

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'A'

Khyber Pakhtunkhwa
Service Tribunal
Entry No. 9275
Date: 21/11/23

To be filled by the Counsel/Applicant

Case Number	1819 - 1859 / 2022			
Case Title	Haroon - wr - Rasheed & others vs Govt of ICP & others			
Date of Institution				
Bench	SB		DB	<input checked="" type="checkbox"/>
Case Status	Fresh		Pending	<input checked="" type="checkbox"/>
Stage	Notice		Reply	Argument <input checked="" type="checkbox"/>
Urgency to clearly stated.	The Hon'ble Tribunal directed the department to produce the record of Junior Clerk posts till date from 2010. However, the department promoted the naib clerks & are filling the posts.			
Nature of the relief sought.	Civil misc. Application has been filed by the appellants. It may kindly be fixed for tomorrow.			
Next date of hearing	14-12-2023.			
Alleged Target Date	22-11-2023.			
Counsel for	Petitioner	<input checked="" type="checkbox"/>	Respondent	<input type="checkbox"/>
			In person	<input type="checkbox"/>



Signature of counsel/party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing _____ -p/20 _____

In case No. _____ -p/20 _____

Vs _____

Presented by _____ on behalf of _____. Entered
in the relevant register.

Put up alongwith 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 Readers/Assistant Registrar branch	

Assistant Registrar

REGISTRAR

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

C.M Application No. _____/2023

IN

Service Appeal No. 1819 -1059/2022

Haroon ur Rasheed and Others

Vs

Government of KP and Others

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APPLICANT

Through



BARRISTER

MUHAMMAD HASSAAN ADIL

Advocate High Court

Dated: 21-11-2023

BEFORE THE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL, PESHAWAR.

C.M Application No. _____/2023

IN

Service Appeal No. 1819 -1859/2022

Haroon ur Rasheed and Others

VERSUS

Government of KP and Others

APPLICATION FOR EARLY HEARING

Respectfully Sheweth:-

1. That the above titled case is pending adjudication before this Hon'ble tribunal and is fixed for 14-12-2023.
2. That the titled appeals are pertain to the promotion of the appellants, wherein on the last date the Hon'ble Tribunal directed the respondent department to produce the record of junior clerk post from 2010 till date. However, to the utter surprise, the department on 11.10.2023, the Departmental Promotion Committee, in its meeting, recommended the promotion of Naib Qasids to the post of Junior clerk (BPS-11) with immediate effect, which was duly followed and they were promoted to the said post on 30-10-2023 by the promoting authority.
3. That now the facts necessitating the filing of instant application are that if the posts in question turn out to be filled by the department, which is their intention, then the appeal of the appellants would be infructuous and the appellant will be greatly prejudiced.
4. That if the above-referred appeals have not been fixed earlier, the main appeal of the appellant would become infructuous and the valuable rights of the appellants would be violated and abused. Similarly, there is no bar on it in fixing the same appeal earlier rather it would be in the interest of justice.

In view of above, it is therefore, most humbly prayed that on acceptance of this application, the above titled appeals no. 1819 – 1859 /2022, may kindly be fixed for an early date preferably on 22nd November, 2023.


APPLICANT

Through

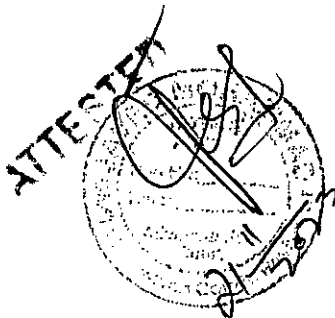

BARRISTER

MUHAMMAD HASSAAN ADIL
Advocate High Court

Dated: 21-11-2023

AFFIDAVIT

I, **Haroon-ur-Rasheed** Son of Muhammad Dawood, Resident of Al-Noor Colony, P.O Khazana Payan, Peshawar, do hereby solemnly affirm and declare on Oath that the contents of accompanying Application are true and correct to the best to my knowledge and nothing has been concealed from this hon'ble tribunal.


ATTESTED


DEPONENT

BARRISTER MUHAMMAD HASSAAN ADIL

Address: Khurshid Building 17-A The Mall Road, Peshawar Cantt

Email: mha50@student.london.ac.uk

Contact No. 0303-8373453, BC No. 85490, B.F # 106308, CNIC # 17301-4151097-9

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

POWER OF ATTORNEY

Haroon-ur-Rasheed and Other

VS

Government of KP & Others

In the matter of case, I, Haroon-ur-Rasheed Son of Muhammad Dawood, Resident of Al-Noor Colony, P.O Khazana Payan, Peshawar, do hereby nominate and appoint;

BARRISTER MUHAMMAD HASSAAN ADIL, to appear, plead act and answer on my behalf in the above office/Court/tribunal or any appellate court/tribunal or any court/tribunal/office to which the business is transferred in the above matter and to sign and file petitions, statement, accounts, exhibits, compromises or other documents whatsoever, in connection with the said matter or any matter arising there from and also to apply to receive all documents or copies of documents, depositions etc. and to apply for and issue summons and other writs or to apply for and get issued any arrest, attachment or other execution, warrants or order and to conduct any proceeding that may arise there out and to apply for all sums or submit the above matter to arbitration.

And to do all acts legally necessary to manage and conduct the said case in all respects whether herein specified or not, as may be proper and expedient.

And I/we hereby agree to ratify and confirm all lawful acts done on my/our behalf under or by virtue of these presents or of the usual practice in such matter.

Provided always that if the case may be dismissed in default if it be proceeded ex-parte the said counsel shall not be held responsible for the same. All costs awarded in favour shall be the right of the counsel or his nominee, and if awarded against shall be payable by me/us.

IN WITNESS WHEREOF, I/we have hereto signed at Peshawar on this 20th November, 2023.

Accepted subject to the terms


EXECUTANT



BARRISTER
MUHAMMAD HASSAAN ADIL