

# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

FORM A

## PROFORMA FOR EARLY HEARING TO BE FILLED BY THE COUNSEL

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 11388

Dated 27-02-2024

Case number	Service appeal No. 896/2022			
Case title	Tahira Bibi versus govt & others			
Date of institution	2022			
Bench	SB		DB	√
Case status	fresh		Pending	√
Stage	Notice	√	Motion	PAN

Urgency to be clearly stated	That the instant case of the appellant is regarding re-instatement in service and the titled Service Appeal has been delayed for various reasons and the appellant has to face great hardships being jobless since illegal termination from service.			
Nature of the relief sought	That the applicant is facing financial hardships and the short question of law is involved in the matter and the date fixed i.e 24-04-2024 is too far, which needs to be accelerated to an early date			
Next date of hearing	<u>24/04/2024</u>			
Alleged target date	<u>Next week</u>			
Counsel for	<u>Petitioner</u>	√	<u>Respondent</u>	<u>In person</u>

Signature of appellant/Petitioner or Counsel:-

Dated:-

27-02-2024

24-04-2024

Peshawar

**KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR**

**PROFORMA FOR EARLY HEARING**

**FORM B**

Inst#

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

In service appeal No. 896/2022

*Tahira Bibi... versus... Govt & others*

Presented by **Fazal Shah Mohmand Advocate supreme Court** 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 a by the branch incharge	
Date(s) fixed in the similar matter Branch incharge	
Available dates Reader/Assistant Registrar Branch	

**ASSISTANT REGISTRAR**

**REGISTRAR**

**BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA**

**PESHAWAR**

CM No; \_\_\_\_\_/2024

in

Service Appeal No-896/2022

Tahira Bibi Ex Primary School Teacher, Govt, Girls Community Model  
School Dhakki Tehsil Tangi District Charsadda.

.....Applicant

**V E R S U S**

1. Director, Elementary and Secondary Education, Govt. Of Khyber Pakhtunkhwa, Peshawar.
2. District Education Officer (Female) Charsadda.
3. Secretary, Elementary and Secondary Education Govt. of Khyber Pakhtunkhwa, Peshawar.
4. Musarrat Begum, Primary School Teacher, Govt. Girls Community Model School Dhakki Tehsil Tangi District Charsadda.

... ..Respondents

**APPLICATION FOR EARLY HEARING OF TITLED SARVICE APPEAL.**

**Respectfully Submitted:-**

1. That the above titled service appeal is pending before this honorable tribunal in which next date is fixed for 24-04-2024.
2. That the instant case of the appellant is regarding re-instatement in service and the titled Service Appeal has been delayed for various reasons and the appellant has to face great hardships being jobless since illegal termination from service.
3. That the applicant is facing financial hardships and the short question of law is involved in the matter and the date fixed i.e 24-04-2024 is too far, which needs to be accelerated to an early date.
4. That it is just, fair as well as in larger interest of justice that the titled appeal be fixed and heard at the earliest.

It is therefore most humbly prayed, that on acceptance of this application, the titled case may kindly fixed for an early date.

Dated:- 27-02-2024

Appellant/Petitioner

Through

  
Fazal Shah Mohmand ASC

Ibad Ur Rehman Khalil 

&

Baseer Ahmad Shah 

Advocates Peshawar 

**A F F I D A V I T :-**

I, Tahira Bibi Ex Primary School Teacher, Govt, Girls Community Model School Dhakki Tehsil Tangi District Charsadda, do hereby solemnly affirm and declare on oath that the contents of this **Application** are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable Court.

  
**DEPONENT**

