

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

CM Petition No. _____/2023

In service Appeal No. 1498- /2023

Syeda Anjum
(Appellant)

VERSUS

GOVT of KPK etc
(Respondents)

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1.	CM Petition with affidavit	--	

Dated: ___/08/2023

Humble Appellant

Syeda Anjum
Through Counsel

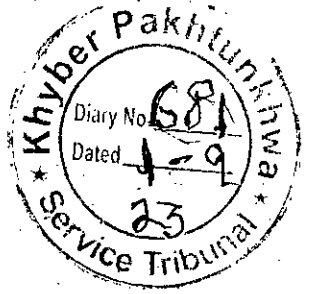
Jamal Abdul Nasir Awan
Advocate High Court
District Bar Dera Ismail Khan
Cell/Whatsapp# 0334-8505400

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

CM Petition No. _____/2023

In service Appeal No. 1196/2023



Syeda Anjum

VERSUS

Govt. of KPK etc

SERVICE APPEAL

**APPLICATION FOR SUSPENSION OF THE IMPUGNED TRANSFER,
ORDER NO. SO(MC)E&SED/4-16/2022 POSTING/TRANSFER
/MC/SHAHIDA PARVEEN DATED 14/04/2023 TILL FINAL
DISPOSAL OF INSTANT SERVICE APPEAL.**

Respectfully Sheweth;

The appellant humbly submits as under;

1. That the above titled service appeal is being filed before this Honourable Court and the instant application may kindly be considered as part of it.
2. That the appellant has prima facie case and balance of convenience also tilts in favour of the appellant.
3. That the impugned transfer order is politically motivated and lacks mature consideration of service tenure and performance of appellant, hence, on this sole ground, the impugned transfer order is liable to be suspended.
4. That if the operation of impugned transfer order is not suspended then the appellant will suffer irreparable loss and purpose of the institution of the instant appeal will become infructuous.
5. That this honourable court has got vast and ample powers to accept the instant application.

It is, therefore, humbly requested that in view of the above submissions, the impugned transfer order may kindly be suspended till the final decision of the instant appeal.

Dated: ___/08/2023

Humble Appellant


Syeda Anjum
Through Counsel

Jamal Abdul Nasir Awan
Advocate High Court
District Bar Dera Ismail Khan
Cell/Whatsapp# 0334-8505400

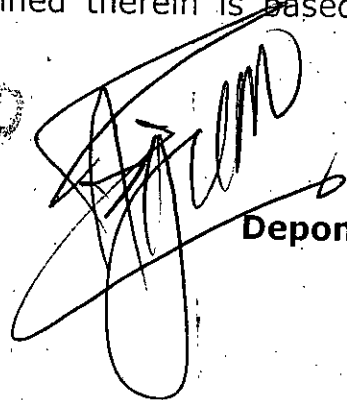
AFFIDAVIT

I, **Syeda Anjum**, the appellant herein, do hereby solemnly affirm on oath:-

1. That the accompanying CM has been drafted by counsel following my instructions;
2. That all parawise contents of the CM are true and correct to the best of my knowledge, belief and information;
3. That nothing has been deliberately concealed from this Honourable Court, nor anything contained therein is based on exaggeration or distortion of facts.

Dated ___/08/2023




Deponent