

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

CM No. \_\_\_\_\_-D/2024

In Service Appeal No. 497 of 2024

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 16270

Dated 02-10-24

**Mushtaq Ahmad**

Versus

Govt. of KPK etc

**APPLICATION FOR TRANSFER OF ABOVE TITLED SERVICE  
APPEAL FROM CAMP COURT DERA ISMAIL KHAN TO  
PRINCIPAL SEAT OF THIS HONOURABLE TRIBUNAL AT  
PESHAWAR BEING URGENT NATURE CASE.**

Respectfully Sheweth;

Petitioner humbly submits as under,

1. That the above titled service appeal is pending adjudication before this Tribunal at camp court Dera Ismail Khan.
2. That, although the petitioner is performing his duties with due diligence but the respondents are not paying the appellant's salary and are making the excuse that there are no vacant posts in the department, effectively committing financial murder of the appellant. On the other hand, the respondents have published a newspaper advertisement for the recruitment of Class-IV employees, inviting applications for the said posts, which clearly shows that there are vacant posts available. Hence, the matter is of urgent nature.
3. That the Khyber Pakhtunkhwa Service Tribunal used to regularly hold camp courts in Dera Ismail Khan. However, due to terrorist attacks on the honorable judges in Dera Ismail Khan and security concerns, the camp court has not visiting to Dera Ismail Khan. Since the service appeal mentioned above is of an urgent nature, it is highly necessary and in the interest of justice to transfer the service appeal from the camp court Dera Ismail Khan to the principal seat at Peshawar.

4. That in such like situation this honourable court has got the vast powers to entertain the instant application.

**It is, therefore, in wake of submission made above it is humbly prayed that the above titled service appeal may kindly be transfer to the principal seat at Peshawar for the interest of justice.**

September 30, 2024

Yours Humble Petitioner

*Mushtaq Ahmad*

**Mushtaq Ahmad**

Through Counsel,

*Asif Bilal*

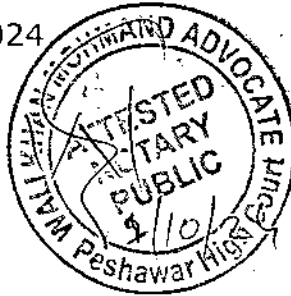
**Asif Bilal**

Advocate High Court

**AFFIDAVIT**

I, **Mushtaq Ahmad**, do hereby solemnly affirm and declare on oath that contents of above CM petition are true & correct to the best of my knowledge and that nothing has been concealed from this Honourable Court.

September 30, 2024



*Mushtaq Ahmad*

**DEPONENT**