

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR

SERVICE APPEAL NO. 2506/2023

Zar Gula Jan

VS

Chief Conservator of Forest etc.

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V. M. S. Khan
RESPONDENT NO. 04.

THROUGH:-

M. Asif Yousafzai
(M. ASIF YOUSAFZAI)
ASC

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

Hilal Zubair
&
(HILAL ZUBAIR)
ADVOCATE

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Cell # 0312-9103240*

BEFORE THE KP SERVICE TRIBUNAL, PESHAWAR.

SERVICE APPEAL NO. 2506/2023

Zar Gula Jan S/o Aman Ullah Khan, Forester North Waziristan Forest
Division Bannu Township, Southern Circle Bannu.

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 15694

Dated 11-09-24

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 for arguments. Any other remedy which august Tribunal deems fit and appropriate that may also be awarded in favour of appellants.


RESPONDENT NO. 04

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. 2506/2023

Zar Gula Jan

VS

Chief Conservator of Forest etc.

AFFIDAVIT

I, Ihsan Ullah Dawar, Forester of North Waziristan Forest Division Bannu, for (Respondent No. 04), 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 Dawar

IDENTIFIED BY:

**(M. ASIF YOUSAFZAI)
ASC**



19 1 SEP 2024

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



Service Appeal No 2506 /2023

Zer Gula Jan S/o Aman Ullah Khan, 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

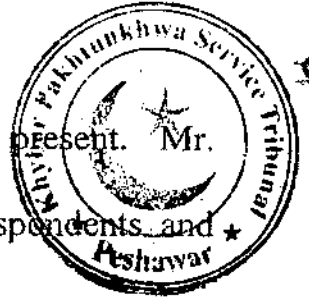
**SERVICE APPEAL UNDER SECTION 4 OF KHYBER
PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974, FOR
SETTING ASIDE THE IMPUGNED SENIORITY LIST ISSUED
VIDE DATED 13.12.2022, WHEREBY THE NAME OF THE
APPELLANT HAS BEEN SHOWN AT SERIAL NO. 15 AND
JUNIORS OF THE APPELLANT HAVE BEEN PLACED AS
SENIOR FROM THE APPELLANT AND 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

TESTED
[Signature]
Conservator Forest Central
Southern Region KPK-1
Peshawar

A No-2506/2023
Zer Gula Jan vs Govt



11th July, 2024 1.

Learned counsel for the appellants present. Mr.

Muhammad Jan, District attorney for official respondents and

junior to counsel for private respondent No.4 present.

2. Learned counsel for the appellants 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

ATTESTED

EXAMINER
Ayub Paktunkhwa
Service Tribunal
Peshawar

Adnan Shah, P.A.

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