### BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER PAKHTUNKHWA, PESHAWAR

16464

# S. A = 1760 / 24

Mehran Ilyas S/o Hamid Ilyas R/o Mehran Raod, KDA, House No. 50, Sector-10, Kohat, Presently Tchsildar waiting for Posting as Assistant Secretary Board Of Revenue.

#### Petitioner

#### Versus

- 1. Government of Khyber Pakhtunkhwa through its Chief Secretary.
- 2. Secretary Establishment Government of Khyber Pakhtunkhwa.
- 3. Election Commission Of Pakistan through its Secretary Office at Constitutional Avenue Islamabad.

Respondent

#### URGENT APPLICATION FOR INTERIM RELIEF

The Applicant humbly submits as under

- That Applicant has filed Appeal before this Hon'ble Court in which date of hearing is 09-10-2024, however, Respondents are bend upon to initiate proceedings in pursuance of the impugned Order dated 02-09-2024 and Order dated 01-08-2024, hence, this Application for Interim Relief.
- 2. That the facts and grounds mentioned in the Appeal may kindly be considered as an integral part of this Application.
- 3. That Application has an excellent prima facie case in his favour and there is genuine hope of its success.
- 4. That balance of convenience is also in favour of the Applicant and if the interim relief sought was not granted the Applicant would suffer irreparable loss.
- 5. That impugned Orders, are erred both in law and facts, hence, not sustainable in the eye of law.

## PRAYER

It is, therefore, humbly prayed that on acceptance of the instant Application, operation of the Impugned Order may please be suspended till final decision of main Appeal.

Any other ground will be taken at the time of arguing the Appeal before this Hon'ble Court with your kind permission.

licant Through mit Jalal Advocate High Court

Inayatuliah Khan Advocate High Court

Amir Ejaz khan Advocate High Court

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