BEFORE THE HON'BLE SERVICE TRIBUNAL TRIBUNAL

KHYBER PAKHTUNKHWA PESHAWAR PROFORMA FOR EARLY HEARING Judicial Branch

Khyber Pakhtukhwa Service Tribunal

Diary No. 1812

Dated 101-03-200

Form "A"

7

To be filled by the counsel

| <u> </u> | C M No | | /202 | | | | | |
|---------------------------------|--|---|--|---|-------------------------|--|--------------------------|--|
| Case No. | C.M No/2024 In | | | | | | | |
| Service Appeal No.285/2023 | | | | | | | | |
| | | | 1 | | | | | |
| | | | VER! | SUS | | | | |
| Case Title | | | er Board | | | e, K | hyber | |
| | Pakhtunkhwa, Peshawar & Others | | | | | | | |
| | 1 | Respond | ents . | | | | | |
| Date of Institution | 2023 | | | | | | | |
| Bench | SB DB | | | | | | | |
| Case Status | Fresh Pending | | | | | | | |
| Stage | Notice | | Motion PAN | | | | * | |
| Urgency to be clearly stated | That the instant appeal pertains to seniority and promotion and respondents are going to issue seniority list in utter violation of law and rules, hence case needs to be fixed for an early date. (Copy of letter is annexed as Annexure "A"). That if the Seniority list is issued then juniors to the appellant would be promoted in violation of law and rules on the subject | | | | | | | |
| Nature of the relief sought | promotion seniority hence can (Copy of "A"). That if the appel | n and list is se ne f le t e Ser lant | nt appeal of respondent utter viceds to be term is an arrival distribution of the subject of the | ents ar plation fixed fi nnexe is issue promote | e goir of law or an las | ng to and early Anne n juni | issue rules, date. exure | |
| Next date of hearing | 01.07.2024 | | | | | | | |
| Alleged Target Date | In this Week or | any othe | possible date | | | ·· ······· | | |
| Counsel for | Petitioner | - | Respondent | | In P | erson | | |

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

| FORM 'B' | |
|--|-----------------------------|
| Inst# | |
| Early Hearing | /2024 |
| IN . | |
| Service Appeal No 285/2 | 2023 |
| Waheed Ahm | nad |
| VS | |
| Senior Member Board of Revenue, Khy & Others | ber Pakhtunkhwa, Peshawar |
| | · |
| Presented by Fazal Shah Mohmand Adv behalf of Applicants/Appellants. Entered | - |
| Presented by Fazal Shah Mohmand Adv behalf of Applicants/Appellants. Entered | - |
| • | l in the Relevant Register. |
| behalf of Applicants/Appellants. Entered | l in the Relevant Register. |
| behalf of Applicants/Appellants. Entered | l in the Relevant Register. |
| behalf of Applicants/Appellants. Entered | in the Relevant Register. |
| behalf of Applicants/Appellants. Entered Put up along with main case | in the Relevant Register. |
| Put up along with main case Last Date fixed | in the Relevant Register. |
| Put up along with main case Last Date fixed Reason(s) for last adjournment, | in the Relevant Register. |
| Put up along with main case Last Date fixed Reason(s) for last adjournment, if any by the Branch Incharge | in the Relevant Register. |
| Put up along with main case Last Date fixed Reason(s) for last adjournment, if any by the Branch Incharge Date(s) fixed in the similar matter | in the Relevant Register. |

ASSISTANT REGISTRAR

REGISTRAR

KHYBER PAKHTUNKHWA PESHAWAR

)

| C.M No | /2024 | | |
|----------------------|---|-------------|---------------------|
| In | | | |
| Service Appeal | No.285/2023 | | : |
| Waheed Ahma Kohat | ad, Computer Opera | tor, Deputy | Commissioner Office |
| | | | Appellant |
| • | VER | SUS | |
| Senior Membe | er Board of Revenue, I | Khyber Pakh | tunkhwa, Peshawar |
| & Others | | | |
| | *************************************** | | Respondents |
| • | | | • |

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| 3. | Copy of Letter | A | 4 |

