

22nd Nov, 2022

Counsel for the petitioner present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

This case pertains to camp court Abbottabad. Learned AAG is directed to ensure compliance of the judgment of this Tribunal and compliance report be submitted at camp court Abbottabad on 23.01.2022 before S.B.





(Kalim Arshad Khan)
Chairman.

Form- A
FORM OF ORDER SHEET

Court of _____

Execution Petition No. 598/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1	10.10.2022	<p>The execution petition of Syed Ibrar Shah submitted today by Sardar Muhammad Azeem Advocate. It is fixed for implementation report before touring Single Bench at A.Abad on <u>18-10-22</u> Original file be requisitioned. AAG has noted the next date. The respondents be issued notices to submit compliance/implementation report on the date fixed.</p> <p style="text-align: right;">By the order of Chairman  REGISTRAR <u>au</u></p>
	18 th Oct., 2022	<p>Counsel for the applicant present. Notices be issued to the respondents. To come up for report implementation report on 22/10/2022 1.2022 before S.B.2022 before 3/11/2022</p> <p style="text-align: right;"> (Fareeha Paul) Member(E)</p>

**SCANNED
KPST
Peshawar**

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Execution Petition No. 598/2022
IN

Service Appeal No. 792/18

SCANNED
KPST
Peshawar

Syed Ibrar Shah, Assistant office of District Public Prosecutor Torghar.

...PETITIONER

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Home & Tribunal
affairs Department, Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

EXECUTION PETITION

INDEX

S. #	Description	Page Nos.	Annexure
1.	Execution Petition (with Affidavit)	1 to 3	
2.	Copy of Judgment	4 to 7	"A"
3.	Copy of application	8 to 9	"B"
4.	Wakalatnama	-10-	

1/18
1/18
...PETITIONER

Dated; 8/10/22/2022

Through

Sardar Muhammad Azeem
(Sardar Muhammad Azeem)
Advocate, Abbottabad Office No. 1573
High Court Plaza
Abbottabad
0312 9832024

1

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

Khyber Pakhtunkhwa
Service Tribunal Execution Petition No. 598/2022
IN
Case No. 1551 Service Appeal No. 792/18
Dated 10-10-2022

Syed Ibrar Shah, Assistant office of District Public Prosecutor Torghar.

...PETITIONER

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Home & Tribunal affairs Department, Khyber Pakhtunkhwa, Peshawar.
2. Director General Prosecution, Khyber Pakhtunkhwa Home & Tribunal affairs Department, Peshawar.
3. District Public Prosecutor Torghar.

...RESPONDENTS

**EXECUTION PETITION SEEKING FOR
IMPLEMENTATION OF JUDGMENT DATED
18/05/2022 IN SERVICE APPEAL NO. 792/18 BY
THIS HONOURABLE TRIBUNAL KHYBER
PAKHTUNKHWA CAMP COURT ABBOTTABAD.**

Respectfully Sheweth;-

That, facts forming the background of instant Service Appeal are arrayed as under;

1. That the respondents' department granted promotion to petitioner in BPS-11 from the post of Junior Clerk BPS-14 to the post of Senior Clerk vide order No. DP/ESA (100) 57-84 dated

31/01/2018 with immediate effect instead of from the date when his junior was promoted i.e. 08/01/2016.

2. That the petitioner filed Appeal Ni. 792/18 before this Honourable Tribunal against his promotion order for amendment in promotion order to the extent that the petitioner may be allowed/bonafide promotion from the dated when his juniors were promoted instead of with immediate effect.
3. That the appeal of the petitioner is accepted by this Honourable Tribunal, vide Judgment dated 13/05/2022 at Camp Court Abbottabad. Copy of Judgment is annexed as Annexure "A".
4. That the petitioner submitted judgment along with application for implementation of Judgment before respondents but the respondents not implement the judgment of this Honourable Tribunal uptill now and attitude of the respondents is prevaricate.
5. That, the Act of the respondents regarding non implementation of Judgment of this Honourable Tribunal dated 18/05/2022 is clear violation and

3


contempt of this Honourable Tribunal. Copy of application is annexed as Annexure "B".

