

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 216 /2024

Asghar Khan Applicant/Appellant

Versus

The Govt. of KPK and another.....Respondents

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Through

Applicant/Appellant

Khaled Rahman
Khaled Rahman,
 Advocate,
 Supreme Court of Pakistan

&

Muhammad Ghazanfar Ali
 Advocate, High Court
 4-B, Haroon Mansion
 Khyber Bazar, Peshawar
 Off: Tel: 091-2592458
 Cell # 0345-9337312

Dated: 27/02/2024

05-03-2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Service Appeal No. 216 /2024

Diary No. 11381

Dated 27-02-2024

Asghar Khan Applicant/Appellant

Versus

The Govt. of KPK and another Respondents

Application for suspending the operation of the office order dated 23.02.2024 till the final disposal of the instant Appeal.

Respectfully Sheweth,

1. That the above titled service appeal pending before the Hon'ble Tribunal which is fixed for hearing on 05.03.2024.
2. That this Hon'ble Tribunal vide order dated 01.02.2024 (*Annex:-A*) had already suspended the operation of the impugned office orders dated 17.12.2023 and 09.01.2024.
3. That when the order of the Hon'ble Tribunal came into the Notice of Respondent No.2, he with malafide intention and to frustrate the instant appeal issued another order dated 23.02.2024 whereby appellant was transferred to the office of the District Health Officer, Mardan.
4. That the facts alleged and grounds taken in the body of Memo of appeal may be taken as intgeral part of this application which make out an excellent prima facie case in favour of the applicant who is thus quite sure that the appeal will succeed on merits.
5. That in case the interim relief is not granted, the applicant is bound to suffer loss which cannot be compensated in terms of money whereas in case of interim relief no one is to suffer.

It is therefore, humbly prayed that on acceptance of this application, the operation of the office order dated 23.02.2024 may graciously be suspended till the disposal of the instant appeal.

Through

Applicant/Appellant

Khaled Rahman,
ASC

&

Muhammad Ghazanfar Ali
Advocate, High Court

Dated: 27/02/2024

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

Service Appeal No. 216 /2024

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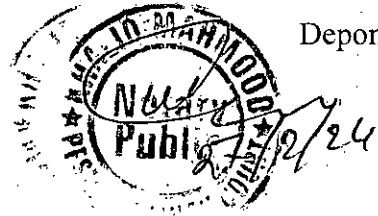
The Govt. of KPK and another.....Respondents

Affidavit

I, Asghar Khan, Office Assistant, Saidu Group of Teaching Hospitals, Swat, 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 nothing has been concealed from this Hon'ble Tribunal.



Deponent



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Amir A²



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUN KHWA PESHAWAR**

E-Mail Address: dgshs@peshawar.com Office Ph# 091-9210269 Ext Exchange# 091-9210187, 9210196 Fax # 091-9210230

OFFICE ORDER

As approved by the competent authority, Mr. Asghar Khan Office Assistant Saidu Group of Teaching Hospital Swat is hereby transferred and posted to District Health Office Mardan office against the vacant post in the interest of public service with immediate effect.

Sd/xxxxxxxxx
DIRECTOR GENERAL HEALTH
SERVICES, K.P.K, PESHAWAR.
Dated 23/10/2024

No. 1519-23 /Personnel
Copy forwarded to the:-

1. M.S SGTH Swat.
2. DHO Mardan.
3. DAOs Mardan/Swat.
4. P.A to DGHS Khyber Pakhtunkhwa.
5. Official concerned.

For information and necessary action.


DIRECTOR GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA PESHAWAR.

ATTESTED