

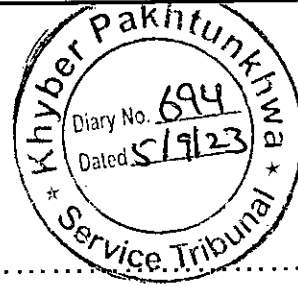
BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M NO. _____

IN

Service Appeal No.1900/2022

Mr. Mir Azam Khan,



.....**APPELLANT**

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat,
Peshawar & others

.....**RESPONDENTS**

**APPLICATION FOR EARLY HEARING IN THE SUBJECT
SERIVCE APPEAL No.1900/2022**

RESPECTFULLY SHEWETH:

1. That the instant appeal was fixed for preliminary hearing on 28-12-2022 and next date 16-02-2023 before the August Khyber Pakhtunkhwa Service Tribunal Peshawar and considered for full argument on the next date of hearing. However, no court proceeding in the case has been made in the following date as per detail given below:-

S.No	Date hearing	Status of the case
1.	28-12-2022	adjourned without any discussion
2.	16-02-2023	-do-
3.	22-05-2023	-do-
4.	15-08-2023	adjourned due to court holy day

2. That the subject appeal is fixed for arguments on 17-11-2023.
3. That in the instant appeal the appellant prayer that on acceptance of this appeal, the Finance Department, Khyber Pakhtunkhwa notification dated 29-11-2019 and letter dated 12-07-2022 may kindly be set aside and the respondents may further be directed to consider the appellant for promotion to the post of Assistant Treasury Officer (BPS-17) from the date when his junior were

promoted, any other remedy which this Hon'ble Tribunal deems fit may also be awarded in favour of appellant.

4. That the appellant is near to retirement on attaining the age of superannuation and promotion cases of the juniors Assistant Accountant of Treasury Establishment are initiated by the respondents, which is in pipeline, due to which the appellant will compel for further litigation and due to non finalization of my case, I will be faced heavy financial loss, which is against the law of justice.
5. That appellant is most senior Assistant Account of Treasury Establishment Khyber Pakhtunkhwa and counterpart Assistant Accountant and Sub Accountant promotion cases were pending/suspend with effect from 29-11-2018, due to instant appeal. Furthermore, it is pertinent to mention that number of employees alongwith appellant are going to be retired from Government service in near future, therefore, they are facing great hardship due to processing their promotion case under the rules.
6. That the appellant is diabetic patient and suffering from hypertension.

It is, therefore, most humbly prayed that on interest of justice the subject application may please be accepted and next date of hearing in the subject appeal may be fixed in the month of August, 2023 or 1st week of September, 2023 instead of 17-11-2023.


Appellant in Personal

Through

AFFIDAVIT

I, solemnly affirm and declare on oath that the contents of the above application are true and correct and that nothing has been kept back or concealed from this Honorable Tribunal.


Deponent

Cell no 03469847343

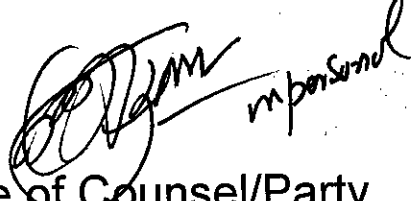
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

FORM-A

TO BE FILED BY THE COUNSEL/APPLICANT

S.No	Case No	1900/2022		
1.	Case Title	Mr. Mir Azam Khan, VERSUS Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar & others		
2.	Date of institution	952/2019	(01-07-2019)	
3.	Bench	SB	DB ✓	
4.	Case status	Fresh	Pending ✓	
5.	Stage	Notice	Reply	Argument ✓
6.	Urgency to clearly stated			
7.	Nature of the relief sought			
8.	Next date of hearing	17-11-2023		
9.	Alleged Target Date			
10.	Counsel for	Petitioner	Respondent	In Person


Signature of Counsel/Party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

FORM-B

1. Early hearing _____ P/202
2. In case No.1900 P/2022
3. Mr. Mir Azam Khan, **VERSUS** Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar & others
4. Presented by Taimur Ali Khan advocate on behalf of Mir Azam Khan Entered in the relevant Register _____
5. Put up alongwith main case _____

6.	Last date fixed	17-11-2023
7.	Reason(s) for last adjournment, if any by the Branch Incharge	
8.	Date (s) fixed in the similar matter by the Branch incharge	
9.	Available dates Readers/Assistant Registrar Branch	

Assistant Registrar