

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 7865/ 2021

Muhammad Tariq Usman S/o Anab Gul Sub Inspector presently posted at CPO,
Peshawar.....Appellant

Versus

Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar
etc.....Respondents

**APPLICATION FOR SHIFTING OF CAPTIONED CASE FROM CAMP COURT
BANNU TO PRINCIPAL SEAT PESHAWAR**

Respectfully Sheweth:

1. That, the appellant filed the instant Service Appeal in the year 2021 which is pending for decision before this Hon'ble Tribunal.
2. That, this Hon'ble Tribunal during hearing on 14.05.2024 shifted the Service Appeal from Principal Seat to Camp Court, Bannu for hearing on 22.05.2024.
3. That, the appellant is performing duties at Central Police Office, Peshawar.
4. That, the appellant presently is also residing along with family at Peshawar.
5. That, the appellant shall face serious problems both officially and domestically in the wake of the Hon'ble Tribunal decision wherein case has been shifted to the Camp Court, Bannu.

PRAYERS:-

In view of above, it is humbly requested that the instant application may kindly be accepted and case of the appellant may be retained at this Principal Seat of Hon'ble Tribunal, please.


MUHAMMAD TARIQ USMAN
(Appellant)

*22-05-24
Bannu.*

BEFORE THE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA PESHAWAR

Service Appeal No. 7865/ 2021

Muhammad Tariq Usman S/o Anab Gul Sub Inspector presently posted at CPO,
Peshawar.....Appellant

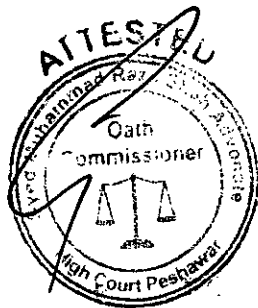
Versus

Government of Khyber Pakhtunkhwa through Chief Secretary, Peshawar
etc.....Respondents

AFFIDAVIT

I, Muhammad Tariq Usman (appellant) do hereby solemnly affirm on oath that the contents of application are correct to the best my knowledge and belief. Nothing has been concealed from this Honorable Tribunal.


MUHAMMAD TARIQ USMAN
(Appellant)



15 MAY 2024

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**BEFORE THE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWAPESHAWAR**



Service Appeal No. 7865 /2021

Tariq Usman S/o Anab Gul Sub Inspector at Police Training School Kohat, R/o Village and P/O Tarkhai Koi, The & Distt Karak.....**Appellant**

VERSUS

1. Provincial Police Officer/ Inspector General of Police
Khyber Pakhtunkhwa, Peshawar
2. Regional Police Officer Kohat Region, Kohat.
3. District Police Officer, Kohat
4. Government of Khyber Pakhtunkhwa through
Chief Secretary, Peshawar.....**Respondents**

**APPEAL UNDER SECTION 4 OF SERVICE TRIBUNAL ACT, 1974,
AGAINST THE ORDER DATED 14/04/2021 BEARING NO. 5002-
03/EC PASSED BY RESPONDENT NO.2 AND AGAINST THE ORDER
DATED 16/11/2021 BEARING NO. 8442-44/EC, PASSED BY
RESPONDENT NO. 2 BY WHICH THE REPRESENTATION AS WELL AS
THE REVISION PETITION TO THE WORTHY RESPONDENT NO. 01
FILED BY THE APPELLANT FOR PROMOTION TO THE RANK OF
INSPECTOR AS PER REVISED SENIORITY WAS NOT CONSIDERED
AND THE APPELLANT WAS DEPRIVED FROM HIS DUE PROMOTION
ACCORDING TO THE PRESCRIBED RULES WITHOUT ANY LAWFUL
JUSTIFICATION.**

PRAYER:

On accepting this service appeal, the impugned orders dated 14/04/2021 and order dated 16/11/2021 may graciously be set aside by declaring it illegal, unlawful, without authority, based on mala fide, void ab-initio and thus not sustainable in the eyes of law and appellant may please be promoted to the rank of **inspector** and be adjusted in seniority with his colleagues/bathmats.

ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Peshawar


SA 7865/21



14.05.2024 01. Counsel for the appellant present. Mr. Arshad Azam,
Assistant A.G for the respondents present.

02. Learned counsel for the appellant requested for adjournment in order to further prepare the brief. Absolute last chance is given for arguments. In case of failure no other chance will be given and the case will be decided without the arguments. To come up for arguments on 22.05.2024 before the D.B at Camp Court, Bannu. PP given to the parties.


(Farceha Paul)
Member(E)


(Rashida Bano)
Member(E)

Fazle Subhan, P.S

ATTESTED

EXAMINER
Khyber Pakhtunkhwa
Service Tribunal
Bannu

15/5/23

Date of Presentation of Application 15/5/23
 Number of ~~Words~~ page 2
 Copying Fee 10/-
 Urgent 8/10
 Total 18/-
 Name of Copyist Shahjad
 Date of Completion of Copy 15/5/23
 Date of Delivery of Copy 15/5/23