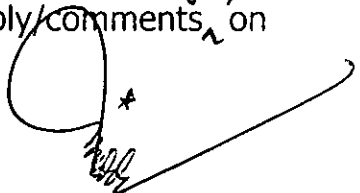


17.05.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl. AG alongwith Zeeshan H.C for the respondents present and submitted written reply/comments on behalf of respondents No. 2 to 4 which are placed on file. Copy of the same is handed over to the learned counsel for the appellant. Written reply/comments on behalf of respondents No. 1 is still awaited. Learned AAG requested for time to submit written reply/comments. Granted. To come up for written reply/comments ^{of Respondent No.1} on 22.07.2022 before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

16.08.2021

Appellant present in person.

I have gone through the memorandum of appeal and documents annexed therewith, the points agitated in the appeal need consideration. The appeal is admitted to full hearing, subject to all just and legal objections including that of limitation to be determined during the course 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.

Security Process Fee
27/8


Chairman

15.12.2021

Counsel for the appellant present. Mr. Kabirullah Khattak, Addl: AG alongwith Mr. Yaqoob Khan, H.C for respondents present.

Written reply/comments on behalf of respondents not submitted. Representative of the respondents seeks time to submit written reply/comments. To come up for written reply/comments on 02.03.2022 before S.B.


(MIAN MUHAMMAD)
MEMBER (E)

2-3-2022

Due to retirement of the Hon'ble Chairman the case is adjourned to come up for the same as before on 17-5-2022

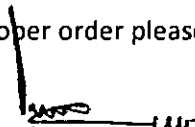


Reader

Form- A

FORM OF ORDER SHEET

Court of _____

Case No. 6609 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	25/06/2021	<p>The appeal of Mr. Muhammad Anwar Shah presented today by Mr. Muhammad Tariq Qureshi 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>2-</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>16/08/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE PESHAWAR HIGH COURT BANNU BENCH

Service Appeal No. 6609 /2021

Muhammad Anwar Shah

..... (Appellant)

VERSUS

Government of KPK through Secretary Home & T.As Peshawar and others.....

(Respondents)

INDEX

S. No	Particular Of Documents	Annexure	Page
1.	Service Appeal	1-4
2.	Affidavit	5
3.	Copy of service card of appellant	A	6
4.	Copy of service book of appellant	B	7-17
5.	Copy of impugned order dated 11.06.2019	C	18-19
6.	Copy of Letter No. 653 dated 25.05.2021	D	20
7.	Copy of departmental appeal of the appellant dated 08.03.2021 along with covering Letter No. 563 dated 08.03.2021	E	21-22
8.	Copy of impugned/appellate order vide Letter No. 2019 dated 21.05.2021	F	23
9.	Copy of application for earned leave along with prescriptions	G	24-29
10.	Copy of letter No.2952 dated 25.05.2017	H	30
11.	Copy of letter No.1719/EC dated Bannu 31.05.2017	I	31
1	Wakalat Nama	32

Dated: 13 /06/2021

Appellant
Muhammad Anwar Shah
Muhammad Anwar, Shah

Through Counsel
Muhammad Tariq Qureshi
Muhammad Tariq Qureshi
Advocate Supreme Court of Pakistan.

(1)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. _____/2021

Muhammad Anwar Shah s/o Dost Muhammad r/o Lakki Marwat Presently,
P.A to DIG/RPO Bannu (Appellant)

VERSUS

1. Government of Khyber Pakhtunkhwa Through Secretary Home Khyber Pakhtunkhwa, Peshawar.
 2. Inspector General of Police / PPO, KPK, Peshawar.
 3. Additional Inspector General of Police/HQrs: K.P. Peshawar.
 4. Deputy Inspector General of Police / RPO, Bannu.
- (Respondents)

SERVICE APPEAL UNDER SECTION 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 11.06.2019 WHEREBY ADVERSE REMARKS HAS BEEN PASSED IN APPELLANT A.C.R FOR THE PERIOD FROM 01.01.2018 TO 22.06.2018 AND ALSO AGAINST THE IMPUGNED APPELLATE ORDER DATED 21.05.2021 WHEREIN THE DEPARTMENTAL APPEAL OF APPELLANT WAS REJECTED.

Prayer in Appeal:

On the acceptance of instant appeal, impugned order Dated: 11.06.2019 of Respondent No.4 and also impugned appellate order dated 21.05.2021 of Respondent No.3 may kindly be set aside and the adverse remarks recorded in A.C.R of appellant for the period from 01.01.2018 to 22.06.2018 may kindly be expunged.

NOTE:- Addresses of the parties are sufficient for the purpose of service.

Respectfully Sheweth,

1. That, the appellant is working as P.A to DIG / RPO Bannu.
2. That, the appellant has got some adverse remarks in his ACRs for the period from 01.01.2018 to 22.06.2018 from the then Reporting Officer/DIG Bannu Mr. Dar Ali Khattak (Respondent No.4).
3. That, as evident from Para-9 Page-1 of the ACR Form (Period 01.01.2018 to 22.6.2018), where he has repeatedly (three-time) corrected and changed his thinking due to personal grudge.

4. That, grounds of the personal grudge of Reporting Officer were that the official under report (Muhammad Anwar Shah PA to DIG) had submitted a leave application along with recipe/prescription of the local doctors of District Bannu, so as to bring his ailing son to Peshawar for specialized treatment but the Reporting Officer (Mr. Dar Ali Khattak) straight away rejected his leave application.
5. That, secondly, his (appellant) services were requisitioned by the Principal/Commandant, Police Training College Hangu, thereby the CPO Peshawar sought concurrence from Mr. Dar Ali Khattak, the then DIG/Bannu, which was regretted by him. Merit to mention here that if he (appellant) was so incompetent as mentioned by the reporting officer the ACR of the appellant, then why he (reporting officer) did not give concurrence to CPO Peshawar for his (appellant) transfer to PTC Hangu.
6. That, the appellant had submitted a representation/departmental appeal to the concerned authority/IGP, KP Peshawar vide DIG/RPO Bannu's letter No.563/PA, dated 10/03/2021, that was sent again to Dar Ali Khattak for comments, who again supported his previous version, as such the competent authority/IGP, KP Peshawar vide order No. S/2019/21 dated 21/5/2021 rejected / filed his representation.
7. That, pertinent to mention here that perhaps the remarks in the ACRs of almost all the officials of RPO Office Bannu were based upon liking and disliking manner rather than evaluating the working / efficiency of the subordinate officials and that is why most of the officials were decorated with adverse remarks as evident from the record of that period (Mr. Dar Ali Khattak's period – 2017 & 2018, in Bannu Region).
8. That, during the entire period of 30-year service of the appellant, wherever he was posted neither attired restful attitude nor became slack in the discharge of official duties rather evinced keen interest and that is why, his working had/has been commented by his 35/36 superior officers and graded as **A-1/A** (Available in his original C.R. Dossier, held in Secret Branch, CPO Peshawar).

3

9. That, a glimpse of the appellant professional carrier is as under:
- i. That, he was enlisted as Junior Clerk on 16-05-1988.
 - ii. That, on 01/03/1991, he was absorber as Steno-typist on proper test/merit.
 - iii. That, soon after the competition of probationary period, all steno-typists including the appellant were put to "Efficiency Test" that was also qualified by the appellant vide DIG/Special Branch, NWFP Peshawar's office Memo No. 2033/SB, dated 31.05.1994, which is available on the record.
 - iv. That, in the year 2002, the appellant also qualified a short course of computer titled "32 Computer Training Program – Office Automation Course" vide IGP NWFP Peshawar's Order Endst No. 16925-27/E-III, Dated 04-07-2002. The course was arranged/organized by Services & General Administration Department, NWFP, Civil Secretariat Peshawar.
10. That, the appellant prays for the acceptance of this service appeal inter alia on the following grounds:
11. That, the following are the documents on which appellant places his reliance:
- (i) Copy of service card of appellant, service book of appellant, impugned order dated 11.06.2019, Letter No. 653 dated 25.04.2021, departmental appeal of the appellant dated 08.03.2021 along with covering Letter No. 563 dated 08.03.2021, impugned/appellate order vide Letter No. 2019 dated 21.05.2021, application for earned leave along with prescriptions, letter No.2952 dated 25.05.2017, letter No.1719/EC, dated Bannu 31.05.2017 are annexed herewith as Annexure " A, B, C, D, E, F, G, H, I".

Grounds of Appeal:

- A. That, the appellant has not been treated in accordance with Law/Policy. Hence valuable rights secured and granted to the appellant are badly violated.
- B. That, the appellant had submitted a leave application along with prescription of doctors of Distt: Bannu, to bring his ailing son to Peshawar

(4)

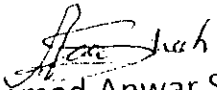
for specialized treatment, which had been rejected due to personal grudges. The Respondent No. 4 has not followed the Policy/Rules for leave and based his order on no material, hence, acting illegally only for disturbing and depriving the appellant from the promotion.