In is therefore, respectfully prayed that on acceptance of this petition respondents may graciously be directed to issue the promotion order of appellant in BPS-14 from the date when his Junior was promoted i.e 08/01/2016 with all back benefits in the interest of justice.

Dated; 8/6 /2022

Through


...PETITIONER


(Sardar Muhammad Azeem)
Advocate, Abbottabad

VERIFICATION:-

Verified that the contents of this execution petition are true and correct to the best of the knowledge and belief nothing material has been suppressed from this Honourable Authority.


...PETITIONER

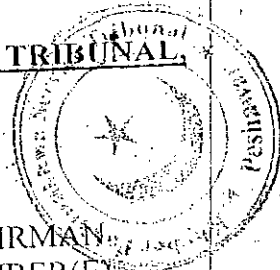
4

'A'

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT ABBOTTABAD.**

Service Appeal No. 792/2018

BEFORE: KALIM ARSHAD KHAN --- CHAIRMAN
FAREEHA PAUL --- MEMBER(E)



Syed Ibrar Shah, Senior Clerk, Office of District Public
Prosecutor, Torghar. (Appellant)

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs Department, Khyber Pakhtunkhwa.
2. Director General Prosecution, Khyber Pakhtunkhwa Home & Tribal Affairs Department, Peshawar.
3. District Public Prosecutor, Torghar.
4. Syed Hakeem Shah, Assistant office of the District Public Prosecutor, Buner through Director General Prosecution, Peshawar.
5. Abdul Wahid, Assistant, office of the Deputy Public Prosecutor Bannu through Director General Prosecution Peshawar.

(Respondents)

Present:

SARDAR MUHAMMAD AZEEM
Advocate --- For Appellant.

MUHAMMAD RIAZ KHAN PAINDAKHEI,
Assistant Advocate General --- For respondents.

Date of Institution.....12.06.2018
Date of Hearing.....17.05.2022
Date of Decision.....18.05.2022

JUDGEMENT

KALIM ARSHAD KHAN, CHAIRMAN:- The service appeal has been instituted under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 for promotion to the post of Senior Clerk (BS-14) with all back benefits and seniority from the date of deferment.

ATTESTED

JOYAL KINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Azeem
Azeem
Sardar Muhammad
Azeem Advocate
High Court Abbottabad

[Handwritten signature]

02. Brief facts of the case are as given in the appeal that the appellant was serving as Junior Clerk in the office of respondent No.3. On 22.07.2015 a complaint was lodged against the appellant regarding illegal gratification. On the basis of this application an enquiry was conducted against the appellant. As a result of that enquiry the appellant was deferred from promotion to the post of Senior Clerk (BS-14). Later on the appellant exonerated from the charges leveled against him vide order dated 31.03.2016. That the appellant submitted an application to the respondents for his promotion w.e.f 29.01.2016 to the post of Senior Clerk (BS-14) but of no avail. Feeling aggrieved, the appellant filed departmental appeal to respondent No.2 on 14.02.2018 which was not responded within the stipulated statutory period, hence, the instant service appeal filed in this Tribunal on 12.06.2018.

03. Notices were issued to the respondents who submitted written replies/comments and contested the appeal.

04. We have heard learned counsel for the appellant and Assistant Advocate General and perused the case file with connected documents thoroughly.

05. Learned counsel for the appellant contended that the promotion order of the appellant issued with immediate effect was discriminatory and that justice demand that the appellant might be treated in accordance with law from the date when his juniors were promoted.

TESTED

EXAMINED
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

18/5/18

Attested
Sardar Muhammad
Azeem Advocate
High Court Abbottabad

06. Learned Additional Advocate General on the other hand submitted that a meeting of Departmental Promotion Committee was convened on 29.01.2016 for the purpose of promotion of Junior Clerks to the posts of Senior Clerks and that the name of the appellant was also included in the working paper however, he was deferred due to pending inquiry against him and after exoneration from the inquiry, the appellant was promoted and that question of superseding the appellant by the junior colleagues did not arise and lastly, he submitted that no discrimination to the appellant was meted out rather he was promoted in accordance with law and rules. He, therefore, requested for dismissal of the instant appeal.

