

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

CM No. _____ of 2021

In

Service Appeal No: 11925 of 2020


Gulzar Khan

Versus

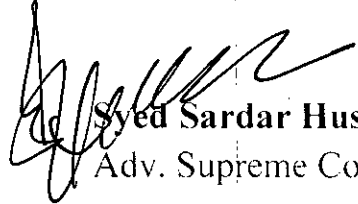
Government of Khyber Pakhtunkhwa & Others

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1.	Memo of Application		
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4.	Wakalatnama		


Applicants / LRs

Through,


Syed Sardar Hussain
Adv. Supreme Court

Dated: ___/___/2021

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**APPLICATION FOR IMPLEADING THE LRS
OF THE DECEASED APPLICANT SAID GUL**

RESPECTFULLY SHEWETH;

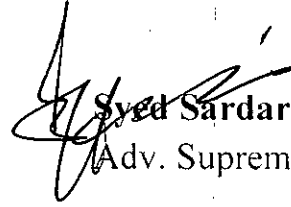
1. That the above title appeal is pending adjudication before this honorable tribunal and is fixed for hearing on 12/01/2022.
2. That Said Gul deceased applicant filed an application in this honorable tribunal for impleadment in the appeal as respondent, unfortunately during the pendency the applicant Said Gul died.
3. That the impleadment of the legal heirs of the Said Gul is very important for just and fair decision due to the reason that the deceased promotion was due since 18/07/2019 but unfortunately the appellant serving on the behest of the stay order which was obtained due to misrepresentation and fraudulently, and incase this honorable tribunal reached to the legal and factual facts of the case the appeal will be definitely dismissed and the deceased shall be promoted from the due date of his promotion i.e. 18/07/2019 which is actually the retirement date of the appellant.
4. That in that case the legal heirs of the deceased applicant will be entitled to all emolument, pension and ancillary of the deceased.
5. That the following are the legal heirs of the deceased applicant
 - a. Mst. Madain Bibi widow of Said Gul
 - b. Hazrat Gul
 - c. Zia Ullah
 - d. Islam Gul
 - e. Ikram Ullah

- f. Naeem Ullah (Sons)
g. Mst. Fareeda
h. Mst. Fazelat Bibi
i. Mst. Noreena Bibi
j. Mst. Tousela Bibi
k. Mst. Sadia Bibi
l. Mst. Nazma Bibi daughters of Said Gul R/O Sikandaro, Hayatae, Gardye, Tehsil Utmankhel, District Bajawar.

It is, therefore, humbly requested that the applicants / LRs of the deceased Said Gul may please be arrayed as respondent in the appeal, as respondent in sack of fair play and justice.

اسلام علی
Applicants / LRs

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AFFIDAVIT

I, Do hereby solemnly affirms and declare on oath that the contents of this application are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this honorable court.



Islam Gul

DEPONENT

Islam Gul (Attorney)

CNIC: 2110763551167

MOB: 03209306070

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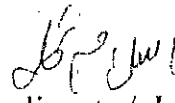
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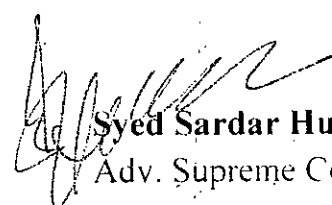
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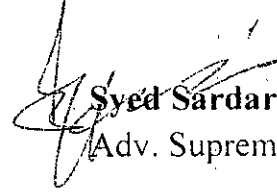
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Islam Gul (Attorney)

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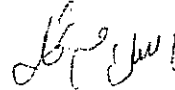
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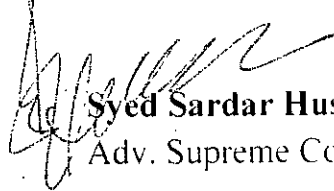
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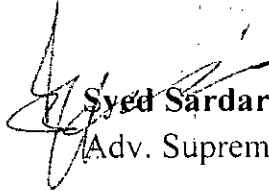
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اسد ساردار
Applicants / LRs

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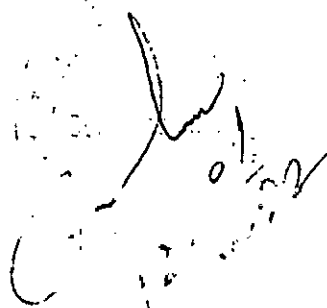
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DEPONENT
Islain Gul (Attorney)

CNIC: 211076355-1167

MOB: 03209306070

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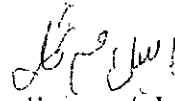
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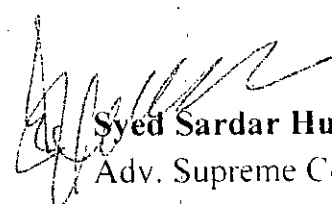
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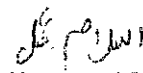
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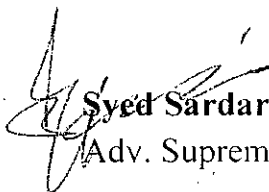
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Islam Gul
DEPONENT

Islam Gul (Attorney)

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