- C. That, non-feasance, mis-feasance and mal-feasance on part of the respondents are apparent from adverse remarks on A.C.R of appellant as well as the contents of the instant appeal.
- D. That, the said illegal act of the respondents is discrimination towards the appellant and order of the respondents is against rule and policy, law and fact and is based on mala-fide.
- E. That, the appellant seeks the permission of this Hon'ble Court to rely on additional grounds at hearing of this appeal.


In wake of the above submissions, the appellant earnestly prays that on the acceptance of instant appeal, the orders of the respondents No. 3 & 4 may kindly be set-aside and the adverse remarks recorded in ACR of the appellant for the period from 01.01.2018 to 22.06.2018 may kindly be expunged along with any appropriate order which this Court deems fit.

Dated: 13/06/2021

Appellant


Muhammad Anwar Shah

Through Counsel


Muhammad Tariq Qureshi
Advocate Supreme Court of Pakistan

(5)

BEFORE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Service Appeal No. _____/2021

Muhammad Anwar Shah s/o Dost Muhammad r/o Lakki Marwat Presently,
P.A TO DIG/RPO BANNU(Appellant)

VERSUS


1. Government of Khyber Pakhtunkhwa through Secretary Home Khyber Pakhtunkhwa Peshawar
2. Inspector General of Police / PPO, Khyber Pakhtunkhwa, Peshawar
3. Additional Inspector General of Police, HQrs: KP Peshawar.
4. Deputy Inspector General of Police / RPO, Bannu

.....(Respondents)

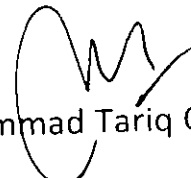
AFFIDAVIT

I, Muhammad Anwar Shah, PA to DIG Bannu, do hereby solemnly affirm and declare on oath that the contents of the above appeal are true and correct and that nothing has been kept back or concealed from this Hon'ble Court.

Deponent


Muhammad Anwar Shah

Identified By


Muhammad Tariq Qureshi

Advocate Supreme Court of Pakistan

Khyber Pakhtunkhwa Police

Card No.0079193



MUHAMMAD ANWAR SHAH
Sr Scale Stenographer



Issuing Authority

Office Of DIG, Bannu

CNIC # 1120172515621

Date of Birth 01-04-1968

Date of Issue 23-02-2021

Date of Expiry 22-02-2024

Emergency Contact# 09289270076

Address House No.1666 Near Mosque Piran Mohallah Khoidad Khel
Lakki City Lakki Marwat



*only for
service appeal*

1. In the event of loss the card holder should report to the nearest police station.
2. If found, please drop into the nearest letter box.
3. Contact us. 091-9210457

(3.)

1. Name—

Mohammad Anwar Shah

2. Nationality—

Pakistani

3. Religion—

Islam

4. Residence—

village Khaidad Khel Tehsil Lakki Marwat District Bannu.

5. Father's name and residence—

Dost Mohammad (Same)

6. Date of birth by the Christian era as nearly as can be ascertained—

1-4-1968

(First April and nineteen sixty eight)

7. Exact height by measurement—

5-7 1/2

34 x 35 1/2

8. Personal mark for identification—

A wound mark near mouth.

9. Left hand thumb and finger impression of (non-gazetted) Government—

Little Finger

Ring Finger

Middle Finger

Fore Finger

Thumb

Signature of Government Servant—

M Anwar Shah

11. Signature and designation of the Head of the Office, or other Attesting Officer—

ATTESTED

NOTE.—The entries in this page should be renewed or re-attested at least every five years and the signatures in lines 9 and 10 should be dated. Finger prints need not be taken afresh every five years under the Act.

Name of post.	Whether substantive or officiating and whether permanent or temporary.	Officiating, state— (i) substantive appointment, or (ii) whether service counts for pension under Art. 371, C.S.R.	Pay in substantive post.	Additional pay for officiating.	Other emoluments falling under the term "Pay".	Date of appointment of the servant.	Signature of the officer in charge of
Sint. outd. as L.D.C. P.P. No. 5 (700-25-1900)			Rs. 700/-			16/5/88	[Signature]
Annual Increment			Rs. 75/-			1-12-88	[Signature]
Annual Increment			Rs. 750/-			1-12-89	[Signature]
Promoted as LDC. under this office Notice No. 257-81 D.H. 2-7-22-90 P.P./E.C. dated 28-2-90							
SI			Rs. 775/-			12/90	[Signature]
Absorbed as Steno typist and pay fixed in Rs. 12 (970-52-2010) W.D. 7-6-3-91			Rs. 970/-			6/3/91	[Signature]
Allowed to draw ERP Special Pay @ Rs. 25% of B. Pay w.e. from 6.3.91 under G.O. P. No. 10671-579/A-2 dt. 2.10.90.							

16.5.89
 For Pay Bills & Acc
 [Signature]
 S. P. [Signature]

[Signature]
 Superintendent of Police, P.S.,
 Mkd; Range at Saidu Bazar,
 (GWAR)

7	8	9	10	11	12	15		14	13
						Nature and duration of leave taken.	Allocation of periods of leave on average pay up to four months for which leave-salary is debitabale to another Government.		
Date of termination of service.	Nature of service.	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 6.	Date of termination of appointment.	Reason of termination such as promotion, transfer, dismissal, etc.	Signature of the head of the office or other attesting officer.	Period.	Government to which debitabale.	Signature of the head of the office or other attesting officer.	Reference to any recorded punishment or censure or reward or praise of the Government servant.
5/98	Shah	SRP/PSA							① Granted acc in Cm General by SRP/PSA vide OB No. 212 dated 19.7.88. Cash reward Rs. 50/- SRP/PSA
1-88	Shah	SRP/PSA							
2-89	Shah	SRP/PSA							② Granted acc in by SRP/PSA for his good performance of duty vide OB No. 388 Dt. 1-12-88.
2/91	Shah	SRP/PSA							
12/90	Shah	SRP/PSA			Mr. Mahammad Anwar Shah of this office absorbed as Steno typist in B.S. 12 NWFP Police and Postal at SP FAR Swat office vide DIP. Hqs. NWFP Postman's Notification No. 4073/E - III dt. 3-3-91 and this office notice No. 941-E/P-PP/PSA dt. 12-3-91			with cash reward Rs. 100/- SRP/PSA ③ Promoted acc in by SRP/PSA for his good work during the year 1988 vide OB No. 13 dt. 11-1-89 with cash reward Rs. 150/-	
12/91	Shah	SRP/PSA							
1/92	Shah	SRP/PSA							④ Granted acc in by SRP/PSA for his good performance of duty vide notice No. 200/E/PSA dt. 2-3-90. with cash reward

[Signature]
Superintendent
Police
Swat

ATTESTED

1 Name of post.	3 Whether substantive or officiating and whether permanent or temporary.	5 Officiating, state— (i) substantive appointment, or (ii) whether service counts for pension under Art. 371, C.S.R.	4 Pay in substantive post.	5 Additional pay for officiating.	6 Other emoluments falling under the term "Pay".	7 Date of appointment.	8 Signature of Govt. servant.
<p>Transferred to the office of SP/Swamy NWEP Peshawar vide O.G./19. NWEP Peshawar order Enclat. No. 14563-68/E-II dated 6.8.91.</p>	<p>S.V.C. 6.3.91 to 31-7-91 ✓</p>			<p>VSP/FRP, Swat 18/8/91</p>			
				<p>VSP/FRP, Swat 18/8/91 ✓</p>			
<p>Pay is hereby fixed in Revised-GRS No. 12 (1355-36-2735) @ Rs. 1453/- PM w.e.f. 1/6/1991, vide FD Notification No. FD (PRC) 1-1/89 dt. 11/2/1991.</p>				<p>Mr. Dy. S. D. J. D. J. Dist. Branch</p>			
				<p>Mr. Dy. S. D. J. D. J. Dist. Branch</p>			

Allowed 2 (Two) advance increments
having Passed EP is hereby revised
in Revised-GRS No. 12 (1355-36-2735)
@ Rs. 1643/- PM w.e.f. 1/1/1991, vide FD
Notification No. FD (PRC) 1-1/89 dt. 11/2/1991.