07. Record reveals that the meeting of Departmental Promotion Committee was convened for the purpose of promotion of Junior Clerks (BS-11) to the post of Senior Clerks (BS-14) and the name of the appellant was also included in the working paper, the Committee however, deferred his case due to a pending enquiry against him. The appellant after exoneration from the charges, was promoted to the post of Senior Clerk (BS-14), but with immediate effect and his name was also placed in his due place in the seniority list, whereas the appellant is seeking relief to the effect that his promotion should be made from the date, when his juniors were promoted, as he was deferred and not superseded. The learned Assistant Advocate General when confronted with the proposition conceded to the fact that the appellant was deferred due to an enquiry pending against him and after his exoneration, respondents were required to give effect to his promotion

Attested
 Sardar Muhammad
 Azeem Advocate
 High Court Abbottabad

ATTESTED

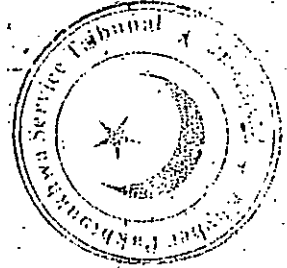
[Signature]

[Signature] *[Signature]*

from the date i.e. 08.01.2016 when his other colleagues were promoted.

08. In the light of foregoing reasons, the appeal in hand is accepted and the respondents are directed that the promotion of the appellant shall be given effect from the date of his deferment. He be also assigned the due place in seniority list. As regard of the other claim for further promotion and seniority of the post of Assistant, the appellant may approach his competent authority in accordance with law and rules. Costs shall follow the event. Consign.

09. Pronounced in open court in Camp Court Abbottabad and given under our hands and seal of the Tribunal this 18th day of May, 2022.



(KALIM ARSHAD KAHN)
CHAIRMAN
CAMP COURT ABBOTTABAD

(FAKEEHA PAUL)
MEMBER(E)
CAMP COURT ABBOTTABAD

Attested
Sardar Muhammad
Azeem Advocate
High Court Abbottabad

Date of Presentation of Application 03/06/22
Number of Words 1600
Copying Fee 18/-
Stamp 4/-
Total 22/-
Name of Applicant
Date of Completion of Copy 03/06/22
Date of Delivery of Copy 03/06/22

Certified to be true copy
EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

To,

The Worthy Director General of Prosecution,
Khyber Pakhtunkhwa Home and
Tribal Affairs Department, Peshawar.

8 (B)

Through: Proper Channel

Subject: - APPLICATION FOR GRANT OF BENEFITS ON PROMOTION FROM JUNIOR CLERK (BPS-11) TO SENIOR CLERK (BPS-14) W.E.F 08-01-2018, IN THE LIGHT OF SERVICE TRIBUNAL COURT JUDGEMENT / ORDER DATED: 18-05-2022.

Respected Sir,

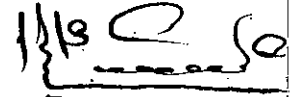
It is stated that, I am enclosing herewith the attested copy of Service Tribunal Court Judgment / Order dated: 18-05-2022.

It is brought into your kind notice that, due to pending inquiry against me, I was promoted from Junior Clerk BPS-11 to Senior Clerk BPS-14 on dated 03-01-2018 while my junior colleagues were promoted on 18-01-2016 and then me and my Juniors Colleagues were promoted as Assistant BPS-16 on 11-02-2019. I was deprived from financial benefits in Salary / Pay & Allowance as my juniors get.

It is, therefore, requested to your honour that, kindly enable my promotion from Junior Clerk BPS-11 to Senior Clerk BPS-14 w.e.f. 08-01-2016 and grant me all benefits in the light of Service Tribunal Court Judgment / Order dated 18-05-2022 and thus obliged.

