

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

**Service Appeal No.508/2021**

**Sher Khan,  
Computer Operator ,  
Office of the Advocate General,  
Khyber Pakhtunkhwa, Peshawar.  
R/o Lalazar Colony, University Campus,  
Peshawar**

**.....Appellant**

**Versus**

**Secretary,  
Govt. of Khyber Pakhtunkhwa,  
Law, Parliamentary Affairs and  
Human Rights Department Peshawar etc**

**-----Respondents**

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**Appellant**  
**Through**  
**Qazi Jawaz Ehsanullah,**  
**Advocate Supreme Court of**

**Pakistan**

**&**  
**Mian Zakir Hussain**  
**Advocate High Court**

**Dated: 4 / 10/ 2023**

*20-10-23  
Peshawar.*

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

Khyber Pakhtunkhwa  
Service Tribunal

**SERVICE APPEAL NO.508/2021**

Date: 8/5/21

Dated: 06-10-23

Sher Khan,  
Computer Operator ,  
Office of the Advocate General,  
Khyber Pakhtunkhwa, Peshawar.  
R/o Lalazar Colony, University Campus,  
Peshawar

.....Appellant

Versus

1. The Secretary,  
Govt. of Khyber Pakhtunkhwa,  
Law, Parliamentary Affairs and  
Human Rights Department Peshawar.
2. The Advocate General,  
Khyber Pakhtunkhwa, Peshawar

.....Respondents

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**REPLY ON BEHALF OF PETITIONER/APPELLANT REGARDING  
IMPLEADMENT APPLICATION OF MR. ZIA KHAN WEB ADMINISTRATOR  
(BPS-17) AND MR. AHMAD KHAN PROGRAMMER (BPS-17)**

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**Respectfully Sheweth,**

**Preliminary objections:**

- 1- Application is misconceived and is liable to be dismissed.
- 2- The appellant is neither a necessary nor a proper party to the *lis*.
- 3- In the subject appeal the appellant is only praying for his personal right of back benefits which have been wrongfully denied to him through impugnd order. This plea has got no nexus whatsoever with the applicants.

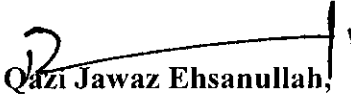
**ON FACTS:**

- A. Correct
- B. Correct.

- C. Correct.
- D. Misconceived, hence denied.
- E. Incorrect, hence denied.

It is therefore humbly prayed that on acceptance of this reply on behalf of petitioner the respondents may not be impleaded in the appellant case.

Appellant  
Through

  
Qazi Jawaz Ehsanullah,  
Advocate Supreme Court of Pakistan

  
Mian Zakir Hussain  
Advocate High Court

Dated: 4 / 10 / 2023

**Affidavit:**

I, Sher Khan (Computer Operator), Office of the Advocate General, Khyber Pakhtunkhwa, Peshawar., do hereby solemnly affirms that the contents of instant reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT

17361-8869629-1

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5-16-23

D.O. 2023  
20/2/23

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

C.M NO. \_\_\_\_\_ / 2023

IN

APPEAL NO.508/2021,

SHER KHAN.....APPELLANT

**VERSUS**

GOVERNMENT OF KPK & OTHERS.....RESPONDENTS

**APPLICATION FOR IMPLEADMENT OF MR. ZIA ULLAH WEB  
ADMINISTRATOR (BPS-17) AND AHMED KHAN COMPUTER  
PROGRAMMER (BPS-17) ADVOCATE GENERAL OFFICE  
PESHAWAR IN THE PANEL OF RESPONDENTS IN THE ABOVE  
TITLED APPEAL.**

**R/SHEWETH:**

The applicant submits as under:

- 1- That the above mentioned Appeal is pending adjudication before this august Tribunal which was fixed for hearing on 28.02.2023.
- 2- That the applicant filed the above titled appeal for their back benefits as well as promotions from back dates.
- 3- That the applicants are the necessary parties as the valuable rights of the applicants are involved in the instant service appeal as if the same is allowed the applicants would be affected.
- 4- That propriety, fair play and justice demands that the above noted persons be impleaded as parties/respondents in the above mentioned appeal.

It is therefore most humbly prayed that on acceptance of this impleadment application the above noted persons may very kindly be impleaded as party/respondents in the above mentioned Appeal.

APPLICANTS

THROUGH:

NOOR MUHAMMAD KHATTAK

&

KAMRAN KHAN  
ADVOCATES



**AFFIDAVIT**

I, Zia Ullah, Web Administrator (BPS-17), do hereby solemnly affirm that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.

DEPONENT

*[Handwritten signature]*  
C.O.