

28.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 17.05.2022 for the same as before.

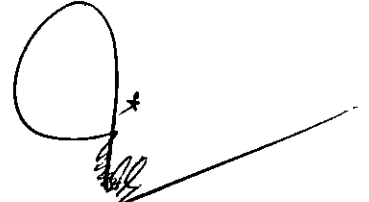


Reader

17.05.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Mr. Muhammad Ayaz S.I for the respondents present.

Written reply/comments not submitted. Representative of the respondents sought time for submission of reply/comments. Granted. To come up for written reply/comments on 22.07.2022 before S.B.



(MIAN MUHAMMAD)
MEMBER (E)

06.08.2021

Appellant present in person. Lawyers are on strike today.

I have gone through the facts and grounds mentioned in the Memorandum of appeal. The case of the appellant precisely seems to be a case of proforma promotion stating in the facts that despite availability of the post, the department remained inactive to hold the DPC for consideration of his case at the relevant time. Points raised need consideration. The appeal is admitted for full hearing, subject to all just and legal objections including that of limitation for determination during full hearing. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments in office within 10 days after receipt of notices, positively. If the written reply/comments are not submitted within the stipulated time, or extension of time is not sought through written application with sufficient cause, the office shall submit the file with a report of non-compliance. File to come up for arguments on 15.12.2021 before the D.B.

Appellant Deposited
Security & Process Fee
17/8/21


Chairman

15.12.2021

Appellant in person present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Suleman, Legal Instructor for respondents present.

Written reply/comments on behalf of respondents not submitted. Representative of the respondents seeks time to submit the same on the next date. To come up for written reply/comments on 28.02.2022 before D.B.




(MIAN MUHAMMAD)
MEMBER (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 6179 /2021

| S.No. | Date of order proceedings | Order or other proceedings with signature of judge |
|-------|---------------------------|--|
| 1 | 2 | 3 |
| 1- | 15/06/2021 | <p>The appeal of Mr. Karimullah resubmitted today by Mr. Naqibullah Khalil Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>06/08/2021</u>.</p> <p style="text-align: right;"> CHAIRMAN</p> |
| 2- | | |

The appeal of Mr. Karimullah son of Arsala Khan r/o Sorizai Payyan District Peshawar received today i.e. on 03.06.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Index of the appeal may be prepared according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 2- Address of the appellant is incomplete which may be completed according to the Khyber Pakhtunkhwa Service Tribunal rules 1974.
- 3- Memorandum of appeal may be got signed by the appellant.
- 4- Appeal has not been flagged/marked with annexures' marks.
- 5- Annexures of the appeal may be attested.
- 6- Certificate be given to the effect that the appellant has not filed any service appeal in the subject matter earlier in this forum.
- 7- Two more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 940 /S.T,

Dt. 04/06 /2021

[Signature]
REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Naqibullah Khalil Adv. Pesh.

*Resubmit to the file
after necessary completion.*

[Signature]

*Counsel of the
appellant.*

ATTESTED

Naqeeb Naqib Khalil
★ ★ Advocate ★ ★
Peshawar High Court

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Service Appeal No. 6179 /2021

Karim Ullah.....Appellant

Versus

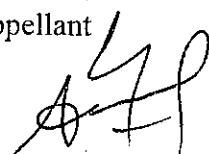
Secy. Finance, Govt of K.P. and othersRespondents

INDEX

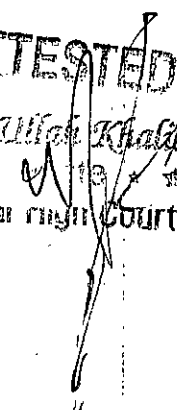
| S.No. | Description of documents. | | Pages. |
|-------|---|---|--------|
| 1) | Memo of appeal with affidavit and certificate. | | 1-4/4 |
| 2) | Addresses of the parties. | | 4/B |
| 3) | Copy of seniority list of Stenographers | A | 5-8 |
| 4) | Copy of notification dated 30.11.2020 | B | 9-10 |
| 5) | Copy of office order dated 17.08.2020 | C | 11-12 |
| 6) | Copy of medical fitness certificate. | D | 13 |
| 7) | Copy of statement showing sanctioned posts dated 27.04.2020 | E | 14-15 |
| 8) | Copy of departmental appeal dated 02.02.2021 | F | 16 |
| 9) | Wakalatnama. | | 17 |

Appellant

Through


Anwar Ali Khan
Advocate High Court

ATTESTED


Nageer Ullah Khali
Peshawar High Court

①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL, PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 5875

Dated 03/6/2021

Service Appeal No...../2021

Karim Ullah S/o Arsala Khan *R/O Sorizai Payyan,*
R/o District Peshawar
..... Appellant

Versus

- 1) Secretary Finance, Government of Khyber Pakhtunkhwa, Peshawar.
- 2) Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 3) Additional Inspector General of Police, Headquarters, Khyber Pakhtunkhwa.
- 4) Assistant Inspector General of Police, Bomb Disposal Unit, Special Branch, Khyber Pakhtunkhwa, Peshawar.

..... Respondents

SERVICE APPEAL U/S 4 OF THE
KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL ACT, 1974 AGAINST THE
INACTION OF THE RESPONDENTS BY
NOT CONSIDERING THE APPELLANT
FOR PROFORMA PROMOTION TO THE
POST OF OFFICE SUPERINTENDENT
(BPS-17) AND NOT TAKING ACTION
ON THE DEPARTMENTAL APPEAL OF
THE APPELLANT.

Filed to-day
Registrar
03/06/2021

PRAYER:

ON ACCEPTANCE OF THIS APPEAL,
THE RESPONDENTS MAY KINDLY BE
DIRECTED TO CONSIDER THE

APPELLANT FOR PROFORMA TO THE
POST OF OFFICE SUPERINTENDENT
(BPS-17), WITH ALL CONSEQUENTIAL
BENEFITS.

ANY OTHER RELIEF WHICH THIS
HON'BLE TRIBUNAL MAY DEEMS
APPROPRIATE IN THE
CIRCUMSTANCES OF THE CASE MAY
ALSO BE GRANTED.

Respectfully Sheweth;

- 1) That the appellant was initially appointed as a junior clerk in Khyber Pakhtunkhwa Police vide office order date 13.04.1982 and was absorbed as a steno-typist vide office order dated 13.10.1988.
- 2) That it is pertinent to mention here that the appellant was promoted to the post of stenographer (BPS-16) in 2011.
- 3) That as per seniority list of stenographers (BPS-16) dated 30.06.2020, the appellant stood at serial No.03. (Copy of the seniority list is Annexure "A").
- 4) That it is worth to mention here that an official namely Bashir Ul Haq at the top of aforesaid seniority list was promoted to the post of Office Superintendent (BPS-17). (Copy of the office order dated 01. 12.2020 is Annexure "B").
- 5) That on promotion of the aforesaid stenographer namely Mr.Bashir Ul Haq, the appellant stood at serial NO.2 of the seniority list of stenographer (BPS-16).
- 6) That it is pertinent to mention here that vide office order dated 17.08.2020, the appellant was asked to provide No

Departmental Inquiry and Medical Fitness Certificate for considering the same in Departmental Selection Committee which the appellant provided well within time. (Copy of the office order dated 17.08.2020 is Annexure "C" and "D" respectively).

- 7) That in the meanwhile 14 posts of Office Superintendent (BPS-17) for newly merged districts with KPK were sanctioned. (Copy of the statement showing sanctioned posts dated 27.04.2020 is Annexure "E").
- 8) That it is pertinent to mention here that the appellant being at serial No.2 of the Seniority list of the Stenographers (BPS-16) and had already submitted his No Departmental Inquiry and Medical Fitness Certificate and availability of the sanctioned vacant posts of Office Superintendent (BPS-17), was hopeful for his promotion but was turned down time and again without any justification, therefore, the appellant feeling aggrieved submitted a departmental appeal/ representation dated 02.02.2021. (Copy of the Departmental Appeal dated 02.02.2021 is Annexure "F").
- 9) That thereafter, the appellant got retired from service on superannuation on dated 09.02.2021.
- 10) That feeling aggrieved from the inaction of the Respondents, the appellant now preferred the instant appeal before this Hon'ble Tribunal on the following grounds inter-alia;

GROUND:

- a) That the impugned inaction of the respondents is against the law, facts and norms of natural justice, hence not tenable in the eye of law.
- b) That the impugned inaction of the respondents is based on malafide, whereby the appellant is being deprived of his vested legal right of promotion.

