

BEFORE THE COURT OF SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR

Service Tribunal Appeal No. 1761/2022

IBRAHIM (EX-CHOWKIDAR)

*****VERSUS*****

Executive District Officer (E&S) Education, District Swat and others

INDEX

S.NO.	DOCUMENTS	ANNEXURE	PAGE
1.	Reply of Application for placing of documents		1
2.	Copy of Application		2
3.	Affidavit		3
4.	Authority Letter		4


RESPONDENT

Dr. Shamim Akhar

District Education Officer (F)

SWAT

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

SERVICE APPEAL NO.1761/2022

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 11407

Dated 27/2/24

IBRAHIM (EX-Chowkidar)

S/O kachi Malik R/O Zora P/O & Tehsil Kabal Swat.

.....(APPELLANT)

VERSUS

1. Executive District Officer(E&S) Education District Swat.
2. Secretary Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
3. Director Elementary & Secondary Education Khyber Pakhtunkhwa, Peshawar.
4. District Education Officer (Female) Swat.

.....(RESPONDENTS)

**REPLY FROM RESPONDENTS No.2 to 4 IN RESPECT OF APPLICATION FOR
PLACING OF DOCUMENTS.**

Respectfully Shewth;

The Respondents submits as under;

Preliminary Objections.

1. That that appellant has no cause of action and locus standi.
2. That the relevant document was not produced before the competent forum nor enlisted with the service appeal.

ON FACTS.

1. *That* this Para No.1 Correct.
2. *That* this Para-2 is incorrect. Hence denied.
3. *That* this Para No.3 is incorrect. Hence denied because the same document was not filed during the competent forum nor with the service appeal.
4. *That* this Para No.4 incorrect, Hence denied.


On acceptance of replication, the application of appellant may kindly be dismissed.


MASOOD AHMAD
SECRETARY

ELEMETARY & SECONDRY EDUCATION
KP PESHAWAR (RESPONDENT NO.2)


SAMINA ALTAF
DIRECTOR

ELEMETARY & SECONDRY EDUCATION
KP PESHAWAR (RESPONDENT NO.3)


DR.SHAMIM AKHTAR
DISTRICT EDUCATION OFFICER(F)
SWAT (RESPONDENT-NO.4)

BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA AT PESHAWAR

No. 2023

In

Service appeal No. 1761 of 2022

3568
15-2-2023

Ex Chukidar Ibrahim Vs Executive District Officer (E&S) education etc

Application for placing Army Certificate on file for just decision of the mentioned above case.

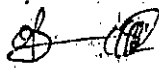
Respectfully Sheweth:

- 1) That the above titled appeal is pending adjudication before this Honorable Tribunal, which is fixed for dated 06/03/2023.
- 2) That the appellant has been arrested by the Pak Army on dated 01/07/2009 and was released on 05/03/2022.
- 3) That due to above detention applicant could not performed his duties, in this regard the Pak Army issued a certificate, but irronously the applicant could not filed the same at the time of filing the above mentioned appeal.
- 4) That inclusion of the said certificate is necessary for just decision of the case and there is no bar of its inclusion at this stage of the appeal.

It is therefore, most humbly prayed that on acceptance of this CM, the applicant may please be allowed to place the mentioned above certificate on file for just decision of the case.

applicant

Through counsel



Syed Izat Badshah

Advocate, High Court

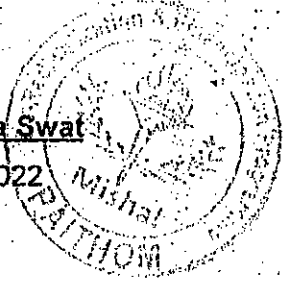
Dated: 14-2-2023

AUTHORITY LETTER

It is certified that Civil (Release) Ibrahim s/o Khache Malik r/o Zora P/O Kabal Teh. 8 Dist Swat (CNIC 15602-847080-7) is Surrendered to Pakistan Army 01 July 2009 and released from Army on 05 Mar 2022 after completion DREP from DRC Mishal (PAITHOM) Gulibagh Charbagh Swat and hereby cleared from Army record. In case of any query/ doubt necessary help can be sought from the undersigned.

Sta: Operation Area Swat

Date: 04 April 2022



CC DREP

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

SERVICE APPEAL NO.1761/2022

IBRAHIM (EX-Chowkidar)

S/O kachi Malik R/O Zora P/O & Tehsil Kabal Swat.

.....(APPELLANT)

VERSUS

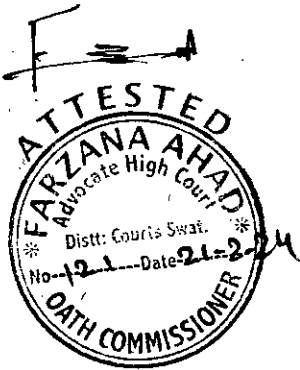
1. Executive District Officer(E&S) Education District Swat.
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.....(RESPONDENTS)

AFFIDAVIT

I,Dr.Shamim Akhtar DEO(F) Swat do hereby solemnly affirm and declare that contents of the accompanying reply of the Applications are true and correct to the best of my knowledge and information and nothing has been concealed from this Hon; Service Tribunal.

The answering respondents have neither place nor their defense struck off /lost.



[Signature]
DEPONENT
District Education Officer (F)
Swat.

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

SERVICE APPEAL NO.1761/2022

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.....(RESPONDENTS)

AUTHORITY LETTER

Mr.Jan Muhammad O/O DEO(F) Swat is hereby authorized to attend the Hon; Khyber Pakhtunkhwa Service Tribunal Peshawar in connection with S.No.1761/2022 Under Title Mr.Ibrahim (Ex-Chowkidar).....VS.....DEO(F) Swat & others. on behalf of the Respondent till the finalization of the case.

DR.SHAMIM AKHTAR
DISTRICT EDUCATION OFFICER(F)
SWAT
District Education Officer (F)
Swat.