# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

# PROFORMA FOR EARLY HEARING

# FORM 'A'.

# To be filled by the Counsel/Applicant

4805 2-11-23

| and the second s | ·                               | <del></del>   |             | <del></del> |    |       |              |      |
|--|---------------------------------|---------------|-------------|-------------|----|-------|--------------|------|
| Case Number  | 1760/2023                       |               |             |             |    |       |              |      |
| Case-Title   | Alesha Quxeshi vs Goot of Kirch |               |             |             |    |       |              |      |
| Date of  |                                 |               |             |             |    |       |              |      |
| Institution  |                                 |               | · · · · · · |             | •  |       |              | ,    |
| Bench  | SB                              |               |             | DB 🛴        |    | _     | , ,          |      |
| Case Status  | Fresh                           |               |             | Pendir      | ng |       | · ·          |      |
| Stage  | Notice                          | ,             |             | Reply       |    |       | Argur        | nent |
| Urgency to   | Rematter Relates to the Service |               |             |             |    |       |              |      |
| clearly stated.  | of appleant Henre the approalis |               |             |             |    |       |              |      |
| Nature of the  | head to be usgent Basic         |               |             |             |    |       |              |      |
| relief sought.   |                                 |               | _           |             |    |       |              |      |
| Next date of   |                                 | . <u>i-</u> - |             |             |    |       | ············ |      |
| hearing  | 25/01/2024                      |               |             |             |    |       |              |      |
| Alleged Target   |                                 |               | ,           |             |    |       |              |      |
| Date   |                                 |               |             |             | :  |       |              |      |
| Counsel for  | Petitioner                      |               | Respo       | ndent       |    | In pe | rson         | <br> |
| i  | _] .,                           |               | <del></del> |             |    |       |              |      |

Signature of counsel/party

# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR PROFORMA FOR EARLY HEARING

|           | • |  |
|-----------|---|--|
| FORM 'B   | , |  |
| · VIIII D |   |  |

| Ħ | nc | <del>111</del> |
|---|----|----------------|

| INST#                               |              |             |
|-------------------------------------|--------------|-------------|
| Early Hearing                       | p/20         |             |
|                                     | 60           |             |
| Alesha Quseshi                      | vs Cx + of 1 | PK9 11 >    |
|                                     | on behalf of |             |
| in the relevant register.           |              | Liiteleu    |
| Put up alongwith main case          |              |             |
|                                     | <u>R</u>     | EGISTRAR    |
|                                     |              |             |
| Last date fixed                     |              | <del></del> |
| Reason(S) for last adjournment, if  |              |             |
| any by the Branch Incharge.         |              |             |
| Date(s) fixed in the similar matter |              |             |
| by the Branch Incharge              |              |             |
| Available dates Readers/Assistant   |              |             |
| Registrar branch                    |              |             |

Assistant Registrar

REGISTRAR

# BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, K.P PESHAWAR

| C.M No.   |         | -A/2023  |
|-----------|---------|----------|
|           | IN      |          |
| S. Appeal | No.1760 | 0-A/2023 |

Miss Ayesha Qureshi Ex-Assistant, Public Library Mansehra, presently Circuit House, Mansehra.

...PETITIONER/APPELLANT

#### **VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Higher Education Archive and Libraries, Peshawar & others.

... RESPONDENTS

#### **APPLICATION**

## **INDEX**

| S.# | Description                     | Page No. | Annexure |
|-----|---------------------------------|----------|----------|
| 1.  | Application alongwith affidavit | 1 to 3   |          |

...PETITIONER/APPELLANT

Through;

Dated: /2023

(Myhammad Arshad Khan Tanoli) Advocate Supreme Court of Pakistan

(Muhammad Ibrhaim Khan) Advocate High Court, Abbottabad

### BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, K.P PESHAWAR

| C.M No             | A/2023      |
|--------------------|-------------|
| $\overline{\Pi}$ . | 1 .         |
| S. Appeal No.      | 1760-A/2023 |

Miss Ayesha Qureshi Ex-Assistant, Public Library Mansehra, presently Circuit House, Mansehra.

#### ...PETITIONER/APPELLANT

#### **VERSUS**

- 1. Government of Khyber Pakhtunkhwa through Secretary Higher Education Archive and Libraries, Peshawar.
- 2. Director Archive and Libraries Khyber Pakhtunkhwa, Peshawar.
- 3. Librarian, Public Library Mansehra.

...RESPONDENTS

#### **SERVICE APPEAL**

APPLICATION FOR EARLY HEARING OF THE CAPTIONED SERVICE APPEAL NO.1760/23 TITLED "AYESHA QURESHI V/S GOVT. OF KP ETC".

Respectfully Sheweth;.

- 1. That the captioned service appeal is pending adjudication before this Honourable Tribunal Court and next dated of hearing is fixed for 25/01/2024.
- 2. That the respondent department has already submitted their comments/ reply in the captioned service appeal, therefore, the matter relates to reinstatements of the appellant/petitioner. Hence, this service appeal is to be heard on urgent basis.

In view of the above it is prayed that on acceptance of the instant application service appeal No. 1760/23 may be ordered to be heard on early date in the Camp Court Abbottabad accordingly.

....PETITIONER/APPELLANT

Through

Dated: \_\_\_\_/2023

(Muhammad Arshad Khan Fanoli) Advocate Supreme Court of Pakistan

(Muhammad Ibrhaim Khan) Advocate High Court, Abbottabad

# BEFORE THE CHAIRMAN KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, K.P PESHAWAR

C.M No. \_\_\_\_\_-A/2023 IN S. Appeal No.1760-A/2023

Miss Ayesha Qureshi Ex-Assistant, Public Library Mansehra, presently Circuit House, Mansehra.

...PETITIONER/APPELLANT

#### **VERSUS**

Government of Khyber Pakhtunkhwa through Secretary Higher Education Archive and Libraries, Peshawar & others.

... RESPONDENTS

# **APPLICATION**

#### **AFFIDAVIT**

I, Ayesha Qureshi Ex-Assistant Public Library Mansehra, do hereby solemnly affirm and declare that the contents of foregoing application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honourable Tribunal.

DEPONENT

