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IN THE HIGH COURT OF MADHYA PRADESH PRINCIPAL SEAT
AT JABALPUR

I.A. NO. _____ OF 2026

IN

WRIT PETITION NO. 24880 OF 2025

PETITIONER: Dr. Swati Tiwari & others

// VERSUS //

RESPONDENTS: The State of M.P. & others

INTERVENER/APPLICANT: Yogesh Kumar Choudhary, aged about 54 years, S/o Shri R.P. Choudhary, Occupation- Assistant Teacher, Posted in Govt. Primary School, Bhantalaiya, District Jabalpur (M.P.)

**APPLICATION FOR APPROPRIATE DIRECTION FOR
IMPLEMENTATION OF THE M.P. PUBLIC SERVICE
(PROMOTION) RULES, 2025**

The Intervener, named-above, most respectfully submits as under: -

1. That the Intervener is already a party to the present proceedings, having been successfully permitted to intervene in the instant writ petition to protect the interests of the reserved category employees who are direct beneficiaries of the M.P. Public Service (Promotion) Rules, 2025.
2. That the instant writ petition has been filed by the petitioners challenging the constitutional validity of various provisions of the M.P. Public Service (Promotion) Rules, 2025.

3. That the present matter was finally heard by this Hon'ble Court, and the judgment was reserved in the month of 17 February 2026.
4. That it has been several months since the conclusion of the final hearings, but the final judgment has not yet been delivered by this Hon'ble Court.
5. That due to the pendency of the judgment, the State Government has completely halted the administrative process, and the newly framed promotion rules are not being implemented. Consequently, no Departmental Promotion Committees (DPCs) are being convened, and legitimate promotions are entirely stalled across departments.
6. That, thousands of eligible employees, including the Intervener, are suffering severe prejudice, irreparable loss, and administrative stagnation in their respective careers due to the non-implementation of the promotion rules. Retirements are occurring monthly, depriving many employees of the promotions they are legally entitled to receive before superannuation.
7. That since there is no explicit absolute stay on the implementation of the rules barring the final outcome of this petition, the respondent State ought to be directed to provisionally implement the rules subject to the final judgment of this Hon'ble Court to ensure the smooth functioning of state administration and to serve the ends of justice.

An affidavit is filed in support of the above.

PRAYER

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It is, therefore, most humbly prayed that this Hon'ble Court may be pleased to:

- (i) Issue appropriate directions to the Respondent State to immediately implement the M.P. Public Service (Promotion) Rules, 2025, and commence the promotion process subject to the final outcome of the instant Writ Petition.
- (ii) Grant any other appropriate relief that this Hon'ble Court may deem fit and proper in the facts and circumstances of the case, in the interest of justice.

JABALPUR:

DATED: 17/06/2026



(Pushpendra Kumar Shah)

RPS LAW ASSOCIATES

High Court of Madhya Pradesh

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COUNSEL FOR INTERVENER

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RESPONDENTS: The State of M.P. & others

INTERVENER: Yogesh Kumar Choudhary

AFFIDAVIT

I, Yogesh Kumar Choudhary, Aged about 54 years, S/o Shri R.P. Choudhary, Occupation- Assistant Teacher, Posted in Govt. Primary School, Bhantalaiya, District Jabalpur (M.P.), do hereby solemnly affirm and state on oath as under:

1. That I am the Intervener in the instant Writ Petition and am well acquainted with the facts of the case.
2. That the accompanying *Application for Appropriate Direction for Implementation of the M.P. Public Service (Promotion) Rules, 2025* has been drafted in accordance with my instructions by my Counsel. The contents thereof from paras 1 to 7 have also been explained to me in Hindi by my Counsel, and I have understood the same. They are true to my personal knowledge and belief based on the records of the case.


DEPONENT

VERIFICATION

I, Yogesh Kumar Choudhary, the deponent, do hereby verify that the contents of this affidavit from paras 1 to 2 are true to my personal knowledge and belief. Signed and verified on this 17th day of June 2026 at Jabalpur.


DEPONENT