(4)

- c) That the appellant has not been treated by the respondent's department in accordance with the law and rules on the subject and such act/omission /inaction of the respondents is a violation of Article 4 of the constitution of Pakistan.
- d) That the appellants has been discriminated by the respondents which is a violation of Article 25 of the constitution.
- e) That the appellant being qualified and eligible in all respect for promotion to the posts of Office Superintendent BPS-17 and inspite of availability of the sanctioned vacant posts, the appellant was not considered and whereby the appellant was deprived from his right to promotion.
- f) That any other ground will be raised at the time of argument with kind permission of this Hon'ble court.

It is, therefore prayed that on acceptance of this appeal, on acceptance of this appeal, the respondents may kindly be directed to consider the appellant for proforma to the post of office superintendent (bps-17), with all consequential benefits.

Any other relief which this Hon'ble Tribunal may deems appropriate in the circumstances of the case may also be granted.

Appellant

Through

Anwar Ali Khan
Advocate, High Court

AFFIDAVIT: *Naqeeb Ullah Khalil*
Advocate, High court.

ATTESTE

Naqeeb Ullah Khalil
** Advocate **
Peshawar High Court

I Karim Ullah S/o Arsala Khan R/o Sorizai, Pajawan, District Peshawar do hereby affirm and declare that the contents of this appeal are and correct to the best of my knowledge and belief and nothing has been concealed form this Hon'ble Tribunal.

Deponent

Karim



4/A

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR

Service Appeal No. _____/2021


Karim Ullah.....Appellant

Versus

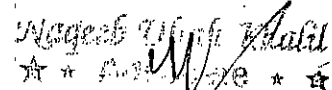
Secy. Finance, Govt of K.P. and othersRespondents

CERTIFICATE

Certified as per information furnished by my client that no such like Service Appeal has earlier been filed before this Hon'ble Tribunal.


Advocate

ATTESTED


★ ★ **Attested** ★ ★
Peshawar High Court

4/B

4/B

BEFORE THE KHYBER PAKHTUNKHWA SERVICES TRIBUNAL

PESHAWAR.

Service Appeal No. _____/2021

Karim Ullah.....Appellant

Versus

Secy. Finance, Govt of K.P. and othersRespondents

ADDRESSES OF THE PARTIES

APPELLANT:

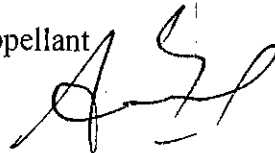
Karim Ullah s/o Arsala Khan
R/o Sorizai, Payan, District Peshawar

RESPONDENTS:

- 1) Secretary Finance, Government of Khyber Pakhtunkhwa, Civil Secretariat, Peshawar.
- 2) Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
- 3) Additional Inspector General of Police, Headquarters, Khyber Pakhtunkhwa.
- 4) Assistant Inspector General of Police, Bomb Disposal Unit, Special Branch. Khyber Pakhtunkhwa, Peshawar

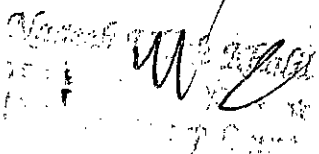
Appellant

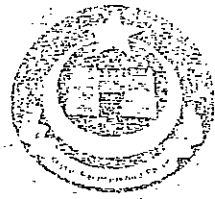
Through



Anwar Ali Khan
Advocate High Court

ATTESTED





5
ATTACHED

Annexure
"A"

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar

SENIORITY LIST OF STENOGRAPHERS (BPS-16) AS IT STOOD ON 30.06.2019

No. 2667-75/E-V: The Seniority list of Stenographers (BPS-16) of Khyber Pakhtunkhwa Police is published for information concerned.

| S.NO | NAME | DATE OF BIRTH | DATE OF RETIREMENT | DOMICILE | DATE OF APPOINTMENT | DATE OF PROMOTION AS STENOGRAPHER (BPS-16) | REMARKS |
|------|-----------------|---------------|--------------------|-----------|--|--|---------|
| 1. ✓ | Bashirul Haq | 25.04.1961 | 24.04.2021 | Nowshera | 11.02.1980-FC 18.09.1988-ST | 23.12.2011 | |
| 2. | Muhammad Anwar | 01.01.1963 | 31.12.2022 | Charsadda | 20.01.1985-JC 26.09.1988-ST | 23.12.2011 | |
| 3. ✓ | Karimullah | 10.02.1961 | 09.02.2021 | Peshawar | 13.04.1982-JC 13.10.1988-ST | 23.12.2011 | |
| 4. | Shahid Ali Shah | 12.11.1967 | 11.11.2027 | Peshawar | 26.10.1989-ST | 23.12.2011 | |
| 5. | Inamullah Khan | 01.10.1972 | 30.09.2032 | Charsadda | 01.10.1990-ST | 23.12.2011 | |
| 6. | Aman Gul | 14.07.1968 | 13.07.2028 | Peshawar | 20.06.1988-JC 01.01.1991-ST | 23.12.2011 | |
| 7. | Fazal Qadir | 18.02.1971 | 17.02.2031 | Mardan | 07.02.1991-ST | 19.07.2013 | |
| 8. | Shah Jehan | 01.03.1961 | 28.02.2021 | Peshawar | 02.07.1979-JC 12.05.1991-ST | 19.07.2013 | |
| 9. | Said Badshah | 28.12.1962 | 27.12.2022 | Karak | 11.12.1983 as ST in local Govt. Karak 30.09.1987-ST in Police | 02.07.2015 | |

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Superintendent P.V.

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| S.NO | NAME | DATE OF BIRTH | DATE OF RETIREMENT | DOMICILE | DATE OF APPOINTMENT | DATE OF PROMOTION AS STENOGRAPHER (BPS-16) | REMARK |
|------|---------------------|---------------|--------------------|-----------|--------------------------------|--|--------|
| 10. | Abdul Karim | 01.10.1966 | 30.09.2026 | Charsadda | 01.04.1986-JC 03.03.1991-ST | 02.07.2015 | |
| 11. | Muhammad Anwar Shah | 01.04.1968 | 31.03.2028 | Lakki | 16.05.1988-JC 03.03.1991-ST | 02.07.2015 | |
| 12. | Ghulam Zakria | 06.05.1964 | 05.05.2024 | Kohat | 09.03.1991-ST | 02.07.2015 | |
| 13. | Fazal Habib | 01.02.1962 | 31.01.2022 | Peshawar | 02.06.1980-JC 19.11.1991-ST | 02.07.2015 | |
| 14. | Malik Rab Nawaz | 14.04.1962 | 13.04.2022 | DIKhan | 13.04.1987-ST | 02.07.2015 | |
| 15. | Almas Khan | 12.04.1971 | 11.04.2031 | Peshawar | 10.02.1988-JC 25.11.1991-ST | 14.06.2016 | |
| 16. | Amir Khattak | 08.02.1969 | 07.02.2029 | Charsadda | 29.08.1993-ST | 14.06.2016 | |
| 17. | Zahir Shah | 30.03.1966 | 29.03.2026 | Haripur | 10.12.1990-JC 12.12.1993-ST | 14.06.2016 | |
| 18. | Ajmal Khattak | 17.03.1972 | 16.03.2032 | Charsadda | 28.05.1994-ST | 14.06.2016 | |
| 19. | Imtiaz Hussain | 17.07.1969 | 16.07.2029 | Swabi | 03.08.1988-JC 02.06.1994-ST | 14.06.2016 | |
| 20. | Niaz Ali | 20.02.1973 | 19.02.2033 | Charsadda | 15.06.1994-ST | 14.06.2016 | |
| 21. | Inayat ur Rehman | 01.11.1972 | 31.10.2032 | Peshawar | 01.09.1992-JC 14.09.1994-ST | 14.06.2016 | |
| 22. | Sohail Ahmad | 13.04.1972 | 12.04.2032 | Charsadda | 11.06.1996-ST | 14.06.2016 | |
| 23. | Fawad Khan | 10.03.1976 | 09-03-2036 | Charsadda | 24.03.1996-ST | 14.06.2016 | |
| 24. | Zafar Ali | 25.05.1972 | 24.05.2032 | Swat | 07.11.1996 | 30.11.2016 | |
| 25. | Rahat Shah | 08.07.1969 | 07.07.2029 | Mardan | 17.02.2010 | 31.01.2017 | |
| 26. | Muhammad Raza | 03.05.1989 | 02.05.2049 | Karak | 23.02.2010 | 31.01.2017 | |

Inspector E-V,

Superintendent CPB.

