

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

Khyber Pakhtunkhwa
Service Tribunal

FORM A

TO BE FILLED BY THE COUNSEL

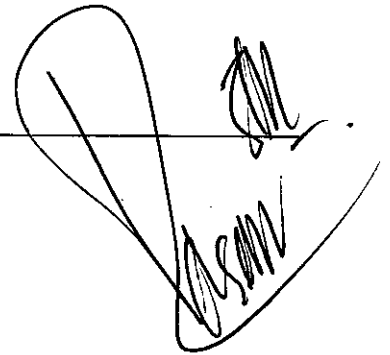
Diary No. 12380

Dated 25-04-2024

| | | | | | |
|---------------------|--|---|---------|-----|--|
| Case number | Service appeal No. 285/2023 | | | | |
| Case title | Waheed Ahmad ... versus... Govt & others | | | | |
| 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. | | | | |
| Nature of the relief sought | That if the seniority list is issued then juniors to the appellant would be promoted in violation of law and rules on the subject. | | | | |
| Next date of hearing | <u>27/05/2024</u> | | | | |
| Alleged target date | <u>Next week</u> | | | | |
| Counsel for | <u>Petitioner</u> | ✓ | <u>Respondent</u> | <u>In person</u> | |

Signature of appellant/Petitioner or Counsel:-



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

Early Hearing _____/2024

IN

Service Appeal No 285/2023

Waheed Ahmad

VS

Senior Member Board of Revenue, Khyber Pakhtunkhwa, Peshawar
& Others

Presented by **Fazal Shah Mohmand Advocate Supreme Court of Pakistan** on behalf of Applicants/Appellants. Entered in the Relevant Register.

Put up along with 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 SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR

CM No; _____/2024

in

Service Appeal No-285/2023

Waheed Ahmad, Computer Oprator, Deputy Commissioner Office Kohat.

.....Applicant

V E R S U S

Senior Member Board of Revenue, Khyber Pakhtunkhwa, Peshawar & Others.

.....Respondents

I N D E X

| S. No | Description of documents | Annexure | Pages |
|-------|--|----------|-------|
| 1. | Application for Early Hearing with Affidavit | | 1 - 2 |
| 2. | Copy of Letter | A | 3 |

Petitioner

Dated:-02-02-2024

Through

Fazal Shah Mohmand ASC

Abd Ur Rehman Khalil

&

Baseer Ahmad Shah

Advocates Peshawar

OFFICE:- Cantonment Plaza Flat 3/B Khyber Bazar Peshawar.

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BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA

PESHAWAR

CM No; _____/2024

in

Service Appeal No-285/2023

Waheed Ahmad, Computer Operator, Deputy Commissioner Office Kohat.

.....Applicant

VERSUS

1. Senior Member Board Of Revenue, Khyber Pakhtunkhwa Peshawar.
2. Govt of Khyber Pakhtunkhwa through Secretary finance Department, Peshawar.
3. Govt Of Khyber Pakhtunkhwa, through Chief Secretary, Civil Secretariat Peshawar.
4. Commissioner Kohat Division Kohat.
5. Deputy Commissioner Kohat.
6. Govt of Khyber Pakhtunkhwa through Secretary Establishment Department Peshawar.
7. Chairman Service Rules Committee, Khyber Pakhtunkhwa Peshawar.

.....Respondents

APPLICATION FOR EARLY HEARING OF TITLED SERVICE APPEAL.

Respectfully Submitted:-

1. That the above titled service appeal is pending before this honorable tribunal in which next date is fixed for 27-05-2024.
2. That in the instant service appeal the appellant earlier submitted an application for early hearing which was allowed by this honorable service tribunal and the case was fixed for 27-05-2024 but the matter pertains to urgency that's why the appellant request for fixation of an early date as soon as possible.

2

3. 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")**.
4. That if the seniority list is issued then juniors to the appellant would be promoted in violation of law and rules on the subject.
5. That the appellant request this honorable tribunal that as such the noted date may kindly be expedited and be fixed in this week or as early as possible.

It is therefore most humbly prayed, that on acceptance of this application, the titled case may kindly fixed for an early date.

Dated:- 25-04-2024

Appellant/Petitioner

Through

Fazal Shah Mohmand ASC

Ibad Ur Rehman Khalil

&

Baseer Ahmad Shah

Advocates Peshawar

A F F I D A V I T:-

I, Waheed Ahmad, Computer Operator, Deputy Commissioner Office Kohat, 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 belief and that nothing has been concealed from this honorable Court.



DEPONENT



**GOVERNMENT OF KHYBER PAKHTUNKHWA
FINANCE DEPARTMENT**

Finance Department (Public Administration) | Finance Dept. | Finance Dept. | Finance Dept.

(3) (4)

SPD / EA
P/S
11/03/24
DCI

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

Through Special Messenger
Dated Peshawar, 07th March, 2024

To
All Deputy Commissioners Khyber Pakhtunkhwa

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 proforma may be provided duly verified/attested by the concerned Deputy Commissioner or authorized officer.

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



Yours faithfully,

(Signature)
(SHEHERYAR)
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.

(Signature)
SECTION OFFICER (ADMN)