Date: 13-08-2022

Yours Sincerely,



Syed Ibrar Shah,

Assistant

District Public Prosecutor Office

Torghar

Attested
Azeem
Sardar Muhammad
Azeem Advocate
High Court Abbottabad



The
District Prosecution
Torghar

No: 186-87/2022/DPP/TOR.
Dated Torghar August, 02, 2022

9

To

The Director General of Prosecution,
Khyber Pakhtunkhwa Home and
Tribal Affairs Department, Peshawar.

Subject:-

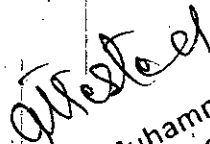
APPLICATION FOR GRANT OF BENEFITS ON
PROMOTION FROM JUNIOR CLERK (BPS-11) TO
SENIOR CLERK (BPS-14) W.E.F. 08-01-2018, IN THE
LIGHT OF SERVICE TRIBUNAL COURT
JUDGMENT DATED 15-05-2022.

Dear Sir,

I have the honor to enclose herewith an application
(in original) of Mr. Syed Ibrar Shah, Assistant, District Public Prosecutor Office
Torghar regarding subject matter for your kind perusal and further necessary
action please.

Faithfully Yours


Shahzad Iqbal
District Public Prosecutor
Torghar


Sardar Muhammad
Azeem Advocate
High Court Abbottabad

کورت فیس

وکالت نامہ

بھارت
 عنوان: سید ابرار شاہ
 نام گورنمنٹ آف ایجوکیشن وائے ایف ایف ایف
 مقام: سائبر ایبٹ آباد

لوجسٹک مقدمہ Execution Petition

باعث آریا گتہ

مقدمہ مندرجہ میں اپنی طرف سے واسے کی روٹی اور جواب دہی کل کارروائی متعلقہ اس مقام

سید ابرار محمد عظیم البرکات و سید ساجد علی

کو دیل مقرر کر کے قرار کیا کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا اور کل صاحب موصوف کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحسب دوسرے اقبال دعویٰ اور بصورت دیگر ڈگری کرائے اجراء وصولی چیک روپیہ و عرضی دعویٰ کی تصدیق اور اس پر دخل کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کی کل یا کسی جزوی کارروائی کے لئے کسی اور دیل یا مختار صاحب قانونی کو اپنے ہمراہ اپنی بجائے تقرر کا اختیار بھی ہوگا اور صاحب مقرر شدہ کو بھی وہی اور ویسے ہی اختیار است ہوں گے اور اس کا ساختہ پر ساختہ لکھ کو منظور قبول ہوگا۔ دوران مقدمہ جو فرچہ و ہر چاہنا اٹوائے مقدمہ کے سبب ہوں گے اس کے مستحق دیل صاحب ہوں گے۔ نیز ہتھیار تم وصول کرنے کا بھی اختیار ہوگا۔ اگر کوئی پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو دیل صاحب موصوف پابند ہوں گے کہ وہی مقدمہ مذکورہ کریں اور اگر تقرر مقرر کردہ میں کوئی جزو ہٹایا ہو تو دیل صاحب موصوف مقدمہ کی ہر وہی کے پابند نہ ہوں گے۔ نیز درخواست ہر اد استہارت ناش ہیضہ منطقی کے دائرہ کرنے اور اس کے ہر وہی کا بھی صاحب موصوف کو اختیار ہوگا۔

لہذا وکالت نامہ تحریر کروایا تاکہ سند رہے۔

مقام: سائبر ایبٹ آباد
 الترقوم: 2022/10/17

سید ابرار محمد عظیم البرکات

Accepted
 Sardar Muhammad
 Azeem Advocate
 High Court Abbottabad

سید ابرار شاہ
 صاحب
 کالہ

AA 9

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Execution Petition No. 598/2022
IN
Service Appeal No. 792/18

Syed Ibrar Shah, Assistant office of District Public Prosecutor Torghar.

