

BEFORE THE SERVICE TE KPK PESHAWAR

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Service Appeal No: 694/2024

Khyber Pakhtokhwa
Service Tribunal

Diary No. 15186

Dated 26/8/24

Hazrat Bilal (Applicant)

VS

Director of E&SE KPK & Others (Respondents)

SERVICE APPEAL

Application for permission to ammend the memo of appeal of appellant to the extent of deletion of names of respondents no: 3 & 4 from memo of appeal while mr. Asif ali s/o mahboob ali khan pst teacher gps major banda saleem khan swabi r/o village saleem khan tehsil & district swabi and mr muhammad zaheer s/o israr muhammad pst teacher gps wali muhammad koroona tarakai r/o swabi village tarakai tehsil razar district swabi may please be arrayed as respondants no: 3 & 4 in the memo of appeal of appellant, who are younger in age from appellant and kept senior than appellant in the seniority list of pst teachers, being necessary party of the instant case, which is illegal, against law and facts.

Respected sheweth,

1. That above captioned case in firxed for pre-liminary hearing on 10-09-2024 before the honourable tribunal.
2. That inadvertently respondent No. 3 Sadiq Ali and respondent No. 4 Sameen Khan were arrayed as respondents No. 3 & 4 in the memo of appeal of appellant who are kept junior than appellant in the seniority list of PST teacher, hence appellant is not seeking any remedy from instant respondents No. 3 & 4 and requesting for deletion of their names from

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panel of respondents in the memo of appeal of appellant. (copy of seniority list is already attached with memo of appeal as Annex B)

3. That Mr. Asif Ali S/O Mehboob Ali Khan PST teacher GPS Major Banda Saleem Khan Swabi and Mr. Muhammad Zaheer S/O Israr Muhammad PST Teacher GPS Wali Muhammad Koroono Tarakai Swabi are younger in age than appellant and kept senior at S/No 125 & 130 in the the seniority list of PST Teacher, who are not arrayed as respondents in the memo of appeal of appellant, hence appellant is requesting to arrayed the same as respondents No. 3 & 4 in memo of instant appeal being necessary parties as per law and rules. Therefore the above subject PST teachers may please be arrayed as respondents No. 3 & 4 instead of deleted respondents No. 3 & 4 in the memo of instant appeal. (copy of seniority list of PST is already attached as Annex B)
4. That appeal of appellant is in initial stage and still pre-argument is not heard in instant case.
5. That there is no bar in arraying of necessary party at any stage of appeal.

It is therefore humbly requested that above mentioned amendment may please be allowed to appellant against respondents being necessary parties for ends of justice and may please be added as respdt: no: 3 & 4 in memo of appellant with red pen entries.

Appellant
Hazrat Bilal

Through Counsel

Yaqub Khan Advocate
District Courts Mardan

AFFIDAVIT

I undersigned declare on oath that the contents of application are true and correct to the best of my knowledge and belief.

Hazrat Bilal
Deponent
Hazrat Bilal

Attested