(Certificate attached)

1	Place of birth
2	Service with the Government (i) date of appointment (ii) nature of appointment (iii) date of termination
3	Pay in which he was employed
4	Advertisement for appointment
5	Other emoluments during the term of appointment
6	Date of appointment

Rs. 1739/- per month

Rs. 1835/- per month

Rs. 1547/- per month

CR - exercise of pay scale (1.6.91)
 Pay was fixed @ Rs. 1547/- per month
 1.6.91 after receiving one month
 in accordance with the order
 No. 89 (82A) 1-191.001.28.6.93.011 (Muz) &
 is second order @ Rs. 1821/-
 only as per Rs. 1547/-
 Rs. 1739/- per month

Rs. 1835/- per month
 Rs. 1835/- per month

Rs. 2027/- per month

Pay fixed provisionally in the
 Revised BPS 12 (1830-130-3780) @ Rs. 2740/- per month

Rs. 2870/- per month with effect from 1-12-1994
 after letter no. PO (Muz) 1-1994 dt. 30/8/94

1931

For Dy. Inspector of Police
 8011 Branch N. W. P. P. Government

8 Signature of Government	9 Name and position of the head of the office or other authority to which the servant is to be assigned.	10 Date of termination of appointment.	11 Reason of termination such as promotion, transfer, discharge, etc.	12 Signature of the head of the office or other authority.	13 Leave		14 Signature of the head of the office or other attending officer.	15 Reference to any recorded punishment or censure or reward or praise of the Government servant.
					Allocation of periods of leave so average pay up to four months for which leave-salary is payable to another Government.			
					Nature and duration of leave taken	Period Government to which available.		
<i>[Signature]</i>	For Director General of Police Branch N.W.F.P. Kashmir				PR 4002	31		
<i>[Signature]</i>	For Dy. Inspector General of Police Branch N.W.F.P. Kashmir				add of pay for annual increment	12/31/91	12/31/91	
<i>[Signature]</i>	Dy. Inspector General of Police Branch N.W.F.P. Kashmir				PR-2264	8/8		
<i>[Signature]</i>	Dy. Inspector General of Police Branch N.W.F.P. Kashmir				Draw and annex of pay	w of 1/6/91 to 5/1/93	B-22646/- w of	allow me anomalies record
<i>[Signature]</i>	Dy. Inspector General of Police Branch N.W.F.P. Kashmir				<i>[Signature]</i>			
<i>[Signature]</i>	Dy. Inspector General of Police Branch N.W.F.P. Kashmir							
<i>[Signature]</i>	Dy. Inspector General of Police Branch N.W.F.P. Kashmir							
<i>[Signature]</i>	Dy. Inspector General of Police Branch N.W.F.P. Kashmir							

1 Name of post	2 Whether sub-stantive or officiating and whether permanent or temporary.	3 Officiating, state— (i) substantive appointment, or (ii) whether service counts for pension and Art. 371, C.S.R.	4 Pay in substantive post.	5 Additional pay for officiating.	6 Other emol-ments falling under the term "Pay".	7 Date of appointment.
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Pias Steno Typist e Rs. 2870/- 3000/- PM wef 1-12-95.

[Signature]
Superintendent of Police
BAKRI

Di as Steno Typist Rs. 3000/- 3130/- PM wef 1-12-1996.

[Signature]
Superintendent of Police
BAKRI

Allowed Two advance increments as BA qualification and his pay is hereby re-fixed in revised BPS-12 (1800-130-3780) @ Rs 3390/- PM wef from 1-4-97 in light of Govt. NWFP Finance Dept. letter No FD(PRC) 1-1/89 dt. 24.8.94.

[Signature]
Superintendent of Police
BAKRI

Detail of his Pay of re-fixation as under.

	PAY DUE	PAY DRAWN	Difference
Pay on 31-12-1996	<u>3130/-</u>	3130/-	-
Allowed two advance increment	3260/-		
Being Passed BA qualification	<u>3390/-</u>	3130/-	Rs. 260/- PM
wef 1-4-1997	3260/-		less wef 1-4-97
			To 31-4-97.

[Signature]

8 Signature of Govt. servant.	9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8.	10 Date of termination of appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer.	15 Reference to any recorded punishment or censure or reward or praise of the Government servant.
					Nature and duration of leave taken.	Allocation of periods of leave on average pay up to four months for which leave-salary is debitable to another Government. Period. Government to which debitable.		
					<p><i>Qualified in short hand and type test, with this office memo. No 2033/88 dt. 31.5.94.</i></p> <p><i>[Signature]</i></p> <p><i>Mr. J. J. J.</i></p> <p><i>General of Police</i></p> <p><i>at Lakki Marwat</i></p>			
							<p><i>Granted acc class III by Mr. J. J. J. on 11/11/97 for his good performance of duty during his visit to village Ghazni whel. DB No 220 with Cash at 18/11/97 Rs. 500/- or.</i></p> <p><i>[Signature]</i></p> <p><i>Superintendent of Police</i></p> <p><i>Lakki Marwat</i></p>	
							<p><i>Two Adv. increments allowed on B.A. out of which one incrs adjusted in anomaly increment on 1-4-97.</i></p> <p><i>T. 490</i></p> <p><i>3/6/97. Drawn</i></p> <p><i>advt of pay & allowances from 1-4-97 to 30-4-97 according to No. 138/10 on file of Two Adv. increments on B.A.</i></p>	

ATTESTED
 1-97
 9/11
 [Signature]

[Signature]
 Superintendent of Police
 LAKKI MARWAT

1	2	3	4	5	6	7
Signature of the officer	Date of termination of appointment	Reason of termination such as promotion, transfer, dismissal, etc.	Signature of the officer or other authority	Name and position of the officer	Signature of the officer or other authority	Reference to any record or award or prize of the Government

ORDER

Granted a Commendation Certificate Class-III along with Cash Reward Rs. 500 in recognition of his good performance and valuable assistance with officer during formal and Informal Inspection of Police Stations and Police Posts of the district, preparation of fool proof security plan during Maharashtra and Cherkun as well during visits of VVIP/VIP side OB No. 380 dt. 25.3.98

[Signature]
S/Comm.

Granted a c.c. Class-III with Cash Reward of Rs. 1000/- for his commendable duties during the year 1999 vide OB No. 562 dt. 31.12.99.

[Signature]
S/Comm.

His basic pay Rs. 3700/- M.N.T. 1.12.2007

[Signature]
S/Comm.

Pay fixed in the revised pay scale 2007 vide Comm. A Depn. Lett. dt. 27.7.2007
CR. 56707- P.M. W.P. 1.12.2007

56707-
[Signature]

ATTESTED

[Signature]
S/Comm.

[Signature]
S/Comm.

1 Name of post	2 Whether substantive or officiating and whether permanent or temporary.	3 Officiating status— (i) substantive appointment, or (ii) whether service counts for pension under Art. 371, C.S.R.	4 Pay in substantive post.	5 Additional pay for officiating.	6 Other emoluments falling under the term "Pay".	7 Date of appointment.
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PI as Steno typist @ Rs. 5865/- P.M. w.e.f 01-12-2002

[Signature]
 Superintendent of Police
 LAKE

ORDER

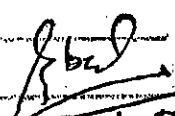
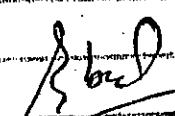
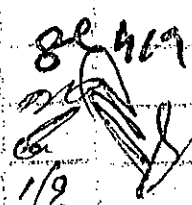

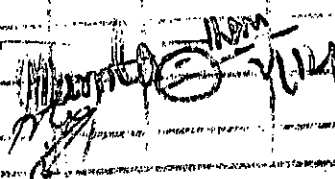
The Pay of Steno Typist Mohammad Anwar Shah is fixed departmentally vide Govt of Pina Deptt letter No. FO(Pe) 1-1/2003 dated 6-5-2003.

	Pay Due	Pay Drawn	Difference
Pay on 1-12-2002 in B/S No 12	3780/-	3780/-	-
Allowed move over from B/S No 12 to 13 vide Govt of Pina Deptt letter No. FO(Pe) 1-1/2003 dated 6-5-2003 w.e.f 1-12-2002	3822	-	-
Pay fixed in revised pay scale 2001 in B/S No 12 w.e.f 1-12-2002	5865/-	5670/-	Rs. 195/- less w.e.f 1-12-2002 To 30-11-2002
Pia as Steno Typist w.e.f 1-12-2002	6060/-	5865/-	Rs. 195/- less w.e.f 1-12-2002 To 30-6-2002
16 Steno - w.e.f 1-12-2002	6255/- P.M.		

[Signature]
 Superintendent of Police - Lake

AS Steno Typist 1-12-04 @ Rs. 6450/- P.M.

