

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

In Re:
CM No: _____/2024
IN
Service Appeal No. 425/2024

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 14413

Dated 22/7/24

Muhammad Naeem

Versus

IGP etc

**APPLICATION FOR AMENDMENT
IN SERVICE APPEAL TO THE
EXTENT OF MENTIONED PRAYER
FOR CHALLENGING THE ORDER
DATED 20/12/2023**

Respectfully Sheweth:-

1. That the above noted case is pending adjudication before this Hon'ble Tribunal and fixed for 25/07/2024.
2. That the applicant challenged the order dated 06/02/2024 whereby the promotion of the applicant from BPS-16 to BPS-17 was deferred and mistakenly not mentioned/challenged the impugned order/ notification dated 20/12/2023.
3. That this Hon'ble Tribunal already called the comments from the respondents but the impugned order/notification dated

20/12/2023 is also necessary to be challenged.

4. That the applicant/plaintiff through this instant application seeks indulgence of this Hon'ble Court, seeking permission to amend the service appeal and prayer to that extent too.
5. That the proposed amendment is not inconsistent the original version, the applicant taken in the appeal.
6. That the not mentioning of the fact regarding the above mentioned notification/ order dated 20/12/2023 was neither intentional nor deliberate.
7. That by not allowing the proposed amendment the applicant will suffer life lasting injury.
8. That proposed amendment in the appeal will not change the nature/version of the main appeal.

It is, therefore, humbly prayed that on acceptance of this application, the proposed amendment may very graciously be allowed and the applicant

be allowed to amend the service appeal to the extent of mentioning the prayer regarding the impugned notification/ order dated 20/12/2023.

Dated:- 22/07/2024

Through:-

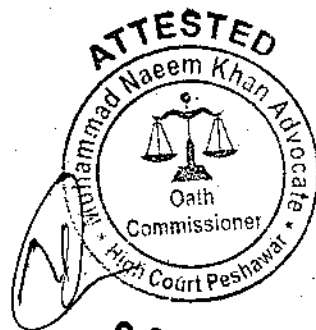
Applicant/Plaintiff

Noor Wali Muqbal
Advocate, High Court,
Peshawar.

AFFIDAVIT

As per instruction of my client, the contents of accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable court.

ADVOCATE



22 JUL 2024

**EFOR THE HONORABLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA PESHAWAR**



Service Appeal No 425 /2024

Muhammad Naeem Khan (Belt No. P/379) Inspector BS-16,
Acting DSP Mardan Khyber Pakhtunkhwa Police.

.....Appellant

VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa,
Central Police Office, Peshawar.
2. Deputy Inspector General of Police Head Quarters,
Khyber Pakhtunkhwa, Central Police Office, Peshawar.

.....Respondents

**SERVICE APPEAL UNDER SECTION 4 OF
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT 1974, AGAINST THE IMPUGNED ORDER
DATED 06.02.2024 ISSUED BY THE
RESPONDENT NO 2 WHEREBY THE PROMOTION
OF THE APPELLANT FROM BPS-16 TO BPS-17
WAS DEFERRED, HENCE THE IMPUGNED
ORDER MAY KINDLY BE DECLARE UNLAWFUL,
UN-CONSTITUTIONAL AND VOID AB INITIO.**

Prayer in Appeal:

On acceptance of this Service Appeal, the
impugned Order dated 06.02.2024 issued by the
respondent No 2 may kindly be set aside and the
appellant may kindly be promoted from BS-16 to BS-
17 as per his service record /career.

ATTESTED

Khyber Pakhtunkhwa
Service Tribunal
Peshawar

A. No. 425/24
M. Nacem vs Govt



08.04.2024. 1. Learned counsel for the appellant present. Mr. Umair Azam,

Additional Advocate General alongwith Mr. Wisal, H.C for the

respondents present.

2. Reply/comments on behalf of respondents not submitted.

Representative of the respondents requested for time to submit

reply/comments. Granted. To come up for reply/comments as well as

preliminary hearing on 23.05.2024 before S.B. P.P given to the

parties.

(Muhammad Akbar Khan)
Member (E)

kamran

23rd May. 2024 1. Learned counsel for the appellant and Mr. Umair Azam,

Additional Advocate General alongwith Mr. Tariq Umar,

DSP (Legal) for the respondents present.

2. Reply has been submitted by the respondents. The

appeal is admitted to full hearing subject to all just and legal

objections by the other side. Appellant is directed to deposit

security fee within three days. To come up for arguments on

23.07.2024 before D.B. P.P given to the parties.

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar

(Kalim Arshad Khan)
Chairman

Mutazem Shah

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