

21.05.2019

No one present on behalf of appellant. Written reply not submitted. Johar Ali SCT representative of respondent department present and seeks time to furnish written reply/comments. Granted. To come up for written reply/comments on 02.07.2019 before S.B.


Member

*g hari's by
withdrawn
this instant
Appeal*

2/7/2019

02.07.2019


Appellant in person present. Mr. Kabirullah Khattak learned Additional Advocate General for the respondents present. Appellant submitted application for withdrawal of the instant service appeal on the ground that his grievance has been redressed by the department. In this regard signature of the appellant was also obtained at margin of order sheet as a token of proof. Accordingly, the present service appeal is dismissed as withdrawn. No order as to costs. File be consigned to the record room.

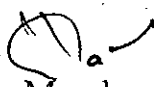

(Hussain Shah)
Member

ANNOUNCED
02.07.2019

13.02.2019

Learned counsel for the appellant present and requested for time to deposit security and process fee. Requested accepted with direction to deposit security and process fee within 3 days. Thereafter notices be issued to the respondents for written reply/comments. Adjourn. To come up for written reply/comments on 05.03.2019 S.B.


Appellant Deposited
Security & Process Fee


Member

05.03.2019

None present on behalf of the appellant. Mr. Kabirullah Khattak,

Additional AG for the respondents present. Written reply on behalf of respondents not submitted. Learned Additional AG requested for further adjournment. Adjourned to 11.04.2019 for written reply/comments before S.B.


(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

11.04.2019

Appellant in person and Addl. AG alongwith Fazlur Rahman, Principal, for respondents present.

Representative of respondents states that the written reply of the respondents is in process of preparation and requests for adjournment.

Adjourned to 21.05.2019 before S.B on which date the requisite reply shall positively be submitted.

Chairman 

29.01.2019

Counsel for the appellant Javed Iqbal present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant was serving in Education Department as Primary School Head Teacher in Government Primary School Jabagai. He was transferred from said school to Government Primary School Dedawar by the competent authority vide order dated 05.01.2019; however, the said order was canceled by the competent authority vide order dated 09.01.2019 without any reason. It was further contended that the appellant has not completed his normal tenure therefore, the cancellation order dated 09.01.2019 is against the Transfer Posting Policy and is based on political influence therefore, the same is liable to be rectified/canceled. The appellant filed departmental appeal but the same was rejected vide order dated 10.01.2019 hence, the present service appeal.

The contention raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days thereafter, notice be issued to the respondents for written reply/comments for 14.02.2019 before S.B. Learned counsel for the appellant also submitted application for suspension of impugned order. Notice of the same be also issued to the respondents for the date fixed.



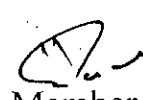
MA

(MUHAMMAD AMIN KHAN KUNDI)
MEMBER

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 57/2019

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	14/1/2019	<p>The appeal of Mr. Javed Iqbal presented today by Mr. Shahid Mehmood Khan Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR 14/1/19</p>
2-	16-1-19	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>13-2-19</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
	23.01.2019	<p>Learned counsel for the appellant appeared. Application for fixation of early date of hearing in the present service appeal received. On the ground mentioned in the application, the same is allowed and the next date of hearing ^{fixed as} is <u>29.01.2019</u>. To come up for preliminary hearing on 29.01.2019 before S.B.</p> <p style="text-align: right;"> Member</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. 57 /2019

Javed Iqbal Appellant

VERSUS

Govt of KPK & others Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-5
2.	Affidavit		6
3.	Application for suspension along with affidavit		7-8
4.	Copy of pay slip	A	9
5.	Copy of order dated 05.01.2019	B	10
6.	copy of order dated 09.01.2019	C	11
7.	copy of the Departmental Appeal	D	12
8.	Copy of order dated 10.01.2019	E	13
9.	Wakalat Nama		14

Appellant,

Through:

SHAHID MEHMOOD KHAN
Advocate, High Court
Peshawar

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR**

Service Appeal No. 57 /2019

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 54

Dated 14-1-2019

Javed Iqbal S/o Hameed Khan R/o Village Dedawar,
Tehsil Bari Kot District Swat

..... **Appellant**

VERSUS

1. Govt of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
2. Secretary Education, Civil Secretariat, Peshawar.
3. Director General, Elementary and Secondary Education, Khyber Pakhtunkhwa, GT Road Peshawar.
4. District Education Officer, (Male) Swat.

