# KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING TO BE FILLED BY THE COUNSEL

Khyber Pakhtukhwa Service Tribunal

Diary No. 11388  $\mathcal{D}_{\mathcal{T}}$ 

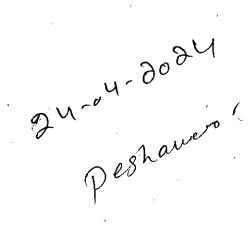
Case number	Service appeal No. 896/2022	Dated
Cas <b>e i</b> ile	Tahira Bibi versus govt & others	
Date of institution	2022	
Bench .	SB	$DB \leftarrow \sqrt{1-1}$
Case status	fresh	Pending V
Stage-	Notice V Motion	PAN

Urgency to be	That the instant case of the appellant is regarding re-instatement in				
clearly stated	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	That the applicant is facing financial hardships and the short question				
relief sought	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	24/04/2024				
hearing.					
	Next week				
date					
Counsel for	<u>Petitioner</u> <u>V</u> <u>Respondent</u> <u>In person</u>				

Signature of appellant/Petitioner or Counsel:-

FORM A

27-02-2024 ou Dated:-



# 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

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Service Appeal No-896/2022

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

.....Applicant

### VERSUS

- **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.

### 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.

Tt 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

ca Fazal Shah Mohmand ASC

Ibad Ur Rehman Khalil

&

Baseer Ahmad Shah

Advocates Peshawar

# A FFIDAVIT:-

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 <u>Application</u> are true and correct to the best of my knowledge and belief and that nothing has been concealed from this honorable Court.

# DEPONENT

