

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

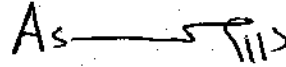
I N D E X

S.No	Description of Documents	Annex	Pages
1.	Early Hearing form		A
2.	Application for early hearing		1-2
3.	Affidavit		3



Applicants / Appellants

Through



ASHRAF ALI KHATTAK
Advocate, Supreme Court
Of Pakistan

**BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR
PROFORMA FOR EARLY HEARING**

Judicial Branch

Khyber Pakhtunkhwa
Service Tribunal

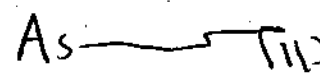
Form "A"

Diary No. 14222

Dated 12-07-24

To be filled by the counsel

Case No.	Service Appeal No. <u>1298/2024</u>				
Case Title	Hameed Badshah.....Appellant VERSUS Govt of KPK & others.....Respondents				
Date of Institution	12.07.2024				
Bench	SB		DB		
Case Status	Fresh		Pending		
Stage	Notice		Reply		Arguments
Urgency to be clearly stated	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 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				
Nature of the relief sought	That the matter pertains to Service of the Appellant				
Next date of hearing	12.09.2024				
Alleged Target Date	Within Week				
Counsel for	Petitioner		Respondent		In Person


 Signature of Counsel/Party

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

APPLICATION FOR EARLY
HEARING / ACCELERATION OF
THE CAPTIONED SERVICE
APPEAL.

Respectfully Sheweth:

1. That the above noted Appeal along with the clubbed Appeals are pending adjudication before this Hon'ble Tribunal, 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.

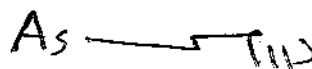
4. That the contention / plea taken by the appellants in their memo of Appeal may kindly be considered as part and parcel of this Application.
5. That there is no legal bar on acceptance of this application.

In view of the above, It is, therefore, most humbly prayed that on acceptance of this application, the above titled Service Appeal along with clubbed Appeals may kindly be fixed for an early date i.e within Week, with the larger interest of Justice.



Applicants / Appellants

Through

As 

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

BEFORE THE HON'BLE SERVICE TRIBUNAL
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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