Superintendent of Police

Signature of Govt. servant.	Signature and designation of the head of the office or other creating officer in attestation of order.	Date of termination of appointment.	Reason of termination such as promotion, transfer, dismissal, etc.	Position of the holder or other appointing officer.	Date and place of issue of order.	Particulars of the order.	Signature of the head of the office or other appointing officer.	Reference to any recorded publication or circular or award or order of the Government servant.
						<p align="center"><u>ORDER</u></p> <p>closed to do as per at Type Branch of Estab. Section MM. Immediate effect vide G.O. MM. even no 16/11-13/E-IV dt 20-6-2002.</p> <p align="right">  P. K. Kamini </p>		
						<p>Approved the Participation 232 Computer Training in "Office Automation" for Private Section vide G.O. MM. Section order No 16925-27/E-IV dt 4.7.2002.</p>		
						<p>Pay 112 dt 6/8/03. Drawn order of pay follow due to promotion from B-12 to B-13. w.e.f. 1-12-2001 to 31-7-2003. net ₹. 3900/-</p> <p align="right">  P. K. Kamini </p>		
						<p>Pay 20 dt 2/11/03. Drawn order of pay w.e.f. 8/2002 net ₹. 1900/-</p> <p align="right">  P. K. Kamini </p>		
						<p>Pay 148 dt 1/11/04. Drawn order of pay w.e.f. 1/2/04 w.e.f. 16 (0) net ₹. 4200/- Less: Adm ₹. 500/- net ₹. 3700/-</p> <p align="right">  P. K. Kamini </p>		
						<p align="center">ATTACHED</p> <p align="right">  P. K. Kamini </p>		

Name of Person	Whether under contract or otherwise	Whether in the employ of the Government or other person	Pay in alternative form	Additional pay for existing	Other emoluments falling under the term "Pay".	Date appointed	Signature
<p style="text-align: center;">(2) PA Office of the Accountant General N.W.F.P. Pay fixed at Rs. 1355-96-27850 of Rs. 1643/- at Rs. 1355-96-27850 with Rs. 1643/- 1904 B-12 Pay: Union Party N.W.F.P. 1904 B-12 Accounts Officer N.W.F.P. 1904 B-12</p>							
<p style="text-align: center;">Office of the Accountant General N.W.F.P. Pay fixed at Rs. 1830-130-3780 of Rs. 2610/- at Rs. 1830-130-3780 with Rs. 2610/- 1904 B-12 Pay: Union Party N.W.F.P. 1904 B-12 Accounts Officer N.W.F.P. 1904 B-12</p>							
<p style="text-align: center;">(2) PA Office of the Accountant General N.W.F.P. Pay fixed at Rs. 2245-195-8595 of Rs. 5865/- at Rs. 2245-195-8595 with Rs. 5865/- 1904 B-12 Pay: Union Party N.W.F.P. 1904 B-12 Accounts Officer N.W.F.P. 1904 B-12</p>							

Handwritten notes in the left margin, including "1904 B-12" and other illegible scribbles.



20

D

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

No. S/ 653 /21, Dated Peshawar the 25/02/2021.

Confidential/In-duplicate

To:- The Regional Police Officer,
Bannu Region, Bannu.

Subject: - ACR/COMMUNICATION OF ADVERSE REMARKS

Memo:

In the Annual Confidential Report on the working of
Stenographer Muhammad Anwar Shah for the period/year 01.01.2018 to 22.06.2018
it has been mentioned that:-

Remarks of the Reporting Officer (RPO).

Part-II

A)

PERSONAL TRAITS

9. Amenability of discipline

"D"

PART-IV

D. Not fit for promotion

"Yes"

(12) Trust worthiness in confidential and secret matters

"No"

2nd countersigning Officer (Addl: IGP/HQrs:)

"To be communicated to the official as per procedure"

The above adverse remarks may please be conveyed to the official
concerned in order that he may remedy the defects. Representation if made should be sent
not later than one month from the date of receipt of this communication.

The acknowledgement as token of the receipt of this memo: may
be obtained from him on the attached duplicate copy of this communication and returned
to this office for record in his Character Roll Dossier.

(IRFANULLAH KHAN)PSP
AIG/Establishment
For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

ATTESTED

[Signature]
AIG

23/02/2021

CC

[Handwritten notes and signatures]

19

(12) Trust worthiness in confidential and secret matters.

YES

NO

Note: - The rating should be recorded by initializing the appropriate column of box.
'A' Very Good; 'B' Good; 'C' Average; 'D' Below Average; 'E' Poor.

PART-III

GENERAL ASSESSMENT OF ANY PARTICULAR QUALITIES
(Appraise in the present grade by initialing the appropriate column below)

Very Good	Good	Average	Below Average	Poor	Special aptitude, if any.
		D			

PART-IV

SUITABILITY FOR PROMOTION
(Initial the appropriate box below)

(A) Recommended for accelerated promotion.

(B) Fit for promotion.

(C) Recently promoted/appointed/consideration for promotion per-mature.

(D) Not yet fit for promotion.

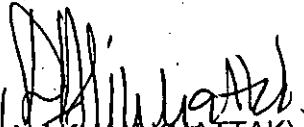
(E) Unfit for further promotion.

(F) Fitness for retention after 25 years service.

PEN-PICTURE

(Totally Average Stuff),

Dated 11-06-2019
Official Stamp


(DARIAL KHAN KHATTAK) PSP
Regional Police Officer,
Bannu Region, Bannu.
Signature, Name and Designation of
Reporting Officer.

ATTESTED


GOVERNMENT OF KHYBER PAKHTUNKHWA

PERFORMANCE EVALUATION REPORT FORM FOR P.Ss., P.As., STENOGRAPHERS/STENO TYPISTS.

NAME OF DEPARTMENT/OFFICE POLICE DEPTT:

ANNUAL SPECIAL

REPORT FOR THE PERIOD 01.01.2018 To 22.06.2018

PART-I

Name: Mohammad Anwar Shah Father's Name: Dost Mohammad

Date of Birth: 01.01.1988 Qualification: B.A

Designation: Stenographer Grade: 16 Pay Rs: 49310/- P.M

Date of entry into Government Service 16.05.1988 Date of appointment to the present Grade 03.03.1991.

Training courses, if any: NIL

PART-II

(A)	A1	A*	B	C	D	Remarks
(1) Standard of Stenography/Typing: (a) Speed. (b) Accuracy.			B			
(2) Maintenance of Officers engagement, diary and conducting of visitation.			B			
(3) Movement of files and record of suspense cases.			B			
(4) Dress and cleanliness.			B			
(5) Regularity and punctuality in attendance.			B			
PERSONAL TRAITS						
(6) Intelligence.			B			
(7) Perseverance and devotion to duty.			B			
(8) Cooperation and team spirit.			B			
(9) Amenability to discipline.			B			
(10) Any disciplinary action taken during the period of report.						

(11) Integrity: -

- (i) Intentionally corrupt.....
- (ii) Reported to be corrupt.....
- (iii) Believed to be corrupt, because of:
 - (a) Personal considerations.....
 - (b) Other considerations.....

Assessment

ATTESTED
[Signature]

8 Signature of Govt. servant.	9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8.	10 Date of termination of appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.	12 Signature of the head of the office or other attesting officer.	13 Leave		14 Signature of the head of the office or other attesting officer.	15 Reference to any recorded punishment or censure or reward or praise of the Government servant.
					Nature and duration of leave taken.	Allocation of periods of leave on average pay up to four months for which leave-salary is debitable to another Government.		
						Period. Government to which debitable.		
Pay as stand in BPs-16C No. 49310/PM							W-e Form 01-12-2017	
Pay as stand in BPs-16C No. 50839/PM							W-e Form 01-12-2018	
<u>Service Verification Certificate</u>								
This Service Form 12-04-2016 TO 04-11-2019 as stand in BPs-16 has been verified from the pay bills and Arq. Roll kept in this office record.								
<u>Transfer order</u>								
Transfer from RPO Office Ramnagar to PAIN Addn. LGP Elite Force 1st Division vide order Encl. No. 6037-49/12-V dt. 30/10/2019.								
ATTESTED								

[Handwritten Signature]

[Handwritten Signature]

[Handwritten Signature]

[Handwritten Signature]

[Handwritten Signature]

1 Name of post.	2 Whether substantive or officiating and whether permanent or temporary.	3 Officiating, state— (i) substantive appointment, or (ii) whether service credit is payable under Art. 27, C.S.S.	4 Pay in substantive post.	5 Additional pay for officiating.	6 Other emoluments falling under the term "Pay".	7 Date of appointment.
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Re-fixation of pay under the Revised Pay Scale 2016.

Consequent on the Revision of Basic Pay Scales of all Govt. Employees effective from 01-7-2016 notified vide Govt. of J&K Finance Dept. (Regulation wing) Postman Notification No. FOPRC/1-1/2016 dttd 19-7-2016 Revised BPS-16 (15880-1280-54280) @ Rs. 38720/- Pm with effect from 01-07-2016.

Recd. [Signature]

Pay as Steno in BPS-16 @ Rs. 40200/- Pm w.e. from 01-12-2016.

Recd. [Signature]

Re-fixation of pay under the Revised Pay Scale 2017.

Consequent on the Revision of Basic Pay Scales of all Govt. Employees effective from 01-7-2017 notified vide Govt. of J&K Finance Dept. (Regulation wing) Postman Notification No. FOPSO(SR-I)/1-1/2017 dttd 17-7-2017 Revised BPS-16 ic (18910-1520-64510) @ Rs. 47730/- Pm w.e. from 01-07-2017.

Recd. [Signature]

Signature of Govt. servant.	Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8.	Date of termination of appointment.	Reason of termination such as promotion, transfer, dismissal, etc.	Signature of the holder or other attesting officer.	Name and designation of the holder.	Period.	Department to which attached.	Reference to any award, punishment or censure or reward or praise of the Government servant.
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OPTION

I hereby opt that my pay may please be fixed in BPS-16 after allowing me annual increment in lower pay scale i.e. BPS-14 on 1.12.2015.

[Signature]
/RPO/DIK

Transfer to Regional Police office Bannu vide PPO/KPK Peshawar Notification No. 2241-47/E-V dt 11.4.2016 (copy pasted).

