

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

C.M NO. _____/2024
IN
APPEAL NO. 1716/2023

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 12378

Dated 25-04-2024

Mr. Saif Ur Rehman, Junior Clerk (BPS-11),
Khyber Teaching Hospital, District Peshawar.

.....:APPELLANT

VERSUS

- 1- The Government of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa, Peshawar.
- 2- The Secretary Establishment Department, Khyber Pakhtunkhwa, Peshawar.
- 3- The Secretary, Health Department, Khyber Pakhtunkhwa, Peshawar.
- 4- The Director General Health Services Department, Khyber Pakhtunkhwa, Peshawar.

.....RESPONDENTS

**APPLICATION FOR RESTRAINING THE RESPONDENTS
FROM PROMOTIONS AGAINST THE DIFFERENT POSTS
INCLUDING THE POST OF OFFICE ASSISTANT (BPS-16)
TILL THE DISPOSAL OF THE INSTANT APPEAL**

R/SHEWETH:

- 1- That the above titled appeal including connected appeals is pending adjudication before this august Tribunal which is fixed for hearing on 07.05.2024 for final arguments.
- 2- That appellant filed the above mentioned service appeal for the issuance of joint seniority lists of the Junior Clerks and Senior Clerks of Health Department.
- 3- That during pendency of the above mentioned appeal the respondent department issued a notice dated 22.04.2024 regarding promotions on different posts including to the post of Office Assistant (BPS-16) which is ineffective upon the rights of appellant. **Copy of the Notice is attached.**
- 4- That the respondents are bent to conduct Departmental Promotion Committee in the near future regarding which necessary documents have also been called from the employees.
- 5- That, all the three ingredients required for the grant of stay is in favor of the appellant.
- 6- That, any other ground would be taken at the time of arguments with prior permission of this Honorable Tribunal.

07.05.24

It is, therefore, most humbly prayed that on acceptance of this application the respondents may kindly be restrained from conducting DPC to the extent of promotion against the post of Senior Clerks and Office Assistant (BPS-16) till the final disposal of the above mentioned service appeal.

Dated: 25.04.2024.

APPELLANT

Through:


MIR ZAMAN SAFI
ADVOCATE

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

C.M NO. _____/2024

IN

APPEAL NO. _____/2023


SAIF UR REHMAN

VS

HEALTH DEPTT:

AFFIDAVIT

I, Mir Zaman Safi, Advocate High Court, Peshawar, on the instructions and on behalf of my client, 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 nothing has been concealed from this Honorable Court.


MIR ZAMAN SAFI,
ADVOCATE



1A - (4)



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA, PESHAWAR**

Mail Address: DGHS Office Peshawar, PAF 091-9210769, 9210196 Fax: 0911-9210730

MEETING NOTICE.

A Meeting of the Departmental Promotion Committee is scheduled to be held on 25/04/2024 at 11:00 AM under the Chairmanship of Director General Health Services, KP Peshawar in his office to discuss the Promotion cases of the following categories..

1. Promotion of Senior Clerk (BPS-14) to Office Assistant (BPS-16)
2. Promotion of Mechanic (BPS-07) to Workshop Technician (BPS-12).
3. Promotion of Helper (BPS-03) to Fitter (BPS-07).

- | | |
|--|----------|
| 1. Additional Director General (Admin) | (Member) |
| 2. Director (Admin) | (Member) |
| ✓ 3. Deputy Director (Admin) (Co-opted | Member) |
| 4. Workshop Engineer | (Member) |

You are requested to attend the meeting on scheduled date and time.

Sd-xxx
Director General Health Services
Khyber Pakhtunkhwa Peshawar.

No: 2537-43 Ministerial Promotion Cell

Dated 22/04 2024

Copy forwarded to:

1. The Secretary to Government of Khyber Pakhtunkhwa Health Department Peshawar with the request to nominate a representative to attend the above meeting on scheduled date and time.
2. All Committee Members DGHS Office KP Peshawar.
3. PA to Director General Health Services KP Peshawar.

ATTESTED

[Signature]
Additional Director General (Admin)
Directorate General Health Services
Khyber Pakhtunkhwa Peshawar