

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
 Khyber Pakhtunkhwa Service Tribunal

PROFORMA FOR EARLY HEARING


Diary No. 16789

FORM - A

Dated 16-10-24

To be filled by the Counsel/Applicant

| | | | |
|------------------------------|--|---------|-----------|
| Case Number | Appeal No. 1891/2024 | | |
| Case Title | Muhammad Khalid Khan vs Secretary F and JE etc | | |
| Date of Institution | 09/10/2024 | | |
| Bench | SB <input checked="" type="checkbox"/> | DB | |
| Case Status | Fresh <input checked="" type="checkbox"/> | Pending | |
| Stage | Notice | Reply | Arguments |
| Urgency to be clearly stated | Matter pertain to transfer/posting | | |
| Nature of the relief sought | if the instant appeal has not been fixed at the earliest the very purpose would be defeated. | | |
| Next date of hearing | 28/10/2024 | | |
| Alleged Target Date | In this week | | |
| Counsel for | Farhan ulah shahbazai for Appellant | | |


Signature of Counsel/Party

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

PROFORMA FOR EARLY HEARING

FORM - B

Institution # _____

Early Hearing _____/20_____

In case No. _____/20_____

_____ Vs _____
Presented by _____ on behalf of _____ Entered
in the registrar _____

Put up along with main case _____

| | |
|---|--|
| Last Date fixed | |
| Reason(s) for last adjournment, if any by the Branch Incharge | |
| Date(s) fixed in the similar matter by the Branch Incharge | |
| Available dates Reader / Assistant Registrar | |

**BEFORE THE HON'ABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL AT PESHAWAR.**

C.M No. _____/2024

IN

Service Appeal No. 1891 of 2024

Muhammad Khalid Khan.....VS..... Secretary E & SE & Others


I N D E X

| S/No | Description of Documents | Annexure | Page No. ^s |
|------|---------------------------------------|----------|-----------------------|
| 1. | Memo of Petition along with affidavit | | 1 |

Dated; 16-10-2024

Petitioner/Appellant

Through:-


(Farhan Ullah Shahbanzai)
Advocate High Court,
Peshawar

Cell No.- 0321-9171522

Office- FF-30, Bilour Plaza, Peshawar Cantt, Peshawar:

Email: farhanullah190@gmail.com

**BEFORE THE HON'ABLE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL AT PESHAWAR.**

C.M No. _____/2024
IN
Service Appeal No. 1891 of 2024

Muhammad Khalid Khan.....VS..... Secretary E & SE & Others

**APPLICATION FOR FIXATION OF AN EARLY DATE OF
HEARING IN THE ABOVE TITLED Service Appeal.**

Respectfully Sheweth,

1. That the above titled Service Appeal is pending before this Hon'able Tribunal wherein date of hearing fixed for 28-10-2024.
2. That the instant service appeal along with 3 other connected service appeals (1888, 1889 & 1890 of 2024) are pertain to the transfer and posting matters as such if the all the connected appeals No. (1888, 1889, 1890 & 1891 of 2024) are not fixed at the earliest the very purpose of the instant service appeal will be defeated and it will amount to "Justice delay, justice denied".
3. That keeping in view the facts & circumstance of the case, and realizing the hardship which petitioner/appellant, as well as in the best interest of justice, the instant service appeal be fixed before Hon'able Tribunal in this week.
4. That on permission of this Hon, able Tribunal the Petitioner reserves the right to urge other grounds at the time of arguments

It is therefore most humbly prayed that on acceptance of this application, an early date of hearing in this week may kindly be fixed in the above titled Service Appeal to meet the ends of justice or with any relief deem appropriate may kindly be granted in favor of the petitioner.

Petitioner/Appellant

Dated; 16-10-2024

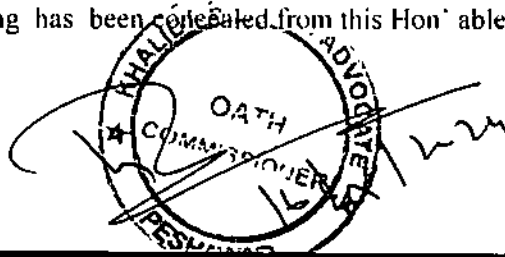
Through:-


Farhan Ullah Shahbanzai)
Advocate High Court,
PESHAWAR

AFFIDAVIT

I, Farhan Ullah Shahbanzai Advocate High Court Peshawar (Counsel for the Petitioner/appellant), as per instruction of my client do hereby solemnly affirm and state, that the contents of accompanying petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon' able Court.

ATTESTED




Deponent.