#### BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

CM NO.\_\_\_\_/2023 IN APPEAL NO. 2373/2023

VS

Khyber Pakhtukhwa Scrvice Teibunal Diary No. 90

## **ABDUL KHALIQ**

#### EDUCATION DEPTT

## APPLICATION FOR RESTRAINING THE RESPONDENTS NOT TO ISSUE PROMOTION ORDER ON BASIS OF IMPUGNED SENIORTY LIST, TILL THE FINAL DISPOSAL OF THE INSTANT APPEAL.

# R.SHEWETH:

- 1. That, the appellants have filed the instant appeal along with other connected appeals.
- 2. That respondents are going to promote the junior colleagues of the appellant 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.

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 appeal.

APPELLANTS/APPLICANTS

**THROUGH:** 

NOOR MOHAMMAD KHATTAK ADVOCATE, SUPREME COURT

#### AFFIDAVIT

I **Abdul Khaliq**, 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.



11 DOMICIAL   2 S5C DMCs/CERTRIFICATES   3 HSSC DMCs/CERTRIFICATES   4 BA/BSC, DMCs/CERTRIFICATES   5 MA/MSC, DMCs/CERTRIFICATES	HECK LIST FOR PROMOTION OF SE	NIOR CADRE DPO	₽.`
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	I BIO DATA & CNIC		
4 SYNOPSIS   5 ACRs FIVE YEARs (2022,2021,2020,2019,2019,2019)   6 5 YEARs RESULT   7 PAY ROLL   8 1st APPOINTMENT ORDER   9 PROMOTION ORDERS ETC   10 TRANING CERTIFICATES/DMCs/Degree   11 DOMICIAL   12 S5C DMCs/CERTRIFICATES   13 HSSC DMCs/CERTRIFICATES   14 BA/BSC, DMCs/CERTRIFICATES   15 MA/MSC, DMCs/CERTRIFICATES	2 NON INVOLEMENT CERTIFICATE		
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 DMICs/CERTRIFICATES   13 HSSC DMICs/CERTRIFICATES   14 BA/BSC, DMCs/CERTRIFICATES	3 SERVICE CERTIFICATE	na na sana na Na sana na sana n	
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	4 SYNOPSIS		n ar an
7 PAY ROLL   8 1st APPOINTMENT ORDER   9 PROMOTION ORDERS ETC   10 TRANING CERTIFICATEs/DMCs/Degree   11 DOMICIAL   12 SSC DMICs/CERTRIFICATES   13 HSSC DMICs/CERTRIFICATES   14 BA/BSC, DMCs/CERTRIFICATES   15 MA/MSC, DMCs/CERTRIFICATES			· · · · · · · · · · · · · · · · · · ·
8 1st APPOINTMENT ORDER   9 PROMOTION ORDERS ETC   10 TRANING CERTIFICATES/DMCs/Degree   11 DOMICIAL   12 SSC DMICs/CERTRIFICATES   13 HSSC DMCs/CERTRIFICATES   14 BA/BSC, DMCs/CERTRIFICATES   15 MA/MSC, DMCs/CERTRIFICATES	6 5 YEARS RESULT		
9 PROMOTION ORDERS ETC   10 TRANING CERTIFICATES/DMCs/Degree   11 DOMICIAL   12 SSC DMICs/CERTRIFICATES   13 HSSC DMCs/CERTRIFICATES   14 BA/BSC, DMCs/CERTRIFICATES   15 MA/MSC, DMCs/CERTRIFICATES	7 PAY ROLL		• .
10 TRANING CERTIFICATEs/DMCs/Degree   11 DOMICIAL   12 S5C DMCs/CERTRIFICATEs   13 H5SC DMCs/CERTRIFICATEs   14 BA/BSC, DMCs/CERTRIFICATEs   15 MA/MSC, DMCs/CERTRIFICATEs	8 1st APPOINTMENT ORDER		
11 DOMICIAL   12 S5C DMCs/CERTRIFICATES   13 H55C DMCs/CERTRIFICATES   14 BA/BSC, DMCs/CERTRIFICATES   15 MA/MSC, DMCs/CERTRIFICATES	9 PROMOTION ORDERS ETC		•
12 S5C DMCs/CERTRIFICATES   13 H5SC DMCs/CERTRIFICATES   14 BA/BSC, DMCs/CERTRIFICATES   15 MA/MSC, DMCs/CERTRIFICATES	D TRANING CERTIFICATEs/DMCs/Degree		
13 HSSC DMCs/CERTRIFICATES 14 BA/BSC, DMCs/CERTRIFICATES 15 MA/MSC, DMCs/CERTRIFICATES	DOMICIAL		
14 BA/BSC, DMCs/CERTRIFICATES	2 SSC DMICs/CERTRIFICATES		
15 MA/MSC, DMCs/CERTRIFICATES	3 HSSC DMCs/CERTRIFICATES		· · · · · · · · · · · · · · · · · · ·
	4 BA/BSC, DMCs/CERTRIFICATES		,
16 SERVICE BOOK	5 MA/MSC, DMCs/CERTRIFICATES		
	6 SERVICE BOOK	·	

712 - 1 ANA

₽!£

.

「「「「「「