

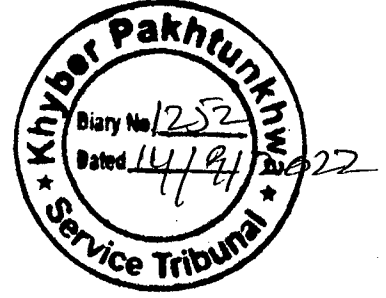
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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

C.M No. _____ /2022

IN

Execution Petition No.269/2021



ABDUL QUDUS & OTHERS VS GOVT: OF KP & OTHERS

APPLICATION FOR EARLY HEARING IN THE MENTIONED
EXECUTION PETITION

R/SHEWETH:

- 1- That the above mentioned Execution Petition for implementation of the judgment dated 15.09.2021 is pending adjudication before this august Tribunal which was fixed for hearing on 13.09.2022 but due to non-availability of the Honorable bench the date of hearing has been adjourned to 24.10.22.
- 2- That the Execution Petition of the judgment mentioned above is pending before this august Tribunal since 2021 but the respondents time and again strictly directed but inspite that they are not willing to implement the same judgment.
- 3- That inspite of clear directions of this august Tribunal in the judgment mentioned above to modify/rectify the promotion order dated 30.6.20 by including the names of appellants/petitioners but instead implementation of the judgment of this august Tribunal, the respondents conducted several PSB meetings in violation of the judgment of this august Tribunal the 1st on 02.12.2021, the 2nd on 07.04.2022 and the 3rd one on 06.07.2022 while promoted many juniors to the petitioners.
- 4- That the respondents time and again violated the judgment of this august Tribunal by conducting PSB meeting for promotion of further juniors of the petitioners but kept deaf ear on the directions of this august Tribunal.
- 5- That it is further added that it came into the knowledge of the petitioners that the respondents are bent to conducting PSB meeting in the near future for further promotion and if the same has been conducted the petitioner would face with further irreparable loss.
- 6- That the interest of justice demands that such like matter should be heard on an earlier date before the PSB meeting of the respondents to meet the ends of justice and also to meet the principles of access to justice.

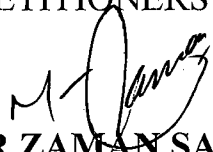
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It is, therefore, most humbly prayed that on acceptance of this application the above mentioned writ petition may very kindly be fixed for hearing as early as possible.

Dated: 14.09.2022.


PETITIONERS

Through:


MIR ZAMAN SAFI
ADVOCATE

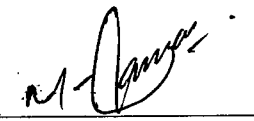
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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
PROFORMA FOR EARLY HEARING

FORM 'A'

To be filled by the counsel

Case Number	C.M. No. _____/2022					
	In Execution Petition No. 269/2021					
Case Title	ABDUL QUDUS & OTHERS		VS	GOVT: OF KP		
Date of Institution	2021					
Bench	SB ✓		DB			
Case Status	Fresh		Pending	✓		
Stage	Notice		Motion		Arguments	✓
Urgency to be clearly stated	That the Honorable Khyber Pakhtunkhwa Service Tribunal, Peshawar decided the matter in favor of the appellants/petitioners vide judgment dated 15.09.2021. That the respondents were not willing to obey the judgment of the august Service Tribunal, therefore, the petitioners filed Execution Petition for implementation of the judgment of august Service Tribunal.					
Nature of the relief Sought	Early fixation of the date in the execution petition.					
Next date of hearing	24.10.2022					
Alleged target date	Next week					
Counsel for	Petitioner	✓	Respondents		In person	

Signature of Counsel/party:- 

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KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing 21/9 -P/2021

In case No. 269 -P/2021

Abdul Qudus & Others Vs Gout: of UP & Others

Presented by Mir Zaman Safi on behalf of Petitioners. Entered in the relevant register.

Put up alongwith main case _____

Last date fixed	<u>13.09.2022</u>
Reason(s) for the last adjournment , If any by the branch Incharge.	<u>Non-availability of the bench.</u>
Date(s) fixed in the similar matter by the Branch Incharge	<u>Nil</u>
Available dates Readers/Assistant Registrar	

Assistant Registrar

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Due to general strike of the bar, the case is adjourned. To come up for further proceedings on 08.03.2022 before S.B.

