

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

FORM – A

To be filled by the Counsel/Applicant

8- Appl. No. 2215/23

|                              |   |         |             |
|------------------------------|---|---------|-------------|
| Case Number                  | Review Petition 67/2024   |         |             |
| Case Title                   | Fayaz Ahmad vs Gohar Khan & others  |         |             |
| Date of Institution          | 13-1-2024   |         |             |
| Bench                        | SB  | DB      | ✓           |
| Case Status                  | Fresh ✓   | Pending |             |
| Stage                        | Notice,   | Reply ✓ | Arguments ✓ |
| Urgency to be clearly stated | The applicant is transferred on 23-1-24.                                    |         |             |
| Nature of the relief sought  | Early hearing and suspension of transfer order                              |         |             |
| Next date of hearing         | 06-2-24   |         |             |
| Alleged Target Date          |   |         |             |
| Counsel for                  | Fayaz Ahmad Deputy Director (E)<br>Directorate of Higher Education Peshawar |         |             |



Signature of Counsel/Party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

FORM – B

Institution #

Early Hearing \_\_\_\_\_ /2024

In case No. 67 /2024

Fayaz Ahmad Vs Gohar Khan & others  
Presented by Adv. Jawad Khan on behalf of Fayaz Ahmad 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                  |  |

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR

Misc Application No \_\_\_\_\_ of 2024

In Re:

Review Petition No 67/2024

Fayaz Ahmad.....Applicant/Appellant

V E R S U S

Gohar Khan and others.....Respondents

I N D E X

| S NO | DESCRIPTION OF DOCUMENTS  | ANNEX | PAGES   |
|------|---|-------|---------|
| 1.   | Application for early hearing and suspension of transfer order  | -     | 01 - 02 |
| 2.   | Affidavit   | -     | 03      |
| 3.   | Copy of the transfer order dated 23 <sup>rd</sup> January, 2024 | -     | 04      |

Applicant

Through: *Jawad Khan*  
~~Advocate High Court~~  
(JAWAD KHAN)  
Advocate,  
High Court, Peshawar  
Cell # 0321-5778557

Dated: -25-01-2024

(1)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR

Misc Application No \_\_\_\_\_ of 2024

In Re:

Review Petition No 67/2024

Fayaz Ahmad, Deputy Director Establishment (BPS-18)  
Directorate of Higher Education, Khyber Pakhtunkhwa  
Peshawar.....Applicant

V E R S U S

1. Gohar Khan, Assistant Professor of Law (BPS-18) Government College, Peshawar
2. Government of KP through Chief Secretary, Civil Secretariat, Peshawar
3. Government of KP through Secretary High Education, Archives and Libraries Department, Peshawar.....Respondents

\_\_\_\_\_

Misc Application for the early hearing /  
fixation of the above titled review petition

Respectfully Sheweth: -

Petitioner humbly submits:-

- 1) That the above noted review petition is pending in this Honourable Court and is fixed for 06-02-2024.
- 2) That the Applicant has been transferred from the post of Deputy Director (Establishment), Directorate of High Education, KP Peshawar to Government College, Peshawar as Assistant Professor vide order SO(C-II)/HED/2-

2

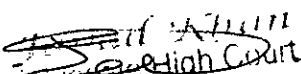
5/2023/Fayaz Ahmad dated 23-01-2024. (Copy of the order is attached as Annex 'A').

- 3) That if the early date in the review petition is not fixed, the review filed by Applicant will become infructuous.
- 4) That early hearing is not against the law; rather in the best interest of justice.
- 3) That this Honourable Tribunal has got ample powers to entertain the instant application.
- 4) That any other ground will be raised at the time of arguments with the permission of this Honourable Tribunal.

It is, therefore, humbly prayed before this Honourable Service Tribunal that above mentioned review petition may kindly be fixed as early as possible. Furthermore, the transfer order of the applicant dated 23-01-2024 may graciously be suspended till the final disposal of the review petition.

Applicant

Through:

  
High Court

(JAWAD KHAN)

Advocate

High Court, Peshawar

Dated:-25-01-2024

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BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE  
TRIBUNAL, PESHAWAR

Misc Application No \_\_\_\_\_ of 2024

In Re:

Review Petition No 67/2024


Fayaz Ahmad.....Applicant/Appellant

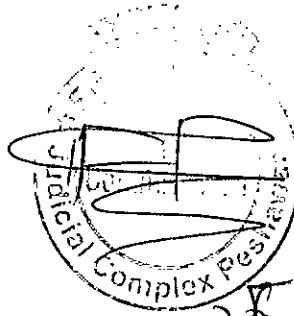
VERSUS

Gohar Khan and others.....Respondents

AFFIDAVIT

I, Fayaz Ahmad, Deputy Director Establishment (BPS-18)  
Directorate of Higher Education, Khyber Pakhtunkhwa Peshawar,  
do hereby solemnly affirm and declare on oath that all the  
contents of this Application are true and correct to the best of  
my knowledge and belief and nothing has been concealed or  
withheld from this Honourable Court.

DEPONENT   
CNIC # 21204-9823745-3  
Cell # 0346-9009205  
Cell # 0300-5965592



28/1  
24

Amnec - A

(4)



**GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION, ARCHIVES &  
LIBRARIES DEPARTMENT**

Dated Peshawar the January 23, 2024

**NOTIFICATION**

**NO.SO(C-II)/HED/2-5/2023/Fayaz Ahmad.** In pursuance of Khyber Pakhtunkhwa Service Tribunal judgment dated 28.11.2023 in Service Appeal No.2215/2023, posting/transfer of the following Assistant Professors of male college cadre are hereby ordered in the best public interest: -

| S# | Name/Designation/BPS  | From   | To   | Remarks       |
|----|---|--|--|---------------|
| 1. | Mr. Gohar Khan, Assistant Professor/Deputy Director Establishment (BS-18) | GC, Peshawar   | As Deputy Director (Establishment) Directorate of Higher Education, Khyber Pakhtunkhwa | Vice Sr. No.2 |
| 2. | Mr. Fayaz Ahmad, Assistant Professor of History (BS-18)                   | Directorate of Higher Education Khyber Pakhtunkhwa, Peshawar | As Assistant Professor of History (BS-18), at GC, Peshawar                             | Vice Sr. No.1 |

-Sd-

SECRETARY TO  
GOVT. OF KHYBER PAKHTUNKHWA  
HIGHER EDUCATION DEPARTMENT

**ENDST: NO. & DATE EVEN:**

Copy forwarded to the:

1. Accountant General, Khyber Pakhtunkhwa, Peshawar.
2. Director, Higher Education, Khyber Pakhtunkhwa, Peshawar.
3. Director-IT, HEMIS, Higher Education Department.
4. Principal, Government College, Peshawar.
5. PS to Secretary, Higher Education Department.
6. Assistant Professors concerned.
7. Master File.

(ABDUL WAL KHAN)  
SECTION OFFICER (COLLEGES-II)

23/01/2024

CS CamScanner

A Hest  
Javad Khan  
Advocate High Court  
Peshawar