[Signature]
A.P.M. No. Appears RPO/DIK
2015 Prior to 30.5.2014

Office Of The Accountant General
Khyber Pakhtunkhwa Peshawar
Pay Fixed in the R.B.P.S 2015
R.B.P.S/0340-720-350320
At Rs. 29300 M.V. 1.07.2015
With Next increment On 1.12.2015

13

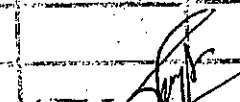
[Signature]
Accounts Officer
Pay Fixation Khyber Pakhtunkhwa Peshawar

tu

[Handwritten notes]
overpaid 9/07 to 6/8/2600
2600 x 10
7/8 to 6/14 111600
36 x 310 116500
7/11 to 3/14
332 500 130260

Office of the Accountant General
Khyber Pakhtunkhwa Peshawar
Pay Fixed in the Revised Basic Pay Scales
Rs. 9094 w.e.f. 01-07-2007
4355310 13655 B 12
Rs. 11127 w.e.f. 01-07-2008
2000 500 22000 B 12
Rs. 12500 w.e.f. 01-07-2011
Date of Next Increment is 01-12-2011
[Signature]
Accounts Officer
Khyber Pakhtunkhwa Peshawar

ATTESTED
[Signature]
ADD

Name of person	Whether he is a candidate for promotion or other purposes as mentioned in the rules.	Grade of the post to which he is appointed.	Date of appointment.	Additional pay for schooling.	Other emoluments falling under the term "Pay".	Date of appointment.
Pi as Steno Typist	BPS No. 14	Rs: 21420/- PM	1-12-2012	✓ Distt: Police Officer Lakki Marwat		
Pi as	BPS No. 14	Rs: 22030/- PM	1-12-2013	✓ Distt: Police Officer Lakki Marwat		
Pi as	BPS No. 14	Rs: 22840/- PM	1-12-2014	✓ Distt: Police Officer Lakki Marwat		
Pay scale revised 2015 and pay fixed in BPS-14 @ Rs. 29300/- PM	15	300718	16	✓ District Police Officer Lakki Marwat		
Promoted as Stenographer in BPS-16 vide PPO/KPK Resman order No 5427-40/E-V dated 11-08-2015 and pay Departmentally fixed @ Rs. 30505/- PM						
<div style="display: flex; justify-content: space-between;"> Secret <div data-bbox="718 2063 1085 2242">  Dy. Inspector General of Police D.I. Khan Range D.I. Khan </div> </div>						
Pi as Steno in BPS-14 @ Rs: 30090/- PM		1-12-15		✓	RPO Lakki	
Pay fixed in BPS-16 @ Rs: 31540/- PM		2-12-15		✓	RPO Lakki	

Site Copy

8 Signature of Govt. servant.	9 Signature and designation of the head of the office or other attesting officer in attestation of columns 1 to 8.	10 Date of termination of appointment.	11 Reason of termination such as promotion, transfer, dismissal, etc.	12 Signature of the head of the office or other attesting officer.	13 Nature and duration of leave taken.	14 Remarks of leave taken, such as pay up to 100% or 50% of basic pay, etc.	15 Signature of the head of the office or other attesting officer in attestation of column 14.	16 Reference to any special provision contained in the rules of the Government servant.
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Pi as BPS NO 12 Steno Rs: 12105/- PM WEF 1-12-2009

VA
Distt: Police Officer
Lakki Marwat

Pi as BPS NO 12 Steno Rs: 12415/- PM WEF 1-12-2010

VA
Distt: Police Officer
Lakki Marwat

Revised in Basic Pay Steno 19500
Scale in BPS NO 12 Rs: (26000/-) PM WEF 1-7-2011

VA
Distt: Police Officer
Lakki Marwat

Pi as BPS NO 12 Steno Rs: (20500/-) PM WEF 1-12-2011

VA
Distt: Police Officer
Lakki Marwat

Notification No FD/SD(FR) 10-22/2012

The competent Authority has been Pleased To accord sanction to the enhancement of pay scales of the following posts, wherever exists, in all the Department / Office (except Secretariat DCPH) of the Govt of S.P.K with effect from 23-12-2011.

upgraded BPS NO 12 to BPS NO 14 and his pay be fixed at Rs. 20810/- PM WEF 23-12-2011

copy of notification of Deptt Hlday 23¹² 11 is enclosed.
Distt: Police Officer
Lakki Marwat

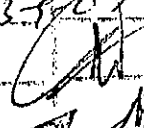
VA
Distt: Police Officer
Lakki Marwat

Name of post	Whether substantive or officiating and whether permanent or temporary.	Officiating, state (i) substantive appointment, or (ii) whether service counts for pension under Art. 371, C.S.P.	Pay in substantive post.	Additional pay for officiating.	Other emoluments falling under the term "Pay".	Date of appointment.
Pay as Steno Typist	BPs No 12		Rs 7430/- PM	W.E.F 1-7-2005	Distt: Police Officer Lakki Marwal	
Pi as	BPs No 12		Rs: 7655/- PM	W.E.F 1-12-2005	Distt: Police Officer Lakki Marwal	
<p>2005 OFFICE OF THE ACCOUNTANT GENERAL KHYBER PAKHTUNKHWA DESHAWAR PAY FIXED IN THE R.R.P 3 2005 3155225-9905 12 1-07-2005 1-12-2005 7430/- W.E.F</p>	BPs No 12		Rs: 7880/- PM	W.E.F 1-12-2006	Distt: Police Officer Lakki Marwal	
<p>Revised in BPs 12 (2007) one Special Advance increment To Assst. Steno. S. Clerk Etc</p>			Rs: 9090/- PM	W.E.F 1-7-2007	Distt: Police Officer Lakki Marwal	
Pi as Steno Typist	BPs 12		Rs: 9350/-	W.E.F 1-9-2007	Distt: Police Officer Lakki Marwal	
<p>9350/- 9090/- 11175/- 19357/-</p>	BPs 12		Rs: 9680/-	W.E.F 1-12-2007	Distt: Police Officer Lakki Marwal	
<p>11175/- 19357/-</p>	BPs 12		Rs: 11185/-	W.E.F 1-7-2008	Distt: Police Officer Lakki Marwal	
Pi as Steno Typist	BPs 12		Rs: 11795/-	W.E.F 1-12-2008	Distt: Police Officer Lakki Marwal	
<p>161 357 161 25532/10/10/07 gone increment with 12 & 30 07 2008</p>					Distt: Police Officer Lakki Marwal	


31/17
1.A.

(A) (14)

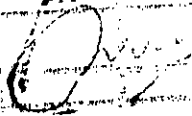
Signature of Govt. receipt.	Particulars and destination of the fund of the office or other attending officer in attendance of order.	Date of termination of appointment.	Division of termination such as promotion, transfer, retirement, etc.	Signature of the head of the office or other attending officer.	Centre and division of issue.	Particulars of the amount of the fund to be credited to the account of the Government to which allocated.	Signature of the head of the office or other attending officer.	Reference to any recorded appointment or pension or reward or prize of the Government servant.
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Dr. 210 dt. 15/07
 Dr. 100 dt. 15/07
 Less Rec. 25000 - 00
 Balance 15000 - 00
 vide G.O. No. 346 dt. 15/9/07
 S.No. 26411 dt. 13/9/07

 A.B. M.A.D.
 10/9/07

Drawn Rs. 160000/-
 as 16000 P.O. No.
 7310 dt. 10/10
 T-235 dt. 10/10

15/10

 22/10

ATTESTED


 A.B. M.A.D.

بخدمت جناب انسپکٹر جنرل آف پولیس صوبہ خیبر پختونخواہ۔

عنوان:- درخواست برائے Expunge کرنے ریمارکس۔

جناب عالی!

التجا کی جاتی ہے کہ مجھے ACRs (مورخہ 22.06.2018 - 01.01.2018) میں ایڈورس ریمارکس Convey کئے گئے ہیں جن کو دیکھ کر میں انتہائی حیران و پریشان ہوا۔ کہ نہ تو میرے خلاف کوئی Explanation وغیرہ تھی اور نہ ہی دوران ڈیوٹی کوئی ایسا جرم سرزد ہوا ہے جس کی بنیاد پر ایڈورس ریمارکس دیئے گئے ہیں۔ کیونکہ اگر دیکھا جائے تو سارے صوبے میں ایسے انتقامی ACRs اتنے بڑے پیمانے پر جملہ ماتحتان کو دیئے گئے ہیں جو کہ ظلم پر مبنی ہے۔ کیونکہ سالانہ ACRs کی بنیاد پر ہی ہم سرکاری اہلکاروں کی ترقی کا دار و مدار ہوتا ہے اور یہ جاننا میرا حق ہے کہ میرے خلاف ACRs (مورخہ 22.06.2018 - 01.01.2018) میں ایڈورس ریمارکس کس بنیاد پر دیئے گئے ہیں کیونکہ میرے خلاف کوئی بھی محکمانہ کارروائی وغیرہ نہیں تھی۔ اور نہ ہی مجھے کوئی نوٹس وغیرہ جاری ہوا تھا۔ اس سلسلے میں، میں پورے وثوق سے کہتا ہوں کہ مجھے ساری سروس میں کوئی بھی خراب ACRs نہیں دیئے گئے ہیں اور تقریباً ACR-1 حاصل کر چکا ہوں۔ میرا اس سلسلے میں سابقہ اور موجودہ ریکارڈ آپ جناب کے دفتر یعنی CPO میں موجود ہے۔ جس سے میری کارکردگی جانچی اور پرکھی جاسکتی ہے۔ چند موجودہ ACRs ہمراہ لف ہیں۔

