

**BEFORE THE KHYBER PAKHTUNKHAWA SERVICE  
TRIBUNAL, PESHAWAR.**

CM No. \_\_\_\_\_/2024  
In  
Service Appeal No. 1727/2023

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 12459

Dated 30/4/24

Imtiaz Hussain ..... Petitioner/Appellant

**VERSUS**

DPC, District Judiciary through its chairman & others..... Respondents

**APPLICATION IN RESPECT TO KINDLY DIRECT  
THE RESPONDENTS THAT TILL THE FINAL  
ADJUDICATION OF THE TITLED APPEAL NO  
PROMOTION VIA DPC MAY BE PROCESS,  
KEEPING IN VIEW THIS HON'BLE TRIBUNAL  
HAS BEEN PLEASED TO GIVE REPEATED  
DIRECTION, ABSOLUTE LAST OPPORTUNITY  
WITH IMPOSITION OF COST OF RS. 2000/-  
AGAINST THE RESPONDENTS BUT  
UNFORTUNATELY THEY ARE RELUCTANT TO  
SUBMIT THE COMMENTS/REPLY.  
MOREOVER, FROM RELIABLE SOURCES THE  
APPLICANT/APPELLANT HAS BEEN  
INTIMATED THAT IN THE UPCOMING WEEK  
THE RESPONDENTS ARE GOING TO PROCESS  
THE DPC OF THE ALIKE NATURE OF  
APPELLANT'S POST.**

**Respectfully Sheweth:-**

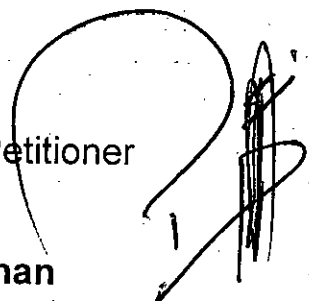
1. That the applicant/appellant has knocked the door of this Hon'ble Tribunal in the instant appeal. This Hon'ble Tribunal has been pleased to admit the same and directed the respondents to submit comments/reply.

2. That the stroke of misfortune hit the appellant, when their vested right of promotions was withheld and further aggravated, by the delaying tactics of the respondents, despite the facts in five different dates the respondents have been sternly directed to submit the comments even absolute last opportunity with cost has been imposed but unfortunately even the directions of this Hon'ble Tribunal has turned with a deaf year.
3. That in such a doldrums sort of situation, the appellant has left no other option but to submit the instant application, keeping in view the coherent facts mentioned in the above subject.
4. That any other point may be raised at time of arguments for the best assistance of this Hon'ble Tribunal.

**PRAYER:**

It is, therefore humbly prayed that on the basis aforesaid facts and circumstances the needful may kindly be done for the best administration of justice and fair play. Keeping in view the apex court observed in plethora of judgments that till the final decision/pendency of a matter pertaining to promotion, no departmental promotion could be processed.

Applicant/Appellant/Petitioner  
Through

  
**Taimur Haider Khan**  
Advocate, Supreme Court  
**Taimur Law Associates**  
Office No.1<sup>st</sup>, Tasneem Plaza,  
3<sup>rd</sup> floor, Jan's Bakers, Cantt,  
Peshawar 0346-9192561

*Note: This Petition/Application may kindly be  
filed for today i.e. 30-04-2024 with main appeal  
being filed for today i.e. appeal # GA # 1727/2023*

**BEFORE THE KHYBER PAKHTUNKHAWA SERVICE  
TRIBUNAL, PESHAWAR.**

CM No. \_\_\_\_\_/2024

In

Service Appeal No. 1727/2023

Imtiaz Hussain ..... Petitioner/Appellant

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**AFFIDAVIT**

I, Imtiaz Hussain, Junior Clerk (BPS-11), at District Judiciary, Khyber Pakhtunkhwa at Kurram do hereby solemnly affirm and declare on oath that the contents of instant **Application/petition** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.

*Imtiaz Hussain*  
DEPONENT  
CNIC No.21302-1449828-3  
Cell No. 0307-0513173





POWER OF ATTORNEY

Ref.# BEFORE THE HON'BLE Serice Tribunal, Peshawar Date:                     

SA # 1727/2023 Emtiaz Hussain

(Petitioner)  
(Appellant)  
(Plaintiff)

Versus

DPL, District Judiciary H. Sagar Its Chawagori

(Defendant)  
(Respondent)

I/We, the undersigned do hereby nominate and appoint

**TAIMUR HAIDER KHAN**  
ADVOCATE, SUPREME COURT

On behalf of of Peshawar / of Peshawar

Know all to whom these presents shall come that I/We the undersigned appoint; the above named Advocate in District Peshawar, in the above mentioned case to do all the following acts, deeds and things.

1. To act, appear and plead in the above mentioned case in this court or any other court in which same may be tried or heard in the first instance or in appeal or review or revision or application or at any other stage of its progress until its final decision.
2. To present pleadings, appeals, case objection or petitioners for execution, review, revision, withdrawal, compromise or other petitions or affidavits or other documents as shall be deemed necessary or advisable for the prosecution/defence of the said case at all stages.
3. To withdraw or compromise the said case or submit to arbitration any difference or disputes that shall arise touching or any manner relating to said cause.
4. To employee, authorize any other legal practitioner to assist or exercise the power in authority hereby conferred on the advocate whenever he may think to do so.

AND I/We, hereby agree to ratify whatever the advocate or his substitute shall do in this behalf and I/We hereby agree not to hold the advocate or his substitute responsible for the result of the case in consequences of his absence from the Court when the said case is called up for hearing.

AND I/We in case of expiry of the said advocate any full fee or part payment thereof, will not claim in any manner whatsoever, or in case of disengagement of the said advocate will not make any claim regarding fee.

9-9-2024

Accepted subject of the terms  
And full payment of Settled Fee

Taimur Haider Khan  
Advocate, Supreme Court

(Signature/thumb impression of the Executant)

*[Handwritten signature and thumb impression of the executant]*

Taimur Haider Khan  
Advocate Supreme Court  
Attested

New Address: Office No.1<sup>st</sup>, Tasneem Plaza, 3<sup>rd</sup> floor, Jan's Bakers, Cantt, Peshawar