..... **Respondents**

APPEAL UNDER SECTION 4 OF KHYBER

PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974

AGAINST THE ORDER OF RESPONDENT NO.4

DATED 09.01.2019, WHEREBY THE

TRANSFER AND POSTING ORDER DATED

05.01.2019 OF APPELLANT HAS BEEN

CANCELLED WITHOUT ANY LAWFUL AND

COGENT REASON.

Filed to-day
Registrar
14/1/19.

Prayer:

On acceptance of this Appeal the concerned respondents may please be directed to withdraw the order dated 09.01.2019 and to give effect to the transfer / posting order dated 05.01.2019 of the appellant.

Respectfully Sheweth:-

1. That the appellant was appointed on 10.10.1992 as Primary School Teacher and he has unblemished service record at his credit. **(Copy of pay slip is attached as annexure A)**
2. That the Appellant is the local resident of UC-Parlay, and prior to order dated 05.01.2019 the Appellant has been serving as PSHT at GPS Jabagai for a long time.
3. That it is pertinent to mention here that the Appellant is the senior most School Teacher in his entire UC i.e UC-parray and he was serving as Senior PSHT in other UC i.e UC-Jabagai.
4. That it is also pertinent to mention here that the wife of the Appellant is also a school teacher serving as CT at GGHS Shamozaï Swat, which is also situated in UC-Parray.

5. That a few months ago Appellant applied to Respondent No 4 for his transfer from GPS- JAbagai to GPS-dedawar i.e to his native UC-Parray against a vacant post which Application was allowed and entertained by Respondent No 1 by passing an order on dated 05.01.2019 and resultantly the Appellant was transferred to GPS Dedawar as per rules and policy. **(Copy of order dated 05.01.2019 is attached as annexure B)**
6. That on dated 09.01.2019 all of a sudden Respondent No 4 passed another order and cancelled the order dated 05.01.2019 without showing any plausible and cogent reason. **(copy of order dated 09.01.2019 is attached as annexure C)**
7. That being aggrieved of the above noted impugned order dated 09.01.2019 the appellant filed a Departmental Appeal / representation before respondent No. 4 for redressal of his grievances. **(copy of the Departmental Appeal is attached herewith as annexure "D")**.
8. That Respondent No 4 vide order dated 10.01.2019 rejected the departmental Appeal / representation of the Appellant, hence the instant Service Appeal. **(Copy of order dated 10.01.2019 is attached as annexure E)**
9. That the appellant being extremely aggrieved, having no other adequate and efficacious remedy now

approaches this Hon'ble Tribunal on the following grounds amongst the others:-

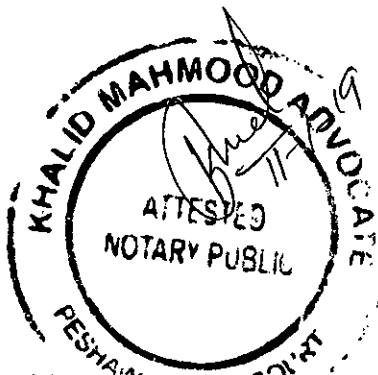
GROUND S:-

- A. That the impugned order dated 09.01.2019 of Respondent No 4 is illegal, unlawful, without authority as well as based on the malafide intentions.
- B. That the appellant is eligible to be transferred to his native UC Parray from a far-flanged UC i.e UC-Jabagai and the order dated 09.01.2019 is liable to be set aside at this score alone.
- C. That the order dated 09.01.2019 is against the Judgment reported as 2015 PLC (CS 1215) and the Judgment reported as 2014 PLC (CS 1032) as the wife of the Appellant is also a Civil Servant who is serving in her native UC Parray.
- D. That the order dated 09.01.2019 is against the law, facts and the policy and it is also against the reported Judgment which is reported as 2014 PLC (CS 1045) as the Respondent No 4 has cancelled the order dated 05.01.2019 without giving any cogent reason.
- E. That the order dated 05.01.2019 was made against a vacant post and there was no other Application from any other Teacher, hence the order dated 09.01.2019 is highly illegal and discriminating which is against the fundamental rights guaranteed under the constitution of Islamic republic of Pakistan 1973.

