

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

PROFORMA FOR EARLY HEARING

Khyber Pakhtukhwa
Service Tribunal

Diary No. 11487

Dated 29/2/24

Form "A"

To be filled by the Counsel/Applicant

Case No.	Service Appeal No.717/2023			
Case Title	Dilshad Hussain.....Vs..... Government of KPK etc.			
Date of Institution	2023			
Bench	SB		DB	✓
Case Status	Fresh		Pending	✓
Stage	Notice	✓	Argument	✓
Urgency to be clearly stated	That respondents have processed case to PSB for promotion to BPS-18 of one Muhammad Ishfaq who is junior to the applicant and is the favorite of official respondents. That the applicant is going to retire from service on 08.03.2024, thus the application is well reasoned.			
Nature of the relief sought	Promotion matter			
Next date of hearing	16.05.2024.			
Alleged Target Date	As early as possible			
Counsel for	Appellant	✓	Respondent	In Person


Signature of Counsel/Party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,

PESHAWAR

PROFORMA FOR EARLY HEARING

Form "B"

Inst#

Early Hearing _____-P/2024

In Case No. 717-P/2023

Dilshad Hussain.....Vs..... Government of KPK etc.

Presented by **Fazal Shah Mohmand** on behalf of **Appellant**.

Entered in the relevant register.

Put up alongwith main case _____

REGISTRAR

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 Branch	

ASSISTANT REGISTRAR

REGISTRAR

**BEFORE THE HON'BLE SERVICES TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

CM No. _____/2024

In

Service Appeal No.717/2023

Dilshad Hussain, Librarian (BPS-18),
Khushal Khan Khattak,
Library Akora Khattak, Nowshera.

.....**APPLICANT/APPELLANT**

V E R S U S

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
2. Government of Khyber Pakhtunkhwa, through Secretary Higher Education, Archives & Libraries Department, Civil Secretariat, Peshawar.
3. Government of Khyber Pakhtunkhwa through Secretary Establishment Department, Civil Secretariat, Peshawar.
4. Director Archives & Libraries, Khyber Pakhtunkhwa, Peshawar.
5. Zahir Ullah Khan, Retired Director, Archives and Libraries, Khyber Pakhtunkhwa, Peshawar.

.....**RESPONDENTS**

APPLICATION FOR EARLY HEARING

Respectfully Sheweth:

1. That the above titled case is pending adjudication before this Honorable Tribunal, which is fixed for 16.05.2024.

2. That respondents have processed case to PSB for promotion to BPS-18 of one Muhammad Ishfaq who is junior to the applicant and is the favorite of official respondents.
3. That the applicant is going to retire from service on 08.03.2024, thus the application is well reasoned.
4. That it is just, fair as well as in larger interest of justice that the above titled case may be fixed and heard at the earliest.

It is, therefore, most humbly prayed that keeping in view the above facts and circumstances of the case, the titled case may kindly be fixed as early as possible.

Through

Appellant/ Applicant


FAZAL SHAH MOHMAND
Advocate Supreme Court.

BEFORE THE HON'BLE SERVICES TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

CM No. _____/2024

In

Service Appeal No.717/2023

Dilshad Hussain, Librarian (BPS-18),
Khushal Khan Khattak,
Library Akora Khattak, Nowshera.

.....**APPLICANT/APELLANT**

V E R S U S

1. Government of Khyber Pakhtunkhwa through Chief Secretary, Civil Secretariat, Peshawar.
2. Government of Khyber Pakhtunkhwa, through Secretary Higher Education, Archives & Libraries Department, Civil Secretariat, Peshawar.
3. Government of Khyber Pakhtunkhwa through Secretary Establishment Department, Civil Secretariat, Peshawar.
4. Director Archives & Libraries, Khyber Pakhtunkhwa, Peshawar.
5. Zahir Ullah Khan, Retired Director, Archives and Libraries, Khyber Pakhtunkhwa, Peshawar.

.....**RESPONDENTS**

A F F I D A V I T

I, Dilshad Hussain, Librarian. (BPS-18), Khushal Khan Khattak, Library Akora Khattak, Nowshera, as per instructions of my client, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Early Hearing Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

DEPONENT

CNIC: 17201-2252288-9

Cell: 0311-8881588

Identified by

FAZAL SHAH MOHMAND
Advocate Supreme Court.

