

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'A'

To be filled by the Counsel/Applicant

Case Number'	1716 / 2023			
Case Title	Saif-ur-Rehman vs Health Dept.			
Date of Institution				
Bench	SB		DB ✓	
Case Status	Fresh		Pending ✓	
Stage	Notice		Reply	Argument ✓
Urgency to clearly stated.	The respondents issued notice dated 22.04.2025 whereby promotions to the post of office Assistant is going to be granted in meeting fix for today on 25.04.2024.			
Nature of the relief sought.	Stay / restraining the respondents from issuing promotion orders.			
Next date of hearing	07 / 05 / 2024			
Alleged Target Date	For today dated 25.04.2024			
Counsel for	✓ Petitioner		Respondent	In person

*M. Jang*  
Signature of counsel/party

07-05-24  
Pesh.

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

PROFORMA FOR EARLY HEARING

FORM 'B'

Inst#

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

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

Vs \_\_\_\_\_

Presented by \_\_\_\_\_ on behalf of \_\_\_\_\_. 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

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR**

C.M NO. \_\_\_\_\_/2024  
IN  
APPEAL NO. 1716 /2023

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 REQUISITIONING THE  
ABOVE MENTIONED SUIT FOR EARLY HEARING**

**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 meeting of the committee is fixed for today on 25.04.2024 and if once the committee decided to make promotions against the post of Office Assistant (BPS-16) the appellant and his other colleagues will face with irreparable.

1- That, valuable rights of the appellant is involved in the instant appeal that are going to be infringed, therefore, the above mentioned appeal may kindly be brought for today.

It is, therefore, most humbly prayed that on acceptance of the instant application the above mentioned appeal may kindly be requisitioned for hearing today on 25.05.2024.

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