...PETITIONER

VERSUS

Government of Khyber Pakhtunkhwa through Secretary Home & Tribunal
affairs Department, Khyber Pakhtunkhwa, Peshawar & others.

...RESPONDENTS

EXECUTION PETITION

INDEX

S. #	Description	Page Nos.	Annexure
1.	Execution Petition	1 to 3	
2.	Copy of Judgment	4 to 7	"A"
3.	Copy of application	8 to 9	"B"
4.	Wakalatnama	-10-	

11/18
12
...PETITIONER

Dated; 8/10/22/2022

Through

(Sardar Muhammad Azeem)

Advocate, Abbottabad office NO 153

High Court Plaza
Abbottabad

0312 9832024

1

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

Execution Petition No. _____

IN

Service Appeal No.792/18

Syed Ibrar Shah, Assistant office of District Public Prosecutor Torghar.

...PETITIONER

VERSUS

1. Government of Khyber Pakhtunkhwa through Secretary Home & Tribunal affairs Department, Khyber Pakhtunkhwa, Peshawar.
2. Director General Prosecution, Khyber Pakhtunkhwa Home & Tribunal affairs Department, Peshawar.
3. District Public Prosecutor Torghar.

...RESPONDENTS

**EXECUTION PETITION SEEKING FOR
IMPLEMENTATION OF JUDGMENT DATED
18/05/2022 IN SERVICE APPEAL NO. 792/18 BY
THIS HONOURABLE TRIBUNAL KHYBER
PAKHTUNKHWA CAMP COURT ABBOTTABAD.**

Respectfully Sheweth;-

That, facts forming the background of instant Service Appeal are arrayed as under;

1. That the respondents' department granted promotion to petitioner in BPS-11 from the post of Junior Clerk BPS-14 to the post of Senior Clerk vide order No. DP/ESA (100) 57-84 dated

31/01/2018 with immediate effect instead of from the date when his junior was promoted i.e. 08/01/2016.

2. That the petitioner filed Appeal Ni. 792/18 before this Honourable Tribunal against his promotion order for amendment in promotion order to the extent that the petitioner may be allowed/bonafide promotion from the dated when his juniors were promoted instead of with immediate effect.
3. That the appeal of the petitioner is accepted by this Honourable Tribunal, vide Judgment dated 13/05/2022 at Camp Court Abbottabad. Copy of Judgment is annexed as Annexure "A".
4. That the petitioner submitted judgment along with application for implementation of Judgment before respondents but the respondents not implement the judgment of this Honourable Tribunal uptill now and attitude of the respondents is prevaricate.
5. That, the Act of the respondents regarding non implementation of Judgment of this Honourable Tribunal dated 18/05/2022 is clear violation and

3

contempt of this Honourable Tribunal. Copy of application is annexed as Annexure "B".

In is therefore, respectfully prayed that on acceptance of this petition respondents may graciously be directed to issue the promotion order of appellant in BPS-14 from the date when his Junior was promoted i.e 08/01/2016 with all back benefits in the interest of justice.

Dated; 21 / 10 / 2022

Through

1/18/21
...PETITIONER

(Sardar Muhammad Azeem)
Advocate, Abbottabad

VERIFICATION:-

Verified that the contents of this execution petition are true and correct to the best of the knowledge and belief nothing material has been suppressed from this Honourable Authority.

1/18/21
...PETITIONER

4

(A)

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
CAMP COURT ABBOTTABAD.**

Service Appeal No. 792/2018

BEFORE: KALIM ARSHAD KHAN ---
FAREEHA PAUL ---

CHAIRMAN
MEMBER(E)



Syed Ibrar Shah, Senior Clerk, Office of District Public
Prosecutor, Torghar. (Appellant)

VERSUS

1. Govt. of Khyber Pakhtunkhwa, through Secretary Home & Tribal Affairs Department, Khyber Pakhtunkhwa.
2. Director General Prosecution, Khyber Pakhtunkhwa Home & Tribal Affairs Department, Peshawar.
3. District Public Prosecutor, Torghar.
4. Syed Hakeem Shah, Assistant office of the District Public Prosecutor, Buner through Director General Prosecution, Peshawar.
5. Abdul Wahid, Assistant, office of the Deputy Public Prosecutor Bannu through Director General Prosecution Peshawar. (Respondents).

