

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

In the matter of appeal No. 884/2024

Diary No. 16877

Dated 17-10-24

Masood Jan

VERSUS

Province of KPK etc

**APPLICATION FOR PLACING ON COURT FILE
THE DEPARTMENTAL APPEAL OF THE
APPELLANT WHICH IS INADVERTENTLY BEEN
OMITTED AND NOT FILED AT THE TIME OF
FILING THE APPEAL AS WELL AS WHEN THE
CASE WAS PENDING BEFORE THE PESHAWAR
HIGH COURT PESHAWAR**

Respected Sir

1. That the appeal cited above has been subjudice before this court and fixed for today i.e 17.10.2024.
2. That at the time of filing the case before the Hon' able Peshawar High Court Peshawar, the Departmental appeal of the appellant was inadvertently been omitted and not filed, which is a necessary document for the decision of the case. The same was remained omitted as this case was sent by the Hon' able Peshawar High Court to KPK Service Tribunal, Peshawar.
3. That there is no legal bar to place the said document in the court file and it is in the interest of justice, that the same be placed on the court file and be treated an integral part of the case.

It is therefore, most humbly prayed that on acceptance of the instant application the Departmental appeal of the appellant may kindly be placed on court file and be treated an integral part of the case.

Dated 17/10/2024

Appellant


Through



Shahzada Irfan Zia
Advocate Peshawar
Cell No. 0300-9345297

AFFIDAVIT

I, Shahzada Irfan Zia Advocate on the instructions of my client do hereby affirm that the contents of this application are true and correct.


Deponent



17/10/2024

The Secretary Finance Department
KPK, Peshawar

(Through Proper Channel)

Subject: Appeal for grant of increases on
the commuted portion of pension w.e.f
the date of retirement to the date of
restoration of pension i.e 05-05-2015

Respected Sir,

1- That the pension of the applicant was restored
on 5-5-2015 after 26 years of his retirement
but without the increases on commuted portion
of pension.

2. That the august Supreme Court of Pakistan already
in a judgment allowed increases on commuted portion of
pension to the retired employees, therefore, the applicant
is also entitled for the same and looking towards
your goodness for kind consideration.

It is therefore requested that the applicant
may kindly be given the increases on commuted portion
of his pension and his pension be revised after inclusion
of all increases of commuted portion of pension and
obeyed.

Dated: 10-2-2023

Yours Sincerely

Masood Jan

EX. PTC (BPS-11)

R/o Phase-6, Street No-5, House No-39

Hayat Abad, Peshawar.

Call: 0317-9847215

10/2/23
S. Ullah