

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Application Petition No. 1189/2024

S.A # 1507/23

Khaista Gul

.....Applicant/Petitioner

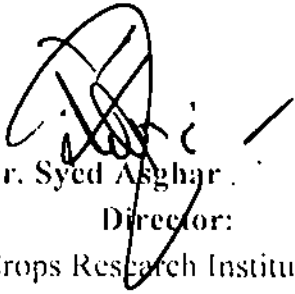
VERSUS

SECRETARY AGRICULTURE & OTHERS

.....Respondents

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Dr. Syed Asghar

Director:

Sugar Crops Research Institute, Mardan

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Application Petition No. 1189/2024

Case No. 17024

Dated 23-10-24

Khaista Gul S/O Wali Gul, J/Clerk (BS-11), presently posted at Sugar
Crops Research Institute Mardan

.....Applicant/Petitioner

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary, Agriculture,
Department, Peshawar
2. The Director General, Agriculture Research, Peshawar
3. The Director, Sugar Crops Research Institute, Mardan
4. Muhammad Ismail (N/Qasid): Sugar Crops Research Institute Mardan
5. Shabir Ahmad (Junior Clerk)
6. Rahat Khan (Junior Clerk)
7. Muhammad Ibrar (Junior Clerk)
8. Noor Aziz (Junior Clerk)
9. Inam Ullah (Junior Clerk)
10. Wajid Khan (Junior Clerk)
11. Ajab Khan (Junior Clerk)
12. Muhammad Basir (Junior Clerk)
13. Mudassir Aqeel (Junior Clerk)

.....Respondents

SUBJECT: REPLY ON BEHALF OF RESPONDENTS NO. 1,2&3

Respectfully Sheweth: -

Para: I-IV Correct to the extent that the appeal was incompetent on account of misjoinder/nonjoinder of necessary parties and was also barred by limitation. Moreover, vide Service Appeal No. 1507/23, the respondent Muhammad Ismail has assailed the promotion order dated 31.10.2022 pertaining to the applicant/petitioner.


Furthermore, the appellant Muhammad Ismail also didn't assailed the seniority notified vide No.2171/Estt/DGAR, dated 28.03.2023, wherein he was at Serial No. 34.

Para: V No comments up to the extent that against the order/judgment dated 25.04.2024 passed by this Hon'ble Tribunal in Service Appeal bearing No. 1507/23, the respondent department has filed CPLA bearing No. 574-P/2014, which is pending before the Supreme Court of Pakistan

Para: VI with the permission of this Hon'ble Tribunal necessary additional grounds/documents in support to this petition will be provided at the time of arguments.

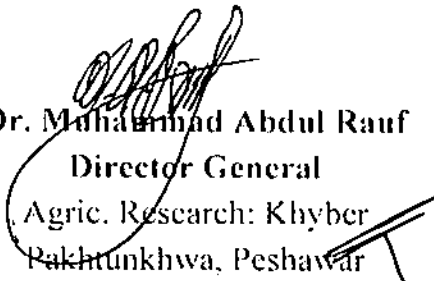
It is therefore most humbly prayed that the instant 12(2): CPC Petition may very graciously be decided on merit

Respondent No. 1



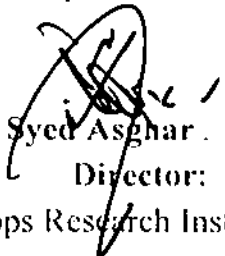
Atta ur Rehman
Secretary
Agriculture Department
Khyber Pakhtunkhwa, Peshawar

Respondent No. 2



Dr. Muhammad Abdul Rauf
Director General
Agric. Research: Khyber
Pakhtunkhwa, Peshawar

Respondent No. 3



Dr. Syed Asghar
Director:
Sugar Crops Research Institute, Mardan

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Application Petition No. 1189/2024

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AFFIDAVIT *****

I, Dr. Muhammad Abdul Rauf, Director General Agric. Research, Peshawar,

do hereby solemnly affirms that the contents of para-wise reply/comments are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Hon'ble Tribunal. The same has also been vetted/approved by the District Attorney/AAG

It is further stated on the oath that in this appeal, the answering respondents have neither been placed *ex-parte* nor their defense has been struck-off.

Dr. Muhammad Abdul Rauf
CNIC# 5602-311641-1
Mob# 03342122268

ATTESTED



23-10-2024

BEFORE THE HONORABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Application Petition No. 1189/2024

Khaista Gul

.....Applicant/Petitioner

VERSUS


SECRETARY AGRICULTURE & OTHERS

..... Respondents

AUTHORITY

I hereby authorize Hafiz Abdul Haq, Research Officer BS-17, o/o Director Sugar Crops Research Institute Mardan to appear before this Hon'ble Tribunal on behalf of Resp. No 1.2 &3 in the afore-mentioned application petition on each and every date, till final decision.

The above-named officer is also authorized to submit all relevant documents/record in connection with the above case.


Dr. Muhammad Abdul Rauf
Director General
Agriculture Research Khyber Pakhtunkhwa, Peshawar
(Respondent No. 2)