

BEFORE THE HON'BLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

CM No. ____/2024

In

Service Appeal No. 2298/2023

Hameed Badshah.....Appellant

VERSUS

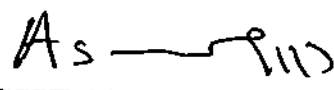
Govt of KPK & others.....Respondents

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Application of Status quo		1-3
2.	Affidavit		4


Applicants / Appellants

Through


ASHRAF ALI KHATTAK
Advocate, Supreme
Court Of Pakistan

BEFORE THE HON'BLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

CM No. ____/2024

Khyber Pakhtunkhwa
Service Tribunal

In

Diary No. 14221

Service Appeal No. 298/2023

Dated 12-09-24

Hameed Badshah.....Appellant

VERSUS

Govt of KPK & others.....Respondents

APPLICATION FOR GRANT OF INTERIM RELIEF
TO EFFECT THAT JUNIOR TO THE APPELLANTS
MAY KINDLY BE RESTRAINED FROM
UNDERGOING PROMOTION COURSE
(INTERMEDIATE COLLEGE COURSE) AT PTC
HANGU WHICH IS GOING TO BE STARTED
W.E.F 15.08.2024, TILL THE FINAL DISPOSAL
OF THE INSTANT WRIT PETITION.

Respectfully Sheweth:

1. That the above mentioned case is pending adjudication before this Hon'ble Court, which is fixed for 12.09.2024.

2. That the Appellants has been deprived from his legal Seniority Position and the Seniority List of LHC and HC.
3. The Appellants are entitled for promotion to the post of HC on the strength of their seniority position to be determined under Rule 13.8 of the Police Rules 1934. The respondents Department has already promoted and nominated the private respondents to undergo intermediate course. Now the respondents department in furtherance of impugned seniority list; junior to the appellants have been nominated and notified to undergo promotion course (Intermediate College Course) at PTC Hangu which is going to be started w.e.f 15.08.2024 and if this Junior Bench is sent for undergoing promotion intermediate college course, the appellants would further deprived of their legal rights and resultantly would fall in continuous litigation for securing their original seniority position in the seniority list of LHC and HC.
4. That the contention / plea taken by the appellants in their memo of Appeal may kindly be considered as part and parcel of this Application.
5. That there is no legal bar on acceptance of this application.

6. That the Petitioners have got prima facie case, balance of inconvenience also tilts in their favour.

It is, therefore, humbly prayed that on acceptance of the instant petition, the relief as prayed in the heading of the Application may please be granted in favour of the applicant / Petitioner & status quo may be maintained, till the final disposal of the main Service Appeal.

Applicants / Appellants

Through

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**ASHRAF ALI KHATTAK
Advocate, Supreme
Court Of Pakistan**

BEFORE THE HON'BLE SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA PESHAWAR

CM No. ____/2024
In
Service Appeal No. 1298/2024

Hameed Badshah.....Appellant
VERSUS
Govt of KPK & others.....Respondents

AFFIDAVIT

I, **Hameed Badshah**, do hereby solemnly affirm and declare on oath that the contents of the accompanying **Application** are true and correct to the best of my knowledge and belief and nothing has been kept concealed from this Hon'ble Court.



DEPONENT

