

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR.

SERVICE APPEAL No 1156 / 2024

MR. IMTIAZ ALI KHAN

V/S

POLICE DEPTT:

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Dated: 03-09-2024

THROUGH:

APPELLANT


NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR.

**Khyber Pakhtunkhwa
Service Tribunal**

SERVICE APPEAL No 1156 / **2024** **Diary No.** 15370

MR. IMTIAZ ALI KHAN

V/S

POLICE DEPTT. 03.09.24

APPLICATION FOR GRANT OF INTERIM RELIEF FOR SUSPENSION OF THE OPERATION OF LETTER DATED 30/08/2024, WHEREBY THE PRIVATE RESPONDENTS HAVE BEEN SELECTED FOR UPPER COLLEGE COURSE OF TRAFFIC WARD ASSISTANT PESHAWAR, WHILE THE APPELLANT HAS BEEN IGNORED, TILL THE FINAL DISPOSAL OF THE INSTANT SERVICE APPEAL.

Respectfully Sheweth:

- 1- That the above mentioned appeal is pending adjudication before this Honourable Tribunal and is fixed for 09/09/2024.
- 2- That appellant filed the above mentioned appeal against the impugned Final Seniority List dated 10/05/2024 whereby juniors to the appellant i.e. Direct/Open Merit Recruitess have been ranked senior to the appellant and against the order dated 13/06/2024 whereby private respondents bought on the list "F" and were promoted to the rank of Sub Inspector (BPS-14), ignoring the appellant.
- 3- That the official respondents vide letter dated 30/08/2024 have selected the private respondents, despite being junior to the appellant, for upper college course of Traffic Warden Peshawar, scheduled to start from 04/09/2024, while the appellant has been ignored. Copy of the letter dated 30/08/2024 is attached as annexure.....**A**
- 4- That all the three ingredients necessary for the stay is in favor of the appellant.
- 5- That the impugned action of the respondents in utter disregard of law and prevailing Rules.

It is therefore, most humbly prayed that on acceptance of this application, the operation of the impugned letter dated 30/08/2024 may kindly be suspended, till the final disposal of the instant service appeal.

Dated: 03-09-2024

Amir
APPELLANT

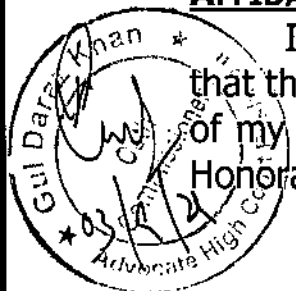
THROUGH:

Noor Muhammad Khattak
NOOR MUHAMMAD KHATTAK
ADVOCATE SUPREME COURT

AFFIDAVIT

I, Imtiaz Ali Khan, (the appellant), do hereby solemnly affirm on oath that the contents of the above application are true and correct to the best of my knowledge and believe and nothing has been concealed from this Honorable Tribunal.

Imtiaz Ali Khan
DEPONENT





OFFICE OF THE
CAPITAL CITY POLICE OFFICER.
PESHAWAR.

Telephone No. 091-9210753 Fax No. 091-9212597.

No. 14598 /EC-I, dated Peshawar the 30/08/2024.

To The Chief Traffic Officer
Peshawar.

Subject: SELECTION FOR UPPER COLLEGE COURSE OF TRAFFIC
WARDEN SYSTEM PESHAWAR.

Memo:

The following SIs on list "E" of Traffic Warden System, Peshawar are hereby selected for the subject course term starting from 04-09-24 at Police Training College Hangu:-

SN	Name, Rank & Nos.	Place of posting.
1.	SI Waqar No. 226/P	City Traffic Peshawar
2.	SI Haider Ali Shah No. 241/P	City Traffic Peshawar
3.	SI Sarmad Ali No. 299/P	City Traffic Peshawar
4.	SI Shahab Saeed No. 300/P	City Traffic Peshawar
5.	SI Kamal Shah No. 255/P	City Traffic Peshawar
6.	SI Muhammad Roman No. 375/P	City Traffic Peshawar
7.	SI Faiz Ali No. 239/P	City Traffic Peshawar
8.	SI Najmus Saqib Shah No. 288/P	City Traffic Peshawar
9.	SI Haris Ibrahim No. 243/P	City Traffic Peshawar
10.	SI Hamid Ali No. 242/P	City Traffic Peshawar
11.	SI Qismat Wali Khan No. 290/P	City Traffic Peshawar
12.	SI Tariq Shah No. 304/P	City Traffic Peshawar
13.	SI Multazim Khan No. 283/P	City Traffic Peshawar
14.	SI Bilal Hussain No. 236/P	City Traffic Peshawar
15.	SI Nabeel Ahmad No. 286/P	City Traffic Peshawar
16.	SI Mobeen Khan No. 262/P	City Traffic Peshawar
17.	SI Asad Ullah No. 234/P	City Traffic Peshawar
18.	SI Muhammad Ishtiaq No. 313/P	City Traffic Peshawar

All the above named selectees may be relieved with the direction to report at PTC/Hangu on 04-09-2024 before 16:00 Hours, alongwith original CNIC, Complete Uniform Kit, Medical Fitness Certificates, nominal roll on the prescribed form and production of COVID-19 certificate from authorized laboratories should be done 72 hours before arrival at PTC Hangu, please.

Note: Candidates are not allowed to bring their smart phones with themselves during training.

(MUHAMMAD WAQAS KHAN) SSP/COORD.
For CAPITAL CITY POLICE OFFICER,
PESHAWAR

No. 14599-603 /EC-I,

Copy of above is forwarded for information and necessary action to the:-

1. Commandant Police Training College, Hangu w/r to his signal No. 1420-60/GC, dated 20.08.2024.
2. SP/Security, Peshawar. Please provide special security arrangements while sending the trainees, please.
3. EC-II and AS.
4. Incharge Emergency Control Room. (Please inform the above officials).