

**BEFORE THE HONOURABLE KHYBERPAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR**

Service Appeal No.961 of 2024

Mr. Nizam Ullah S/o Israr Ullah Ward orderly BPS-04, DHO Nowshera.

... (Appellant)

...VERSUS...

District Accounts Officer & Others

... (Respondent No. 03)

S. NO	Description of Documents	Pages
1.	Para wise comments on behalf of the Respondent No. 03	01 & 02
2.	Affidavit	03
3.	Authority letter	04

Respondent No. 03

(Mohammad Riaz)

District Accounts Officer

District Accounts Officer

Nowshera

Nowshera

Before Service The Tribunal Khyber Pakhtunkhwa Peshawar

Appeal .No 961 of 2024

Mr. Nizam UllahPetitioner

Versus

District Accounts officer Nowshera and others..... Respondents.

(Para wise reply on behalf of respondent No. 3)

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 15042

Date 16-08-24

Preliminary Objections:

1. That the applicant has no cause of action.
2. That the appellants have no locus standi.
3. That the appeal in hand is not maintainable.

Respectfully Sheweth:-

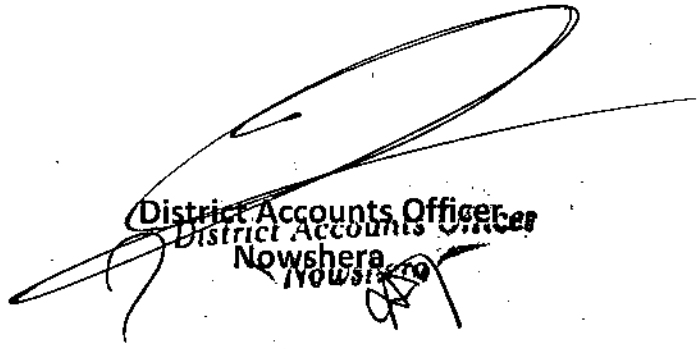
- Para 1:- The Para under reply does not pertain to the answering respondent.
- Para 2:- The Para under reply does not pertain to the answering respondent.
- Para 3:- The Para under reply does not pertain to the answering respondent.
- Para 4:- The Para under reply does not pertain to the answering respondent.
- Para 5:- The Para under reply does not pertain to the answering respondent.
- Para 6:- The Para under reply does not pertain to the answering respondent.

GROUNDS:

- A. No request/Source I for starting of salary of the petitioner was submitted by the Respondent No. 02. Hence it was the responsibility of the DHO Nowshera to have submitted source I for starting of salary of the appellant against the vacant post of Ward Orderly but they are reluctant for reasons known to him.
- B. As replied in Para A.
- C. As replied in Para A.
- D. Legal grounds. No Comments.
- E. As replied in Para A.

- F. As replied in Para A.
- G. Legal grounds. No Comments.
- H. No Comments.

It is therefore requested that the petitioner has no cause of action. Hence the necessary party may please be impleaded.



District Accounts Officer
District Accounts Officer
Nowshera
Nowshera

M. Riaz

Responded No-3

BEFORE THE HONOURABLE KHYBERPAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No.961 of 2024

Mr. Nizam Ullah S/o Israr Ullah Ward orderly BPS-04, DHO Nowshera.

... (Appellant)

...VERSUS...

District Accounts Officer & Others

... (Respondent No. 03)

Affidavit

I, Mr. Mohammad Riaz District Accounts Officer, Nowshera do hereby solemnly affirm and declare on oath that the contents of the para wise comments on behalf of the respondent No.03 are true and correct to the best of my knowledge and nothing has been concealed from the Honourable Court.

It is further stated on oath that the answering respondent have neither been placed ex-parte. nor their defense struck off/cost.

Deponent

[Handwritten Signature]

Name: Mr. Mohammad Riaz

CNIC: 17301-0848437-7

Contact number: 0334-9353901



16 AUG 2024



**Office of the
DISTRICT ACCOUNTS OFFICER**

Phone: 0923-9220452

NOWSHERA

Fax: 0923-9220354

No .DAO(NSR)/Admin/____

Dated: 15 /08/2024

AUTHORITY LETTER

Mr. Zeeshan khan, Senior Auditor of this office is hereby authorized to attend court on behalf of the undersigned please.

(Mohammad Riaz)

~~District Accounts Officer~~
~~District Accounts Officer~~
Nowshera
Nowshera