لہذا استدعا ہے کہ آپ کے حضور پیش ہو کر اپنی آرزوداشت پیش کرنے کا موقع فراہم کیا جائے اور میری کارکردگی کو دیکھتے ہوئے ACRs (مورخہ 22.06.2018 - 01.01.2018) میں جو ریمارکس دیئے گئے ہیں ان کو Expunge کیا جاوے۔

عین نوازش ہوگی۔

مورخہ: 08.03.2021

ATTESTED
Qureshi
ASST

سائل
محمد انور شاہ (سینیوگرافر) PA ٹورنیکل پولیس آفیسر بنوں۔

22

10



OFFICE OF THE
REGIONAL POLICE OFFICER,
BANNU REGION, BANNU

Email: rprobannu2@gmail.com

Ph: 0928-9270076
Fax: 0928-9270075

To: The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

Attention: The Additional Inspector General of Police,
Headquarters, Khyber Pakhtunkhwa, Peshawar.

No. 563 /PA Dated Bannu, the 10 /03 /2021.

Subject: REPRESENTATION.

Memo:

Kindly refer to CPO, Peshawar letter No.653/21, dated 25.02.2021, on the subject cited above.

It is submitted that a representation along with its enclosures preferred by Stenographer Muhammad Anwar Shah requesting therein for expunging the adverse remarks from his ACR for the period from 01.01.2018 to 22.06.2018 recorded by the then RPO-Bannu Mr. Dar Ali Khan Khattak is enclosed herewith for kind perusal and sympathetic consideration, please.

Encl: As above.

Awal Khan

(AWAL KHAN) PSP
Regional Police Officer,
Bannu Region, Bannu.

ATTESTED

Orin



(23)

F

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

No. S/ 2019 /21, dated Peshawar the 21/05 2021

ORDER

This order pertains to the representation preferred by Stenographer Mr. Muhammad Anwar Shah s/o Dost Muhammad of Bannu Region for the expunction of Adverse Remarks contained in his ACR for the period from 01.01.2018 to 22.06.2018 received by the reporting officer. Comments were also obtained.

After going through the relevant record, comments and material on ground the Adverse Remarks recorded in his ACR for the period from 01.01.2018 to 22.06.2018 is hereby filed/rejected and remarks maintained.

-Sd-

(KASHIF ALAM)PSP

Addl: IGP/HQrs:

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

Endst: No. & date even

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

1. Regional Police Officer, Bannu Region w/r to his memo No. 563/PA, dated 10.03.2021. Necessary entry into this effect may also be made in his Duplicate Character Roll Dossier. The applicant may also please be informed accordingly.
2. Office Superintendent "E-V" Branch CPO.

(IRFANULLAH KHAN)PSP

AIG/Establishment,

For Inspector General of Police,
Khyber Pakhtunkhwa, Peshawar

ATTACHED

(24)

9

To: The Worthy Regional Police Officer,
Bannu Region, Bannu.

Subject: REQUEST FOR EARNED LEAVE.

Respected Sir,

With due respect, it is submitted that my son is suffering from headache. We consulted Dr. Anwar Shah Neuro-Surgeon time and again (recipies attached) but not yet healed. Now, I intend to get his specialize treatment followed by house repair.

It is, therefore, very humbly requested to kindly grant me 30 days earned leave and oblige.

Yours obediently,

Muhammad Anwar Shah
(Muhammad Anwar Shah)
P.A to W/RPO Bannu.

Ec
Dues
13/12/18

ATTESTED
[Signature]

Dr. Atta Ur Rehman
Medical Chest Specialist



ڈاکٹر عطاء الرحمان

میڈیکل چیفٹ سپیشلسٹ
ایم بی بی ایس، ڈی ٹی سی ڈی (پنجاب)
ایم۔ ڈی۔ ایم۔ اے سی بی ایس (امریکہ)
سابقہ رجسٹرار چیسٹ وارڈ میو ہسپتال، (لاہور)
چیفٹ سپیشلسٹ مردانہ ہسپتال، بنوں

MBBS, DTCD (Panjab)
M.DM, ACPS (Amrika)
Ex-Registrar Chest Word Mivo Hospital (Lahore)
Chest Specialist DHQ Hospital Bannu
Registrar KGN Hospital Bannu

رجسٹرار خلیفہ گھوڑا ہسپتال بنوں

Patient Name

Age

Sex

Date

[Handwritten signature]

[Handwritten initials]

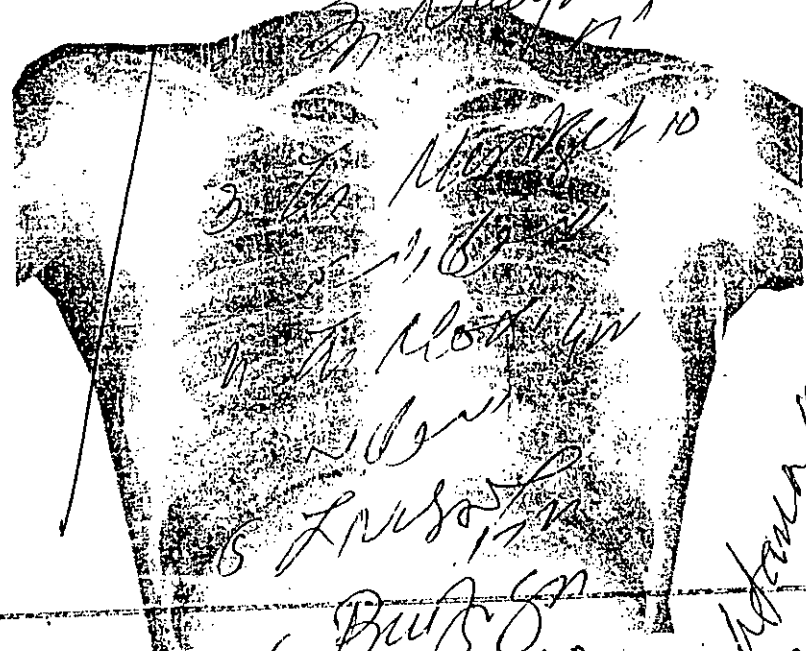
[Handwritten date]

Clinical Record

Rx *[Handwritten]*

[Handwritten notes in Clinical Record section]

[Handwritten notes: 1. Spm Ades 222]



[Handwritten notes on X-ray: 2. No consolidation, 3. No pleural effusion, 4. No pneumothorax, 5. Normal heart size, 6. Normal mediastinum]

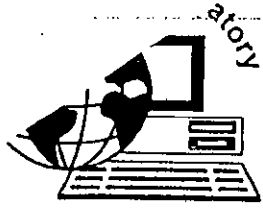
[Handwritten signature]

[Handwritten notes: 01/11/2022, Ch B, M, N]

[Handwritten notes: CDR, MD/Med, BMD]

0331-7223504

[Faint stamp]



NAWAZ

نواز میڈیکل لیبارٹری

Opp: D.H.Q Hospital Gate No 1 Bannu.
Ph:0928-610033 / 0332-9726296

COMPUTERIZED
NOT VALID FOR COURT

P'Name. Muzamel

Ref.By Dr: Atta ur Rehman Sb

Date: 15 October 2017

Test Required.FBC/MP/Widal SPECIMEN:BLOOD

Age/Sex: M

BLOOD COMPLETE

HB%	11.9 Gms/dl	(14----16)
T.L.C.	9800 /Cmm.	(4000---10000)
D.L.C.	N ; 68 %	(40---75)
	L ; 30 %	(20---45)
	M ; 02 %	(02----07)
	E ; 00 %	(00---01)

BLOOD FOR WIDAL TEST;

TO, 1/80

TH, 1/40

Not diagnostic of enteric fever at present.

MP ; No MP seen in the smear examined.

Sign.

Lab. Tech.

بالمقابل گیٹ نمبر 1 ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بنوں



Dr. Muhammad Bashir

MBBS, D.C.P., M.C.P.S., F.C.P.S.

Asstt: Prof:
 Head Physiology Deptt.
 Ex-Vice Principal Bannu Medical College
 Visiting Medical Specialist
 D.H.Q. Hospital Bannu



ڈاکٹر محمد بشیر میڈیکل سپیشلسٹ

ایم۔ بی۔ بی۔ ایس۔ ڈی۔ سی۔ پی
 ایم۔ سی۔ پی۔ ایس۔ ایف۔ سی۔ پی۔ ایس
 سابقہ اسٹنٹ پرفیسر، میڈیالوجی ڈیپارٹمنٹ
 وائس پرنسپل، بھٹی میڈیکل کالج
 ڈسٹنگ فزیشن ڈسٹرکٹ ہیڈ کوارٹر ہسپتال بھٹی

P.Name Muzamil Age 17 Sex M Date 16/1/2

Clinical Record

[Handwritten notes in the Clinical Record section, including 'Muzamil' and other illegible scribbles.]