- F. That there is also not a single charge or complaint against the Appellant but the Respondent No 4 passed the order on Political pressure of the local MPA which is also against the law and the natural justice.
- G. That the Appellant is the senior most teacher in the entire Union Council hence he is fully eligible to be transferred and be posted to his native UC / village.
- H. That any other ground will be raised at the time of arguments with prior permission of this Hon'ble Tribunal.

It is, therefore, respectfully prayed that On acceptance of this Appeal the concerned respondents may please be directed to withdraw the order dated 09.01.2019 and to give effect to the transfer / posting order dated 05.01.2019 of the appellant.

Any other relief deemed proper and fit in the circumstances of the case may also very graciously be granted to the appellant.



Appellant

Through:

SHAHID MEHMOOD KHAN
Advocate, High Court
Peshawar

C E R T I F I C A T E :-

Certified that as per instructions of my client no such Service Appeal on behalf of the petitioner has earlier been filed in this Hon'ble Tribunal on the subject matter.

ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. ____/2019

Javed Iqbal Appellant

VERSUS

Govt of KPK & others Respondents

AFFIDAVIT

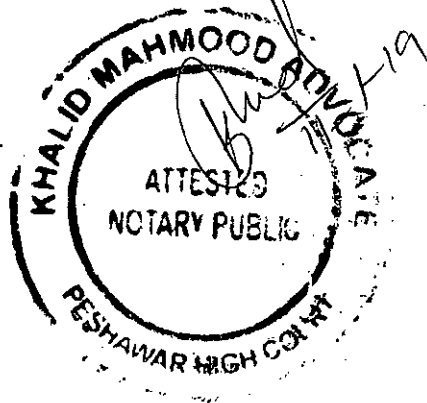
I, Javed Iqbal S/o Hameed Khan R/o Village Dedawar, Tehsil Bari Kot District Swat, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.



DEPONENT

Identified by:

SHAHID MEHMOOD KHAN
Advocate, Peshawar



BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Service Appeal No. ____/2019

Javed Iqbal Appellant

VERSUS

Govt of KPK & others Respondents

APPLICATION FOR SUSPENSION OF
IMPUGNED ORDER DATED
09.01.2019, TILL THE FINAL
DECISION OF THE INSTANT
SERVICE APPEAL

Respectfully Sheweth:

1. That the above noted Service Appeal is being filed before this hon'ble court, in which no date of hearing has yet been fixed.
2. That the applicant has got a good prima facie case in his favour, and are sanguine about its success.
3. That the balance of inconvenience also lies in favour of the applicant.
4. That if the impugned order dated 09.01.2019 is not suspended, the applicant would sustain an irreparable

loss, and very purpose of the present petition will become frustrated.

5. That the facts and grounds of the appeal may kindly be read as an integral part of this application.

It is, therefore, respectfully prayed that on acceptance of this application, the impugned order dated 09.01.2019 may kindly be suspended, till the final decision of the case.


Appellant

Through:


SHAHID MEHMOOD KHAN
Advocate, High Court
Peshawar

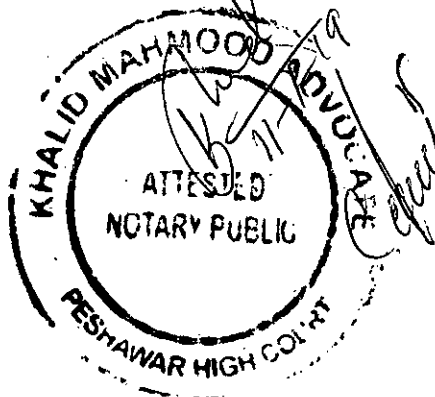
CERTIFICATE:-

Certified that as per instructions of my client no such Service Appeal on behalf of the petitioner has earlier been filed in this Hon'ble Tribunal on the subject matter.


