subjudice and this Hon'ble Court and next date 25.05.2023 is fixed an Abbottabad. Other service appeal of Shah Zeb and Qasim Chandio are also pending regarding the same FIR allegation which are admitted for regular hearing.
- 2. That at the time of drafting this appeal mistakenly the dismissal order No.306-11/EC.FRP dated 11.02.2022 of SP, FR Hazara Region Abbottabad and appellate / Commondent FRP, FR Police KP Peshawar order No.310 20.04.2022 were not mentioned and the remedy was also not sought properly. And the above mentioned /persons/officers/official. The above mentioned officer ware not as party properly in the service appeal in shape of respondent who are proper and necessary party who are required to be made party for the ends of justice.
- 3. That the proper remedy and contents in the service appeal was also not sought clearly mistakenly.

4. That the error and mistaken is human being and not deliberately which may be removed for the ends of Justice and amendment may graciously be permitted in the above service appeal.

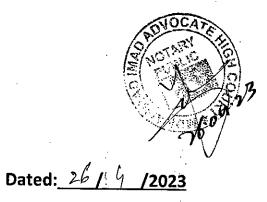
So it is requested that the said amendment may graciously be granted / permitted for the ends of Justice.

Applicant / Appellant Zaheer Ahmed Through Muhammad Ishaq (Battgrami) Advocate High Court for appellant

#### **AFFIDAVIT**

(

I Zaheer Ahmed S/o Basheer Ahmed (Ex) Constable 4792 R/o Sikandarpur Tehsil and District Haripur. Hereby verified on oath that the contents of the following application is true and correct and nothing has been concealed from this honorable Court.



\_ · A

DEPONENT Zaheer Ahmed CNIC No 13302-0391204-7