Present:

SARDAR MUHAMMAD AZEEM
Advocate

For Appellant.

MUHAMMAD RIAZ KHAN PAINDAKHEI,
Assistant Advocate General

For respondents.

Date of Institution.....12.06.2018
Date of Hearing.....17.05.2022
Date of Decision.....18.05.2022

JUDGEMENT

KALIM ARSHAD KHAN, CHAIRMAN:- The service appeal has been instituted under Section-4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974 for promotion to the post of Senior Clerk (BS-14) with all back benefits and seniority from the date of deferment.

ATTESTED

CHAIRMAN
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Sardar Muhammad
Azeem Advocate
High Court Abbottabad

02. Brief facts of the case are as given in the appeal that the appellant was serving as Junior Clerk in the office of respondent No.3. On 22.07.2015 a complaint was lodged against the appellant regarding illegal gratification. On the basis of this application an enquiry was conducted against the appellant. As a result of that enquiry the appellant was deferred from promotion to the post of Senior Clerk (BS-14). Later on the appellant exonerated from the charges leveled against him vide order dated 31.03.2016. That the appellant submitted an application to the respondents for his promotion w.e.f 29.01.2016 to the post of Senior Clerk (BS-14) but of no avail. Feeling aggrieved, the appellant filed departmental appeal to respondent No.2 on 14.02.2018 which was not responded within the stipulated statutory period, hence, the instant service appeal filed in this Tribunal on 12.06.2018.

03. Notices were issued to the respondents who submitted written replies/comments and contested the appeal.

04. We have heard learned counsel for the appellant and Assistant Advocate General and perused the case file with connected documents thoroughly.

05. Learned counsel for the appellant contended that the promotion order of the appellant issued with immediate effect was discriminatory and that justice demand that the appellant might be treated in accordance with law from the date when his juniors were promoted.

ATTESSED

EXAMINED
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

18/5/22

Attested
Sardar Muhammad
Azeem Advocate
High Court Abbottabad

06. Learned Additional Advocate General on the other hand submitted that a meeting of Departmental Promotion Committee was convened on 29.01.2016 for the purpose of promotion of Junior Clerks to the posts of Senior Clerks and that the name of the appellant was also included in the working paper however, he was deferred due to pending inquiry against him and after exoneration from the inquiry, the appellant was promoted and that question of superseding the appellant by the junior colleagues did not arise and lastly, he submitted that no discrimination to the appellant was meted out rather he was promoted in accordance with law and rules. He, therefore, requested for dismissal of the instant appeal.

07. Record reveals that the meeting of Departmental Promotion Committee was convened for the purpose of promotion of Junior Clerks (BS-11) to the post of Senior Clerks (BS-14) and the name of the appellant was also included in the working paper, the Committee however, deferred his case due to a pending enquiry against him. The appellant after exoneration from the charges, was promoted to the post of Senior Clerk (BS-14), but with immediate effect and his name was also placed in his due place in the seniority list, whereas the appellant is seeking relief to the effect that his promotion should be made from the date, when his juniors were promoted, as he was deferred and not superseded. The learned Assistant Advocate General when confronted with the proposition conceded to the fact that the appellant was deferred due to an enquiry pending against him and after his exoneration, respondents were required to give effect to his promotion

ATTESTED

[Signature]
Sardar Muhammad
Azeem Advocate
High Court Abbottabad

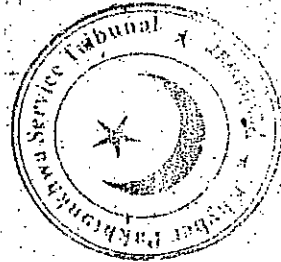
[Signature]

from the date i.e 08.01.2016 when his other colleagues were promoted.

