

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

CM No. _____/2024

In

Service Appeal No. 1369/2023

Dr. Amin Ul Haq

VERSUS

Government of Khyber Pakhtunkhwa and others

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Application		1-2
2.	Affidavit		0-3

Appellant


Through



Naveed Akhtar

Advocate Supreme Court

Mob No. 0300-9596181



Munir Ud Din Ghori

Advocate High Court

Dated: 10.01.2024

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

CM No. _____/2024

In

Service Appeal No. 1369/2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 10740

Dated 23-1-2024

Dr. Amin Ul Haq S/o Abdul Haq R/o Tangi Nasratzai, Muhalla Usman
Khail, District Charsadda. Senior Drug Inspector BPS-18.

.....Appellant

VERSUS

Government of Khyber Pakhtunkhwa through Chief Secretary, Civil
Secretariat, Peshawar and others

.....Respondents

APPLICATION FOR EARLY HEARING IN THE
ABOVE TITLED WRIT PETITION ON BEHALF
OF PETITIONER.

Respectfully Sheweth: -

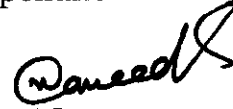
1. That the above titled petition is pending adjudication before this Hon'ble Court and is fixed 21.04.2024.
2. That the above titled appeal has filed against the impugned notification no. SOH-iii/7-262/2023(amin) dated 02.02.2023, whereby major penalty of removal from service upon the appellant was imposed.
3. That the appeal is pending since long and comments on behalf of the department have also been filed.
4. that the appellant may kindly be allowed to adduce additional arguments /documents at the time of hearing of the instant application

It is, therefore, humbly prayed that on acceptance of the instant application the above titled appeal may kindly be accelerated convenient to this Hon'ble Tribunal in the interest of justice.

Any other remedy this august tribunal deems fit may kindly be awarded in favor of the appellant as well.

Appellant

Through



Naveed Akhtar

Advocate Supreme Court

Mob No. 0300-9596181



Munir Ud Din Ghori

Advocate High Court

Dated: .01.2024

BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

CM No. _____/2024

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Service Appeal No. 1369/2023

Dr. Amin Ul Haq

VERSUS

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AFFIDAVIT

I, Dr. Amin Ul Haq S/o Abdul Haq R/o Tangi Nasratzai, Muhalla Usman Khail, District Charsadda. Senior Drug Inspector BPS-18, do hereby solemnly affirm and declare on oath that the contents of accompanying Service Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.

DEPONENT



BEFORE THE SERVICES TRIBUNAL KHYBER PAKHTUNKHWA
PESHAWAR

Service Appeal No. 1369 /2023



Dr. Amin Ul Haq S/o Abdul Haq R/o Tangi Nasratzai, Muhalla Usman
Khail, District Charsadda. Senior Drug Inspector BPS-18.

.....Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
2. Chief Minister, Khyber Pakhtunkhwa through Principal Secretary, CM Secretariat, Peshawar.
3. Secretary Health Services, Government of Khyber Pakhtunkhwa Peshawar.
4. Director General, Drug Control and Pharmacy Services, Khyber Pakhtunkhwa.
5. Director General Health Services, Government of Khyber Pakhtunkhwa Peshawar.

.....Respondents

APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974 AGAINST THE IMPUGNED NOTIFICATION NO. SOH-III/7-262/2023 (AMIN) DATED 02.02.2023, WHEREBY MAJOR PENALTY OF REMOVAL FROM SERVICE UPON THE APPELLANT WAS IMPOSED AND THE REVIEW PETITION OF THE APPELLANT DATED 02.02.2023 FILED AGAINST THE IMPUGNED ORDER, TOO WAS LET UN-ANSWERED.

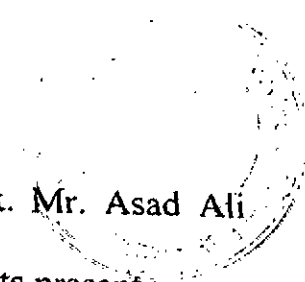
PRAYER:

THAT ON ACCEPTANCE OF THIS SERVICE APPEAL THE IMPUGNED OFFICE ORDER DATED 02.02.2023 OF THE RESPONDENT NO. 2 MAY KINDLY BE SET-

Certified to be true copy

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

1369 / 2023




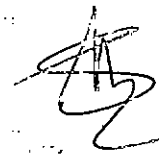
12th Dec. 2023

1. Junior to counsel for the appellant present. Mr. Asad Ali Khan, Assistant Advocate General for the respondents present.
2. Reply alongwith cost of Rs.5000/- has been submitted through office. Copy of reply was given to the junior to counsel for the appellant. To come up for arguments on 16.04.2024 before D.B. P.P given to the parties.

SCANNED
KPST
Peshawar

Muazzem Shah


(Kalim Arshad Khan)
Chairman



10/1/24

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