

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

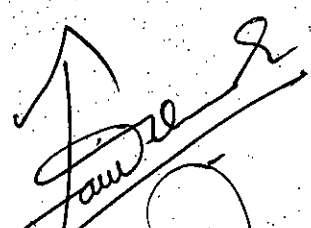
Civil Miscellaneous No: _____ / 2024

In Service Appeal No: 5968 / 2021

JAMIL AHMAD QURESHI VS Govt. of Khyber Pakhtunkhwa etc.

I N D E X

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Applicant / Appellant

Through:


BILAL AHMAD KAKAIZAI

(Advocate Supreme Court of Pakistan)

213, Sunehri Masjid Road, Near HBL

Nothia Branch, Peshawar Cantt.

0300-9020098.

(2)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR.

Khyber Pakhtunkhwa
Service Tribunal

Civil Miscellaneous No: _____ / 2024

Diary No. 11096

In Service Appeal No: 5968 / 2021

Date 13-02-2024

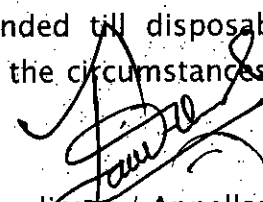
JAMIL AHMAD QURESHI VS **Govt. of Khyber Pakhtunkhwa etc.**

APPLICATION FOR INTERIM RELIEF

Respectfully Sheweth,

- 1) That, the titled Service Appeal is pending subjudice before this Honorable Tribunal and is fixed for 16.02.2024.
- 2) That, the claim of the Applicant / Appellant in the titled Appeal is with regard to his seniority position & vires of rules etc whereby other incumbents have been allowed full chance of promotion and the Appellant's Cadre is ignored, purposely.
- 3) That, recently, on 25.01.2024, Labour Department of Government of Khyber Pakhtunkhwa, has sent the working papers of Respondent No. 8 for the purpose of promotion as the meeting of the Provincial Selection Board is scheduled to be held in end of February. Needless to mention here that in case of his promotion, the chances of further promotion of any cadre relating to Applicant / Appellant would be reduced to zero till 2056, copy of the Letter dated 25.01.2024 is attached as Annexure-A.
- 4) That, Applicant / Appellant has prima facie case in his favour moreover balance of convenience also lies in his favour.
- 5) That, Applicant / Appellant will suffer irreparable loss if the Respondent No. 8 is accommodated for the post of Chief Inspector of Factories, moreover it will also result in multiplicity of litigation.

It is, therefore, requested that Interim Relief be granted to the effect that Letter dated 24.07.2023 may please be suspended till disposal of titled Appeal, with such other relief as may deem fit in the circumstances of the case may also be granted.


Applicant / Appellant

Through:


BILAL AHMAD KAKAIZAI

(Advocate Supreme Court of Pakistan)

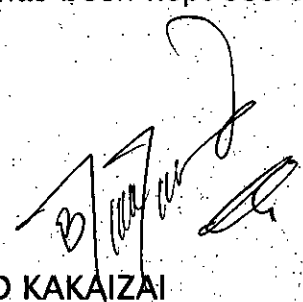
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PESHAWAR.

Civil Miscellaneous No: _____ / 2024
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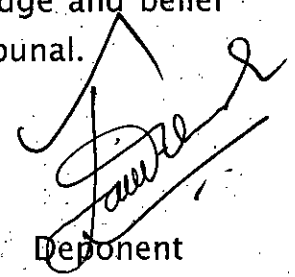
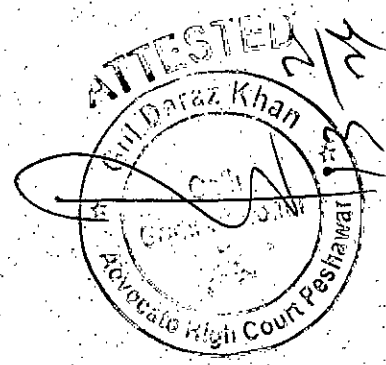
JAMIL AHMAD QURESHI VS **Govt. of Khyber Pakhtunkhwa etc.**

AFFIDAVIT

I, **JAMIL AHMAD QURESHI**, Assistant Director Litigation, Directorate of Labour, Government of Khyber Pakhtunkhwa, Peshawar, Applicant / Appellant do hereby on oath affirm and declare that the contents of the Application are true and correct to the best of my knowledge and belief and nothing has been kept secret from this Honourable Tribunal.



BILAL AHMAD KAKAIZAI
(Advocate, Supreme Court of Pakistan)


Deponent

ATTESTED
Muhammad Daraz Khan
Advocate High Court Peshawar
2/2/24

A 4



GOVERNMENT OF KHYBER PAKHTUNKHWA
LABOUR DEPARTMENT

No. SO(LD)10
Dated 25.01.2024

To
The Secretary to Govt. of Khyber Pakhtunkhwa,
Establishment Department,
Peshawar

Subject - STREAMLINING OF PROVINCIAL SELECTION BOARD (PSB) MEETINGS

Dear Sir,

I am directed to refer to your letter No SO(PSB)ED/1-25/2022/PSB dated 17th January, 2024 on the subject noted above and to enclose herewith a self-explanatory ~~document~~ alongwith enclosure in respect of Mr. Raim Ullah Inspector of Factories (Technical) (BPS-17) for appointment against the vacant post of ~~Inspector of Factories (BPS-18)~~ on acting charge basis. This department has already forwarded 07 sets of working paper on 10.08.2023.

2 In view of the above it is requested to place the case before the Provincial Selection Board for consideration, please

Encl. as above

Yours faithfully,

SECTION OFFICER (LABOUR)

Endst. of even No & date

Gopy is forwarded to P.S to Secretary Labour Department Khyber Pakhtunkhwa

SECTION OFFICER (LABOUR)

o/c

Attested