

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

**Appeal No. 330/2023**

Najam Uz Zaman.....Appellant  
V/S

Govt: Of Khyber Pakhtunkhwa, through Chief Secretary,  
Peshawar & others.....Respondents

(Reply on behalf of Respondent No.3)

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*Ymmi*  
Deponent

28/09/23  
Peshawar.

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(Reply on behalf of Respondent No.3)

Respectfully Sheweth:-

Para: - 1 to 8:-

It is submitted that the matter in hand relates to Respondent No.1 & 2 and they are in better position to satisfy the grievance of the appellant being an Administrative Department. Besides, the appellant has raised no grievance against Respondent No.3.

It is pertinent to mention here that letter No. SOSR-II/FD-1-6/2022 dated: 19.01.2023 issued by Finance Department, Peshawar [REDACTED] is very much clear and gets finality.

Keeping in view the above mention facts it is therefore humbly prayed that the name of Respondent No.3 may kindly be deleted from the array of the Respondent.



ACCOUNTANT GENERAL  
KHYBER PAKHTUNKHWA

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 7710

Dated 20/09/23

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR

Appeal No. 330/2023

Najam Uz Zaman.....Appellant  
V/S

Govt: Of Khyber Pakhtunkhwa, through Chief Secretary,  
Peshawar & others.....Respondents

(Reply on behalf of Respondent No.3)

**AFFIDAVIT**

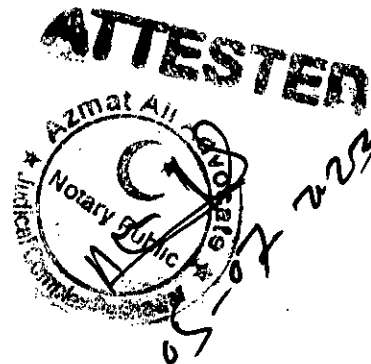
I, Syed Tariq Shah, Senior Auditor, Office of the Accountant General Khyber Pakhtunkhwa Peshawar do hereby solemnly affirms & declare that the contents of reply submitted on behalf of Respondent No.3 is true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Court.

It is further stated on oath that in this appeal the answering respondent have neither been placed Ex-part nor their defense have been struck off.

*Y. Tariq Shah*  
Deponent

Nic - 17307 - 132 7637 - 9

cell . 0346 9191 985



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Amber



**GOVERNMENT OF KHYBER PAKHTUNKHWA  
FINANCE DEPARTMENT**

Finance Department Civil Secretariat Peshawar <http://www.finance.gkp.pk> [facebook.com/GoKPTD](https://www.facebook.com/GoKPTD) [twitter.com/GoKPTD](https://twitter.com/GoKPTD)

NO.SOSR-JMFD/1-6/2022

Dated Peshawar the 19.01.2023

To  
Muhammad Haroon,  
Assistant Director, FMU, Finance Department,  
Khyber Pakhtunkhwa.

Subject:- DEPARTMENTAL APPEAL FOR COUNTING OF PREVIOUS SERVICE TOWARDS PENSION (I.E FROM THE DATE OF FIRST APPOINTMENT ON 01<sup>ST</sup> JULY, 2008.

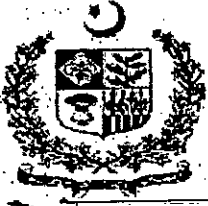
Dear Sir,

I am directed to refer to your application regarding departmental appeal for counting of previous service towards pension (i.e from the date of first appointment on 01<sup>st</sup> July, 2008) and to state that the subject case is not covered under the rules/policy, hence, regretted, please.

Yours faithfully,

SECTION OFFICER (SR.II)

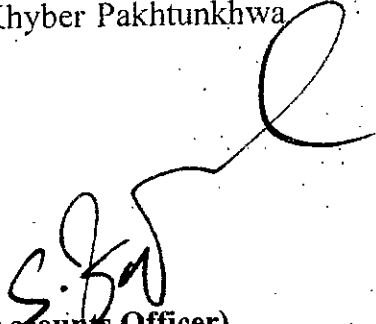
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Office of the  
**Accountant General**  
Fort Road, Khyber Pakhtunkhwa  
Peshawar Pakistan  
Phone: 091 9211250-54

**AUTHORITY LETTER**

Mr. Syed Tariq Shah, Senior Auditor, (BPS-17) Office of the Accountant General Khyber Pakhtunkhwa Peshawar is hereby authorized to attend the Khyber Pakhtunkhwa Service Tribunal Peshawar on behalf of this office.

  
(Accounts Officer)  
Litigation Section  
O/o the Accountant General  
Khyber Pakhtunkhwa  
Peshawar