

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Transfer Petition No. _____/2023

In Service Appeal No. 1955/2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 2800

Dated 2/11/23

Farid Ullah son of Nawaz Khan r/o Langar Khel Pakka,
Tehsil & District Lakki Marwat. Presently Zafar Abad
Colony Dera Ismail Khan.

.... Petitioner

VERSUS

1. Govt. of Khyber Pakhtunkhwa through Secretary Home
Department KPK Peshawar.
2. Commandant FRP, Khyber Pakhtunkhwa Peshawar.
3. Superintendent of Police Bannu. ✓

..... Respondents

**APPLICATION FOR TRANSFER OF THE ABOVE TITLED
SERVICE APPEAL FROM KHYBER PAKHTUNKHWA PESHAWAR
TO CAMP COURT DERA ISMAIL KHAN.**

Respectfully Sheweth:

The petitioner humbly submits and states as under,

1. That the above titled service appeal is pending adjudication
before the learned Khyber Pakhtunkhwa Service Tribunal
Peshawar and is fixed for today.
2. That the appellant along with his family is residing at Dera Ismail
Khan since long, hence, it is difficult for petitioner to travel to
Peshawar on every date of hearing.
3. That as mentioned above the petitioner is permanently resident
in District Dera Ismail Khan, hence, it is very difficult for
petitioner to appear before this learned this learned Tribunal at
Peshawar, hence, shifting/transferring the appeal from Peshawar
to Camp Court Dera Ismail Khan is in accordance with law.

4. That it is also pertinent to mention here that two other service appeals No. 2048/2023 titled "Umar Khitab Vs. Govt. of KPK" & Service Appeal No. 2049 titled "Haider Ali Shah Vs. Govt. of KPK" with the same subject matter and also related to the same FIR are pending adjudication before the KP Service Tribunal Camp Court Dera Ismail Khan, hence, shifting the above mentioned appeal at Camp Court Dera Ismail Khan is in accordance with law.
5. That this Honourable Tribunal has got vast powers and competent jurisdiction to accept the instant application.

In wake of the submissions made above, this Honourable Tribunal is humbly requested to transfer the subject service appeal from the KP Service Tribunal Peshawar to the Camp Court Dera Ismail Khan to meet the ends of justice.

Dated: 02/11/2023

Your Humble Petitioner

فرید اللہ
Farid Ullah

Through Counsel


Muhammad Waqas

Advocate

District Bar Dera Ismail Khan

AFFIDAVIT

I, **Farid Ullah**, the petitioner, under the instructions of my client, do hereby solemnly affirm and declare on oath that the contents of this application are true and correct and that nothing has been concealed from this Honourable Tribunal.

Dated: 02/11/2023



فرید اللہ
DEPONENT