Rx

[Handwritten prescriptions in Urdu, including:]
 ZMC Gramin 10
 - 1 - 1
 SPT - MNC 11 21 21
 ZMC Rindil 10
 25 - 1 - 1
 SPT - 11 21 21
 SPT - 11 21 21
 ZMC 11 21 21

Maqbool Khan

ATTESTED
[Signature]



Neurosurgeon
 Dr. Anwar Shah Orakzai
 M.B.B.S. (Pesh)
 M.S (Neurosurgery)
 (PIMS, Islamabad)

ڈاکٹر انور شاہ اورکزئی
 ایم بی بی ایس (پشاور)
 ایم ایس (نورسرجری) (کیو ایس ایم ایس)
 ایس ایس سی ایس (اسرائیل)
 اسٹینٹ پروفیسر
 نورسرجری ایجوکیشن
 جونیئر لیگل کالج / علی گڑھ ہسپتال

Assistant Professor
 Neurosurgery Deptt:
 Bannu Medical College
 Khalifa Gul Nawaz Hospital Bannu.

Rx

Patient's Name Muzammit
 Age 17y Sex M Date 19/08/17

Wt loss
 W/A -
 4 days

Tab. Isoniazid - 0.5g
 15
 Tab. Rifampin 500mg - 30
 15
 Tab. Ethambutol 1500mg
 15
 Tab. Pyrazinamide -
 1500mg - 15

A

(27)

Khalifa Gul Nawaz Teaching Hospital

Operator: BASIR1

CT-Scan Slip (Patient Copy)

Patient's No: 202

Source: Main OPD

Test Date: 23-OCT-17

Time: 10:15:33

Patient Name: MUZAMIL SHAH

Age: 16 Years

Gender: Male

Ref By: NEURO SURGERY

Authority:

Request(s): CT Brain (ENTITLED), 0

Discount :

0 / (0)

Paid

Amount :

ڈاکٹر انور شاہ امجدی

اسٹنٹ پروفیسر
نوروزی اسپتال

اعظم کلینکل ایسوسی ایٹس

انجیل ایسوسی ایٹس (پرائیویٹ) لمیٹڈ
ایم ایس (نوروزی) (پرائیویٹ) لمیٹڈ
ایس ایس ایس ایس (پرائیویٹ) لمیٹڈ
ایم ایس ایس ایس ایس (پرائیویٹ) لمیٹڈ

دماغ اور اعصاب، سروروزی، کمر درد، بڑی بونی، عصبی
درد، تھک، برق النساء، بچوں کے سر کا پھارنا، کمر درد، سروروزی

پتھان، سیم ایئر، کیمیکل، ٹاکون، شپ، عیال

RECEIVED

23 OCT 2017

10:15:33

202

DEPARTMENT OF RADIOLOGY
KHALIFA GUL NAWAZ TEACHING HOSPITAL, BANNU

Ph 0928 633633 Fax 0928-633633

Email- khalifagulhospital@yahoo.com

Name:

Date:

MuZamil
Shah
C.T. Brain
Sinusitis

Brain

Normal

9

Dr. Mian Akhtar Ali Kaka Khel
Head Department Of Radiology

23-10-2010

28

KHALIFA GUL NAWAZ TEACHING HOSPITAL

BANNU

OUT-PATIENT DEPARTMENT

R
Y
G

Name _____ Age _____ Sex _____

Address _____

Hospital Yearly No. _____ Dated _____

PC Status. <i>Referred</i>	R/- <i>Referred</i>
Pt. Hist.	<i>Handwritten patient history notes</i>
Clinical Examination	<i>Handwritten clinical examination notes</i>
Provisional Diagnosis	<i>Handwritten provisional diagnosis</i>
Investigations Required	<i>Handwritten investigations required</i>

GS&PD.KP.1152/22-KGNTH-1,600 Peds-10.07.17/KGNTH/Emergency OPD Chit

ATTESTED

Handwritten signature
ATTESTED

5112
15/2

Ta M. P. Long W

~~R. W. S.~~

~~of. Hall~~

~~Al. W. J. S.~~

T
A
H
Pt



(29)

Rx

Tab - Malarest

10101

supp - Bupren

202

supp -

Lysomit ✓

202

ATTESTED

[Signature]



30

H

OFFICE OF THE
INSPECTOR GENERAL OF POLICE
KHYBER PAKHTUNKHWA
CENTRAL POLICE OFFICE
PESHAWAR
Ph: 091-9210545 Fax: 091-9210927
Email: OSEstabV@gmail.com

No. 2952 /E-V dated Peshawar the, 25 /2017

To: - The Regional Police Officer,
Bannu Region, Bannu.

Subject: - TRANSFER OF STENOGRAPHER.

Memo:-

The Commandant PTC, Hangu has requested that the services of Mr. Anwar Shah Stenographer (BPS-16) of your Establishment are required to his office, upon the perusal of which the Competent Authority has directed to ask Concurrence from your office in this regard.

(PERVEZ ELAHI)
Registrar
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

Endst: No. & date even.

Copy of above is forwarded to Commandant PTC, Hangu w/r to his letter No. 670/EC, dated 17-05-2017 to intimate the availability of vacancy of Stenographer (BPS-16),

EC
No

[Handwritten signature]

(PERVEZ ELAHI)
Registrar
For Inspector General of Police,
Khyber Pakhtunkhwa,
Peshawar

ATTESTED
[Handwritten signature]

~~31~~

31

I

From: The Regional Police Officer,
Bannu Region, Bannu

To: The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar


No: 1719 /EC, dated Bannu, the 31 /05/2017

Subject: TRANSFER OF STENOGRAPHER

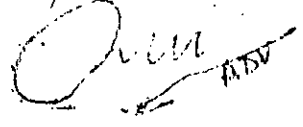
Memo:

25.05.2017. Kindly refer to CPO Peshawar Memo: No.2952/E-V,

It is submitted that the service of Mr. Anwar Shah Stenographer the undersigned cannot be spared for transfer to Police Training College, Hangu, please


(DAR ALI KHAN KHATTAK) PSP
Regional Police Officer,
Bannu Region, Bannu
31/5/17

ATTESTED


MSV

32

وکالت نامہ

بعدالت فیبریکٹو الخوفہ سروس ٹریڈنگ پشاور

قیمتی ایک روپیہ

کورٹ فیس

2021ء منجانب ایپلینٹ
بنام حکومت KPK

جون 13

نہ انور شاہ

سروس ایبل
پاؤنڈیشن تحریر آئٹم

مورخہ
مقدمہ
دعوی
جرم

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی وکل کاروائی متعلقہ آن
مقام پشاور کے لئے محمد طارق قریشی ایڈووکیٹ
مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز
وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جواب دہی اور اقبال دعویٰ اور بصورت
ڈگری کرانے اجراء اور وصولی چک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زر
اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی اور منسوخ
دانہ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختیار قانونی گوہراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب
مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہونگے۔ اور اس کا ساختہ پر ساختہ منظور قبول
ہوگا اور دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق وکیل صاحب
موصوف ہونگے۔ نیز بقایا و خرچہ کی وصولی کر نیز کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہو
یا جگہ سے باہر ہو تو وکیل صاحب پابند ہونگے کے پیروی مقدمہ مذکور کریں لہذا وکالت
لکھ دیا تاکہ سند رہے

نہ انور شاہ (ایپلینٹ)

Accepted

2021ء

ماہ جون

13

المرقوم

[Signature]

العبد

گواہ نشد

العبد

[Signature]

کے لئے منظور ہے

پشاور

بمقام



محمد طارق قریشی ایڈووکیٹ

سپریم کورٹ آف پاکستان

موبائل: 0300-5768804

یا سر مروت پرنسنگ پریس پشاور موبائل: 0333-9123075

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL

PESHAWAR

Appeal No.6609 /2021

Muhammad Anwar ShahAppellant

Versus

The Inspector General of Police, KPK, Peshawar and others

..... Respondents

INDEX

S/No	Description of Documents	Annexure	Page
1	Comments/Reply		1-2
2	Authority Letter		3
3	Affidavit		4


DEPONENT

11101-1483421-1

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No.6609 /2021

Muhammad Anwar ShahAppellant

Versus

The Inspector General of Police, KPK, Peshawar and others

..... Respondents

PARA WISE COMMENTS/REPLY ON BEHALF OF RESPONDENTS NO.2,3 & 4

Preliminary Objections

1. That the appeal of the appellant is badly barred by law and limitation.
2. That the appeal is not maintainable in its present form.
3. That the appellant has concealed the actual facts from this Honorable Tribunal.
4. That the appeal is bad in law due to non-joinder and mis-joinder of unnecessary parties.
5. That the appellant has approached the Honorable Tribunal with unclean hands.
6. That the appellant has got no cause of action and locus-standi to file the instant appeal.
7. That the appellant has been estopped by his own conduct to file the instant appeal.

