

HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

M.A

IN

Service Appeal No:734/2023

Awais Khan Khattak Appellant

Versus

Govt. of Khyber Pakhtunkhwa
Through Secretary, Higher Education
& others.....

Respondents

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Respondent

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Khyber Pakhtunkhwa
Service Tribunal

M.A
IN

S.A # 734/2023

Awais Khan Khattak

Diary No. 6950

Dated 10/08/23
Applicant

Versus

Govt. of Khyber Pakhtunkhwa

Through Secretary, Higher Education Peshawar

& Others..... Respondents

SUBJECT: REPLY TO MISCELLANEOUS APPLICATION ON BEHALF OF RESPONDENT

NO.1 & 4

Respectfully Sheweth: -

Preliminary Objections:-

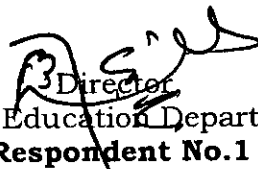
1. That the applicant has got no cause of action/locus standi to file the instant Service application.
2. That the applicant has not come to this Honourable Tribunal with clean hands and is trying to conceal material facts.
3. That the applicant is estopped by his own conduct to file the instant service application.

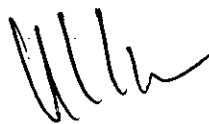
Facts: -

- 1) Para 1 is Correct.
- 2) Para 2 is Incorrect.
- 3) Para 3 is Incorrect.

Prayer: -

It is, therefore, humbly prayed that the instant application my kindly be dismissed.


Director
Higher Education Department,
Respondent No.1


Secretary,
Higher Education Department,
Respondent No. 2

HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

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IN

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AFFIDAVIT

I, Mr. Muhammad Sohrab Khan, Lecturer in Law (BPS-17), Higher Education Department do hereby declare and affirm on oath that the contents of Reply to Miscellaneous Application are correct to the best of my knowledge and belief that nothing has been concealed from this Honourable Court.

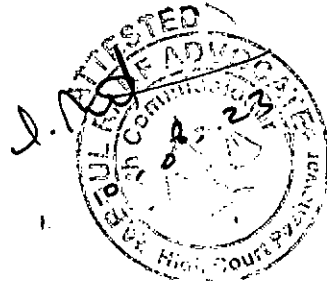
It is further stated on oath that in this appeal, the answering respondents have neither been placed ex-parte nor their defense has been struck off, or costs.

Identified by:

Sohrab

Deponent

CNIC # *17307-6418910-9*
Contact # 0321-5778226





**DIRECTORATE OF HIGHER EDUCATION
KHYBER PAKHTUNKHWA
RANO GHARI, CHAMKANI STOP, PESHAWAR**

Tel # 091-2650024 / Fax # 091-2260181

E-mail:- dhekpkesh@gmail.com Facebook.com/dhekpkeshwar Twitter.com/dhekpkeshwar1

AUTHORITY LETTER

Mr. Muhammad Sohrab Khan, Lecturer in Law (BPS-17),
Govt; Degree College, Mathra is hereby authorised to submit
Reply to Miscellaneous Application in SA#734/2023 titled
Awais Khan Khattak versus Govt: Khyber Pakhtunkhwa on
behalf of respondents.

Director,

Directorate of Higher Education,
Khyber Pakhtunkhwa Peshawar