

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

**Khyber Pakhtunkhwa  
Service Tribunal**

C. M. No \_\_\_\_\_/2024  
In  
Service Appeal No 221/2022

Diary No. 14057

Dated 09/07/24

Hussain Akbar, Assistant DC Office Mardan/ Divisional  
Coordinator Revenue Department, Mardan. . . . . **APPELLANT**

**VERSUS**

1. The Government of Khyber Pakhtunkhwa  
Through Chief Secretary,  
Khyber Pakhtunkhwa, Peshawar
2. The Secretary Establishment,  
Civil Secretariat, Khyber Pakhtunkhwa, Peshawar
3. Khyber Pakhtunkhwa Public Service Commission  
through its Chairman, Peshawar

. . . . . **RESPONDENTS**

**APPLICATION FOR AMENDMENT IN THE**  
**PRAYER OF TITLED SERVICE APPEAL**

***Respectfully Submitted:***

1. That the above titled Service Appeal is pending before this  
honorable Tribunal and is fixed for today i, e 09-07-2024.
2. That the appellant has challenged the Notification dated  
04-10-2010/Original Order while has inadvertently in the  
prayer clause, has not challenged the appellate Order  
dated 25-05-2021, communicated to the appellant vide  
Letter dated 27-01-2022, though copies of which are  
available on file at page No.56, 58 & 59, and the prayer  
clause is required to be amended accordingly.

3. That besides the appellant had filed the titled Service Appeal in person and the omission is not deliberate and this honorable Tribunal is very much competent to order for the requested amendment/correction.
4. That the valuable rights of the applicant are at stake and if the requested amendment is not ordered, the appellant would be adversely affected.

It is therefore prayed, that on acceptance of this application, the prayer clause of titled Service Appeal may kindly be amended/ modified as "on acceptance of this appeal, the impugned notification dated: 04.10.2010 to the extent of Revenue Department/ Divisional & District Administration and the order dated: 25.05.2021, communicated to the appellant vide letter dated: 27.01.2022 may kindly be set aside being ultra-varies of the constitution, thereby directing respondent No.3 to complete necessary recruitment process on the withheld result of the appellant" in the best interest of justice.



Applicant/Appellant

Through



**FAZAL SHAH MOHMAND**  
Advocate,  
Supreme Court of Pakistan

**AFFIDAVIT:**

I, Hussain Akbar, Assistant, Deputy Commissioner Office, Mardan, do hereby solemnly affirm 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 concealed from this honorable Tribunal.



**DEPONENT**