ADVOCATE

AFFIDAVIT

It is solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.




DEPONENT

Annex A (9)
Dist. Govt. NWFP-Provincial
District Accounts Office SWAT
Monthly Salary Statement (December-2018)



Personal Information of Mr JAVID IQBAL d/w/s of HABIB KHAN

Personnel Number: 00070955 CNIC: 1560290423507 NTN: 0
 Date of Birth: 15.08.1970 Entry into Govt. Service: 16.10.1992 Length of Service: 26 Years 02 Months 023 Days

Employment Category: Active Temporary

Designation: SENIOR PRIMARY SCHOOL TEA 80731369-DISTRICT GOVERNMENT KHYBE
 DDO Code: SW6425-District Swat
 Payroll Section: 001 GPF Section: 001 Cash Center: 3
 GPF A/C No: EDUSW017435 Interest Applied: Yes GPF Balance: 408,511.00
 Vendor Number: -
Pay and Allowances: Pay scale: BPS For - 2017 Pay Scale Type: Civil BPS: 15 Pay Stage: 19

Wage type		Amount	Wage type		Amount
0001	Basic Pay	41,390.00	1000	House Rent Allowance	2,349.00
1210	Convey Allowance 2005	2,856.00	1300	Medical Allowance	1,500.00
1505	Charge Allowance	40.00	1911	Compen Allow 20% (1-15)	1,000.00
2148	15% Adhoc Relief All-2013	918.00	2199	Adhoc Relief Allow @10%	614.00
2211	Adhoc Relief All 2016 10%	3,134.00	2224	Adhoc Relief All 2017 10%	4,139.00
2247	Adhoc Relief All 2018 10%	4,139.00			0.00

Deductions - General

Wage type		Amount	Wage type		Amount
3015	GPF Subscription - Rs2890	-2,890.00	3501	Benevolent Fund	-600.00
3609	Income Tax	-50.00	3990	Emp.Edu. Fund KPK	-125.00
4004	R. Benefits & Death Comp:	-1,052.00			0.00

Deductions - Loans and Advances

Loan	Description	Principal amount	Deduction	Balance

Deductions - Income Tax

Payable: 1,000.00 Recovered till December-2018: 300.00 Exempted: 400.00 Recoverable: 300.00

Gross Pay (Rs.): 62,079.00 Deductions: (Rs.): -4,717.00 Net Pay: (Rs.): 57,362.00

Payee Name: JAVID IQBAL
 Account Number: PLS 123-6
 Bank Details: NATIONAL BANK OF PAKISTAN, 231970 BARIKOT SWAT BARIKOT SWAT, swat

Leaves: Opening Balance: Aailed: Earned: Balance:

Permanent Address: DISTT SWAT

City: SWAT Domicile: NW - Khyber Pakhtunkhwa Housing Status: No Official
 Temp. Address: Email: email2javediqbal@gmail.com

Attested

Annex "B" (10)



OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) SWAT

OFFICE ORDER

The following teachers are hereby transferred to the school noted against each on their own pay and scale with effect from the date of their taking over charge in the interest of public service -

S. NO.	N. AME	FROM	TO	REMARKS
1	Javed Iqbal PSIII	GPS Jabayun	GPS Dairawa	1 P Post
2	Muhammad Saleem PSI	GPS Kishwa	GPS Munglawar No 1	1 P Post

- Note - 1 No F.I.D.U is allowed
- 2 Charge report should be submitted to all concerned

(N. Iqbal)
DISTRICT EDUCATION OFFICER (M)
SWAT

Dated

Copy of Transfer P.O. M.D.O. No. ...
Copy forwarded to

- The D.O. Swat
- The D.O. ...