ATTESTED

| S.NO | NAME | DATE OF BIRTH | DATE OF RETIREMENT | DOMICILE | DATE OF APPOINTMENT | DATE OF PROMOTION AS STENOGRAPHER (BPS-16) | REMAR |
|------|--------------|---------------|--------------------|----------------|---------------------|--|-------|
| 27. | Kiramatullah | 02.06.1977 | 01.06.2037 | Charsadda | 25.03.1996 | 05.09.2019 | |
| 28. | Bacha Jehan | 24.04.1974 | 23.04.2034 | Peshawar | 17.09.1998 | 05.09.2019 | |
| 29. | Aamir Khan | 06.06.1994 | 05.06.2054 | Abbottabad | 06.08.2013 | 05.09.2019 | |
| 30. | Nadir Khan | 01.02.1993 | 31.01.2053 | Khyber Agency | 02.03.2015 | 05.09.2019 | |
| 31. | Noor Zaman | 16.01.1990 | 15.01.2050 | Chitral | 02.03.2015 | 05.09.2019 | |
| 32. | Amjid Ali | 01.02.1990 | 31.01.2050 | Mohmand Agency | 02.03.2015 | 05.09.2019 | |

NOTE: - Any officer who has any objection regarding his seniority/ missing of name/date of birth etc, he must submit his re within one month after the issuance of this list, otherwise no representation will be entertained after the specific period.

Haidar Z
Superintendent E-V,

[Signature]
Superintendent CPB,

[Signature]
Registrar,

ATTESTED

[Signature]
(KASHIF ZULFIQAR)
AIG/Establishment
For Inspector General of Pol
Khyber Pakhtunkhwa,
Peshawar.

No. 2667-75/EV, dated Peshawar, the 12/08 /2020.

Copy of above is forwarded for information and necessary action to the:-

1. Addl: Inspector General of Police, in Khyber Pakhtunkhwa.
2. Capital City Police Officer, Peshawar.

3. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
4. Commandant, PTC, Hangu.
5. All Regional Police Officers in Khyber Pakhtunkhwa.
6. All Deputy Inspector General of Police, in Khyber Pakhtunkhwa.
7. Chief Traffic Officer, Peshawar.
8. Commandant, CPC, Peshawar.
9. Assistant Inspector General of Police, BDU, Peshawar.
10. Director, FSL, Khyber Pakhtunkhwa, Peshawar.
11. Director, IT, CPO, Peshawar.
12. All District Police Officers in Khyber Pakhtunkhwa.
13. All Superintendent of Police, Investigations in Khyber Pakhtunkhwa.
14. Deputy Superintendent of Police, PQR.
15. All Branches in CPO, Peshawar.
16. In-charge, Central Registry Cell, CPO, Peshawar.

8

No.

Dt.

Mr.

ATTESTED

9

Annexure "B"

Dated Peshawar 30/11/2020

NOTIFICATION

No. 4416-50 /E-V, **PROMOTION**: - In pursuance to the provision contained in the Khyber Pakhtunkhwa Police Department Ministerial Service Rules, 1974 at S.No. 2 of the Appendix-A to the said Rules, the Competent Authority on the recommendations of the Departmental Selection Committee (D.S.C) meeting held on 18.11.2020, is pleased to promote the following Assistant Grade Clerks and Stenographers (BS-16) to the rank of Office Superintendents (BS-17) on regular basis with immediate effect:-

| S# | NAME OF OFFICIAL | PRESENT PLACE OF POSTING |
|-----|--------------------|--|
| 1. | Fazal Shah | CCPO, Peshawar (He is conditionally promoted to the rank of Office Superintendent (BPS-17) subject to completion of ACRs for the period from 01.01.2015 to 31.12.2015, 01.01.2016 to 31.12.2016, 25.03.2017 to 16.07.2017 and 01.01.2018 to 30.06.2018 within fortnight) |
| 2. | Muhammad Saleem | Special Branch Khyber Pakhtunkhwa |
| 3. | Masood Khan | BDU/Special Branch Khyber Pakhtunkhwa |
| 4. | Sardar Hussain | Budget Branch CPO, Peshawar |
| 5. | Akhtar Aurangzeb | FRP Khyber Pakhtunkhwa Peshawar |
| 6. | Syed Sabz Ali Shah | Elite Force, Khyber Pakhtunkhwa |
| 7. | Muhammad Israr | DPO Office Mardan (He is conditionally promoted to the rank of Office Superintendent (BPS-17) subject to completion of ACRs for the period from 01.01.2018 to 31.12.2018 within fortnight) |
| 8. | Naimatullah | Special Branch Khyber Pakhtunkhwa |
| 9. | Ghulam Ishfaq | DPO Office Haripur |
| 10. | Fazal Khaliq | RPO Office Mardan |
| 11. | Noor Rehman | E-IV Branch CPO, Peshawar |
| 12. | Muhammad Iqbal | DPO Office Kurram |
| 13. | Jafar Shah | CCPO, Peshawar |
| 14. | Bashir Ul Haq | Special Branch Khyber Pakhtunkhwa |

ATTESTED

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Terms and conditions of promotion are as under:-

1. They will be on probation for a period of one year extendable for another year in terms of Section-6 (2) of Khyber Pakhtunkhwa, Civil Servant Act-1973 read with Rules-15 (1) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989.
2. Their promotion will take effect from the date of they actually assume the charge of their higher responsibilities.
3. The promotion of officials having ACRs deficiency will be conditioned with submission of their remaining ACRs within fortnight. In case of non-compliance, they shall be considered deferred and a fresh Notification of their deferment shall be issued.

Sd/-
(Dr. ISHTIAQ AHMED) PSP/PPM
 Additional Inspector General of Police,
 Headquarters, Khyber Pakhtunkhwa,
 Peshawar

Endst: No. and dated even

Copy forwarded to the:-

- All Addl: Inspectors General of Police in Khyber Pakhtunkhwa.
- All Regional Police Officers, in Khyber Pakhtunkhwa.
- Accountant General Khyber Pakhtunkhwa, Peshawar.
- All Deputy Inspectors General of Police in Khyber Pakhtunkhwa.
- Capital City Police Officer, Peshawar.
- Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
- All Assistant Inspectors General of Police in Khyber Pakhtunkhwa.
- All District Account Officers in Khyber Pakhtunkhwa.
- PSO in Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.

8
ATTESTED

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 761



(11)

Annexure
"C"

OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR.

No. CPO/CPB/DSC/ 197

Dated Peshawar

17 August, 2020

To: The Addl. Inspector General of Police, Elite Force, Khyber Pakhtunkhwa, Peshawar.
The Capital City Police Officer, Peshawar.
The Deputy Inspectors General of Police, Special Branch, Investigation, Operations, Internal Accountability, CTD, Telecommunications, Traffic, Finance & Procurement and Training, Khyber Pakhtunkhwa, Peshawar.
The Regional Police Officers, Mardan, Hazara, Malakand, Kohat, Bannu and D.I. Khan Regions.
The Commandant, Frontier Reserve Police, Khyber Pakhtunkhwa, Peshawar.
The Commandant, Police Training College, Hangu.
The Assistant Inspectors General of Police Legal & BDU, Khyber Pakhtunkhwa.
The Directors, CPC and ISI Khyber Pakhtunkhwa, Peshawar.
All Branches in CPO, Peshawar.

ATTESTED

Subject:
Memo:

NO DEPARTMENTAL ENQUIRY AND MEDICAL FITNESS CERTIFICATE

A meeting of the Departmental Selection Committee regarding promotion of Assistant Grade Clerks & Stenographers to the rank of Office Superintendent (BS-17) will be held shortly.