Appellant

Through

Dated 19/03/2024

Fazal Shah Mohmand Advocate, Supreme Court

Of Pakistan



BEFORE THE HON'BLE SERVICE TRIBUNAL TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

| C.M No. | | /2 | 2024 | | | | · | | |
|-----------|---------------|--------------|---------|-----------------------|---------|--------|------------|--------|-----------|
| In | | | | | | | | | |
| Service A | Appea | l No.285, | 2023 | | | | | | |
| Waheed | Ahm | ad, Com | puter (| Operat | or, De | puty | Commis | sione | r Office |
| Kohat | | | • | | | - | | | |
| | | ••••• | | | | | | App | ellant |
| | | | | ERS | SUS | | | | 4 |
| | nior shawa | Member ar | Board | l of I | Revenu | ie, k | Chyber I | akhtı | ınkhwa, |
| 2. Go | vernr | nent of K | hyber F | akhtu | nkhwa, | , thro | ough Secr | etary | Finance |
| De | partn | nent, Pesl | nawar. | | | | • | | |
| 3. Go | vernr | nent of I | Chyber | Pakhtı | unkhwa | a, th | rough Ch | ief Se | ecretary, |
| Ci | vil Sec | eretariat, | Peshaw | ar. | | • | | | |
| 4. Co | mmis | sioner, K | ohat Di | vision, | , Kohat | • | | 1 | |
| 5. De | puty | Commiss | ioner K | ohat | | | | • | |
| 6. G | vt of | Khyber 3 | Pakhtui | nkhwa | throug | gh Se | ecretary I | Establ | ishment |
| De | partn | nent, Pesl | nawar. | | | | | | |
| 7. Cl | ıairma | an, Stai | nding | Servic | e Ru | ıles | Commit | tee, | Khyber |
| Pa | khtur | ıkhwa, Pe | shawar | • | | | | | |
| | | | | | | | | • | _ |
| | | | | • • • • • • • • • • • | **** | | Resp | onde | ents |

APPLICATION FOR EARLY HEARING/ ACCELERATION OF THE DATE OF HEARING FROM 01.07.2024 IN THE ABOVE TITLED SERVICE APPEAL.

Respectfully Sheweth:-

>

1. That the above noted case is pending adjudication before this Hon'ble Tribunal which is fixed for 01.07.2024.

- 2. That the instant appeal pertains to seniority and promotion and respondents are going to issue seniority list in utter violation of law and rules, hence case needs to be fixed for an early date.

 (Copy of letter is annexed as Annexure "A").
- 3. That if the Seniority list is issued then juniors to the appellant would be promoted in violation of law and rules on the subject.
- 4. That the appellant requests this Hon'ble Tribunal that as such the noted date may please be expedited and be fixed in this week or as early as possible.

It is therefore, respectfully prayed that on acceptance of this application, the above noted case may please be accelerated to an early date in the current week for the best interest of justice and fair play.

Through

Appellant

Dated 19/03/2024

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Fazal Shah Mohmand
Advocate, Supreme Court
Of Pakistan

BEFORE THE HON'BLE SERVICE TRIBUNAL TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

| C.M No/2024 |
|--|
| In |
| Service Appeal No.285/2023 |
| Waheed Ahmad, Computer Operator, Deputy Commissioner Office Kohat |
| Appellant |
| VERSUS |
| Senior Member Board of Revenue, Khyber Pakhtunkhwa, Peshawar |
| & Others |
| Respondents |
| |

AFFIDAVIT

I, Waheed Ahmad, Computer Operator, Deputy Commissioner Office Kohat, (**Petitioner**), do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

 $DEP \phi \widetilde{NENT}$





GOVERNMENT OF KHYBER PAKHTUNKHWA FINANCE DEPARTMENT

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No.SO(A)/FD/1-3/2022/CO/Sentority List

Through Special Massanger Dated Peshawar, 07th Mirich, 2024

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All Deputy Commissioners Khyber Pakhlunkhwa

Subject: -

SENIORITY LIST OF COMPUTER OPERATORS BS-16 WORKING IN THE

DISTRICT FINANCE OFFICES

Dear Sir.

I am directed to refer to the subject cited above and to say that the Seniority List of Computer Operators working in District Finance Offices under the supervision of Deputy Commissioners concerned in Khyber Pakhtunkhwa could not be finalized due to deficiencies of vital documents/ information. In order to streamline and issue Seniority List in respect of the cadre in accordance with the provisions of Khyber Pakhtunkhwa Civil Servants Act, 1989 and Khyber Pakhtunkhwa Civil Servants (Appointment Promotion & Transfer) Rules, 1985, the requisite information be furnished on the enclosed format/proforma.

It is, therefore, requested that all the requisite documents mentioned in the enclosed proforms may be provided duly verified/attested by the concerned Deputy Commissioner or authorized officer.

AN STY CO.

Note: - Submission of the requisite information/documents may be ensured within five (05) working days positively.

Yours faithfully,

SECTION OFFICER (ADMN)

Tel# 091-9210074

Endst: No. & Date Even.

A Copy is forwarded to PA to Additional Secretary (Admin), Finance

Department for information, please.

SECTION OFFICER YADMN