

Before the Khyber Pakhtunkhwa Service Tribunal,  
Peshawar

Service Appeal No.657/2023

Jan Alam

**Vs.**

Govt. of Khyber Pakhtunkhwa & others

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 9926

Dated 15/12/23

**APPLICATION FOR TRANSFER OF TITLED  
SERVICE APPEAL ON THE PRINCIPAL SEAT  
AT PESHAWAR.**

**Respectfully Sheweth:**

1. That the titled Service Appeal is pending before this Hon'ble Tribunal and is fixed for final arguments on 21.12.2023 at Camp Court D.I.Khan.
2. That the appellant has now been transferred from PIMT D.I.Khan and posted at Public Health School Hayatabad Peshawar vide order dated 25.08.2023. (Copy of the Office Order is attached as annexure "A").
3. That as most of the respondents are the resident of Peshawar and the appellant has also been transferred and posted at Peshawar, therefore, the transfer of the titled appeal will be more convenient to both the parties i.e. appellant and respondents, therefore, the titled appeal is requested to be transferred at Principal Seat Peshawar, hence the instant application.

4. That if the titled appeal is transferred at Peshawar, it will not only be beneficial and convenient to the parties, but will also be convenient to the counsels of the parties.

It is, therefore, most humbly prayed that on acceptance of this application, the titled Service Appeal may please be transferred to Principal Seat at Peshawar.

Through Respondents No.8 & 9

  
**ABDULLAH QAZI**  
Advocate High Court

Dated: 15.12.2023

### **A.F.F I D A V I T**

It is stated on oath that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

  
D E P O N E N T

**BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA**  
**SERVICE TRIBUNAL, PESHAWAR.**

Service Appeal No. 657 of 2023

Khyber Pakhtunkhwa  
Service

Registry No. 4212

Dated 10/3/2023

Jan Alam, son of Latif Shah, Senior Clerk, Paramedical Institute of Technology, D.I.Khan

**APPELLANT**

**VERSUS**

1. Government of Khyber Pakhtunkhwa, through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
2. Secretary to Govt of Khyber Pakhtunkhwa, Health Department, Peshawar.
3. Director General (Health), Provincial Health Service Academy, Khyber Pakhtunkhwa, Peshawar.
4. Director General, Health Services, Khyber Pakhtunkhwa, Peshawar.
5. Principal, Paramedical Institute of Technology, D.I.Khan.
6. Principal, Public Health School, D.I.Khan.
7. Khurshid Ali son of Firdos Khan, presently serving as office Assistant, PIMT Swat.
8. Faridullah son of Khalil-ur-Rehman, presently serving as Office Assistant PIMT Swat.
9. Rehmat Ali son of Taj Muhammad, presently serving as Office Assistant (Acting Charge) PHSA, Peshawar.
10. Gul Benaf Shah son of Mian Gul Bahar Shah, presently serving as Office Assistant PGCN, Peshawar.

*Principal Nursing College Distt D.I.K* **RESPONDENTS**

**SERVICE APPEAL UNDER SECTION 4 OF THE K.P.  
SERVICE TRIBUNALS ACT, 1974, AGAINST OFFICE  
ORDER BEARING No.23/PHSA/ADMIN/PROMOTION  
CLASS-III/2020-21/2430 DATED 28.10.2020 ISSUED  
BY THE RESPONDENT NO.3, WHEREBY RESPONDENTS  
NO. 7 TO 10 HAVE BEEN PROMOTED TO THE POSTS OF**

*M/11*  
*Filed on 10/10/23*

*Registrar*

16<sup>th</sup> Oct. 2023

1. Appellant in person present. Mr. Asad Ali Khan, Assistant Advocate General alongwith Miss Lubna, Principal for the official respondents present.
2. Lawyers are on strike, therefore, case is adjourned. To come up for arguments on 23.11.2023 before D.B at Camp Court, D.I.Khan. P.P given to the parties.

*\*Mutazem Shah \**

(Salah-Ud-Din)  
Member (J)

(Kalim Arshad Khan)  
Chairman  
Camp Court, D.I.Khan

23<sup>rd</sup> Nov. 2023

1. Junior to counsel for the appellant and Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.
2. Bench is incomplete. Therefore, case is adjourned. To come up for arguments on 21.12.2023 before D.B at Camp Court, D.I.Khan. P.P given to the parties.

*\*Mutazem Shah \**

(Muhammad Akbar Khan)  
Member (E)  
Camp Court, D.I.Khan