

BEFORE THE HON'BLE SERVICE TRIBUNAL KHYBER
PAKHTUNKHWA PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

CM No. _____-D/2024
In Service Appeal No. 497 of 2024

Diary No. 17499

Dated 01-11-24

Mushtaq Ahmad

Versus

Govt. of KPK etc

APPLICATION FOR INTERIM RELIEF BY DIRECTING THE
RESPONDENTS TO RELEASE THE CURRENT SALARY OF
APPELLANT TILL FINAL DISPOSAL OF THE MAIN SERVICE
APPEAL.

Respectfully Sheweth;
Petitioner humbly submits as under,

1. That the above titled service appeal is pending adjudication before this Tribunal.
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, petitioner has got a good prima facie case and balance of convenience also lies in favour of the petitioner.
3. That the respondents are intending to fill the vacant Class-IV posts by sabotaging the valuable rights of petitioner.
4. That if the respondents are not restrained to fill the vacant Class-IV posts in their department then the petitioner will suffer irreparable loss and purpose of institution of instant writ petition will become futile.
5. 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 respondents may please be directed to release the current salary of the petitioner till the final disposal of instant service appeal.

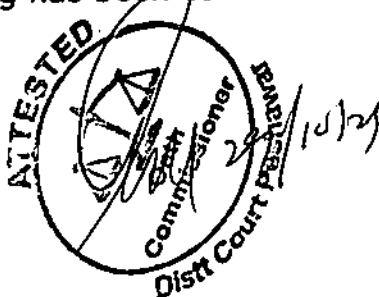
Through

Mushtaq Ahmad
Yours Humble Petitioner

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.



Mushtaq Ahmad
DEPONENT