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**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL  
PESHAWAR**

CM NO. \_\_\_\_\_/2023  
IN  
APPEAL NO. 2372/2023

Khyber Pakhtunkhwa  
Service Tribunal  
Diary No. 9484  
Dated 24/11/23

**NAEEM ULLAH VS EDUCATION DEPTT**

**APPLICATION FOR RESTRAINING THE RESPONDENTS NOT TO  
ISSUE PROMOTION ORDER ON BASIS OF IMPUGNED SENIORITY  
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 **Naeem Ullah**, 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**

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9A''



### 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	