OBJECTIONS ON FACTS:

Respectfully Sheweth

1. Pertains to record. Hence, Needs no comments.
2. Pertains to record. Hence, Needs no comments.
3. Incorrect. After perusing the relevant record, the adverse remarks recorded in ACR of the appellant for the period with effect from 01.01.2018 to 22.06.2018. However, Respondent No.4 is competent to record remarks.
4. Incorrect. There is no personal grudge on the part of the Reporting Officer. After perusing the relevant record, the adverse remarks were recorded in his (appellant) ACR.
5. Pertains to record. Hence, needs no comments.
6. Correct to the extent that the appellant preferred an appeal before the Respondent No.2 (PPO KP). After perusing the relevant record, comments and material on grounds, the adverse remarks recorded in ACR of the appellant for the period with effect from 01.01.2018 to 22.06.2018, the appeal was rejected being devoid of merit

7. Incorrect. Remarks in the ACRs of all the officials of RPO Office Bannu including the appellant were based upon evaluating the working/efficiency of the subordinate officials.
8. This para for appellant to prove.
9. Pertains to record. Hence, needs no comments.
10. The respondent Department also submit his reply on the following grounds.
11. Pertains to record. Hence, needs no comments.

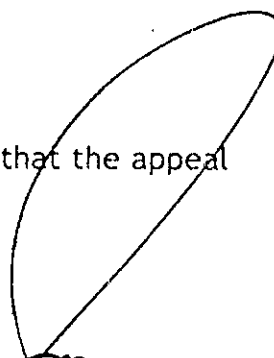
The respondent Department also submit his reply on the following grounds:-

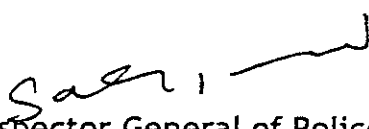
OBJECTIONS ON GROUNDS


- A. Incorrect. The appellant has been treated in accordance with law/rules and there is no malafide on the part of the Respondent Department.
- B. Incorrect. The act of the Respondent Department is quite legal in accordance with policy/rules.
- C. Incorrect. The appellant has been treated in accordance with law/rules and there is no malafide on the part of the Respondent Department.
- D. Reply has already been given in the above para.
- E. That the respondent department may be allowed to advance any other grounds & material as evidence at the time of arguments.

PRAYER:

In view of the above replies, it is most humbly prayed that the appeal of the appellant may kindly be dismissed with cost please.


Regional Police Officer
Bannu Region, Bannu
(Respondent No.4)


Addl: Inspector General of Police,
HQrs, Khyber Pakhtunkhwa
Peshawar
(Respondent No.3)


Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar
(Respondent No.2)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No.6609 /2021

Muhammad Anwar ShahAppellant

Versus

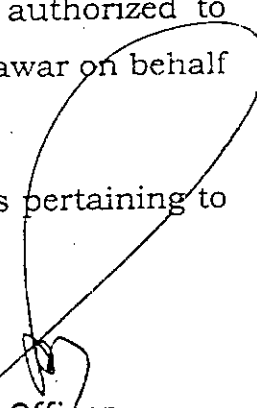
The Inspector General of Police, KPK, Peshawar and others


..... Respondents

AUTHORITY LETTER.

Mr. Muhammad Farooq Khan, DSP Legal is hereby authorized to appear before The Service Tribunal Khyber Pakhtunkhwa Peshawar on behalf of the undersigned in the above cited case.

He is authorized to submit and sign all documents pertaining to the present appeal.


Regional Police Officer,
Bannu Region, Bannu
(Respondent No.4)


Addl: Inspector General of Police,
HQrs, Khyber Pakhtunkhwa
Peshawar
(Respondent No.3)


Provincial Police Officer,
Khyber Pakhtunkhwa Peshawar
(Respondent No.2)

BEFORE THE HONOURABLE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Appeal No.6609 /2021

Muhammad Anwar ShahAppellant

Versus

The Inspector General of Police, KPK, Peshawar and others
..... Respondents

AFFIDAVIT

I, **Muhammad Farooq Khan**, DSP Legal Bannu representative for Respondent Nos. 2, 3 and 4 do hereby solemnly affirm and declare that the contents of the accompanying comments submitted by me are true and correct to the best of my knowledge and belief and that nothing has been concealed from this Honourable Tribunal.


DEPONENT

11101-1483421-1

وکالت نامہ

بعدالت فیبریحی الخوذہ روس بیرون پشاور

قیمتی ایک روپیہ

کورٹ فیس

2011ء منجانب ایڈمنٹ
نام حکومت KDK

12 جون 13
نور شاہ

مورخہ
مقدمہ
دعویٰ
جرم

سروس ایبل
باعث تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب وہی وکل کاروائی متعلقہ آن
مقام پشاور کے لئے محمد طارق قریشی ایڈووکیٹ کی رو سے
مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا نیز
وکیل صاحب کو راضی نامہ و تقرر ثالث و فیصلہ پر حلف دینے جو اب وہی اور اقبال دعویٰ اور بصورت
ڈگری کرانے اجراء اور وصولی چک روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زر
اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری یک طرفہ یا اپیل کی برآمدگی او مسوج
داڑ کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا جزوی
کاروائی کے واسطے اور وکیل یا مختیار قانونی کو ہمراہ یا اپنی بجائے تقرر کا کا اختیار ہوگا اور صاحب
مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہونگے۔ اور اس کا ساختہ پر ساختہ منظور قبول
ہوگا اور دوران مقدمہ میں جو خرچہ و ہر جانہ التوائے مقدمہ کے سبب سے ہوگا۔ اس کے مستحق وکیل صاحب
موصوف ہونگے۔ نیز بقایا و خرچہ کی وصولی کرینا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہو
یا جگہ سے باہر ہو تو وکیل صاحب پابند ہونگے کے پیروی مقدمہ مذکور کریں لہذا وکالت
لکھد یا تاکہ سندر ہے

Accepted

13 جون 2011ء

نور شاہ (ایڈمنٹ)

M
KDK

العبد العبد
گواہ شد
پشاور
مقام کے لئے منظور ہے

Asif



محمد طارق قریشی ایڈووکیٹ

سپریم کورٹ آف پاکستان

موبائل: 0300-5768804

یاسر مروت پرنٹنگ پریس پشاور موبائل: 0333-9123075

"B"

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

No.

Recd
 J

Appeal No. 6609 of 2021

M. Anwar Shah Appellant/Petitioner

Versus

Through Secy Home Pesh. Respondent

Respondent No. 4

Notice to: Deputy Inspector General of Police /
RPO Bannu.

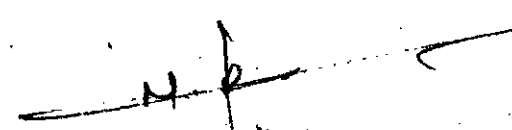
WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 15/12/2021 at 8.00 A.M. If you wish to urge anything against the appellants/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 along with 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 11th Day of Nov 2021.

(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,
PESHAWAR.

D.R

No.

Appeal No..... 6609 of 2021.

Muhammad Anwar Shah..... Appellant/Petitioner

Versus

→ Through Secy Home Pesh...... Respondent

Respondent No..... 1.....

Notice to: Court, of KPK Through Secretary Home
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..... 15/12/2021..... 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.

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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..... 11/11.....

Day of..... Nov..... 2021.

For Reply,
Jamil
17-11-21.

M. J.
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. 6609 of 2021

Muhammad Anwar Shah Appellant/Petitioner

Versus

Through Secy Home Pesh. Respondent

Respondent No. 2

Notice to: Inspector General of Police / PPO,
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 15/12/2021 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~~ appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated.....

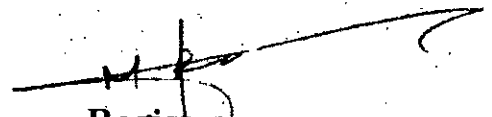
Given under my hand and the seal of this Court, at Peshawar this 11/11.....

Day of Nov 2021

(For Reply)



17/11/2021



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.

D.B

No.

Appeal No. 6609 of 20 21

M - Anwar Shah Appellant/Petitioner

Versus

Through Secy Home Pesh. Respondent

Respondent No. 3

Notice to:

Additional Inspector General of Police /
HOs: 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.....15/12/2021.....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.

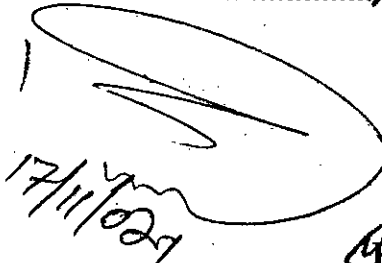
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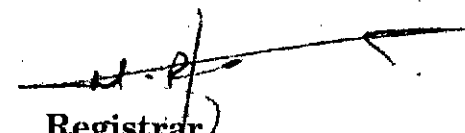
Copy of appeal is attached. Copy of appeal has already been sent to you vide this

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

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

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

1 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.
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