It is requested to furnish No Departmental Enquiry and Medical Fitness Certificates in respect of the following Assistant Grade Clerks & Stenographers serving in your Regions/Units to this office within a week time i.e 21.08.2020 through special messenger positively:-

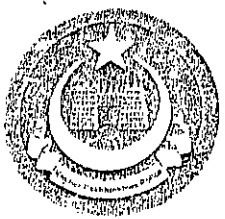
| ASSISTANT GRADE CLERK | | |
|-----------------------|---------------------|---------------|
| S.NO | NAME | HOME DISTRICT |
| 1. | Fazal Shah | Peshawar |
| 2. | Muhammad Saleem | Peshawar |
| 3. | Masood Khan | Charsadda |
| 4. | Sardar Hussain | Peshawar |
| 5. | Ghulam Muhammad | Bannu |
| 6. | Syed Sabir Ali Shah | Peshawar |
| 7. | Muhammad Israr | Mardan |
| 8. | Naimatullah | Peshawar |
| 9. | Ghulam Ishaq | Kohat |
| 10. | Fazal Khaliq | Bajaur Agency |
| 11. | Noor Rehman | Charsadda |
| 12. | Muhammad Iqbal | Karak |
| 13. | Jafar Shah | MKD Agency |
| 14. | Hamid Khan | Kohat |
| 15. | Haseebullah | Peshawar |
| 16. | Sher Nawab | Peshawar |

997
17/08/20



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Handwritten number 961



OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE,
PESHAWAR.

| NO | NAME | HOME DISTRICT |
|---------------------|-------------------|---------------|
| 20. | Muhammad Naeem | Charsadda |
| 21. | Attaullah Khan | D.U.Khan |
| 22. | Ghani-Ur-Rehman | Kohat |
| 23. | Muhammad Shoaib | Koba |
| 24. | Nasir Khan | Peshawar |
| 25. | Halim Khan | Peshawar |
| 26. | Mumshad Khan | Charsadda |
| 27. | Hazrat Hussain | Swat |
| 28. | Shafi-Ur-Rehman | Peshawar |
| 29. | Hidayatullah | Charsadda |
| 30. | Muhammad Shafique | Peshawar |
| STENOGRAPHER | | |
| → 1. | Bashir-Ul-Haq | Nowshera |
| 2. | Muhammad Anwar | Charsadda |
| 3. | Karimullah | Peshawar |
| 4. | Shahid Ali Shah | Peshawar |

Note:

This office may also be informed if any Assistant-Grade Clerk and Stenographer of your region has been retired or reverted or dismissed from service.

ATTESTED

(KASHIF ZULFIQAR)PSP
AIG/Establishment,
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar.

Endst: No. and dated even

Copy forwarded to the:-

1. Addl: Inspector General of Police, Headquarters, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police, HQrs., Khyber Pakhtunkhwa, Peshawar.
3. Registrar, CPO, Peshawar.
4. Supdt: Secret, CPO Peshawar to provide synopsis of the above named Asst. Grade Clerks and Stenographers to Career Planning Branch CPO within a week time positively.
5. Supdt: Establishment-V, CPO, Peshawar.

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761

13

Annexure

D



**OFFICE OF THE
MEDICAL SUPERINTENDANT
SERVICES HOSPITAL, PESHAWAR**

Phone: (Off) 091 9210509 (Exch) 091 9223472 Fax: 091 9210543

Dated: 17/08/2020

MEDICAL FITNESS CERTIFICATE

Certified that Mr. Karim Ullah S/O Arsala Khan R/O: District: Peshawar having CNIC No. 17301-1617661-5 appeared before me on 17/08/2020 for medical examinations.

He was examined thoroughly and found medically/physically and mentally FIT for Promotion.

Mark of identification: Nil

ATTACHED

Medical Superintendent
Services Hospital
Peshawar
Medical Superintendent
Police Services, Hospital
Peshawar
17/08/2020

[Handwritten signature]

761

STATEMENT SHOWING DISTRIBUTION OF SANCTIONED STRENGTH UP TO DATE FOR NEWLY MERGED DISTRICTS AND SUB DIVISION ALONG WITH LEVIES AND KHASADAR FORCE

Annexure "E"

(14)

ATTACHED

| Districts/Units | DPO BS-19 | DSP BS-17 | Inspector BS-16 | S.I BS-14 | ASI BS-11 | HC BS-09 | Constable BS-07 | Total | Office Supdt. BS-17 | Office Assistant BS-16 | Sr. Clerk BS-14 | Jr. Clerk BS-11 | Overseer BS-11 | Moharrir BS-09 | Driver BS-07 | Driver BS-05 | Risaldar BS-05 | Pesh Imam BS-05 | Head Armourer BS-04 | Behishti BS-04 | Naib Qasid BS-04 | Khakrob BS-04 | Assistant Armourer BS-03 | Dafadar BS-02 | Lance Dafadar BS-02 | Cook BS-02 | Cobbler BS-02 | Pesh Imam BS-02 | Sweeper BS-02 | Tailor BS-02 | Total | G. Total | | |
|--|-----------|-----------|-----------------|------------|-----------|------------|-----------------|-------------|---------------------|------------------------|-----------------|-----------------|----------------|----------------|--------------|--------------|----------------|-----------------|---------------------|----------------|------------------|---------------|--------------------------|---------------|---------------------|------------|---------------|-----------------|---------------|--------------|-------------|-------------|------|------|
| District Police Officer Bajaur | 1 | 2 | 3 | 6 | 3 | 3 | 18 | 36 | 1 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 36 | |
| Inspector Bajaur (Levies) | 0 | 0 | 2 | 25 | 40 | 98 | 2067 | 2232 | 1 | 2 | 2 | 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 11 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 39 |
| Sub Insp: Bajaur (Khasadar) | 0 | 0 | 0 | 1 | 2 | 4 | 477 | 484 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 11 | 0 | 0 | 2 | 0 | 0 | 3 | 1 | 2 | 3 | 2 | 37 | 2269 | |
| Total of Bajaur | 1 | 2 | 5 | 32 | 45 | 105 | 2562 | 2752 | 2 | 2 | 2 | 9 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 484 | | |
| District Police Officer Khyber | 1 | 2 | 3 | 6 | 3 | 3 | 18 | 36 | 1 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 11 | 0 | 0 | 2 | 0 | 0 | 3 | 1 | 2 | 3 | 2 | 40 | 2792 | |
| Inspector Khyber (Levies) | 0 | 0 | 3 | 17 | 27 | 90 | 1147 | 1284 | 1 | 2 | 2 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 39 |
| Inspector Khyber (Khasadar) | 0 | 0 | 1 | 22 | 47 | 120 | 2645 | 2835 | 0 | 0 | 1 | 1 | 1 | 0 | 0 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6 | 1290 |
| Total of Khyber | 1 | 2 | 7 | 45 | 77 | 213 | 3810 | 4155 | 2 | 2 | 3 | 4 | 1 | 0 | 0 | 3 | 0 | 0 | 0 | 19 | 0 | 24 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 48 | 2884 | | |
| District Police Officer Kurram | 1 | 2 | 3 | 6 | 3 | 3 | 18 | 36 | 1 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 58 | 4213 | |
| Inspector Kurram (Levies) | 0 | 0 | 3 | 19 | 42 | 77 | 1713 | 1854 | 1 | 1 | 2 | 4 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 39 | |
| Inspector Kurram (Khasadar) | 0 | 0 | 1 | 0 | 4 | 8 | 914 | 927 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 10 | 1864 | |
| Total of Kurram | 1 | 2 | 7 | 25 | 49 | 88 | 2645 | 2817 | 2 | 1 | 2 | 6 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 927 | | |
| District Police Officer Orakzai | 1 | 2 | 3 | 6 | 3 | 3 | 18 | 36 | 1 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 13 | 2830 | | |
| Inspector Orakzai (Levies) | 0 | 0 | 2 | 9 | 23 | 105 | 1484 | 1623 | 1 | 1 | 2 | 4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 39 | | |
| Sub Insp: Orakzai (Khasadar) | 0 | 0 | 0 | 6 | 16 | 31 | 903 | 956 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 8 | 1631 | | |
| Total of Orakzai | 1 | 2 | 5 | 21 | 42 | 139 | 2405 | 2615 | 2 | 1 | 2 | 6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 956 | | | |
| District Police Officer Mohmand | 1 | 2 | 3 | 6 | 3 | 3 | 18 | 36 | 1 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 11 | 2626 | | |
| Inspector Mohmand (Levies) | 0 | 0 | 3 | 18 | 26 | 89 | 1050 | 1186 | 1 | 2 | 2 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 39 | | |
| Inspector Mohmand (Khasadar) | 0 | 0 | 1 | 3 | 22 | 185 | 2553 | 2764 | 0 | 0 | 0 | 2 | 0 | 3 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6 | 1192 | | |
| Total of Mohmand | 1 | 2 | 7 | 27 | 51 | 277 | 3621 | 3986 | 2 | 2 | 2 | 5 | 0 | 3 | 0 | 2 | 0 | 0 | 0 | 2 | 5 | 4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 18 | 2782 | | |
| District Police Officer North Waziristan | 1 | 2 | 3 | 6 | 3 | 3 | 18 | 36 | 1 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 27 | 4013 | | |
| Inspector North Waziristan (Levies) | 0 | 0 | 3 | 6 | 18 | 70 | 729 | 826 | 1 | 1 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 39 | | | |
| Inspector North Waziristan (Khasadar) | 0 | 0 | 2 | 37 | 43 | 149 | 3413 | 3644 | 0 | 0 | 2 | 2 | 1 | 0 | 0 | 3 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4 | 830 | | | |
| Total of North Waziristan | 1 | 2 | 8 | 49 | 64 | 222 | 4160 | 4506 | 2 | 1 | 3 | 5 | 1 | 0 | 0 | 3 | 1 | 0 | 0 | 19 | 1 | 10 | 0 | 8 | 12 | 0 | 0 | 0 | 0 | 59 | 3703 | | | |
| District Police Officer South Waziristan | 1 | 2 | 3 | 6 | 3 | 3 | 18 | 36 | 1 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 66 | 4572 | | | |
| Inspector South Waziristan (Levies) | 0 | 0 | 3 | 19 | 21 | 81 | 768 | 892 | 1 | 1 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 39 | | | |
| Inspector South Waziristan (Khasadar) | 0 | 0 | 1 | 93 | 28 | 264 | 3488 | 3674 | 0 | 0 | 2 | 3 | 1 | 0 | 0 | 4 | 4 | 1 | 0 | 12 | 1 | 8 | 0 | 2 | 5 | 0 | 0 | 0 | 0 | 4 | 896 | | | |
| Total of South Waziristan | 1 | 2 | 7 | 118 | 52 | 348 | 4274 | 4802 | 2 | 1 | 3 | 6 | 1 | 0 | 0 | 4 | 4 | 1 | 0 | 12 | 1 | 8 | 0 | 2 | 5 | 0 | 0 | 0 | 0 | 43 | 3917 | | | |
| Total | 1 | 2 | 7 | 45 | 77 | 213 | 3810 | 4155 | 2 | 2 | 3 | 4 | 1 | 0 | 0 | 3 | 0 | 0 | 0 | 19 | 0 | 24 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 50 | 4852 | | |

