

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR

CM NO. _____ /2023

IN

APPEALS NO. 2361 TO 2420/2023


MUHAMMAD IQBAL & 59 OTHERS VS GOVT.OF KPK

I N D E X

S. NO	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGE
1	Memo of Application with affidavit	-----	1-2
2	Check List for Promotion	A	3

APPELLANTS/APPLICANTS

Through:


NOOR MOHAMMAD KHATTAK,
ADVOCATE
SUPREME COURT OF PAKISTAN

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

CM NO. _____/2023

IN

APPEALS NO. 2361 TO 2420/2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 9414

Dated 24-11-2023

Mr. Muhammad Iqbal, & 59 Others, PST (BPS-12),
GPS Bedami District Dir Upper **Appellants/Applicants**

VS

- 1- The Secretary Elementary and Secondary Education Department,
Khyber Pakhtunkhwa, Peshawar.
- 2- The Director Elementary and Secondary Education, Khyber
Pakhtunkhwa, Peshawar.
- 3- The District Education Officer, District Dir Upper.

..... **RESPONDENTS**

**APPLICATION FOR RESTRAINING THE RESPONDENTS NOT TO
ISSUE PROMOTION ORDER ON BASIS OF IMPUGNED SENIORITY
LIST, TILL THE FINAL DISPOSAL OF THE INSTANTB APPEALS.**

R.SHEWETH:

1. That, the appellants have filed the instant appeal along with other
connected appeals which is mentioned above.
2. That respondents are going to promote the junior colleagues of the
appellants therefore prima facie tilts in favor of the appellants. (Copy of
check list for promotion is attached as annexure "A")
3. That the balance of convenience is also in favor of the appellants.
4. That, all the three ingredients required for grant of stay are in favor of
the appellant.

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It is therefore, most humbly prayed that on acceptance of this application the respondents may kindly be restrained from issuing promotion orders on basis of impugned seniority list. till the disposal of the instant service appeals.


APPELLANTS/APPLICANTS

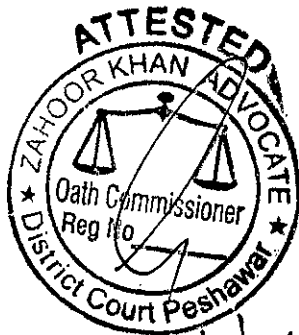
THROUGH:


NOOR MOHAMMAD KHATTAK
ADVOCATE, SUPREME COURT

AFFIDAVIT

I **Muhammad Iqbal**, do hereby solemnly affirm that the contents of this **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Court.


DEPONENT



24/11/23

9A'' (3)

CHECK LIST FOR PROMOTION OF SENIOR CADRE DPC

1	BIO DATA & CNIC	
2	NON INVOLEMENT CERTIFICATE	
3	SERVICE CERTIFICATE	
4	SYNOPSIS	
5	ACRs FIVE YEARS (2022,2021,2020,2019, 2018)	
6	5 YEARS RESULT	
7	PAY ROLL	
8	1st APPOINTMENT ORDER	
9	PROMOTION ORDERs ETC	
10	TRANING CERTIFICATEs/DMCs/Degree	
11	DOMICIAL	
12	SSC DMCs/CERTRIFICATEs	
13	HSSC DMCs/CERTRIFICATEs	
14	BA/BSC, DMCs/CERTRIFICATEs	
15	MA/MSC, DMCs/CERTRIFICATEs	
16	SERVICE BOOK	

Attested