08. In the light of foregoing reasons, the appeal in hand is accepted and the respondents are directed that the promotion of the appellant shall be given effect from the date of his deferment. He be also assigned the due place in seniority list. As regard of the other claim for further promotion and seniority of the post of Assistant, the appellant may approach his competent authority in accordance with law and rules. Costs shall follow the event. Consign.

09. Pronounced in open court in Camp Court Abbottabad and given under our hands and seal of the Tribunal this 18th day of May, 2022.

Attested
[Signature]
Sardar Muhammad
Azeem Advocate
High Court Abbottabad



[Signature]
(KALIM ARSHAD KAHN)
CHAIRMAN
CAMP COURT ABBOTTABAD

[Signature]
(FAKEEHA PAUL)
MEMBER(E)
CAMP COURT ABBOTTABAD

Certified to be true copy

[Signature]
MEMBER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

Date of Presentation of Application 03/06/22

Number of Words 1600

Copying Fee 18/-

Wages 4/-

Total 22/-

Name of Court _____

Date of Completion of Copy 03/06/22

Date of Delivery of Copy 03/06/22

To,

The Worthy Director General of Prosecution,
Khyber Pakhtunkhwa Home and
Tribal Affairs Department, Peshawar.

8 (B)

Through:

Proper Channel

Subject: -

APPLICATION FOR GRANT OF BENEFITS ON
PROMOTION FROM JUNIOR CLERK (BPS-11) TO SENIOR
CLERK (BPS-14) W.E.F 08-01-2018, IN THE LIGHT OF
SERVICE TRIBUNAL COURT JUDGEMENT / ORDER
DATED: 18-05-2022.

Respected Sir,

It is stated that, I am enclosing herewith the attested copy of Service Tribunal Court Judgment / Order dated: 18-05-2022.

It is brought into your kind notice that, due to pending inquiry against me, I was promoted from Junior Clerk BPS-11 to Senior Clerk BPS-14 on dated 03-01-2018 while my junior colleagues were promoted on 18-01-2016 and then me and my Juniors Colleagues were promoted as Assistant BPS-16 on 11-02-2019. I was deprived from financial benefits in Salary / Pay & Allowance as my juniors get.

It is, therefore, requested to your honour that, kindly enable my promotion from Junior Clerk BPS-11 to Senior Clerk BPS-14 w.e.f. 08-01-2016 and grant me all benefits in the light of Service Tribunal Court Judgment / Order dated 18-05-2022 and thus obliged.

Date: 13-08-2022

Yours Sincerely,

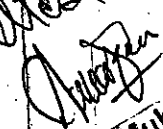


Syed Ibrar Shah,

Assistant

District Public Prosecutor Office

Torghar

Attested

Sandar Muhammad
Azeem Advocate
High Court Abbottabad



The
District Prosecution
Torghar

No: 186-87/2022/DPP/TOR.
Dated Torghar August, 02, 2022

9

To

The Director General of Prosecution,
Khyber Pakhtunkhwa Home and
Tribal Affairs Department, Peshawar.


Subject:-

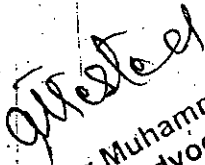
APPLICATION FOR GRANT OF BENEFITS ON
PROMOTION FROM JUNIOR CLERK (BPS-11) TO
SENIOR CLERK (BPS-14) W.E.F. 08-01-2018, IN THE
LIGHT OF SERVICE TRIBUNAL COURT
JUDGMENT DATED 15-05-2022.

Dear Sir,

I have the honor to enclose herewith an application
(in original) of Mr. Syed Ibrar Shah, Assistant, District Public Prosecutor Office
Torghar regarding subject matter for your kind perusal and further necessary
action please.

Faithfully Yours


Shahzad Iqbal
District Public Prosecutor
Torghar


Sardar Muhammad
Azeem Advocate
High Court Abbottabad