15

| Districts/Units | DPO BS-13 | DSP BS-17 | Inspector BS-16 | S.I. BS-14 | ASI BS-11 | HC BS-09 | Constable BS-07 | Total | Office Supdt: BS-17 | Office Assistant BS-16 | Sr. Clerk BS-14 | Jr. Clerk BS-11 | Overseer BS-11 | Moharrir BS-09 | Driver BS-07 | Driver BS-05 | Rikaidar BS-05 | Pesh Imam BS-05 | Head Armourer BS-04 | Behishti BS-04 | Naib Qasid BS-04 | Khakrob BS-04 | Assistant Armourer BS-03 | Dafadar BS-02 | Lance Dafadar BS-02 | Cook BS-02 | Cobbler BS-02 | Pesh Imam BS-02 | Sweeper BS-02 | Tailor BS-02 | Total | G. Total | | | |
|---|-----------|-----------|-----------------|------------|-----------|----------|-----------------|-------|---------------------|------------------------|-----------------|-----------------|----------------|----------------|--------------|--------------|----------------|-----------------|---------------------|----------------|------------------|---------------|--------------------------|---------------|---------------------|------------|---------------|-----------------|---------------|--------------|-------|----------|------|-----|--|
| Law & Order Peshawar (Hassan khel SD) | 0 | 1 | 2 | 2 | 2 | 3 | 10 | 20 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 20 | | |
| Inspector Hassan Khel Pesh: (Khasadar SD) | 0 | 0 | 1 | 5 | 3 | 24 | 297 | 330 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 20 | |
| Khasadar Hassan Khel (SD) | 0 | 0 | 0 | 0 | 0 | 0 | 107 | 107 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 330 | |
| Total of Hassan Khel Sub Division | 0 | 1 | 3 | 7 | 5 | 27 | 414 | 457 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 107 | | |
| Levies Secretariat Merged Area Pesh; | 0 | 0 | 0 | 0 | 1 | 4 | 45 | 50 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 457 | | |
| Law & Order Kohat (Dara Adam Khel SD) | 0 | 1 | 2 | 2 | 2 | 3 | 10 | 20 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 50 | | |
| Inspector Dara Kohat (Levies SD) | 0 | 0 | 1 | 7 | 10 | 31 | 401 | 450 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 20 | | |
| Khasadar Darra (SD) | 0 | 0 | 0 | 0 | 0 | 0 | 405 | 405 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 450 | | |
| Total of Dara Adam Khel Sub Division | 0 | 1 | 3 | 9 | 12 | 34 | 816 | 875 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 405 | | |
| Law & Order Bannu (Wazir SD) | 0 | 1 | 2 | 2 | 2 | 3 | 10 | 20 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 875 | | |
| Inspector Wazir Bannu (Levies SD) | 0 | 0 | 1 | 2 | 6 | 18 | 248 | 275 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 20 | | |
| Sub Insp: Wazir Bannu (Khasadar SD) | 0 | 0 | 0 | 5 | 19 | 20 | 732 | 776 | 0 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 275 | | |
| Total of Wazir Sub Division | 0 | 1 | 3 | 9 | 27 | 41 | 990 | 1071 | 0 | 0 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 779 | | |
| Law & Order Lakki Marwat (Bhittani SD) | 0 | 1 | 2 | 2 | 2 | 3 | 10 | 20 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 1074 | | |
| Inspector Bhittani Lakki (Levies SD) | 0 | 0 | 1 | 2 | 5 | 16 | 226 | 250 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 20 | | |
| Inspector Bhittani Lakki (Khasadar SD) | 0 | 0 | 1 | 1 | 2 | 5 | 191 | 200 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 250 | | |
| Total of Bhittani Sub Division | 0 | 1 | 4 | 5 | 9 | 24 | 427 | 470 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 200 | | |
| Law & Order DIKhan (Darazinda SD) | 0 | 1 | 2 | 2 | 2 | 3 | 10 | 20 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 470 | | |
| Inspector Darazinda DIKhan (Levies SD) | 0 | 0 | 1 | 2 | 6 | 17 | 243 | 269 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 20 | | |
| Sub Insp: Darazinda DIKhan (Khasadar SD) | 0 | 0 | 0 | 3 | 0 | 11 | 280 | 294 | 0 | 0 | 0 | 1 | 0 | 3 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 269 | | |
| Total of Darazinda Sub Division | 0 | 1 | 3 | 7 | 8 | 31 | 533 | 583 | 0 | 0 | 0 | 1 | 0 | 3 | 0 | 1 | 0 | 0 | 0 | 11 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 17 | 311 | | | |
| Law & Order Tank (Jandola SD) | 0 | 1 | 2 | 2 | 2 | 3 | 10 | 20 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 11 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 17 | 600 | | |
| Inspector Jandola Tank (Levies SD) | 0 | 0 | 1 | 3 | 6 | 23 | 240 | 273 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 20 | | |
| Khasadar Jandola (SD) Tank | 0 | 0 | 0 | 9 | 0 | 13 | 484 | 506 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 273 | | |
| Total of Jandola Sub Division | 0 | 1 | 3 | 14 | 8 | 39 | 734 | 799 | 0 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 507 | | |
| G. Total:- | 7 | 20 | 65 | 368 | 450 | 1592 | 27436 | 29938 | 14 | 10 | 17 | 45 | 3 | 6 | 2 | 13 | 5 | 1 | 1 | 74 | 9 | 46 | 2 | 10 | 17 | 3 | 1 | 2 | 3 | 2 | 286 | 30224 | | | |

ATTSTED

Annexure
"F"

To, The Assistant Inspector General of Police, K.P.K Peshawar.

