

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 2505/2023

Muhammad Arif

VS

Chief Conservator of Forest etc.

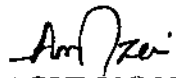
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01.	Memo of application	----	01-02
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RESPONDENT NO. 05

IHSAN ULLAH WAZIR

THROUGH:-


(M. ASIF YOUSAFZAI)
ASC


(S.NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT
OF PESHAWAR

&

(HILAL ZUBAIR)
ADVOCATE

Room No.FR-08, 4th Floor,
Bilour Plaza Peshawar Cantt:
Cell # 0312-9103240

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

Khyber Pakhtunkhwa
Service Tribunal

W.P. No. 2505/2023

Diary No. 15695

Dated 11-09-24

Muhammad Arif Forester North Waziristan Forest Division Bannu
Township, Southern Circle Bannu.

APPELLANT

VERSUS

1. Chief Conservator of Forests Central Southern Region-I Peshawar.
2. Conservator of Forests Southern Circle Bannu.
3. Division Forest Officer North Waziristan Forest Division Bannu.
4. Ihsan Ullah Dawar Forester North Waziristan Forest Division Bannu.
5. Ihsan Ullah Wazir Forester North Waziristan Forest Division Bannu.
6. Muhammad Ishaq Shah Forester North Waziristan Forest Division.
7. Muhammad Iqbal Forester D.I.Khan Forest Division.
8. Conservator Forests Central Southern Region KPK-I Peshawar.

RESPONDENTS

.....
**APPLICATION FOR FIXING THE ABOVE
TITLED APPEAL AT PRINCIPAL SEAT
PESHAWAR.**

.....

RESPECTFULLY SHEWETH:

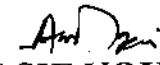
1. That the above titled appeal is pending before this august Tribunal and fixed for 20-9-2024 at Bannu Bench.
2. That the appellate Authority i.e Respondent No. 01 is at Peshawar as well as the Counsels for the appellant and private Respondents are also practicing lawyers at Peshawar station and it would be inconvenient for all the parties to pursue the case at Bannu Bench.
3. That there is no legal hurdle in fixing the case at Principal Seat Peshawar, especially, to meet the ends of justice and chance of defence.


It is, therefore, most humbly prayed that the above captioned appeal may be fixed at Principal Seat Peshawar on the date already fixed for arguments. Any other remedy which august Tribunal deems fit and appropriate that may also be awarded in favour of appellant.


RESPONDENT NO. 05

IHSAN ULLAH WAZIR

THROUGH:


(M. ASIF YOUSAFZAI)
ASC


(S. NOMAN ALI BUKHARI)
ADVOCATE HIGH COURT
OF PESHAWAR

& 
(HILAL ZUBAIR)
ADVOCATE

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 2505/2023

Muhammad Arif

VS

Chief Conservator of Forest etc.

AFFIDAVIT

I, Ihsan Ullah Wazir S/o Akbar Ali Jan, Forester of North Waziristan Forest Division Bannu, for (Respondent No. 05) do hereby affirm that the contents of this CM Application are true and correct and nothing has been concealed from this Honorable Tribunal.

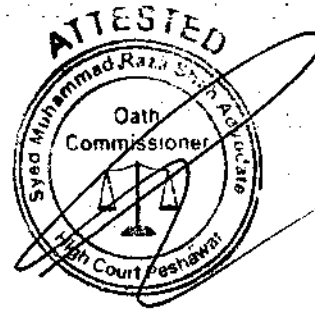

DEPONENT

Ihsan Ullah Wazir

IDENTIFIED BY:

(M. ASIF YOUSAFZAI)
ASC

11 SEP 2024



**BEFORE THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**



Service Appeal No 285/2023

Muhammad Arif, Forester North Waziristan, Forest Division Bannu Township, Southern Forest Circle Bannu.

.....Appellant

VERSUS

1. Chief Conservator Forest Central Southern Region-I Khyber Pakhtunkhwa Peshawar.
2. Conservator Southern Forest Circle Bannu.
3. Divisional Forest Officer, North Waziristan, Forest Division Bannu.
4. Ihsan Ullah Dawar Forester North Waziristan, Forest Division Bannu Township, Southern Forest Circle Bannu.
5. Ihsan Ullah Wazir Forester North Waziristan, Forest Division Bannu Township, Southern Forest Circle Bannu.
6. Muhammad Ishaq Shah, Forester South Waziristan, Forest Division Bannu Township, Southern Forest Circle Bannu.
7. Muhammad Iqbal, Forester D.I Khan, Forest Division Bannu Township, Southern Forest Circle Bannu.
8. Conservator Forest Central Southern Region KPK-1 Peshawar.

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, FOR
SETTING ASIDE THE IMPUGNED SENIORITY LIST ISSUED
VIDE DATED 13.12.2022, WHEREBY THE NAME OF THE
APPELLANT HAS BEEN SHOWN AT SERIAL NO 15 AND
JUNIORS OF THE APPELLANT HAVE BEEN PLACED AS
SENIOR FROM THE APPELLANT AND AFTER GOT THE
KNOWLEDGE OF THE IMPUGNED SENIORITY THE
APPELLANT FILED DEPARTMENTAL APPEAL FOR
RECTIFICATION / CORRECTION SENIORITY LIST, WHICH
WAS NOT YET DECIDED AFTER COMPLETION OF THE
STATUTORY PERIOD.**

Prayer in Appeal:

On acceptance of the instant Appeal, the Appellant being Senior from the respondents No 4-to 7 and since his appointment his correct seniority list had been issued, but the fresh seniority list issued vide dated 13.12.2022, whereby the Appellant has been placed Junior from the respondents No 4 to 8 which is illegal and liable to be set aside, consequently the official respondents may kindly be directed to prepare Fresh Seniority List of the Foresters and place the appellant at appropriate position over and above

ED

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

A. No. 255/2023
M. Arif is Qad

11th July, 2024 1.

Learned counsel for the appellant present

Muhammad Jan, District attorney for official respondents and

junior to counsel for private respondent No.4 present.



2. Learned counsel for the appellant seeks adjournment on the ground that he has not prepared the case. This case pertains to camp court Banno, therefore, let it be fixed there. To come up for arguments on 20.09.2024 before D.B at camp court Bannu. P.P given to the parties.

(Rashida Bano)
Member (J)

(Kalim Arshad Khan)
Chairman

Adnan Shah, P.A.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

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