

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

CM No: _____/2024

In

S.A No. 770/2024

Anas Iqbal

VERSUS

Secretary Relief Government of Khyber Pakhtunkhwa.

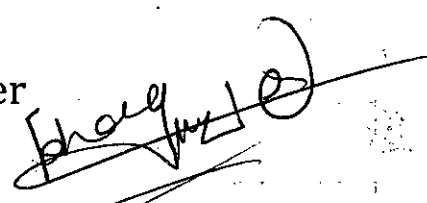
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Dated: 27/06/2024

Petitioner

Through


Muhammad Ishaq Khan
Advocate, High Court,
Peshawar.

BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

CM No: _____/2024

In

S.A No. 770/2024

Khyber Pakhtunkhwa
Service TribunalDiary No. 13831Dated 27-06-2024

Anas Iqbal

VERSUS

Secretary Relief Government of Khyber Pakhtunkhwa.

APPLICATION FOR SUSPENSION OF THE IMPUGNED NOTIFICATION DATED: 11/06/2024 OFFICE ORDER 3945-50 WHEREBY THE ADDITIONAL CHARGE OF MTO (MAINTENANCE TRANSPORT OFFICER) D.I.KHAN HAS ILLEGALLY BEEN GIVEN TO MR. KALEEM ULLAH S/O BASIT ALI KHAN. MOREOVER THE PETITIONER MAY KINDLY BE RESTORED TO HIS POSITION BY ASSIGNING HIM THE ADDITIONAL CHARGE OF MTO.

RESPECTFULLY SHEWETH:

1. That the above titled case is pending before this worthy Service Tribunal and is fixed for today i.e. 27/06/2024.
2. That this worthy Service Tribunal granted interim relief to the petitioner vide order dated 11/06/2024 whereby the transfer notification dated: 24/04/2024 was suspended by this worthy Service Tribunal.
3. That this in violation of the order of this worthy Service Tribunal, another notification dated: 11/06/2024 office order 3945-50 was issued and the additional charge was assigned to Mr. Kaleem Ullah S/o Basit Ali Khan which is violation of the order of this worthy Service Tribunal. **(Copy of Impugned Notification is annexed as annexure "A")**
4. That the POL bill of Rescue 1122 D.I Khan, POL bill of Rescue 11122 FR (DIK) and POL bill of Rescue 1122

Health Ambulance (DIK) in Rs.192,844/-, Rs.578,841/-, Rs.13,23,856/- for the month of May 2024 of the petitioner is also pending and has not been paid. Further the DEO has threatened the petitioner to withdraw his case or else he would not be paid the due which are pending. **(Copy of POL Bills are annexed as annexure "B")**

5. That similarly the maintenance bill worth rupees of Rs.18,54,940/- is also pending and has not been paid to the petitioner yet despite the fact that the bills have been approved.
6. That there is no legal bar on acceptance of the instant application rather it is for the best interest of justice.

It is, therefore, humbly prayed that the application of the petitioner may kindly be allowed.

Any other relief which this Hon'ble Tribunal deems fit may also extended in the favor of the petitioner.

Dated: 27/06/2024

Through

Petitioner

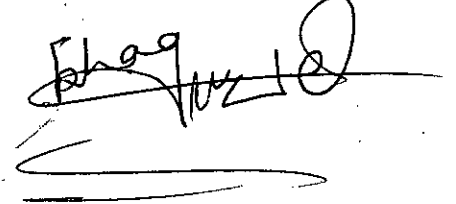


Muhammad Ishaq Khan
Advocate, High Court,
Peshawar.

Note:

No such like petition has earlier filed by the petitioner in any court of law, prior to this one.

Advocate



BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR

CM No: _____/2024

In

S.A No. 770/2024

Anas Iqbal

BEFORE

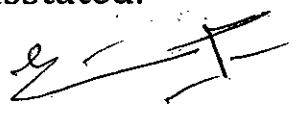
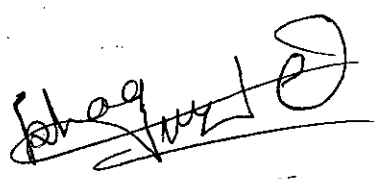
VERSUS

PESHAWAR

Secretary Relief Government of Khyber Pakhtunkhwa.

AFFIDAVIT

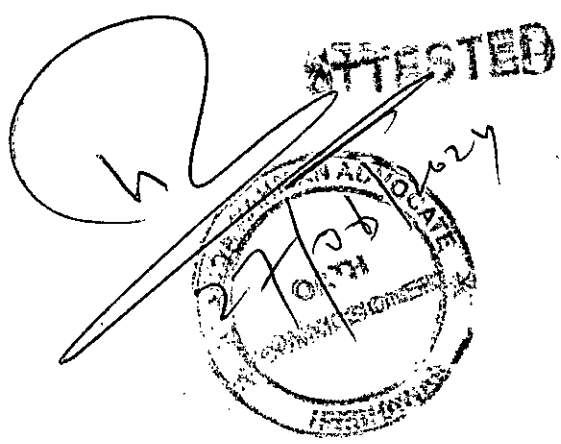
I, **Anas Iqbal S/o Muhammad Iqbal R/o D.I Khan**, do hereby solemnly affirm & declare on oath that contents of instant application are true & correct to the best of my knowledge and belief and nothing has been kept concealed or misstated.



