

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL**

In S.A # 6/2023

And

10/2023, 878/2023,

1. Salman Ahmad,
2. Shazia Batool,
3. Manzoor Elahi

Versus

Chief Secretary Khyber Pakhtunkhwa

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Dated: 15/12/2023

Dated: 15-12-2023

Through

Appellant


JABIR KHAN

Advocate High Court
Peshawar.

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**

In S.A # 6/2023

And

10/2023, 878/2023,

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 9920

Dated 15-12-2023

1. Salman Ahmad,
2. Shazia Batool,
3. Manzoor Elahi

Versus

Chief Secretary Khyber Pakhtunkhwa

**APPLICATION FOR EARLY HEARING OF THE
ABOVE TITLE CASE**

Respectfully Sheweth,

1. That the above title Service Appeal is pending adjudication before this Hon'ble Service Tribunal & is fixed for March 2024.
2. That the matter is pertaining to seniority and the promotion of the appellant. Furthermore the date which is fixed is too far away and the matter of the appellant is urgent in nature because of the department on the basis of seniority pertaining to the impugned orders and notifications issues times and again different seniority list which will be the ultimate reason for the promotion of private respondents and will have long lasting and

negative effect on the service career of the appellant.

3. That if the captioned service appeal has not been fixed for an early date, the Appellant will suffer irreparable loss.
4. That in the given circumstances early fixation of the instant service appeal is indispensable.

It is, therefore, most humbly prayed that on acceptance of this Application, the above title service appeal may kindly be fixed for an early date in the first week of January

Dated: 15-12-2023

Appellant

Through



JABIR KHAN

Advocate High Court
Peshawar.

**BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE
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In S.A # 6/2023

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AFFIDAVIT

I, **Jabir Khan Advocate**, do hereby solemnly affirm and declare on oath that all the contents of the instant application are true and correct to the best of my knowledge and belief and nothing has been concealed or withheld from this Hon'ble Court.



Daire

15/12/23

Jabir Khan
Advocate

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

FORM - A

To be filled by the Counsel/Applicant

Case Number	6,10,878/2023		
Case Title	Salman Ahmad, Shazia Batool, Masood Elali vs Chief Secretary		
Date of Institution			
Bench	SB	DB	
Case Status	Fresh	Pending	
Stage	Notice	Reply	Arguments
Urgency to be clearly stated	Seniority is given to Private respondent		
Nature of the relief sought			
Next date of hearing	First week of Jan		
Alleged Target Date			
Counsel for	Applicant		



Signature of Counsel/Party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

FORM – B

Institution # _____

Early Hearing _____/20____

In case No. 6, 10,878/2023

Salman Ahmad, Shafia Batoolee vs Chief Secretary KPDC

Presented by Zabir Khan on behalf of Applicant. Entered
in the registrar

Put up alongwith main case _____

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 Reader / Assistant
Registrar