

**BEFORE THE HONORABLE KHYBER PAKHATUNKHWA  
SERVICE TRIBUNAL PESHAWAR.**

CM Application No. \_\_\_\_\_ /2024 in Service Appeal No: 170/2024

Fazal Ur Rehman, Senior Clerk District Kohat ..... Appellant

**VERSUS**

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 12000

Dated 29-03-2024

1. The Secretary E&SE KP Peshawar.

2. Director Education E&SE KPK.

3. District Education Officer (Male) Kohat..... Respondents

**REPLY TO THE TITLED APPLICATION ON BEHALF OF THE RESPONDENTS  
NO 1 TO 3**

Respectfully Sheweth: -

The Respondents No. 1 to 3 submit as under: -

1. Correct, the titled appeal is pending for disposal before this Honorable Tribunal for submission of reply on behalf of the Respondent No. 1 to 3.
2. Incorrect & not admitted, the plea of the appellant is illegal; however, the reply to the facts & ground to the main appeal of the appellant may kindly be treated as part & parcel of the instant reply to the titled application on behalf of the respondent No. 1 to 3.
3. Incorrect & not admitted, the stand of the appellant is against the mitigating circumstances of the titled appeal, hence, liable to be rejected.

Therefore, in view of the above made submissions it is humbly requested that this Honorable Tribunal may kindly be pleased to dismiss the titled application in favor of the Respondents No. 1 to 3 in the interest of justice please.

Dated: \_\_\_/\_\_\_/2024

  
**SAMINA ALTAF**  
**DIRECTOR**

E&SE Department Khyber  
Pakhtunkhwa, Peshawar.  
**(Respondents No: 1 to 3)**

29-03-2024

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**AFFIDAVIT**

***L. Samina Altaf Director E&SE Department Khyber Pakhtunkhwa***, do hereby solemnly affirm & declare on oath that the contents of the instant application are true & correct to the best of my knowledge & belief. It is further stated on oath that in this appeal the answering Respondents have neither been placed Ex-Parte nor their defense has been struck off/cost.

*Samina Altaf*  
 DEPONENT  
**SAMINA ALTAF**  
 DIRECTOR  
 E&SE Department Khyber  
 Pakhtunkhwa, Peshawar.  
 (Respondents No:1 to 3)

**ATTESTED**

