

BEFORE THE KP, SERVICE TRIBUNAL, PESHAWAR.

CM No _____/2024

IN
Service Appeal No. 1463 /2024

Saimoon

V/S Director E&SE KP & Other.

I N D E X

S.No.	Documents	Annexure	Page No.
1.	Memo of Application+Affidavit	----	01-02

Saimoon
APPELLANT

THROUGH:

M. Asif Yousafzai
(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,
OF PAKISTAN.
& *Hilal Zubair*
(HILAL ZUBAIR)
ADVOCATE

Room No. Fr-8, 4th Floor.
Bilour Plaza, Peshawar Cantt:
Contact No. 0333-9103240

BEFORE THE KP SERVICE TRIBUNAL PESHAWAR

CM No _____/2024
IN
Service Appeal No. 1463 /2024

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 17288

Dated 29-10-24

Saimoon, Ex-PST,
Govt: Girls Primary School Said Ali Mela
Central Kurram.....APPELLANT

V/S

1. The Director, E&SE Khyber Pakhtunkhwa near Firdous Chowk Peshawar.
2. The District Education Officer (Female) Kurram.

RESPONDENTS.

APPLICATION FOR CONDONATION OF DELAY IF ANY.

RESPECTFULLY SHEWETH:

1. That the above titled appeal is pending before this august Tribunal which has been filed against the order dated 30.10.2021 in time but the final rejection order has been communicated to the appellant after the lapse of 90-days.
2. That the reasons for the delay communication was due to missing of record of appellant at the relevant time as the concerned office was shifted to another place and the missing of record was not fault of the appellant.
3. That the rejection order was communicated to the appellant on his application and efforts which cannot be termed legally as time barred, keeping in view the reported judgment as 13-SCMR-1053, 95-SCMR-776.
4. That the Honorable Supreme Court of Pakistan has held in many cases that the lis is required to be decided on merits instead of knocking out litigant on technicalities including limitation 2003-PLD (S.C)724.

5. That the appellant valuable rights are involved in the matter which needs adjudication on merit as per principle of law and natural justice.

It is therefore most humbly prayed that any delay in the instant case may very graciously be condoned in the instant of justice enabling the appellant to defend his rights on merit. Any other remedy which this august Tribunal deems fit and appropriate that may also be awarded in favour of the appellant.

Saim
APPELLANT

THROUGH:

M. Asif
(M. ASIF YOUSAFZAI)
ADVOCATE SUPREME COURT,
OF PAKISTAN.

Hilal
& *Zubair*
(HILAL ZUBAIR)
ADVOCATE

AFFIDAVIT

It is affirmed and declared that the contents of application are true and correct to the best of my knowledge and belief.



Saim
DEPONENT