

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**

**PESHAWAR.**

**PROFORMA FOR EARLY HEARING**

**FORM 'A'**

**To be filled by the counsel**

Case Number	APPEAL No.1419/2022					
Case Title	Imtiaz Muhammad ..... <b>Versus</b> ..... Govt & Others					
Date of Institution						
Bench	SB	<input checked="" type="checkbox"/>	DB			
Case Status	Fresh			<b>Pending</b>	<input checked="" type="checkbox"/>	
Urgency to be clearly stated	That the Appellant/Applicant filed the ibid Service appeal against the impugned notification dated 31.01.2022 to the extent of note attached to rule (1) (iii) (d) in respect of promotion on the basis of seniority to be reckoned from the date of first regular appointment rather than date of acquiring the Degree of B.Tech engineering.					
Nature of the relief sought	That during pendency of the ibid Service Appeal the respondents scheduled the meeting of Departmental Promotion Committee for the promotion of juniors to the Appellant/Applicant which is to be held on 16.12.2022, thus the titled Appeal need to be fixed before 16-12-2022. <b>(Copy of letter dated 12-12-2022 is enclosed as Annexure A).</b>					
Next date of hearing	31-01-2022					
Alleged target date	<b>15-12-2022</b>					
Counsel for	<b>Appellant</b>	<input checked="" type="checkbox"/>	Respondent			In person

Signature of Counsel/party :-



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

CM NO. \_\_\_\_\_/2022

IN

APPEAL NO. 1419/2022

Received Peshawar  
No. 2310  
Dated 14-12-22

**IMTIAZ MUHAMMAD VS GOVT.OF KPK**

**APPLICATION FOR REQUISITIONING THE ABOVE TITLED APPEAL**  
**FOR EARLY HEARING.**

**R/SHEWETH:**

**The applicant submits as under:**

1. That the captioned service appeal is pending adjudication before this Hon'ble Tribunal, in which 31-01-2022 is fixed for hearing.
2. That the Appellant/Applicant filed the ibid Service appeal against the impugned notification dated 31.01.2022 to the extent of note attached to rule (1) (iii) (d) in respect of promotion on the basis of seniority to be reckoned from the date of first regular appointment rather than date of acquiring the Degree of B.Tech engineering.
3. That during pendency of the ibid Service Appeal the respondents scheduled the meeting of Departmental Promotion Committee for the promotion of juniors to the Appellant/Applicant which is to be held on 16.12.2022, thus the titled Appeal need to be fixed before 16-12-2022. **(Copy of letter dated 12-12-2022 is enclosed as Annexure A).**
4. That fixing an early date is in the interest of justice and there is no hurdle in fixing an early date in the above titled Petition, besides if an early date is not fixed in the titled Petition, the petitioners would suffer irreparable loss.

**It is therefore prayed, that on acceptance of this application, the titled case may kindly fixed before 16-12-2022.**

Dated 14-12-22

**APPELLANT/APPLICANT**

**THROUGH:**

  
**NOOR MUHAMMAD KHATTAK**  
**ADVOCATE SUPREME COUR**



GOVERNMENT OF KHYBER PAKHTUNKHWA  
PUBLIC HEALTH ENGG: DEPARTMENT

No.SO(Estt)/PHED/4-53-B/2020-21  
Dated Peshawar, the December 12, 2022

To

1. The Additional Secretary (Regulation),  
Govt: of Khyber Pakhtunkhwa,  
Establishment Department, Peshawar
2. The Additional Secretary (Reg),  
Govt: of Khyber Pakhtunkhwa,  
Finance Department, Peshawar
3. The Chief Engineer (Center),  
PHE Department Peshawar

Subject: **MEETING OF THE DEPARTMENTAL PROMOTION COMMITTEE.**

Dear Sir,

I am directed to refer to the subject noted above and to state that a meeting of the Departmental Promotion Committee is scheduled to be held on **16.12.2022 at 1100 Hours** under the chairmanship of Secretary Public Health Engineering Department in his office to consider the promotion case of B. Tech Hons (Civil) Degree Holder Sub Engineers to the posts of Assistant Engineers/SDOs (BPS-17) on regular basis in PHED.

2. You are, therefore, requested to depute representative of your respective department to attend the said DPC meeting on the scheduled date, time and venue. Working Papers alongwith relevant documents are enclosed herewith.

Yours faithfully,

*[Signature]*  
12/12/22  
SECTION OFFICER (ESTT)

**ENDST: OF EVEN NO. & DATE**

Copy forwarded to the:-

1. Deputy Secretary (Admn) PHE Department Peshawar
2. PS to Secretary PHE Department Peshawar for Information.

Chief Engineer (Center) PHE Department Peshawar	
Dairy No.	719
Dated	13/12/22
Case No.	
S.E (HQ)	
CHD	

*[Signature]*  
12/12/22  
SECTION OFFICER (ESTT)