Departmental Appeal:-

(16)

Annexure
"F"

R/sir,

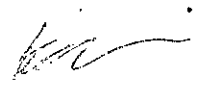
With profound honor I beg to submit that I am serving in Police Department for the last 40 years in different capacities.

Presently I am serving as Senior Scale Stenographer (BPS-16) in Bomb Disposal Unit Khyber Pakhtunkhwa.


I am attaining the age of superannuation on 09.02.2021, while the DPC for the promotion of Office Superintendent is expected in February, 2021 vide. CPO Letter No. CPO/CPB/DSC/56, dated 29.01.2021.

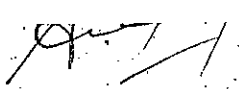
I am standing on seniority list at 2nd position, where in the above referred letter no seats for Stenographer are announced for promotion. As per Police Ministerial act 1973 20 % quota is fixed for the promotion to Office Superintendent for Stenographers.

It is therefore; humbly requested that my case for promotion may please considered on merit basis, please.


(KARIM ULLAH)
Stenographer
BDU

Dt: 02/02/2021


ATTESTED



19

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 6179/2021.

Karim Ullah s/o Arsala khan r/o Sorizai Payyan, District Peshawar
..... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa and others(Respondents)

INDEX

| S. No | Description of Documents | Annexure | Page No. |
|-------|-------------------------------------|----------|----------|
| 1. | Service Appeal | | 1-3 |
| 2. | Authority letter | | 4 |
| 3. | Affidavit | | 5 |
| 4. | Seniority list and retirement order | A | 6-10 |

①

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 6179/2021.

Karim Ullah s/o Arsala khan r/o Sorizai Payyan, District Peshawar

..... (Appellant)

VERSUS

Government of Khyber Pakhtunkhwa and others(Respondents)

REPLY BY RESPONDENTS.

Respectfully Sheweth:

PRELIMINARY OBJECTIONS:-

- a) That the appellant has no cause of action.
- b) That the appeal is badly barred by law & limitation.
- c) That the appellant has been estopped by his own conduct to file the appeal.
- d) That the appeal is not maintainable in its present form.
- e) That the appellant has not come to the Hon'ble Tribunal with clean hands.
- f) That the appeal is bad for misjoinder and non joinder of necessary parties.
- g) The appeal has not been filed against any final original or appellate authority order therefore the appeal is not maintainable under section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974.
- h) This Hon'ble Tribunal lacks Jurisdiction into the matter because appellant has prayed for pro-forma promotion therefore the appeal is hit by proviso (b) (i) of section 4 of Khyber Pakhtunkhwa Service Tribunal Act, 1974.
- i) Taking cognizance of appeal for pro-forma promotion will open a floodgate for retired civil servants seeking such promotions.

FACTS:-

1. Needs no comments as this Para of the appeal pertains to service record of the appellant.
2. Appellant was correctly promoted to this rank of stenographer on his own turn which establishes bona-fide of the respondent department.
3. The name of appellant was correctly existing at serial No.3 of the seniority list of stenographers. Appellant has admitted that his seniority was correctly fixed.
4. Correct to the extent of promotion of Bashir-ul-Haq stenographer whose name was existing at serial No.1 of the Seniority list. No promotion of stenographers have been made after 01.12.2020.
5. Correct to the extent that on promotion of Bashir-ul-Haq appellant stood at serial No.2 of the seniority list of stenographers. However, this is worth mentioning that

- Muhammad Anwar whose name stood at serial No.1 of the seniority list of stenographers has not yet been promoted. Therefore appellant has wrongly claimed pro-forma promotion. He retired on attaining the age of superannuation before his turn of promotion. (Seniority list and retirement order is enclosed as Annexure "A")
6. Incorrect, the departmental promotion committee requisitioned service record, No departmental inquiry and Medical fitness Certificates of panel of three officers for promotion against one vacancy. The name of appellant was at serial No.3 of the seniority list of the stenographers therefore his data was also requisitioned for filling of one vacancy of office Superintendent falling within the share of stenographers. The DPC meeting held on 18.11.2020 and approved 13 Assistant Grade Clerks besides one stenographer namely Bashir-ul-Haq for promotion to the Office Superintendent.
 7. Incorrect, appellant has admitted that the 14 posts of Office Superintendent were sanctioned for merged districts. In case of any promotions against that posts, promotion of Muhammad Anwar senior to appellant was due. Appellant retired before his turn of promotion.
 8. Incorrect, appellant was not on turn of promotion and his prayer amounts to out of turn promotion.
 9. Correct to the extent that appellant retired on 09.02.2020 on attaining the age of superannuation.
 10. Incorrect, appellant has not specified and pointed any illegality in promotions made against the vacancies of Office Superintendent. He has not pointed out any mala-fide or mal-practice on the part of respondents. His prayer for out of turn promotion was not tenable. Therefore, his appeal is not sustainable on the given grounds.

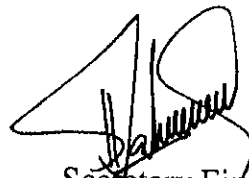
GROUND:-

- A. Incorrect, the respondent department has made promotions against the vacancies of Office Superintendent on merit and seniority cum fitness basis. Appellant has not pointed out the inaction of the respondents.
- B. Incorrect, Muhammad Anwar stenographer senior to appellant has not yet been promoted. The promotions were made on merit. Appellant has not pointed out and specified any junior stenographer promoted prior to him. Appellant retired on attaining the age of superannuation much before his turn of promotion.
- C. Incorrect, appellant was treated in accordance with law. Follow of merit policy in promotion and denial of out of turn promotion does not amount to inaction or omission on the part of respondents.

- D. Incorrect, appellant has not referred any instance of discrimination. Respondents have not promoted any junior to appellant.
- E. Incorrect, respondents have passed no order or remarks with regard to ineligibility of appellant. He retired much before his turn of promotion.
- F. Respondents also seek permission for raising additional defense at the time of hearing of the case.

PRAYER:-

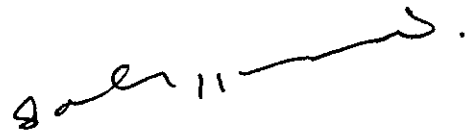
It is therefore prayed that on acceptance of reply to the appeal, the same may kindly be dismissed with costs please.



Secretary Finance,
Government of Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 1)



Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 2)



Additional Inspector General of Police, Headquarter
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 3)



Assistant Inspector General of Police,
Bomb Disposal Unit,
Special Branch Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 4)

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 6179/2021.

Karim Ullah s/o Arsala khan r/o Sorizai Payyan, District Peshawar

..... (Appellant)


VERSUS

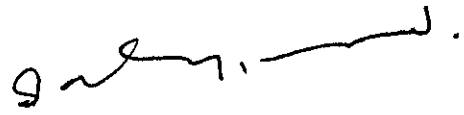
Government of Khyber Pakhtunkhwa and others(Respondents)

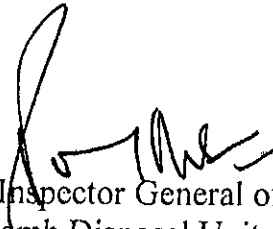
AUTHORITY LETTER

Muhammad Asif DSP Legal, Special Branch, Khyber Pakhtunkhwa Peshawar is hereby authorized to appear on behalf of the Respondents before the Hon'ble Service Tribunal Peshawar. He is authorized to submit all required documents and replies etc pertaining to the appeal through the Government Pleader.

Secretary Finance,
Government of Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 1)


Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 2)


Additional Inspector General of Police, Headquarter
Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 3)


Assistant Inspector General of Police,
Bomb Disposal Unit,
Special Branch Khyber Pakhtunkhwa, Peshawar.
(Respondent No. 4)

5

BEFORE THE HON'BLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No. 6179/2021.