The District Education Officer (M) Swat

(Signature)
DISTRICT EDUCATION OFFICER (M)
SWAT

(Signature)



OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) SWAT

Annex "C" (11)

OFFICE ORDER

This Office transfer order issued under Endst:No.7546-47/Transfer/PST/M/DEO/Swat dated 05.1.2019 at S.No.1 in respect of Mr.Javid Iqbal PSHT GPS Jabagai to GPS Dedawar is hereby cancelled in the interest of public service:-

(NAWAB ALI)


DISTRICT EDUCATION OFFICER (M)
SWAT.

7674-75
Endst: NO. _____/Transfer/PST/M/DEO/Swat.

Dated. 9/1/2019

Copy forwarded to:-

1. The DAO Swat.
2. The SDEO (M) Swat Barikot
3. The teacher concerned.
4. PA to DEO Local Office.


DISTRICT EDUCATION OFFICER (M)
SWAT

Attested

To

Annex "D" (12)
The District Education Officer,
Elementary and Secondary Education,
Swat.

Subject: Departmental Appeal

Respected Sir,

With due respect, I beg to request your honour that I had been transferred from GPS Jabagai Shamozaï to GPS Dedawar vide transfer order No. 7546-47 Serial No. 1 dated 05/01/2019. (The order is attached with the application).

That on order No. 7674-75 dated 9/01/2019, the same order was cancelled due to un-known reasons. The cancellation order is attached herewith.

That the transfer order may be restored due to the following reasons:

- i. That my transfer was made against vacant post.
- ii. That there was no other application for the same post.
- iii. That the transfer was cancelled without any reason.
- iv. That there is not a single charge against me in my whole service.
- v. That I am the most senior Teacher in the entire union council.
- vi. That my wife is also a C.T Teacher at GGHS shamozaï Swat.

So, I humbly request, that my first order from GPS Jabagai to-GPS Dedawar may please be restored.

Attested

Your obediently,

Cekul PSHT
Javid Iqbal

Primary School Teacher GPS Jabagai,
Shamozaï District Swat.

Annex "E"

13



OFFICE OF THE DISTRICT EDUCATION OFFICER (MALE)
DISTRICT SWAT

Email: emi@swat.gov.pk, Phone No. 09469260228

No. 10080 P.F./DEO(M)/swat
TO

Dated: 10/1/2019

Mr. Javid Iqbal PSHT GPS Jabagal under transfer to GPS Dedawar

Subject: - APPEAL FOR RESTORATION OF TRANSFER ORDER

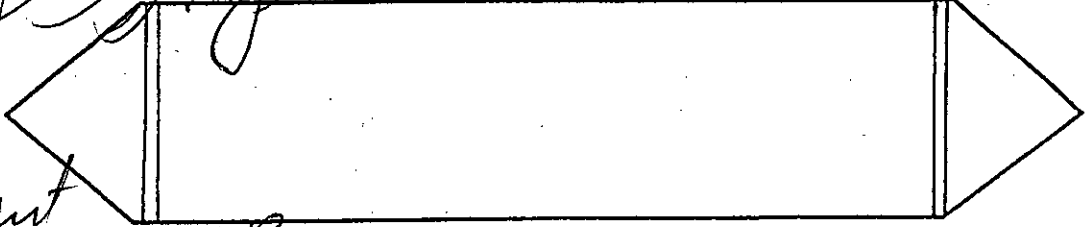
Memo:-

Your departmental appeal for the restoration of transfer order, issued by this office bearing No. 75-16 dated 5-01-2019 is hereby rejected.


District-Education Officer (M)
Swat.

Attested

بعدالت کتبہ بروی تہ اکتوبر ۲۰۱۹ء کو تیار کیا گیا ہے



Appellant

2019ء پنجاب

حاجہ سیدہ علیہ بی نام کو رولٹ ۱۹۹۶ء کی روٹ ۱۹۹۶ء

4-1-2019

موزعم مقدمہ

دعویٰ

جرم

باعث تحریر آئندہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی (محلقتہ) آن مقام ~~سیدہ علیہ~~ کیلئے ~~سیدہ علیہ~~ موجود حال اس لئے مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا۔ نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالثہ فیصلہ برحلف دیئے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرنے اجراء اور صولی چیک دروپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا۔ اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ باختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ درجہ جاناہ التوائے مقدمہ کے سبب سے وہ ہوگا۔ کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ مندر ہے۔

Handwritten signature on the right margin.

