

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

SERVICE APPEAL No:- 2076/2023

IMRAN BABAR

V/S

C & W DEPTT

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Dated: 02/10/2024

APPELLANT

THROUGH:


WALEED ADNAN
ADVOCATE HIGH COURT

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BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

C.M NO. _____ /2024

Khyber Pakhtunkhwa
Service Tribunal

IN
SERVICE APPEAL No.2076/2023

Diary No. 16272

IMRAN BABAR

VS

C&W DEPTT:

Dated 02-10-24

APPLICATION FOR RESTRIANING THE RESPONDENTS FROM PROMOTING THE PRIVATE RESPONDENTS ON THE BASIS OF IMPUGNED SENIORITY LIST TILL THE DISPOSAL OF THE ABOVE MENTIONED APPEAL.

R/SHEWETH:

- 1- That the above mentioned appeal was filed by the applicant/appellant before this august Tribunal which is fixed for 14.11.2024.
- 2- That applicant/appellant filed the above mentioned appeal against the impugned Seniority List of Head Draftsman/ Divisional Head Draftsman (BPS-14) of the C&W Department of the year 2022 whereby juniors to the appellant have been placed senior.
- 3- That now the respondent department has issued letter dated 26.09.2024 whereby the respective heads of the private respondents have been asked for provision of private respondents' documents/ ACR's for the purpose of promotion. Copy of letter dated 26.09.2024 is attached as annexure.....A.
- 4- That the respondent department is going to promote the private respondents on the basis of impugned seniority list in utter disregard of law and prevailing rules.
- 5- That all the three ingredients necessary for stay, are in favor of the applicant/appellant.
- 6- That all the grounds of the main appeal be considered as part and parcel of this application.

It is therefore, most humbly prayed that on acceptance of this application, the respondents may kindly be directed not to promote the private respondents on the basis of impugned seniority list till the disposal of the above mentioned service appeal.


**APPLICANT
IMRAN BABAR**

THROUGH:


**WALEED ADNAN
ADVOCATE HIGH COURT**

AFFIDAVIT

I, **IMRAN BABAR** (The Applicant) do hereby solemnly affirm and declare on oath that the contents of this application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.




DEPONENT

(2)



OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA, PESHAWAR

No. CEC / C&WD/2-7/E&A, 1622

Dated Peshawar the 26 /09/2024

To

Managing Director
Pakhtunkhwa Highways Authority

All Superintending Engineers
C&W Department Khyber Pakhtunkhwa

All Executive Engineers
C&W Department Khyber Pakhtunkhwa

Subject: PROVISION OF ACR's OF HEAD DRAFTSMAN / DIVISIONAL HEAD DRAFTSMAN (BPS-14).

I am directed to the subject noted above and you are requested to provide Annual Confidential Reports along-with synopsis of ACR/PER's and Non Involvement Certificates along-with Personal files and Copy of Service Book (attested) in respect of the following Head Draftsman / Divisional Head Draftsman (BPS-14) under your respective offices for the purpose of promotion, at the earliest, please.

S. No	Name Of Official	Place of Posting
1.	Shahid Mansoor	O/O Section Officer (Roads), C&W Department, Peshawar
2.	Saeedullah	O/O Chief Engineer (North), C&W Department Saidu Sharif at Swat
3.	Muhammad Riaz	O/O Executive Engineer, C&W Building Division, Charsadda
4.	Fayaz Ali	O/O Executive Engineer, C&W Highway Division, Khyber
5.	Muhammad Jamil	O/O Executive Engineer, C&W Building Division, Dir Lower
6.	Muhammad Nazir	O/O Executive Engineer, C&W Division, Buner-I
7.	Malal Khan	O/O Executive Engineer, C&W Building-I Division, Peshawar
8.	Aqal Rehman	O/O Executive Engineer, C&W Division, Kohat
9.	Habibullah	O/O Executive Engineer, C&W Division, Swabi
10.	Tahirullah	O/O Executive Engineer, C&W Division, Lower Kohistan
11.	Imran Babar	O/O Executive Engineer, C&W Building-II Division, Peshawar
12.	Muhammad Ishrat	O/O Executive Engineer, C&W Highway Division-I, Peshawar

ATTACHED

25/9/2024
Zahid Habib

Administrative Officer