

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

CM No. _____/2024
IN
Service Appeal No. 1711/2023

Khyber Pakhtunkhwa
Service Tribunal
Diary No. 10576
Dated 16-1-2024

Niaz Ali Khan..... **Petitioner**
Versus
Addl. IGP and others **Respondents**

**APPLICATION FOR EARLY
FIXATION OF THE INSTANT
SERVICE APPEAL**

Respectfully Sheweth:-

Applicant submits as under:-

1. That the captioned case is subjudice in this Hon'ble Court and was fixed on 16/04/2024 for arguments as the respondents already submitted their comments.
2. That the instant case is pertains to the promotion of the appellant and the Departmental Promotion Committee Meeting will be held shortly to be expected in mid of February 2024.
3. That the applicant is placed at Serial No. 126 in the promotion list for consideration.

4. That the instant appeal is not fixed before the meeting of departmental promotion committee then the petitioner would sustain irreparable loss and will be deprived from his due legal promotion right.
5. That there is no legal bar on acceptance of instant application and fixation of an early date of hearing.

It is, therefore, requested that on acceptance of this application, an early date of hearing may kindly be fixed in the above noted appeal before the meeting of departmental promotion committee in the 2nd week of February, 2024.

Dated:- 15/01/2024

Through

Applicant



Arshad Ali Nowsherwi
Advocate, Supreme Court of
Pakistan

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing _____/2024
Service Appeal No. 1711/2023

Niaz Ali Khan..... **Petitioner**

Versus

Addl. IGP and others **Respondents**

Presented by **Arshad Ali Nowsherwei Advocate Supreme Court of Pakistan**, on behalf of Applicant/Appellant. Entered in the Relevant Register.

Put up along with 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 Reader/Assistant Registrar Branch	

ASSISTANT REGISTRAR

REGISTRAR

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

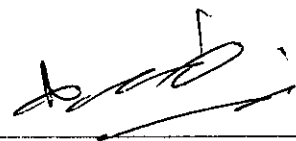
PROFORMA FOR EARLY HEARING

FORM 'A'

To be filled by the counsel

Case Number	Service Appeal No. 1711/2023					
Case Title	<u>Niaz Ali Khan..Versus...Addl. IGP etc</u>					
Date of Institution	<u>2023</u>					
Bench	SB		DB			
Case Status	Fresh		Pending		√	
Stage	Notice	√	Motion		PAN	
Urgency to be clearly stated	<u>That the instant case is pertains to the promotion of the appellant and the Departmental Promotion Committee Meeting will be held shortly to be expected in mid of February 2024.</u>					
Nature of the relief sought	<u>That the instant appeal is not fixed before the meeting of departmental promotion committee then the petitioner would sustain irreparable loss and will be deprived from his due legal promotion right.</u>					
Next date of haring	<u>16/04/2024</u>					
Alleged target date	<u>Before 2nd week of February 2024.</u>					
Counsel for	Petitioner	√	Respondent		In person	

Signature of Counsel/party :-



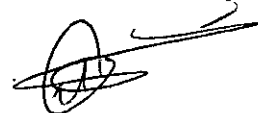
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AFFIDAVIT

I, **Niaz Ali Khan S/o Khan Wali Khan LHC/2013
Police Station Dadi Wala Unit Investigation District
Lakki Marwat, R/o Mohallah Sari Khel, Sarai
Naurang District Lakki Marwat**, do hereby solemnly
affirm and declare on oath that the contents of this
accompanying **Application** are true and correct to the
best of my knowledge and belief and nothing has been
concealed from this Honourable Court.



DEPONENT

CNIC: 11201-0374884-9
Cell: 0331-9194176

