# **BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

CM No. \_\_\_\_\_ of 2022

In

Service Appeal No: 11927 of 2020

### Sattar

Versus

# Government of Khyber Pakhtunkhwa & Others

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الل على Applicants / LRs

ardar Hussain

Supreme Court

Through,

Dated: \_\_/\_/202

# **BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

CM No. \_\_\_\_\_ of 2022

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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
  - i. Mst. Madain Bibi widow of Said Gul
  - ii. Hazrat Gul
  - iii. Zia Ullah
  - iv. Islam Gul
  - v. Ikram Ullah

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- vi. Naeem Ullah (Sons)
- vii. Mst. Fareeda

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- viii. Mst. Fazelat Bibi
  - ix. Mst. Noreena Bibi
  - x. Mst. Tousela Bibi
  - xi. Mst. Sadia Bibi
- xii. 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.

> المراقم كل Applicants / LRs

Through,

01 Sardar Hussain Adv. Supreme Court

Dated: / /2021

# BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No: \_\_\_\_\_ of 202

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Sattar

Versus

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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.



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DEPONENT Islam Gul (Attoning)

CNIC: 21 07 63 55 1167 MOB: 03209306070

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