## BEFORE HONORABLE SERVICE TRIBUNAL PESHAWAR

Re:

In

Sarvice Appeal.No.2042/2023

### Rahmat Jalil

### VERSUS

Government of Khyber Pakhtunkhwa (KPK) through the Secretary Home and Tribal affair KPK Peshawar & others

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Ruel Petitioner/ Applicant

**Through** 

Syed Ghufranullah Shah

(Advocate Supreme Court of Pakistan)

Office; 22-A Nasir Mansion Railway Road, Peshawar

Cell No.0334-9185580



## BEFORE THE KHYBER PAKHTUNKHUWA SERVICE TRIBUNAL PESHAWAR

Re:

In

Sarvice Appeal.No.2042/2023

Khyber Pakhtukhwa Service Tribunai

Diary No. <u>933</u>

Dated 22-11-202

Rahmat Jalil

### VERSUS

Government of Khyber Pakhtunkhwa (KPK) through the Secretary Home and Tribal affair KPK Peshawar & others

## AN APPLICATION WITH EFFECT TRANFER THE SUBJECT SERVICE APPEAL BEFORE THE PRINCIPAL SEAT AT PESHAWAR

### Respectfully Sheweth;

- 1. That the subject service appeal is pending for adjudication before the camp court swat and fixed for hearing on 04/12/2023.
- 2. That the subject application is being filed against the final impugned order passed by Inspector General of Police / Respondent No.2 through his office situated at Peshawar.
- 3. That the petioner/appellant has no relation or facility to proceed his case at Swat and he is convenient and interested to file and proceed his appeal at Principle seat Peshawar. Furthermore he has engaged counsel practicing at Peshawar.
- 4. That administration of justice require to facilitate the appellant instead to create hurdle in access to justice.
- 5. Any other ground will be furnished at the time of arguments.

It is therefore most humbly prayed to allow this application and to fix the case before the Principal seat for the best interest of justice.

Through

Syed Ghufranullah Shah (Advocate Supreme Court of Pakistan)

Petitionery Applicant



# BEFORE THE KHYBER PAKHTUNKHUWA SERVICE TRIBUNAL PESHAWAR

Re:

In

Sarvice Appeal.No.2042/2023

Rahmat Jalil

VERSUS

Government of Khyber Pakhtunkhwa (KPK) through the Secretary Home and Tribal affair KPK Peshawar

### **AFFIDAVIT**

I, Rahmat Jalil S/o Ali Rahmat R/o Garam Chashma Munoor Tehsil Tehsil & District Chitral, Ex-Police Constable No. 3920 District Chitral. Petitioner; do hereby solemnly verify and declare on oath that all the contents of the subject application; are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

Deponent

C.N.I.C No 15201-1052353-5

Verified by

Syed Ghufran ullah Shah Advocate Peshawar

Per Court Perio

## BEFORE THE KHYBER PAKHTUNKHUWA SERVICE TRIBUNAL PESHAWAR

Re:

In

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Rahmat Jalil

### VERSUS

Government of Khyber Pakhtunkhwa (KPK) through the Secretary Home and Tribal affair KPK Peshawar & others

### ADRESSES OFPARTIES

### **PETITIONERS**;

### Rahmat Jalil

S/o Ali Rahmat R/o Garam Chashma Munoor Tehsil Tehsil & District Chitral, Ex-Police Constable No. 3920 District Chitral.

### **RESPONDENTS**;

- 1. Government of Khyber Pakhtunkhwa (KPK) through the Secretary Home and Tribal affair KPK Peshawar.
- 2. Inspector General of Police Khyber Pukhtunkwa Peshawar.
- 3. AIG/Establishment for Inspector General of Police Khyber Pukhtunkwa Peshawar.
- 4. Deputy Inspector General of Police Malakand Division Saidu Sharif Sawat.
- 5. District Police Officer Chitral.
- 6. Secretary Finance Government of K.P.K at Civil Secretariat Peshawar.

Petitioner/Applicant

Through

Syed Ghufkanullah Shah (Advocate Supreme Court of Pakistan) بنام کوریشک آف یے ی کے را المان المان زادي 1.7. باعث تحريرا نكبه مقرركر كا ترأركيا جاتا مه كدما حب وصوف كومقدمسككل كاردال كاكال اختيارة وكافير وكل مساحب كوماسى نامه كرف وتقرونالت وفيعله برحلف ديئ جواب والااورا تبال دعوى اور السورت والكرى كرف اجراءادرصولى چيك وروبيارمونني دعوى اوردرخواست برتم كى تقديق زرای پردستندا کرانے کا اختیار و دگا۔ فیز صورت عدم بیروی یا د گری کی طرف یا ایل کی برا مرگ اورمنسونی نیز دا ترکرنے ایک مکرانی دنظر ٹانی دبیروی کرنے کا ختیار موگا۔ از بصورت ضرورت مقدمہ مذکور ككل يا بزوى كاروالى ك واسط اوردكيل يا مخارة الونى كاسين بمراه يااسين بجائة تقرر كااختيار ودكا اورمها حب مقررت وكوي واى جمله ندكوره بااختيارات حاصل مول محاوراس كاساخت برواخت منظور تبول موكا - دوران مقدمه من جونر چد برجان التوائي مقدمه كسب سے وموكا ـ کوئی تاری پیشی مقام دوره پر بو یا مدے باہر بوتو وکیل صاحب پابند بول کے کہ پیروی مكوركرين لبدادكالت نامهكهديا كمندرب الرَّدِم <u>29-11-99</u> بمقام لستبادير B.C. 11-12-12 - 2-11 15202-4540915-7 03349185580

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