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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

CM NO._____/2023

APPEAL NO. 2410/2023

Nor 9474

Deted 24-11-23

KIFAYATULLAH

VS

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

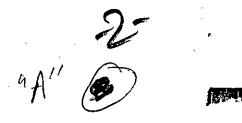
THROUGH:

NOOR MOHAMMAD KHATTAK ADVOCATE, SUPREME COURT

AFFIDAVIT

I **KIFAYATULLAH**, 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



CHECK LIST FOR PROMOTION OF SENIOR CADRE DPC

	all the committee of th	
)	BIO DATA & CNIC	i. 41
	NON INVOLEMENT CERTIFICATE	
-3	SERVICE CERTIFICATE	*
4	SYNOPSIS	
5	ACRs FIVE YEARS (2022,2021,2020,2019, 2018)	
G	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	
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