DEPONENT
CNIC:

IDENTIFIED BY:

Muhammad Ishaq Khan
Advocate, High Court,
Peshawar.



Annexure "A"

Pg (4)



DIRECTORATE OF
EMERGENCY RESCUE SERVICE (RESCUE - 1122),
GOVERNMENT OF KHYBER PAKHTUNKHWA
info@rescue1122kpk.com www.rescue1122kpk.com



No.1-1/D (OPS)/ Office Order - 3945-50 Peshawar: 11-6 -2024

OFFICE ORDER

Consequent upon approval of the Competent Authority (Director General) Mr. Kaleem Ullah S/O Basit Ali Khan - Computer Operator Belt No: 6216, District D-I Khan is hereby authorized to hold look after charge of MTO (Maintenance Transport Officer) at District D-I Khan in addition to his own duties with immediate effect till further orders.

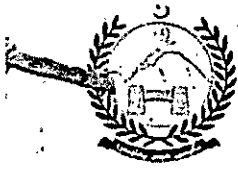
-SD-
DIRECTOR GENERAL
Emergency Rescue Services (Rescue 1122),
Khyber Pakhtunkhwa

Copy forwarded to: -

- 1- Director (Admin), ERS (Rescue-1122) Khyber Pakhtunkhwa.
- 2- District Emergency Officer, ERS(Rescue-1122) D-I Khan.
- 3- PA to Director General, ERS (Rescue-1122) Khyber Pakhtunkhwa.
- 4- Official concerned for compliance.
- 5- Office file.

DY. DIRECTOR (ADMINISTRATION)
Emergency Rescue Services (Rescue 1122),
Khyber Pakhtunkhwa

[Handwritten signature]
11/50/24



**EMERGENCY RESCUE SERVICE (RESCUE 1122),
KHYBER PAKHTUNKHWA.**



**SUBJEC; POL Bill of Rescue 1122 FR (DIK) for the
Month Of May-2024**

Enclosed here the pol bill of Rescue 1122 FR (DIK) for the month of May 2024 .Amounting Rs= **1, 92,844 /-** In words

(One Lac, ninety two thousand, eight hundred fourty four only)

Is submitted for approval please.

POL Consumption Certificate is attached at flag 'A'

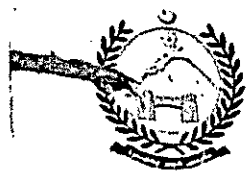
Consumption summary is attached at flag 'B'

Monthly Emergency Detail is attached at flag 'C'

[Handwritten Signature]
MRS
DIK

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Scanner



**EMERGENCY RESCUE SERVICE (RESCUE 1122),
KHYBER PAKHTUNKHWA.**



**SUBJEC; POL Bill of Rescue 1122 Health Ambulances
(D I Khan) for the Month Of May -2024**

Scanner

Enclosed here the pol bill of Rescue 1122 Health ambulances
(DIK) for the month of May 2024 .Amounting Rs= 5,78,841 /- In
words (Five Lac, seventy eight thousand, eight hundred fourty one
only)

Is submitted for approval please .

POL Consumption Certificate is attached at flag 'A'

Consumption summary is attached at flag 'B'

Monthly Emergency Detail is attached at flag 'C'

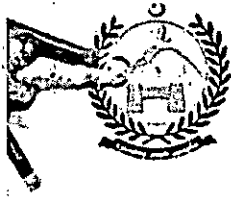
[Handwritten Signature]
MTO
DIK.

Scanner

Scanner

Scanner

7



**EMERGENCY RESCUE SERVICE (RESCUE 1122),
KHYBER PAKHTUNKHWA.**



**SUBJECT; POL Bill of Rescue 1122 D I Khan for the
Month Of May -2024**

Enclosed here the pol bill of Rescue 1122 D I Khan for the
month of May 2024 .Amounting Rs= 13, 23,856/- In words

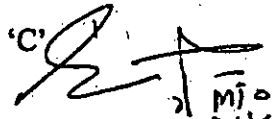
(Thirteen Lac, twenty three thousand, eight hundred fifty six only)

is submitted for approval please.

POL Consumption Certificate is attached at flag 'A'

Consumption summary is attached at flag 'B'

Monthly Emergency Detail is attached at flag 'C'


Mj o
D I K.