Khyber Pakhtukhwa Service Tribunal Diary No 3928

# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

### PROFORMA FOR EARLY HEARING

FORM 'A'

## To be filled by the counsel

| Case Number                  | Service Appeal No. 7505/2021  |     |            |       |           |               |  |
|------------------------------|---|-----|------------|-------|-----------|---------------|--|
| Case Title                   | Zia JanVersusGovt. of KPK etc   |     |            |       |           |               |  |
| Date of Institution          |   |     | ·          |       |           |               |  |
| Bench                        | SB  |     | DB         | ·   V | 1         | <del></del> - |  |
| Case Status                  | Fresh   |     | Per        | nding | 1         |               |  |
| Stage                        | Notice  | 7   | Motion     |       | PAN       |               |  |
| Urgency to be clearly stated | That the applicant has got retired from service year back and the case is regarding proforma promotion, as his juniors were promoted ignoring the applicants, and the case has been fixed in the month of January 2024. |     |            |       |           |               |  |
| Nature of the relief sought  | That the applicant is facing financial hardships and the short question of law is involved in the matter and the date fixed i.e. 08/01/2024 is too far, which needs to be accelerated to an early date.                 |     |            |       |           |               |  |
| Next date of haring          | 08/01/2024  |     |            |       |           |               |  |
| Alleged target date          | As soon as possible   |     |            |       |           |               |  |
| Counsel for                  | Appellant   | V . | Respondent | t     | In person |               |  |

|                                    | eul |
|------------------------------------|-----|
| Signature of Counsel/party :- $\_$ |     |

### KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

### PROFORMA FOR EARLY HEARING

| FORM 'B'  |  |
|---|--|
| Inst#   |  |
| Early Hear<br>In Servi  | ring/2023<br>ce Appeal No. 7505/2021                             |
|   | Versus   |
| Presented by <u>Fazal Shah Mo</u><br>Entered in the Relevant Regist | <b>hmand ASC</b> on behalf of <b>Applicant/Appellant</b><br>ter. |
| Put up along with main case _                                       | · · · · · · · · · · · · · · · · · · ·                            |
|   | REGISTRAR  |
| Last Date fixed   |  |
| Reason(s) for last adjournment,                                     |  |
| if any by the Branch Incharge                                       |  |
| Date(s) fixed in the similar  |  |
| matter by the Branch Incharge                                       |  |
| Available dates Reader/Assistant                                    |  |
| Registrar Branch  |  |
|   |  |

ASSISTANT REGISTRAR

**REGISTRAR** 

# BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR.

| CM | No;_ |  | /2023 |
|----|------|--|-------|
|----|------|--|-------|

in

Service Appeal No-7505/2021

Zia Jan, Sub Engineer, (Retired), Office Of Executive Engineer, Communication and Works Division Charsadda.

.....Applicant

#### VERSUS

- **1.** Govt. of Khyber Pakhtunkhwa, through Secretary, Communication and works Department Civil Secretariat Peshawar.
- **2.** Chief Engineer (Centre) Communication and works Department Civil Secretariat Peshawar.
- **3.** Chief Secretary, Govt. of Khyber Pakhtunkhwa, civil Secretariat Peshawar. **Respondents**

### APPLICATION FOR EARLY HEARING OF TITLED SERVICE APPEAL.

### **Respectfully Submitted:-**

- **1.** That the above titled Service Appeal is pending before this honorable Court in which next date is fixed for 08-01-2024
- 2. That the Applicant has got retired from Service year back and the case is regarding Profarma promotion, as his juniors were promoted ignoring the applicants, and the case has been fixed in the month of January 2024.
- **3.** That the applicant is facing financial hardships and the short question of law is involved in the matter and the date fixed i.e 08-01-2024 is too far, which needs to be accelerated to an early date.
- **4.** That it is just, fair as well as in larger interest of justice that the titled appeal be fixed and heard at the earliest.

It is therefore prayed, that on acceptance of this application, the titled case may kindly fixed for an early date.

Dated:-

Appellant/Petitioner

**Through** 

**Fazal Shah Mohmand** 

**Advocate Supreme Court** 

Of Pakistan.

### A FFIDAVIT:-

I, Zia Jan, Sub Engineer, (Retired), Office Of Executive Engineer, Communication and Works Division Charsadda, do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable Court.

Oath Omnissione

ocale High

**DEPONENT**