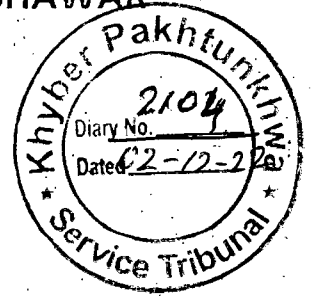


KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING



FORM 'B'

Inst#

Early Hearing 915 -p/20 22

In case No. 915 -p/20 22

Zulfiqar Ali Khan Vs Govt of KP

Presented by _____ on behalf of _____. Entered in the relevant register.

Put up alongwith main case _____

Last date fixed

25/11/22

Reason(S) for last adjournment, if any by the Branch Incharge.

—

Date(s) fixed in the similar matter by the Branch Incharge

Available dates Readers/Assistant

Registrar branch

Assistant Registrar

REGISTRAR

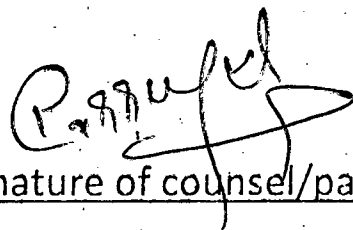
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'A'

To be filled by the Counsel/Applicant

| | | | |
|------------------------------|----------------------------------|--|--|
| Case Number | 915/2022 | | |
| Case Title | Zulfiqar Ali Khan Vs Govt. of KP | | |
| Date of Institution | | | |
| Bench | SB | | DB <input checked="" type="checkbox"/> |
| Case Status | Fresh | | Pending |
| Stage | Notice | | Reply <input checked="" type="checkbox"/> Argument <input checked="" type="checkbox"/> |
| Urgency to clearly stated. | | | |
| Nature of the relief sought. | | | |
| Next date of hearing | 26/01/2023 | | |
| Alleged Target | | | |
| Date | | | |
| Counsel for | Petitioner | Respondent <input checked="" type="checkbox"/> | In person |


Signature of counsel/party

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SA No.915/2022

Zulfiqar Ali Khan

.....Petitioner

Versus

Government of Khyber Pukhtunkhwa and Others.

.....Respondents

SUBJECT: APPLICATION FOR EARLY HEARING.

Respectfully Sheweth:-

- 1 That the instant Service Appeal is pending before this Hon'ble Tribunal.
- 2 That the Hon'ble Tribunal has suspended the operation of impugned Transfer/posting notification dated: 10-06-2022, to the extent of petitioner.
- 3 That no material proceedings have been made in the case for the last few dates owing to different reasons.
- 4 That lastly, the case was fixed for hearing on dated: 25-11-2022, but was adjourned, due to rush of work, to a long date of 26-01-2023.

Prayer:

It is therefore, most humbly requested that the case may kindly be fixed at an early date, for the ends of justice, please.

*Director General
Prosecution
(Respondent No.4)*

Through,

**Additional Advocate General,
Khyber Pakhtunkhwa,
Peshawar.**

IN THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

SA No.915/2022

Zulfiqar Ali Khan

.....Petitioner

Versus

Government of Khyber Pakhtunkhwa and Others.

.....Respondents

SUBJECT:

APPLICATION FOR REVERSING/VACATION OF THE ORDER OF SUSPENSION, OF IMPGUNED NOTIFICATION DATED 10.06.2022, TILL THE FINAL DISPOSAL OF THE INSTANT SERVICE APPEAL.

Respectfully Sheweth:-

- 1 That the instant case is pending before this Hon'ble Tribunal and is fixed for dated: 26-01-2023.
- 2 That this Hon'ble Tribunal has suspended the operation of the impugned order dated: 10-06-2022, to the extent of petitioner, where by the petitioner was transferred from the post of Senior Public Prosecutor Peshawar to the post of Senior Public Prosecutor, Anti-Terrorism Court, Dir Lower.
- 3 That the said suspension of the notification order has given rise to administrative issues, to the respondent Departments.
- 4 That this Hon'ble Tribunal has ample powers to overturn the said suspension order.

Prayer:

It is therefore, most humbly, requested that the suspension of the impugned notification dated: 10-06-2022, may kindly be reversed, till the final disposal of the case, please.

Director General Prosecution

(Respondent No.4)

Through,

**Additional Advocate General,
Khyber Pakhtunkhwa,
Peshawar.**

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

APPEAL NO. 915 of 2022

**Mr. Zulfiqar Ali Khan Senior Public Prosecutor (BPS-19) District
Peshawar.**

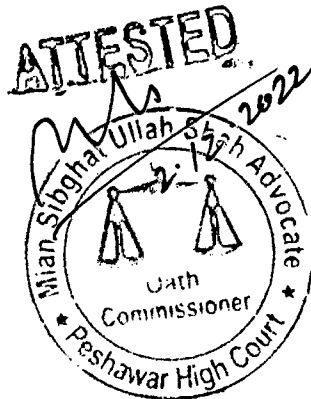
APPELLANT.....

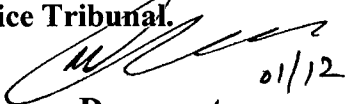
VERSUS

- 1. Govt. of Khyber Pakhtunkhwa, through Chief Secretary Khyber
Pakhtunkhwa, Civil Secretariat Peshawar.**
- 2. Secretary to Govt. of Khyber Pakhtunkhwa, Home and Tribal Affairs
Department Civil Secretariat Peshawar.**
- 3. The Chief Secretary Government of Khyber Pakhtunkhwa, Civil
Secretariat Peshawar.**
- 4. The Director General (Prosecution) Khyber Pakhtunkhwa, Peshawar.**

AFFIDAVIT

I, Muhammad Umair Umar, Deputy Director Legal, Directorate of
Prosecution, Khyber Pakhtunkhwa do hereby solemnly affirm and declare on oath that the
contents of the application for early hearing & vacation of the status quo in the Service
Appeal No. 915/2022, are true and correct to the extent of office record and nothing has
been concealed from this Hon'able Service Tribunal.




Deponent
CNIC No: 17301-4649657-5
Cell No: 0315-0942701