

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

C.M. No _____/2024

In

12(2) Petition No. 884/2024

in

Service Appeal No. 2361/2023

1. Said Badshah, Primary School Teacher (BPS-12), Govt. Primary School, Pankot, Dir Upper.
2. Shabir Ahmad, Primary School Teacher (BPS-12), Govt. Primary School, Narkon Sheringal, Dir Upper.
3. Shakir Ullah, Primary School Teacher (BPS-12), Govt. Primary School, Panaghar Dogdara, Dir Upper.
4. Muhammad Ishaq, Primary School Teacher (BPS-12), Govt. Primary School, Petaw Banda, Dir Upper.
5. Aziz Ullah, Primary School Teacher (BPS-12), Govt. Primary School, Shaga Seratai, Dir Upper.
6. Bakht Zada, Primary School Teacher (BPS-12), Govt. Primary School, Rundish, Dir Upper.
7. Inam Ullah, Primary School Teacher (BPS-12), Govt. Primary School, Petaw Banda, Dir Upper.
8. Sami Ul Haq, Primary School Teacher (BPS-12), Govt. Primary School, Dodba, Dir Upper.
9. Nadeem Hussain, Primary School Teacher (BPS-12), Govt. Primary School, Sia Nagha, Dir Upper.
10. Basit Ali Khan, Primary School Teacher (BPS-12), Govt. Primary School, Shormai, Dir Upper.
11. Zia Uddin, Primary School Teacher (BPS-12), Govt. Primary School, Gujaro Kass, Dir Upper.
12. Muhammad Fayaz, Primary School Teacher (BPS-12), Govt. Primary School, Medankhowar, Dir Upper.
13. Zaheer Ullah, Primary School Teacher (BPS-12), Govt. Primary School, Bibyaware, Dir Upper.
14. Fazal Badshah, Primary School Teacher (BPS-12), Govt. Primary School, Sarbala, Dir Upper.
15. Amir Sohail, Primary School Teacher (BPS-12), Govt. Primary School, Sarbala, Dir Upper.
16. Amin Ullah, Primary School Teacher (BPS-12), Govt. Primary School, Sahib Abad, Dir Upper.
17. Sami Ullah, Primary School Teacher (BPS-12), Govt. Primary School, Nagrail, Dir Upper.
18. Tariq Ullah, Primary School Teacher (BPS-12), Govt. Primary School, Tikerkot No 1, Dir Upper.
19. Jamal Ud Din Primary School Teacher (BPS-12), Govt. Primary School, Unkar, Dir Upper.

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20. Naseem Ullah, Primary School Teacher (BPS-12), Govt. Primary School, Taloo, Dir Upper.
21. Seyasat Jan, Primary School Teacher (BPS-12), Govt. Primary School, Taloo, Dir Upper.

.....Petitioners

Khyber Pakhtunkhwa
Service Tribunal

VERSUS

Diary No. _____

Dated _____

1. Secretary, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
2. Director, Elementary and Secondary Education, Khyber Pakhtunkhwa, Peshawar.
3. District education Officer (Male), Dir Upper.
4. Muhammad Iqbal, Primary School Teacher (BPS-12), Govt. Primary School, Bedamai, District Dir Upper.

.....Respondents

APPLICATION FOR THE TRANSFER OF TITLED 12(2) PETITION FROM BENCH AT SWAT TO BENCH AT PESHAWAR.

Respectfully Submitted:-

1. That the above titled service 12(2) Petition is pending adjudication before this honorable Tribunal and is fixed for 08-10-2024.
2. That the respondents No 1 & 2 as well as the counsel of the petitioners are seated at Peshawar hence the applicants requests for transfer of the titled 12(2) petition at principal seat of this honorable Tribunal at Peshawar.
3. That the valuable rights of the applicants are at stake as in case the appeal of the appellant is not heard at Peshawar, they would be burdened with charges for no fault.
4. That there is no legal bar on transfer of titled 12(2) petition at principal seat of this honorable Tribunal which would rather cause convenience to the parties.

It is therefore most humbly prayed, that on acceptance of this application, the titled 12(2) petition, may kindly be transferred from the bench of honorable Tribunal at Swat to the bench of this honorable Tribunal at Peshawar.

Dated:--12-09-2024

Basit Ali
Appellant

Through

Fazal Shah Mohmand
Fazal Shah Mohmand

Advocate

Supreme Court Of Pakistan.

&

Ibad Ur Rehman Khalil *Ibad*

&

Baseer Shah *Baseer*

Advocates High Court *Baseer*

AFFIDAVIT

I, Basit Ali Khan, Primary School Teacher (BPS-12), Govt. Primary School, Shormai, Dir Upper (Petitioner No 10), 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.

Basit Ali
DEPONENT

