

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. 922/2024

Kamal Hussain (Forester)

..... **Appellant**


VERSUS

Chief Conservator of Forests, Central

Southern Forest Region-I, Peshawar and others **Respondents**

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Divisional Forest Officer
Orakzai Forest Division
At Hangu

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 922/2024

Kamal Hussain (Forester)

Appellant

VERSUS

Chief Conservator of Forests, Central Southern
Forest Region-I, Peshawar and others

Respondents

**APPLICATION FOR GRANT OF INTERIM RELIEF BY RESTRAINING THE RESPONDENTS FROM
CONDUCTING THE DEPARTMENTAL PROMOTION COMMITTEE (DPC) MEETING IN RESPECT OF
FORESTER FOREST DEPARTMENT DISTRICT ORAKZAI, TILL THE FINAL DISPOSAL OF THE
INSTANT SERVICE APPEAL**

REPLY ON BEHALF OF THE RESPONDENTS NO.1 TO 3.

Khyber Pakhtunkhwa
Service Tribunal

Sl. No. 16277

Dated 02-10-24

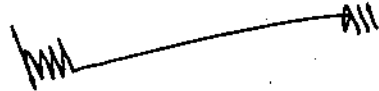
Respectfully Sheweth

PRELIMINARY OBJECTIONS

- I. That the appellant has no locus standi.
- II. That the appellant did not come to this Honorable Tribunal with clean hands.
- III. That the application is not maintainable.
- IV. That the instant application is bad for misjoinder and non-joinder of necessary and proper parties.
- V. That the application of the appellant is barred by law and limitation.

1. Needs no comments.
2. Incorrect.
3. Incorrect.
4. Incorrect. The respondents have filed the parawise comments in the main Service Appeal No. 922/2024 Titled "Kamal Hussain vs Chief Conservator of Forests, Central Southern Forest Region-I, Peshawar and others" in this Honorable Service Tribunal on 03-09-2024.
5. Incorrect. The para-wise comments have been filed in the main Service Appeal No. 922/2024 Titled "Kamal Hussain vs Chief Conservator of Forests, Central Southern Forest Region-I, Peshawar and others" in this Honorable Service Tribunal on 03-09-2024.

It is therefore, humbly prayed that the instant application for interim relief of the appellant being devoid of merits may please be dismissed with cost.



JAN-E-ALAM
Divisional Forest Officer
Orakzai Forest Division
At Hangu
Respondent No. 3



KIFAYAT ULLAH BALOCH
Chief Conservator of Forests
Central Southern Forest Region-I
At Peshawar
Respondent No. 1



HAYAT ALI
Conservator of Forests
Kohat Forest Circle
At Peshawar
Respondent No. 2

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Service Appeal No. 922/2024

Kamal Hussain (Forester)

..... Appellant

VERSUS

Chief Conservator of Forests, Central

Southern Forest Region-I, Peshawar and others Respondents

APPLICATION FOR GRANT OF INTERIM RELIEF BY RESTRAINING THE RESPONDENTS FROM CONDUCTING THE DEPARTMENTAL PROMOTION COMMITTEE (DPC) MEETING IN RESPECT OF FORESTER FOREST DEPARTMENT DISTRICT ORAKZAI, TILL THE FINAL DISPOSAL OF THE INSTANT SERVICE APPEAL

AFFIDAVIT

I, Jan-e-Alam Divisional Forest Officer Orakzai Forest Division, do hereby solemnly affirm and declare on oath that the contents of the accompanying comments/Reply are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

It is further stated on oath that the answering respondents have neither been placed en-passe nor their defense struck off/est.

DEPONENT

CNIC No.17201-7740943-1

Cell No. 0342-1133000

Respondent No - 3

ATTESTE!



24-9-2024

CHIEF CONSERVATOR OF FORESTS
CENTRAL SOUTHERN FOREST REGION-I
KHYBER PAKHTUNKHWA
(HAD)



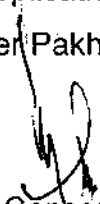
SHAMI ROAD PESHAWAR
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No. 1562 /E,

Dated 30 /09/2024

AUTHORITY LETTER

Mr. Jan-e-Alam Divisional Forest Officer is hereby authorized to file the reply of the application for grant of interim relief in the service appeal No.922/2024 in the Khyber Pakhtunkhwa Service Tribunal Peshawar on behalf of the undersigned.


Chief Conservator of Forests
Central Southern Forest Region-I,
Khyber Pakhtunkhwa Peshawar
Chief Conservator of Forests
Central Southern Forest Region-I
Khyber Pakhtunkhwa Peshawar.