(Mian Muhammad)
Member(E)

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Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 02.06.2022 for the same as before.

Reader.

All the petitioners, except petitioner namely Farasat Ullah, Deputy Public Prosecutor, are present. Mr. Naeem Ullah, Assistant Director (Litigation) alongwith Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present and stated at the bar that working paper has already been submitted to the concerned quarter and that the case of the petitioners shall be placed before the PSB in its upcoming meeting. Adjourned. To come up for implementation report on 28.06.2022 before the S.B.

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PSB meeting held on 02.12.2021

	<p>upgraded from BS-17 to BS-18 on 02.02.2017. She has neither completed prescribed length of service for promotion nor for appointment on acting charge basis in BS-19.</p> <p>The Board recommended to defer her promotion.</p>
r. irasatullah.	<p>His date of birth is 31.10.1984. He joined government service on 09.12.2014 as Assistant Public Prosecutor BS-17 and was appointed on 24.05.2016 as Deputy Public Prosecutor BS-17. Subsequently the post of Deputy Public Prosecutor was upgraded from BS-17 to BS-18 on 02.02.2017. He has neither completed prescribed length of service for promotion nor for appointment on acting charge basis in BS-19.</p> <p>The Board recommended to defer his promotion.</p>
iss Sumaira.	<p>Her date of birth is 05.05.1979. She joined government service on 24.05.2016 as Deputy Public Prosecutor BS-17. Subsequently the post of Deputy Public Prosecutor was upgraded from BS-17 to BS-18 on 02.02.2017. She has neither completed prescribed length of service for promotion nor for appointment on acting charge basis in BS-19.</p> <p>The Board recommended to defer her promotion.</p>
Miss Mahjabeen.	<p>Her date of birth is 20.02.1980. She joined government service on 24.05.2016 as Deputy Public Prosecutor BS-17. Subsequently the post of Deputy Public Prosecutor was upgraded from BS-17 to BS-18 on 02.02.2017. She has neither completed prescribed length of service for promotion nor for appointment on acting charge basis in BS-19.</p> <p>The Board recommended to defer her promotion.</p>
Mr. Abdul udus Khan.	<p>His date of birth is 03.10.1987. He joined government service on 24.05.2016 as Deputy Public Prosecutor BS-17. Subsequently the post of Deputy Public Prosecutor was upgraded from BS-17 to BS-18 on 02.02.2017. He has neither completed prescribed length of service for promotion nor for appointment on acting charge basis in BS-19.</p> <p>The Board recommended to defer his promotion.</p>
Miss Fari afaqie.	<p>Her date of birth is 21.10.1979. She joined government service on 30.09.2016 as Deputy Public Prosecutor BS-17. Subsequently the post of Deputy Public Prosecutor was upgraded from BS-17 to BS-18 on 02.02.2017. She has neither completed prescribed length of service for promotion nor for appointment on acting charge basis in BS-19.</p> <p>The Board recommended to defer her promotion.</p>
Muhammad	<p>His date of birth is 01.05.1962. He joined government service on 03.08.1991 and was promoted as Assistant Public</p>

Office (PSB)
Be...
ment Department

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VAKALATNAMA

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

_____ OF 2022

Abdul Qudoos & others (APPELLANT)
(PLAINTIFF)
(PETITIONER)

VERSUS

Chief Secretary KP & others (RESPONDENT)
(DEFENDANT)

I/We Farasat Ullah

Do hereby appoint and constitute **MIR ZAMAN SAFI, Advocate, Peshawar** to appear, plead, act, compromise, withdraw or refer to arbitration for me/us as my/our Counsel/Advocate in the above noted matter, without any liability for his default and with the authority to engage/appoint any other Advocate Counsel on my/our cost. I/we authorize the said Advocate to deposit, withdraw and receive on my/our behalf all sums and amounts payable or deposited on my/our account in the above noted matter.

Dated. 13 / 09 / 2022

Farasat Ullah
CLIENT FARASAT ULLAH
12201-8046231-9
MIR ZAMAN SAFI
ACCEPTED
MIR ZAMAN SAFI
ADVOCATE

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Hashtnagri, Peshawar.
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0317-9743003