

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL**

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

IN

Service appeal No. 1729/2023

Muhammad Ishaq.....APPELLANT

VERSUS

Govt. Of KPK & Others .....RESPONDENTS

INDEX

S. NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Memo of Application	.....	
2.	Affidavit	.....	

*[Signature]*  
APPELLANT

THROUGH:

&

*[Signature]*  
AHMAD SULTAN TAREEN

*[Signature]*  
HAIDER ALI  
ADVOCATES HIGH COURT

N.D - 3-11-23

*[Signature]*

**BEFORE THE KHYBER PAKHTUNKHWA SERVICES  
TRIBUNAL.**

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

Khyber Pakhtunkhwa  
Service Tribunal

IN

Diary No. 8764

Dated 1-11-2023

Service Appeal No. 1729/2023

Muhammad Ishaq.....APPELLANT

VERSUS

Govt. Of KPK & Others .....RESPONDENTS

**APPLICATION FOR IMPLEADMENT OF THE BELOW  
MENTIONED PERSONS BEING NECESSARY PARTY IN  
THE ABOVE TITLED SERVICE APPEAL ON THE PANEL  
OF RESPONDENTS.**

- 1) Mr. Haroon-Ur-Rasheed Turk, Computer Operator (BPS-16), Board of Revenue, Civil Secretariat, Peshawar, Khyber Pakhtunkhwa.
- 2) Mr. Faheem Ullah Khan, Computer Operator (BPS-16), Board of Revenue, Civil Secretariat, Peshawar, Khyber Pakhtunkhwa.
- 3) Mr. Afsar Ali Khan, Computer Operator (BPS-16), Board of Revenue, Civil Secretariat, Peshawar, Khyber Pakhtunkhwa.
- 4) Mr. Bilal Khalid, Computer Operator (BPS-16), Board of Revenue, Civil Secretariat, Peshawar, Khyber Pakhtunkhwa.
- 5) Mr. Sawair Ullah, Computer Operator (BPS-16), Board of Revenue, Civil Secretariat, Peshawar, Khyber Pakhtunkhwa.

- 6) **Mr. Shah Hussain, Computer Operator (BPS-16), Board of Revenue, Civil Secretariat, Peshawar, Khyber Pakhtunkhwa.**
- 7) **Mr. Farhan Ullah, Computer Operator (BPS-16), Board of Revenue, Civil Secretariat, Peshawar, Khyber Pakhtunkhwa.**

**R/SHEWETH:**

**The applicants seek to submit as under:-**

- That the captioned service appeal is pending adjudication before this Hon'ble Tribunal, which is fixed for 03/11/2023 for next hearing.
- That as spelt out from the memo of appeal, the appellant has advanced the soi disant grievance as representative of a group of functionaries making part of the office establishment of Board of Revenue and of Director Land Records who happen to be Assistants and Senior Scale Stenographers. The applicants holding the post of Computer Operators are part of the same establishment.
- That grievance of the appellant as designed in the memo of appeal is that Assistants and Senior Scale Stenographers of the said offices were beneficiary of 5% quota prescribed by the service structure/rules notification dated 13-05-2019 for promotion to the post of Tehsildar but the appellant having been irked by a further amendment introduced vide notification dated 30-05-2023 has challenged the same on behalf of Assistants and Senior Scale Stenographers that holders of the post of computer operators in the office establishment of Board of Revenue have been included in said quota unwarrantedly. However, the applicants holding the post of Computer Operators being beneficiary of the impugned notification have not been impleaded designedly.

- That the applicants are beneficiary of the notification challenged in the appeal of appellant. The seniority list with names of the incumbents of posts attracting the said quota is to be updated in consequence of the amendment obviously including the names of the applicants. The appeal as preferred by the appellant is baseless and only meant to cause delay in implementation of the amended notification in favor of the applicants. Therefore, they are necessary party for impleadment as respondents.
- The former believes that the amendment notification benefitting the applicants has been rightly issued in compliance with all codal formalities and appellant has no legal or constitutional right to challenge the same under the facts and law.
- That any other grounds would be raised at the time of arguments with prior permission of this Honorable Tribunal.

It is therefore most humbly prayed that on acceptance of this impleadment application, the above-named applicants may kindly be impleaded in the array of the respondents for just and proper decision of the instant service appeal.

  
APPELLANT

**THROUGH:**

**AHMAD SULTAN TAREEN**

  
&  
**HAIDER ALI**

**ADVOCATES HIGH COURT**

## AFFIDAVIT

I **Faheem Ullah Khan** S/o Abdul Hanan, Computer Operator (BPS-16), R/O Peshawar 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 Court.



  
DEPONENT

**WAKALATNAMA  
(Power of Attorney)**

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

*FAHEEM ULLAH KHAN & others*..... (Petitioner)  
..... (Appellant)

VERSUS

Govt of KP & others..... (Respondent)

I/ We, *Faheem Ullah Khan & others*

In the above noted Appeal, do hereby appoint and constitute

**Ahmad Sultan Tareen & Haider Ali**

Advocates, Peshawar to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel in the above noted matter, without any liability for their default and with the authority to engage/ appoint any other Advocate/ Counsel at my/ our matter.

Attested & Accepted

*Ahmad Sultan Tareen*  
**Ahmad Sultan Tareen**

&

*Haider Ali*  
**Haider Ali**

Advocates High Court,  
B-13 Nasir Mansion Shoba Bazar,  
PESHAWAR.

*Faheem Ullah Khan*  
CLIENT