المرقوم 11/ 2019

BG 10-3539

کے لئے منظور ہے۔

بمقام

03339306491

Attested Acceptance
Attested
Handwritten signature

حضرت علیؑ - حضرت میں سے وہ جس نے رسول خدا ﷺ کو خواتین سے

مخبروں: Withdrawal of Case

No 57/19 Edu.

صاحب عالی

صدر دہلی لکھنؤ - میرا اردو صنوبر پورہ

اردو طلبہ 787-89، نتائج 2019/3/19ء

لکھنؤ میں اپنا کسب و کسب لینا چاہتا ہوں

الغالب

Official

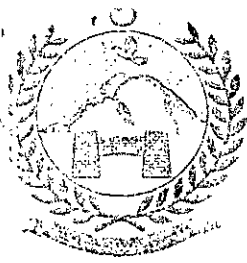
حاجہ اقبال PSHTA

حیاتیاتی

15602-9042350-7

0342-9190409

No 57/19



OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) SWAT

OFFICE ORDER.

Consequent upon the direction of the Honorable Service Tribunal Khyber Pakhtunkhwa Peshawar dated 6.3.2019, This office transfer order issued under Endst:No.7546-47/transfer/PST dated 05/1/2019 in i/o Mr:Javid Iqbal PSHT GPS Jabagai to GPS Dedawar is hereby restored and this office cancellation order issued under Endst:No.7674-75 dated 9/1/2019 is hereby cancelled with immediate in the interest of public service.

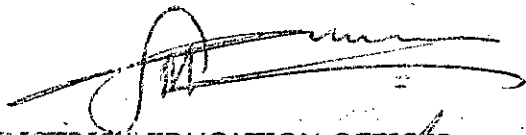
(MUHAMMAD AMIN)
DISTRICT EDUCATION OFFICER
(MALE) SWAT.

Dated 19/5/2019

787-09
Endst:No. /Transfer /PST/

Copy to:-

1. The Director E&SE Khyber Pakhtunkhwa Peshawar.
2. The Sub Divisional Education Officer (M) Swat.
3. The ASDEO Concerned .
3. The teacher concerned.
4. PA to DEO local office.


DISTRICT EDUCATION OFFICER
(MALE) SWAT.



OFFICE OF THE
DISTRICT EDUCATION OFFICER (MALE)
Swat (Cell # 0946 9240209-228)

No. _____ Dated. _____

To

The Registrar,
Service tribunal,
Khyber Pakhtunkhwa Peshawar.

SUBJECT: - **SERVICE APPEAL NO.57/2019 JAVID IQBAL VS GOVERNMENT OF
KPK AND OTHERS**

Memo:

With reference to the cited above service appeal, it is stated that the departmental appeal of the Appellant was later on accepted by the competent authority and the impugned order has been withdrawn. The grievances of the appellant has been removed. (Copy of the order is attached).

Comment has been sought from the respondents by the Honourable Tribunal. However, as his grievances have been removed. And there is no need to file comments in the instant appeal now. Your good self is therefore requested to please dispose off the instant appeal of the appellant accordingly.

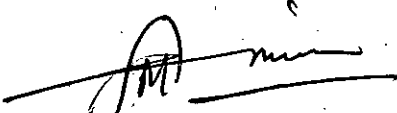
DISTRICT EDUCATION OFFICER
(MALE) SWAT

Endst: no 1467-68 /C.Case(litigation)

Dated 4/4/ /2017

Copy forwarded to:

1. The Director Elementary & Secondary Education Peshawar
2. Section officer litigation II Elementary & Secondary Education Peshawar.
3. The Assistant Director II Elementary & Secondary Education Peshawar.


DISTRICT EDUCATION OFFICER
(MALE) SWAT



**OFFICE OF THE
DISTRICT EDUCATION OFFICER
(MALE) SWAT**

OFFICE ORDER.

