

BEFORE THE CHAIRMAN SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 1056 / 2023

Arshad Khan versus Police Department

Service Tribunal

Diary No. 9997

Dated: 20-12-2023

Subject: **APPLICATION FOR EARLY HEARING IN THE ABOVE MENTION SERVICE APPEAL.**

Respectfully Sheweth:


1. That the above mention service appeal was pending before this Hon'rabable Tribunal which was fixed for arguments on 29. 03.2024.
2. That the service appeal of the appellent is for reinstatement. The appellent belong to a very poor family and facing several financial constraint.

It is therefore humbly prayed that on acceptance of this early hearing application, the date of the service appeal may be fixed as soon as possible.


Appellant

Arshad Khan

Through


Syed Noman Ali Bukhari
Advocate High Court Peshawar

29-3-2024

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'A'

To be filled by the Counsel/Applicant

Case Number	1056/2023			
Case Title	Ashad Khan vs Police Officer			
Date of Institution				
Bench	SB		DB	<input checked="" type="checkbox"/>
Case Status	Fresh		Pending	<input checked="" type="checkbox"/>
Stage	Notice		Reply	<input checked="" type="checkbox"/>
Urgency to clearly stated.	Fairness constraint			
Nature of the relief sought.	Re-instatement			
Next date of hearing	29-03-24			
Alleged Target				
Date				
Counsel for	<input checked="" type="checkbox"/> Petitioner		<input type="checkbox"/> Respondent	<input type="checkbox"/> In person

[Handwritten Signature]

Signature of counsel/party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing _____ -p/20 _____

In case No. _____ -p/20 _____

Vs _____

Presented by _____ on behalf of _____. Entered
in the relevant register.

Put up alongwith main case _____

REGISTRAR

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 Readers/Assistant Registrar branch	

Assistant Registrar

REGISTRAR

BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR

APPEAL NO. 1056 /2023

Arshad Khan Ex-PASI
I/C Traffic District Bannu.



..... (Appellant)

VERSUS


1. The Inspector General of Police, KP, Peshawar.
2. The Regional Police Officer Bannu region Bannu.
3. The District Police Officer Bannu.

.....(Respondents)

APPEAL UNDER SECTION 4 OF THE KP SERVICES TRIBUNAL ACT, 1974 AGAINST THE ORDER DATED 14-02-2023 WHEREBY THE APPELLANT WAS DISMISSED FROM SERVICE ILLEGALLY WITHOUT LAWFUL AUTHORITY AND WITHOUT JURISDICTION AND AGAINST THE REJECTION ORDER DATED 12-04-2023 WHEREBY THE DEPARTMENTAL APPEAL OF THE APPELLANT WAS REJECTED WITHOUT SHOWING ANY COGENT REASON.

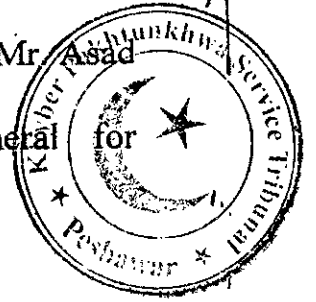
PRAYER:

THAT ON THE ACCEPTANCE OF THIS APPEAL, THE ORDER DATED 14/02/2023 AND 12-04-2023 MAY KINDLY BE SET ASIDE AND THE APPELLANT MAY BE REINSTATED IN TO SERVICE WITH ALL BACK AND CONSEQUENTIAL BENEFITS. ANY OTHER REMEDY WHICH THIS AUGUST TRIBUNAL DEEMS FIT AND APPROPRIATE THAT MAY ALSO BE AWARDED IN FAVOR OF APPELLANT.

Certified to be true copy

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar


15.09.2023

1. Learned counsel for the appellant present. Mr. Asad Ali Khan learned Assistant Advocate General for respondents present.



SCANNED
Peshawar

2. Written reply on behalf of respondents submitted which is placed on filed. A copy of the same is handed over to learned counsel for the appellant. To come up for arguments on 07.12.2023 before D.B. P.P given to parties.



(Rashida Bano)
Member (J)

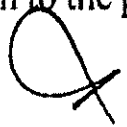
Kaloem Ullah

07th Dec. 2023

Learned counsel for the appellant present. Mr. Asif Masood Ali Shah, Deputy District Attorney for the respondents present.

Learned counsel for the appellant seeks some time for preparation of arguments. To come up for arguments on 29.03.2024 before the D.B. Parcha Peshi given to the parties.


(Salah-ud-Din)
Member (J)


(Kalim Arshad Khan)
Chairman

*Naeem Amin
Certified to be true copy
CHIEF CLERK
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

Date of Presentation of Application 19/12/23
Number of Words 27
Copying Fee 10/-
Urgent ✓
Total 18/-
Name of Copyist _____
Date of Completion of Copy 19/12/23
Date of Delivery of Copy 19/12/23