Karim Ullah s/o Arsala khan r/o Sorizai Payyan, District Peshawar

..... (Appellant)

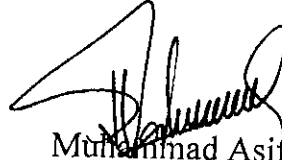
VERSUS

Government of Khyber Pakhtunkhwa and others(Respondents)

AFFIDAVIT

I, Muhammad Asif DSP Legal Special Branch, Khyber Pakhtunkhwa Peshawar do here by solemnly affirm on oath that the contents of enclosed application on behalf of respondents. Nothing has been concealed from this Hon'ble Tribunal.

Deponent



Muhammad Asif
DSP/Legal
17301-3746129-3



(A) (B)

**OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
Central Police Office, Peshawar**

SENIORITY LIST OF STENOGRAPHERS (BPS-16) AS IT STOOD ON 30.10.2021

No. 3300 /E-V: The Seniority list of Stenographers (BPS-16) of Khyber Pakhtunkhwa Police is published for information to all concerned.

| S.NO | NAME | DATE OF BIRTH | DATE OF RETIREMENT | DOMICILE | EDUCATION | DATE OF APPOINTMENT | DATE OF PROMOTION AS STENOGRAPHER (BPS-16) | Present Posting | REMARKS |
|------|---------------------|---------------|--------------------|-----------|-----------|--|--|---------------------------------------|---------|
| 1. | Muhammad Anwar | 01.01.1963 | 31.12.2022 | Charsadda | B.A | 20.01.1985-JC 26.09.1988-ST | 23.12.2011 | PA to Commandant FRP KP | |
| 2. | Shahid Ali Shah | 12.11.1967 | 11.11.2027 | Peshawar | D.Com | 26.10.1989-ST | 23.12.2011 | PA to DIG/Training KP | |
| 3. | Inamullah Khan | 01.10.1972 | 30.09.2032 | Charsadda | M.A | 01.10.1990-ST | 23.12.2011 | PA to Director Research & Analyst CPO | |
| 4. | Aman Gul | 14.07.1968 | 13.07.2028 | Peshawar | D.Com | 20.06.1988-JC 01.01.1991-ST | 23.12.2011 | PA to Addl: IGP/Accountability CPO | |
| 5. | Fazal Qadir | 18.02.1971 | 17.02.2031 | Mardan | B.A | 07.02.1991-ST | 19.07.2013 | PA to DPO Mardan | |
| 6. | Said Badshah | 28.12.1962 | 27.12.2022 | Karak | D.Com | 11.12.1983 as ST in local Govt: Karak 30.09.1987-ST in Police | 02.07.2015 | EC to Commandant PTC Hangu | |
| 7. | Abdul Karim | 01.10.1966 | 30.09.2026 | Charsadda | D.Com | 01.04.1986-JC 03.03.1991-ST | 02.07.2015 | Commandant Elite Force KP | |
| 8. | Muhammad Anwar Shah | 01.04.1968 | 31.03.2028 | Lakki | F.A | 16.05.1988-JC 03.03.1991-ST | 02.07.2015 | PA to RPO Bannu | |

Supdt: E-V,

Supdt: CPB,


Supdt: Secret,

Registrar,


10

7

| S.NO | NAME | DATE OF BIRTH | DATE OF RETIREMENT | DOMICILE | EDUCATION | DATE OF APPOINTMENT | DATE OF PROMOTION AS STENOGRAPHER (BPS-16) | Present Posting | REMARKS |
|------|------------------|---------------|--------------------|-----------|-----------|--------------------------------|--|-------------------------|--|
| 9. | Ghulam Zakria | 06.05.1964 | 05.05.2024 | Kohat | B.A | 09.03.1991-ST | 02.07.2015 | PA to PTC Hangu | |
| 10. | Malik Rab Nawaz | 14.04.1962 | 13.04.2022 | DIKhan | D.Com | 13.04.1987-ST | 14.06.2016 | PA to RPO D.J Khan | |
| 11. | Almas Khan | 12.04.1971 | 11.04.2031 | Peshawar | F.A | 10.02.1988-JC 25.11.1991-ST | 14.06.2016 | PA to SP/HQrs: CCP | |
| 12. | Amir Khattak | 08.02.1969 | 07.02.2029 | Charsadda | B.A | 29.08.1993-ST | 14.06.2016 | Closed to CPO | Under suspension vide order No. 690-95/E-V, dated 26.02.2021 |
| 13. | Ajmal Khattak | 17.03.1972 | 16.03.2032 | Charsadda | FSc | 28.05.1994-ST | 14.06.2016 | Closed to CPO | Under suspension vide order No. 690-95/E-V, dated 26.02.2021 |
| 14. | Imtiaz Hussain | 17.07.1969 | 16.07.2029 | Swabi | F.A | 03.08.1988-JC 02.06.1994-ST | 14.06.2016 | PA to DPO Swabi | |
| 15. | Niaz Ali | 20.02.1973 | 19.02.2033 | Charsadda | B.A | 15.06.1994-ST | 14.06.2016 | PA to CCP Peshawar | |
| 16. | Inayat ur Rehman | 01.11.1972 | 31.10.2032 | Peshawar | M.A | 01.09.1992-JC 14.09.1994-ST | 14.06.2016 | Nil | On deputation to FIA for a period of 03-years, vide this office order No.1781-88/E-V, dated 21.06.2021. |
| 17. | Sohail Ahmad | 13.04.1972 | 12.04.2032 | Charsadda | B.A | 11.06.1996-ST | 14.06.2016 | PA to Registrar CPO | |
| 18. | Fawad Khan | 10.03.1976 | 09-03-2036 | Charsadda | F.A | 24.03.1996-ST | 30.11.2016 | PA to SP/Inv: Charsadda | Awarded major punishment of Dismissal from Service vide order No. 434-39/PA, dated 08.08.2020. Later on, his major punishment has been converted into minor punishment of withholding of two years increments with cumulative effect vide this office order No. 4762-67/E-V, dated 17.12.2020. |


Supdt. E-V,


Supdt. CPB,


Supdt. Secret,


Registrar,

| S.NO | NAME | DATE OF BIRTH | DATE OF RETIREMENT | DOMICILE | EDUCATION | DATE OF APPOINTMENT | DATE OF PROMOTION AS STENOGRAPHER (BPS-16) | Present Posting | REMARKS |
|------|---------------|---------------|--------------------|--------------|-----------|---------------------|--|--|---------|
| 19. | Zafar Ali | 25.05.1972 | 24.05.2032 | Swat | B.Com | 07.11.1996 | 31.01.2017 | PTS Swat as Head Clerk | |
| 20. | Muhammad Raza | 03.05.1989 | 02.05.2049 | Karak | F.A | 23.02.2010 | 31.01.2017 | PA to Deputy Commandant Elite Force KP | |
| 21. | Kiramatullah | 02.06.1977 | 01.06.2037 | Charsadda | D.Com | 25.03.1996 | 05.09.2019 | Special Branch | |
| 22. | Bacha Jehan | 24.04.1974 | 23.04.2034 | Peshawar | F.A | 17.09.1998 | 05.09.2019 | Special Branch | |
| 23. | Aamir Khan-I | 06.06.1994 | 05.06.2054 | Abbottabad | B.A | 06.08.2013 | 05.09.2019 | PA to DPO/Abbottabad | |
| 24. | Nadir Khan | 01.02.1993 | 31.01.2053 | Khyber | B.A | 02.03.2015 | 05.09.2019 | PA to RPO/Kohat | |
| 25. | Noor Zaman | 16.01.1990 | 15.01.2050 | Chitral | M.Com | 02.03.2015 | 05.09.2019 | PA to DPO Chitral | |
| 26. | Amjid Ali | 01.02.1990 | 31.01.2050 | Mohmand | B.A | 02.03.2015 | 05.09.2019 | PA to AIG/Legal CPO | |
| 27. | Aamir Khan-II | 20.03.1992 | 19.03.2052 | D.I Khan | FSc | 02.03.2015 | 12.03.2021 | PA to DIG/Finance/Procurement CPO | |
| 28. | Noman Khan | 31.03.1992 | 30.03.2052 | Peshawar | BSc | 02.03.2015 | 12.03.2021 | Investigation Unit CPO | |
| 29. | Tufail Khan | 01.03.1990 | 28.02.2050 | Khyber | D.Com | 02.03.2015 | 12.03.2021 | PA to CTO/Peshawar | |
| 30. | Matiullah | 04.03.1984 | 03.03.2044 | Lakki Marwat | MBA | 02.03.2015 | 12.03.2021 | PA to IGP/KP | |

NOTE:- Any officer who has any objection regarding his seniority/ missing of name/date of birth etc, he must submit his representation within one month after the issuance of this list, otherwise no representation will be entertained after the specific period.