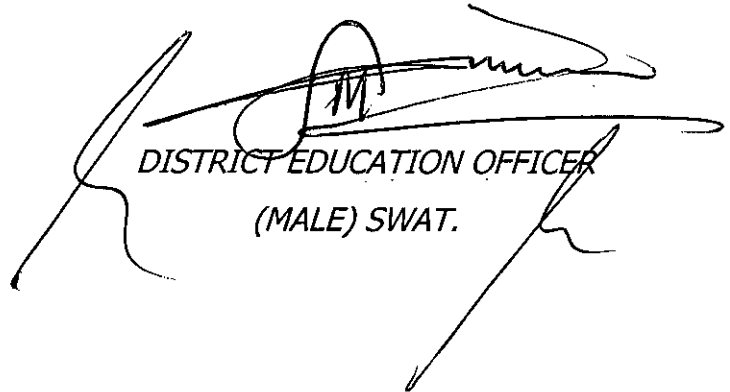
Consequent upon the direction of the Honorable Service Tribunal Khyber Pakhtunkhwa Peshawar dated 6.3.2019, This office transfer order issued under Endst:No.7546-47/transfer/PST dated 05/1/2019 in r/o Mr:Javid Iqbal PSHT GPS Jabagai to GPS Dedawar is hereby restored and this office cancellation order issued under Endst:No.7674-75 dated 9/1/2019 is hereby cancelled with immediate in the interest of public service.

787-89
Endst:NO _____/Transfer /PST/

(MUHAMMAD AMIN)
DISTRICT EDUCATION OFFICER
(MALE) SWAT;
Dated 9 / 3 / 2019

Copy to:-

1. The Director E&SE Khyber Pakhtunkhwa Peshawar.
2. The Sub Divisional Education Officer (M) Swat.
3. The ASDEO Concerned .
3. The teacher concerned.
4. PA to DEO local office.


DISTRICT EDUCATION OFFICER
(MALE) SWAT.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No. 57/2019

Javed Iqbal

Versus

Govt. Of
KPK and others

**Khyber Pakhtunkhwa
Service Tribunal**

Diary No. 116

Dated 23-1-2019

APPLICATION FOR FIXATION AN
EARLY DATE OF HEARING IN ABOVE
TITLED SERVICE APPEAL

*put up to the court with
relevant appeal.*
23/1/19.
Respectfully Sheweth:-

Appellant/applicant submits as under:-

1. That the above noted Service Appeal is pending before this Honourable Tribunal which is fixed for 13/02/2019.
2. That respondents are bent upon to transfer another person on the post of appellant.
3. That if the case is not fixed earlier then the main purpose of the instant appeal would become infructuous.
4. That no hearing in the instant appeal has yet been done due to lack of time and burden of cases before this honourable Tribunal.

It is, therefore, requested that on acceptance of this application, an early date of hearing may kindly be fixed in the above noted Service Appeal.

Appellant/Applicant

Through:-

[Signature]
Shahid Mahmood Khan
Advocate, High Court,
Peshawar.

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL, PESHAWAR

Service Appeal No.

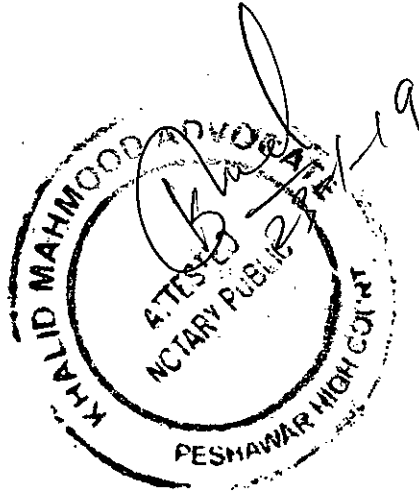
Javed Iqbal

Versus

Govt. Of
KPK and others

AFFIDAVIT

As per instruction of my client, it is hereby solemnly affirmed and declared on oath that the contents of this accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Court.



[Handwritten Signature]

DEPONENT