

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

SERVICE APPEAL No. 970 /2024
Khyber Pakhtunkhwa
Service Tribunal

Diary No. 15071

Dated 20/8/24

Muhammad Ayub Khan, Ex- SST/Head Master, GMS, Forest College,
Peshawar R/O Village Tehkal Bala, Tehsil & district, Peshawar. (Appellant)

-: VERSUS: -

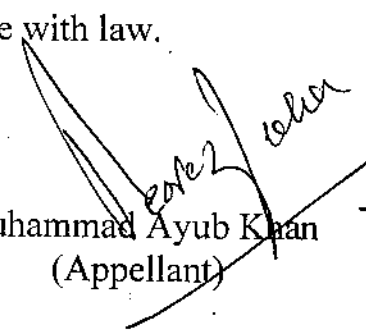
Government of Khyber Pakhtunkhwa through Director, Elementary &
Secondary Education, Peshawar & others. (Respondents)

Application for amendment of Appeal.

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Respectfully Sheweth,

1. That, the subject service appeal is pending before this august Tribunal for today.
2. That, the appellant requests for slight amendment in his appeal as follow:
 - a. To include prayer of Re-instatement with pensionary benefits or allowing Compassionate allowance in lieu thereof with payments of Gratuity and G.P. Fund in the Prayers as contemplated by Section 19 of Civil Servant Act, 1973.
 - b. Taking plea of proceeding against him under the misconceived KP Govt. Servants (E&D) Rules, 2011 instead of N.W.F.P Removal from Service (Special Powers) Ordinance, 2000, applicable.
 - c. Before his removal from service the proceeding provided in section 3-A of RSO 200 was not followed/completed as prescribed.
 - d. Any other appropriate amendment in accordance with law.

Dated: 20.8.24


Muhammad Ayub Khan
(Appellant) 20.8.24

Through:
Pervez Khan Khalil, Senior Advocate, Peshawar.