

**BEFORE THE KHYBER PAAKHTUN KHAWA**  
**SERVICE TRIBUNAL PESHAWAR**

SERVICE APPEAL NO-----OF 2024

Bilal Raza -----APPELLANT.

***VERSUS***

The District and Sessions Judge, District courts Mansehra etc.

-----***RESPONDENTS.***

**I N D E X**

S. NO.	DESCRIPTION OF DOCUMENTS	ANNEXURE	PAGES
1.	Misc;Application	---	1
2.	Affidavit	---	2

Appellant

  
Bilal Raza

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'A'

Khyber Pakhtunkhwa  
Service Tribunal


Diary No. 12764

Dated 14/5/24

To be filled by the Counsel/Applicant

Case Number				
Case Title	Bilal Raza vs District Judge			
Date of Institution	14 - 05 - 2024			
Bench	SB	<input checked="" type="checkbox"/>	DB	<input type="checkbox"/>
Case Status	Fresh	<input type="checkbox"/>	Pending	<input checked="" type="checkbox"/>
Stage	Notice	<input checked="" type="checkbox"/>	Reply	Argument
Urgency to clearly stated.	Interim Relief for Suspension of order			
Nature of the relief sought.	to set aside the impugned order			
Next date of hearing	29-05-2024			
Alleged Target				
Date				
Counsel for	Petitioner	<input checked="" type="checkbox"/>	Respondent	<input type="checkbox"/>
			In person	<input type="checkbox"/>

Signature of counsel/party



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing \_\_\_\_\_ -p/20 \_\_\_\_\_

In case No. \_\_\_\_\_ -p/20 \_\_\_\_\_

Bilal Raza Vs District Judge Mansu

Presented by M. Basim on behalf of Petitioner. 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 Readers/Assistant Registrar branch	

Assistant Registrar

REGISTRAR

KPK PESHAWAR

Diary No. \_\_\_\_\_

Dated \_\_\_\_\_

**Bilal Raza son of Abdul Razzaq, Junior Clerk/Moharrir,  
District Courts Mansehra. -----(APPLICANT)**

**VS**

**The District and Sessions Judge District Courts Mansehra.  
----- (RESPONDENT)**

**Subject: APPLICATION IN SERVICE APPEAL NO 598/24, FOR  
REQUISITION THE SERVICE APPEAL, AND GRANTING OF  
INTERIM RELIEF BY SUSPENDING THE IMPUGNED  
ORDER DATED 29-11-2023 AND CONSIDER THE  
APPLICANT FOR PROMOTION.**

**Respectfully Sheweth:**

1. That, the above titled service appeal is pending adjudication before this Hon'ble Tribunal is fixed for 29.05.24.
2. That, the applicant preferred the above appeal for setting aside impugned order dated 29.11.2023, passed by Hon'ble District and Sessions judge/ competent authority, whereby promotion of appellant was withheld for a period of two years.
3. That, the department/respondent schedule departmental promotion committee meeting for promotions of two junior clerks to the post of senior clerks. Which could adversely affect the valuable rights of appellant being on top in seniority of the incumbent seniority list.
4. That, prior to the instant DPC the applicant had not been considered for promotions for one or the other reason twice and deprived from the vested right.

In the light of above, submissions respondent that may kindly be directed that appellant consider for coming promotions by suspending the impugned order.

  
Applicant  
Bilal Raza

**BEFORE THE KHYBER PAKHTUN KHAWA**  
**SERVICE TRIBUNAL PESHAWAR**

SERVICE APPEAL NO-----OF 2024

Bilal Raza -----APPELLANT.

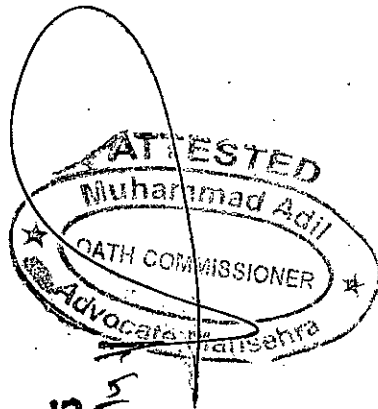
**VERSUS**

The District and Sessions Judge, District courts Mansehra etc.  
-----RESPONDENTS.

**AFFIDAVIT**

I, Bilal Raza, son of Abdul Razzaq, junior Clerk/Moharrir, District Courts, Mansehra, do hereby solemnly affirm and declare on oath. That the no such subject matter application has ever been filed before this honorable court. That the contents of fore-going affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed or suppressed form this honorable tribunal.

Dated: 14.05.2024



Bilal Raza  
  
DEPONENT

IN THE COURT OF HON'BLE SERVICE TRIBUNAL  
KPK PESHAWAR

**Bilal Raza son of Abdul Razzaq, Junior Clerk/Moharrir,**  
**District Courts Mansehra. -----(APPLICANT)**

VS

**The District and Sessions Judge District Courts Mansehra.**  
**----- (RESPONDENT)**

**Subject: EARLY HEARING APPLICATION IN THE SERVICE APPEAL 598/2024, AND GRANT INTERIM RELIEF BY SUSPENDING THE IMPUGNED ORDER DATED 29-11-2023.**

**Respectfully Sheweth:**

1. That, the above titled service appeal is pending adjudication before this Hon'ble Tribunal is fixed for **29.05.24.**
2. That, the applicant preferred the above appeal for setting aside impugned order dated 29.11.2023, passed by Hon'ble District and Sessions judge/ competent authority, whereby promotion of appellant was withheld for a period of two years.
3. That, the department/respondent schedule departmental promotion committee meeting for promotions of two junior clerks to the post of senior clerks. Which could adversely affect the valuable rights of appellant being on top in seniority of the incumbent seniority list.
4. That, prior to the instant DPC the applicant had not been considered for promotions for one or the other reason twice and deprived from the vested right.

In the light of above, submissions respondent that may kindly be directed that appellant consider for coming promotions by suspending the impugned order.

Applicant  
Bilal Raza

14/5/2024

قیمت  
50 روپے

42074

پشاور بار ایسوسی ایشن، خیبر پختونخوا

ایڈوکیٹ: حکیم سلطان جمال پوری ایڈووکیٹ



بار کونسل ایسوسی ایشن نمبر: \_\_\_\_\_  
رابطہ نمبر: 0333 5022920

بعدالت جناب:

مخائب: مسائل	دعویٰ:
	علت نمبر:
	مورخہ:
	جرم:
	تھانہ:

بلا لکھنا بنام دستبردار علی

### باعت تحریر آنگہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کارروائی متعلقہ

آن مقام پشاور کیلئے محمد قاسم جمال پوری کو ذیل مقرر

کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ برواختہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانبہ التوائے مقدمہ کے سبب سے ہوگا کوئی تازہ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب باہندانہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

PESHAWAR BAR ASSOCIATION  
KHYBER PAKHTOONKHA

المرقوم: 2022/5/1

العبد گواہ شد العبد

مقام کے لیے منظور ہے۔

نوٹ: اس وکالت نامہ کی فوٹو کاپی ناقابل قبول ہوگی۔