

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

CM No. \_\_\_\_\_/2023

In Re:

Appeal No. 559/2022

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 4513

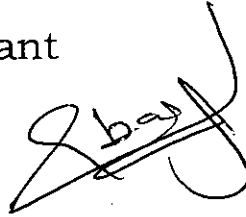
Dated 22/3/2023

**Mehboob ur Rehman .....Appellant/Applicant**  
**VERSUS**  
**Director E&SE .....Respondent**

**I N D E X**

S.No	Description of Documents	Annex	Pages
1.	Memo of Application for suspension		1-2
2.	Affidavit		3
3.	Copy of Promotion Order		4

Appellant  
Through



**SAFDAR IQBAL KHATTAK**  
Advocate, High Court  
Peshawar

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**KHYBER PAKHTUNKHWA, PESHAWAR**

CM No. \_\_\_\_\_/2023

In Re:

Appeal No. 559/2022

**Mehboob ur Rehman .....Appellant/Applicant**  
**VERSUS**  
**Director E&SE .....Respondent**

**APPLICATION FOR ISSUANCE OF**  
**TEMPORARY INJUNCTION IN**  
**SHAPE OF SUSPENSION OF THE**  
**IMPUGNED LETTER NO**  
**1356/PROMOTION PRY**  
**TEACHERS DATED 15.03.2023**

**Respectfully Sheweth:**

1. That the above titled Appeal is pending adjudication before this Honourable Court which is fixed for 25.05.2023.
2. That in the instant Appeal the respondents submitted Parawise Comments, wherein they submitted a revised final seniority list. (Copy of the same is already annexed)
3. That upon the above revised final merit list, the respondents issued a letter No. 1356 dated

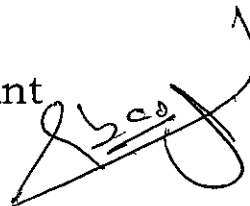
2

15.03.2023 for submission of file / Bio Data for promotion from primary Teacher.

4. That as the same has already been impugned before this Hon'ble Tribunal and if the respondent department issued a promotion letter to the Junior from the Appellant, the very out come of the instant Appeal would become infructuous and the Appellant will get irreparable loss.
5. That the appellant have got good prima facie and arguable case in his favour and balance of convenience also lies in favour of the Appellant.
6. That there is no legal bar on acceptance of this application.
7. That any other grounds will be raised at the time of arguments with prior permission of this Hon'ble Court.

**It is, therefore, most humbly prayed that a stay may kindly be granted to the Applicant / Appellant in shape of suspension of the letter No. 1356 dated 15.03.2023, till final disposal of the instant Appeal.**

Appellant  
Through



**SAFDAR IQBAL KHATTAK**  
Advocate, High Court  
Peshawar

3

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

CM No. \_\_\_\_\_/2023

In Re:

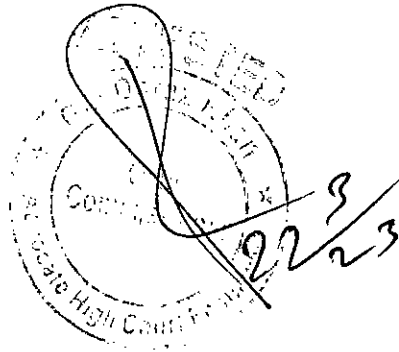
Appeal No. 559/2022

**Mehboob ur Rehman .....Appellant/Applicant**  
**V E R S U S**  
**Director E&SE .....Respondent**

**AFFIDAVIT**

I, Mehboob ur Rehman S/o Zameer Ahmad R/o District Karak, do hereby 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**



9

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

No. 181356 / Promotion Prg: Teachers, the Dated 15-3 /2023

To

The all SDEOs (Male),  
In District Karak

**SUBJECT:- SUBMISSION OF FILE/BIO-DATA FOR PROMOTION FROM PRIMARY TEACHERS.**

Memo:-

Refer to the Office of undersigned notification No. 5453 dated 14.6.2022 on the subject quoted above. You all are hereby directed to submit the files for promotion of PST/SPST to the post of SPST/PSHT completed in all respect till 21.03.2023 as per the list shown below.

1. No of files required for promotion to PSHT as per seniority/fitness/qualification	70
2. No of files required for promotion to SPST as per seniority/fitness/qualification. All those who have completed five years of Service.	200

Note:-Also provide Vacant post detail of PSHT and SPST School wise for promotion.

*(Signature)*  
15/3/2023  
District Education Officer,  
(Male) Karak.