Supdt. E-V,

Supdt. CPB,

Supdt. Secret,

Registrar,

Z. Asghar
(ZEESHAN ASGHAR) PSP
AIG/Establishment

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

No. 3301-12/EV, dated Peshawar, the 30 /11/2020.

Copy of above is forwarded for information and necessary action to the:-

1. Addl: Inspector General of Police, in Khyber Pakhtunkhwa.
2. Capital City Police Officer, Peshawar.
3. Commandant, FRP, Khyber Pakhtunkhwa, Peshawar.
4. Commandant, PTC, Hangu.
5. All Regional Police Officers in Khyber Pakhtunkhwa.
6. All Deputy Inspector General of Police, in Khyber Pakhtunkhwa.
7. Chief Traffic Officer, Peshawar.
8. Commandant, CPC, Peshawar.
9. Assistant Inspector General of Police, BDU, Peshawar.
10. Director, FSL, Khyber Pakhtunkhwa, Peshawar.
11. Director, IT, CPO, Peshawar.
12. All District Police Officers in Khyber Pakhtunkhwa.
13. All Superintendent of Police, Investigations in Khyber Pakhtunkhwa.
14. Deputy Superintendent of Police, PQR.
15. All Branches in CPO, Peshawar.
16. In-charge, Central Registry Cell, CPO, Peshawar.

(17)

وکالت نامہ کی بنیاد پر لکھو گوا

نقیب اللہ خلیل ایڈووکیٹ
پشاور ہائی کورٹ
0332-9254039

پشاور ہائی کورٹ

نقیب اللہ خلیل
ایڈووکیٹ

دعویٰ یا جرم

ایف آئی آر، عدالت نمبر

باعث تحریر آنکہ مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے بیرونی وجوہات سے وکیل کارروائی متعلقہ آن
ہر مقام کیلئے نقیب اللہ خلیل ایڈووکیٹ ہائی کورٹ پشاور مقرر کر کے اقرار کیا جاتا ہے۔
کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کمال اختیار ہوگا۔ نیز وکیل صاحبان کو راضی نامہ کرنے و تقرر ثالث و فیصلہ
پر حلف دینے جو اب وہی اقبال دعویٰ اور بصورت ڈگری کرنے اجراء در و وصولی چیک و روپیہ غرضی دعویٰ اور درخواست
ہر قسم کی تعدیق زرائع پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم بیرونی یا ڈگری یا پٹرنہ یا اپیل کی برآمدگی اور منسوخی
نیز دائر کرنے اپیل گرانے و نظر ثانی و بیرونی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور کے کل یا جزوی کارروائی کے
واسطے اور وکیل یا مختیار قانونی کو اپنے ہمراہ ماننے بجا پٹرنہ کا اختیار ہوگا۔ اور صاحبان مقرر شدہ کو ہمیشہ وہی جملہ مذکورہ
بااختیارات حاصل ہوں گے اور اس ساختہ پر واضح منظور و قبول ہوگا۔ دوران مقدمہ میں جو شرط و ہر جائزہ التوائے مقدمہ کے
سبب سے ہوگا کوئی تاریخ پیشی مقام ذورہ پر ہو یا حد سے باہر ہو وکیل صاحبان پابند ہونگے۔ کہ بیرونی مذکور کریں۔
لہذا وکالت نامہ لکھ دیا کہ مسترد ہے۔

عظیم الرحمن ایڈووکیٹ

20

25

31

ATTESTED

Pest

نقیب اللہ خلیل ایڈووکیٹ ہائی کورٹ
0332-9254039

Naqeeb Ullah Khalil
** Advocate **
Peshawar High Court

عظیم الرحمن ایڈووکیٹ

Recd

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR. D.B

No.

Appeal No. 6179 of 20 21

Kaxim Ullah Appellant/Petitioner

Versus

Secy Finance Deptt. KPK Respondent

Respondent No. 4

Notice to: —

Assistant Inspector General of Police
Bomb Disposal unit Special Branch
KPK Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15/10/21 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has ~~already been sent to you vide this~~

office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this 13/10

Day of 11/10 20 21

(for Reply)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PB
PESHAWAR.

No.

Appeal No. 6179 of 20 21

Karimullah Appellant/Petitioner

Secy: Finance Dept. KPK Respondent

Respondent No. 3

Notice to: —

Additional Inspector General of Police
Headquarters KPK Peshawar.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15/12/21 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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Copy of appeal is attached. ~~Copy of appeal has already been sent to you vide this~~

office Notice No. dated.....

Given under my hand and the seal of this Court, at Peshawar this 13/11

Day of: Oct 2021.

(For Reply)
11/11

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

- Note:
1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

"B"

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD
PESHAWAR.

No.

Appeal No. 6179 of 20 21

Kashimullah Appellant/Petitioner

Versus

Sup. Finance Dept. K.P. Respondent

Respondent No. 2

Notice to: —

Inspector General of Police Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on...../...../.....at 8.00 A.M. If you wish to urge anything against the appelland/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

Given under my hand and the seal of this Court, at Peshawar this.....

Day of.....21.....20 21

(Handwritten signature)

(Handwritten signature)

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.

“B”

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.
JUDICIAL COMPLEX (OLD), KHYBER ROAD, PESHAWAR.

21

No.

Appeal No. 6179 of 20 21

Karimullah Appellant/Petitioner

Versus

Secy. Finance Deptt. of KPK Respondent
Respondent No. 1

Notice to: —

Secretary Finance Deptt of KPK Peshawar

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 12/1/21 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

Notice of any alteration in the date fixed for hearing of this appeal/petition will be given to you by registered post. You should inform the Registrar of any change in your address. If you fail to furnish such address your address contained in this notice which the address given in the appeal/petition will be deemed to be your correct address, and further notice posted to this address by registered post will be deemed sufficient for the purpose of this appeal/petition.

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No. dated.....

Given under my hand and the seal of this Court, at Peshawar this 12/1/21

Day of Oct 20 21

(for Reply)

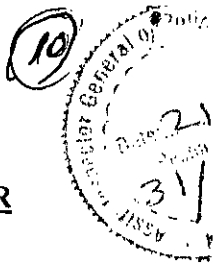
Secy. Finance KPK
Dairy No. 24-44
Date

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sunday and Gazetted Holidays.
2. Always quote Case No. While making any correspondence.



OFFICE OF THE
INSPECTOR GENERAL OF POLICE,
CENTRAL POLICE OFFICE,
KHYBER PAKHTUNKHWA PESHAWAR



Dated: 27/05/2021

NOTIFICATION

No. 1516-22 /E-V, **RETIREMENT ON SUPERANNUATION**: - Karim Ullah Stenographer (BPS-16) of AIG/BDU Special Branch KPK is hereby retired from service w.e.f 09.02.2021 on attaining the age of superannuation, subject to fulfillment of all codal formalities.

Sd/-
(KAHSIF ALAM) PSP
Additional Inspector General of Police,
Headquarters, Khyber Pakhtunkhwa,
Peshawar

No. & date even.

Copy forwarded to the: -

1. Addl: Inspector General of Police, HQrs: Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police, HQrs: Khyber Pakhtunkhwa, Peshawar.
3. Deputy Inspector General of Police, Finance, Khyber Pakhtunkhwa, Peshawar.
- ④ Assistant Inspector General of Police, BDU, Special Branch, KPK, Peshawar w/r to his letter No. 421/EST-BDU dated 27.04.2021.
5. Budget Officer, CPO Peshawar.
6. Accountant General Office Khyber Pakhtunkhwa, Peshawar.
7. Office Superintendent Secret Branch CPO, Peshawar.

(IRFAN ULLAH) PSP
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar