

BEFORE THE SERVICE TRIBUNAL
KHYBERPAKHTUNKHWA, CAMP COURT SWAT

Misc:Application No _____ /2023

In

Service Appeal No.1804/2023

**Khyber Pakhtukhwa
Service Tribunal**

Diary No. 9846

Dated 12-12-2023

Khalida Ahmad

.....**Appellant**

V E R S U S

Govt of KP and others

.....**Respondents**

**IN THE MATTER OF SERVICE APPEAL AGAINST DISCRIMINATION IN THE
SENIORITY LIST OF FEMALE (CT) TEACHERS**

**APPLICATION FOR AMENDMENT IN
PRAYER OF IBID APPEAL ON BEHALF OF
THE APPELLANT AS PER DIRECTION OF
THIS HONOURABLE TRIBUNAL THROUGH
ORDER DATED 08-11-2023.**

Respectfully Sheweth:

The appellant humbly submit as under;

1. That the above title noted service appeal is pending before this respected tribunal for adjudication and is fixed for today, i.e. ~~03/01/2024~~ 03/01/2024
2. That the above service appeal has been preferred by the appellant against the discriminatory CT- Teachers BPS-15 seniority list issued by the respondent No.3, whereby the name of the appellant has been placed at serial No.48 of the seniority list and junior employees name has been placed before the appellant name in the seniority list. Which effect future promotions etc of the appellant.
3. That the appellant counsel inadvertently mentioned SCT instead of seniority list of CT female BPS-15 in the prayer of appeal.
4. That the appellant humbly request to this Hon'ble Tribunal to amend the prayer of the instant service appeal and to read/consider as follow:

PRAYER IN APPEAL :

It is, therefore, most humbly prayed that on acceptance of the instant appeal the respondents may kindly be directed to place the appellant name before all junior candidates in the seniority list issued for CT-DPC and further direct the respondents to consider the name of the appellant for promotion since 31-12-2021.

OR

Any other relief available in the circumstances of the case, not specifically asked for, may also be granted to the appellant.

Appellant/Applicant
Through

Saif Ullah Mongol
Advocate, High court

Saif Ullah Mongol

Date: 12.12.2023

AFFIDAVIT

I, Gul Wahid S/o Fazal Wahid do hereby solemnly affirm and declare that the contents of the accompanying Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



DEPONENT
CNIC: 15302-0932120-5
Cell No. 0343-9500988

Gul Wahid



SA 1804/23

08th Nov. 2023

01. Learned counsel for the appellant present and produced a copy of final seniority list of Female CT Teachers BS-15 as stood on 25.08.2023, which is placed on file. Preliminary arguments heard.

02. Learned counsel for the appellant stated that similar nature appeals No. 1848/2023 and 1949/2023 have already been admitted for full hearing on 05.10.2023 and requested that instant appeal might be admitted for full hearing. In the analogy of order dated 05.10.2023 in the above mentioned service appeals, instant appeal is also admitted for full hearing, subject to all just and legal objections by the other side.

03. Learned counsel for the appellant further stated that due to inadvertence in the prayer part of the appeal, the word "SCT" have been written instead of the word "CT". He requested for time to submit application for correction to that extent only. Appellant is directed to submit application for correction of the word "CT" instead of "SCT" in the prayer part of the appeal, within 03 days at Principal Seat. The appellant is further directed to deposit security fee within 10 days. Thereafter, notices be issued to the respondents through TCS the expenses of which shall be deposited by the appellant within 03 days. To come up for reply/comments alongwith Service Appeals No. 1948/2023 and 1949/2023 on 06.12.2023 before the S.B at Camp Court, Swat. Parcha Peshi given to learned counsel for the appellant.

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(FAREHA PAUL)
Member (E)
Camp Court, Swat.

*Fazle Subhan, P.S.

Khayber Pakhtunkhwa
Service Tribunal,
Peshawar