

URGENT FORM

Khyber Pakhtunkhwa Service Tribunal

Service Appeal # 1062/2023

The application has been filed on urgent basis

as the respondents are bent upon to promote

SDM cadre to SST cadre posts. Applicant being

on merit therefore this application has been

filed with application for interim relief. The case is of urgent nature, therefore, need urgent fixation

TITLE

Mst: Nighat Jehan

PETITIONER

VERSUS

Secretary Education (E/SE) and others

RESPONDENT

application

Will you kind treat the accompanying ~~W/P~~ as Urgent and in accordance with the Provisions of Rules, 9 Chapter 5-A, Rules order of the High Court, Lahore Volume V.

2. The grounds of urgency are: Respondents are going to convene DPC meeting against the accrued right of the appellant

Dated: 25-09-2023

Ajehar

Yours Obediently,

Appellant

Thaqir

for

Ashraf Ali

ASC

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Misc Application No. _____ /2023

In

Service Appeal No. 1062/2022

Nighat Jehan Applicant

VERSUS

The Secretary Education & others Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Application for Early hearing		1-2
2.	Affidavit		3

Nighat Jehan
25/9/23
Appellant / Applicant

Through

Dated: 25.09.2023

Asl 5910
ASHRAF ALI KHATTAK
Advocate, Supreme Court
Of Pakistan

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR**

Misc Application No. _____ /2023

In

Service Appeal No. 1062/2022

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 787/
Dated 25/09/23

Nighat Jehan Applicant

VERSUS

The Secretary Education & others Respondents

**APPLICATION FOR EARLY HEARING IN
THE ABOVE TITLED SERVICE APPEAL**

Respectfully Sheweth:

1. That the above titled Appeal is pending adjudication before this Honourable Court which was fixed for 06.12.2023.
2. That the respondent are bent upon to convene DPC meeting of SDM Cadre to the post of SST and for which necessary documents has been requisitioned for all concerned.
3. That Applicant / Appellant is the most Senior SDM but her Seniority has been disturbed without any legal justification and the fresh procedure adopted by the

Respondents are meant to deprive applicant of her occurred right of promotion.

4. That there is no legal bar on acceptance of this application.

It is, therefore, most humbly prayed that on acceptance of this application, the case being of urgent nature may kindly be fixed for today or tomorrow or on 29.09.2023 as per discretion of this Hon'ble Tribunal

Ajeban
25/9/23
Appellant / Applicant

Through

Dated: 25.09.2023

Ashraf Ali Khattak
ASHRAF ALI KHATTAK
Advocate, Supreme Court
Of Pakistan

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Misc Application No. _____ /2023

In

Service Appeal No. 1062/2022

Nighat Jehan Applicant

VERSUS

The Secretary Education & others Respondents

AFFIDAVIT:

Mst Nighat Jehan W/o Profg. Engr Noor ul Qamer, SDM, GGHS, Achini Payan, do hereby solemnly affirm and declare on oath that the contents of the instant Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



Nighat Jehan
25/9/23
DEPONENT