


22.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 18.05.2022 for the same as before.


Reader

18.05.2022

Junior to counsel for the appellant present and requested for adjournment as senior counsel for the petitioner is not available today. To come up for preliminary hearing on 25.07.2022 before S.B.

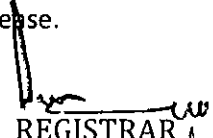

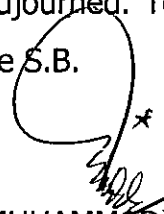

(Mian Muhammad)
Member (E)

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- 7560 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	07/10/2021	<p>The appeal of Mr. Muzaffar Iqbal resubmitted today by Syed Mudassir Pirzada Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	13.12.2021	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>13/12/21</u>.</p> <p> CHAIRMAN</p> <p>Clerk of learned counsel for the appellant present.</p> <p>Clerk of learned counsel for the appellant seeks adjournment on the ground that learned counsel for the appellant is busy before the Peshawar High Court, Peshawar. Adjourned. To come up for preliminary hearing on 22.02.2022 before S.B.</p> <p> (MIAN MUHAMMAD) MEMBER (E)</p>

The appeal of Mr. Muzaffar Iqbal Ex-Constable no. 683 District Police Kohat received today i.e. on 10.09.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- ✓1- Check list is not attached with the appeal.
- ✓2- Affidavit may be got attested by the Oath Commissioner.
- 3- Appeal has not been flagged/marked with annexures marks.
- 4- Annexures of the appeal may be attested.
- ✓5- Copy of impugned order bear no. 9812 dated 10.08.2021 mentioned in the heading of appeal is not attached with the appeal which may be placed on it. *at page No-15*
- 6- Annexures of the appeal are not in sequence which may be annexed serial wise as mentioned in the memo of appeal.
- 7- Five more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 1810 /S.T,

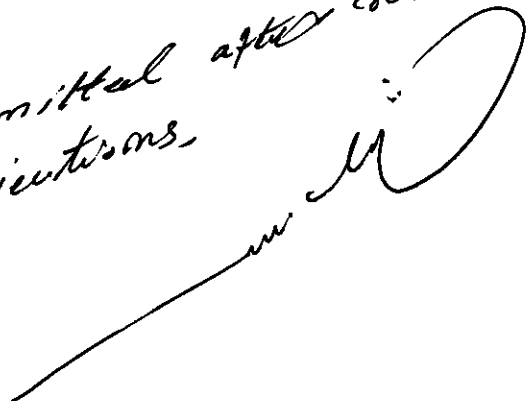
Dt. 10/09 /2021


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Syed Mudasir Pirzada Adv. Kohat.

Note

Re. Submittal after removal
all the objections.



KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR
CHECK LIST

Case Title: Muzafar 99/bak US 99P Jr

S#	CONTENTS	YES	NO
1	This Appeal has been presented by:	✓	
2	Whether Counsel/Appellant/Respondent/Deponent have signed the requisite documents?	✓	
3	Whether appeal is within time?	✓	
4	Whether the enactment under which the appeal is filed mentioned?	✓	
5	Whether the enactment under which the appeal is filed is correct?	✓	
6	Whether affidavit is appended?	✓	
7	Whether affidavit is duly attested by competent Oath Commissioner?	✓	
8	Whether appeal/annexures are properly paged?	✓	
9	Whether certificate regarding filing any earlier appeal on the subject, furnished?	✓	
10	Whether annexures are legible?	✓	
11	Whether annexures are attested?	✓	
12	Whether copies of annexures are readable/clear?	✓	
13	Whether copy of appeal is delivered to AG/DAG?		
14	Whether Power of Attorney of the Counsel engaged is attested and signed by petitioner/appellant/respondents?	✓	
15	Whether numbers of referred cases given are correct?		
16	Whether appeal contains cutting/overwriting?		
17	Whether list of books has been provided at the end of the appeal?		
18	Whether case relate to this court?	✓	
19	Whether requisite number of spare copies attached?	✓	
20	Whether complete spare copy is filed in separate file cover?	✓	
21	Whether addresses of parties given are complete?	✓	
22	Whether index filed?	✓	
23	Whether index is correct?	✓	
24	Whether Security and Process Fee deposited? On		
25	Whether in view of Khyber Pakhtunkhwa Service Tribunal Rules 1974 Rule 11, notice along with copy of appeal and annexures has been sent to respondents? On		
26	Whether copies of comments/reply/rejoinder submitted? On		
27	Whether copies of comments/reply/rejoinder provided to opposite party? On		

It is certified that formalities/documentation as required in the above table have been fulfilled.

Name:

Syed Mudasir Prasad

Signature:

[Signature]

Dated:

7/10/2021

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal 7560 2021

Muzaffar Iqbal Ex-Constable No:683 District Police Kohat

(Appellant)

VERSUS

1. INSPECTOR GENERAL OF KP/K POLICE PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT.

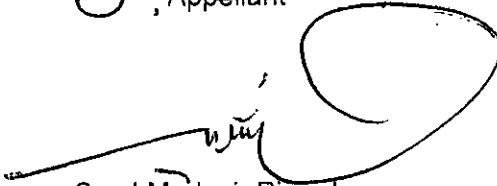
(Respondent)

INDEX

Sr No	Description of Documents	Annexure	Page
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عظف اقبال
Appellant

Through



Syed Mudasir Pirzada
Advocate HC
0345-9645854

Date 10 / 9 / 2021

1

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Muzaffar Iqbal Ex-Constable No:683 District Police Kohat

(Appellant) Khyber Pakhtoon Khwa Service Tribunal

VERSUS

Diary No. 754

1. INSPECTOR GENERAL OF KPK POLICE PESHAWAR.

Dated: 10/9/2021

2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT

3. DISTRICT POLICE OFFICER KOHAT.

(Respondent)

APPEAL UNDER SECTION 4 OF THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL ACT 1974 AGAINST THE IMPUGNED ORDER DATED 10-08-2021-VIDE NO 1259 SRC IN WHICH THE RESPONDENT NO:-3 WITHOUT ANY COGENT REASON DECLARE IN VALIDED FOR SERVICE AND APPELLANT PREFER REPRESENTATION WHICH WERE FILED ON DATED 10-08-2021

Respectfully Sheweth,

With great veneration the instant appeal is preferred by the appellant on the following Facts and grounds:-

Facts:

1:-Briefly facts are that while appellant serving in police department as S.R.C report that the appellant was suffering from psychiatrist disease and unable to continue more active police duty and the appellant were appear before the respondent No.3 and was referred to medical Supdt: KDA for proper standing medical board and as per SRC report the appellant was invalided out of service w.e.f 28-07-2020 (Copy of report of SRC dated 22-04-2021 is annexed as ~~letter~~ annexure A)

10/9/2021
Registrar

That upon the report of SRC the DSP legal reported the matter with remarks that the (appellant may produce medical fitness certificate and after that the case shall be reviewed in accordance with the rules on dated 03-05-21(copy already annexed)

That even dated different letters were endorsed and finally upon the medical examination report the appellant was declared fit for service but the appellant was not valided for service .(Copy of SMB report dated 28-06-2021 along with letter No 4644 dated 07-07-21 is annexed as annexure B).

That the appellant services were not considered and respondent No 3 given false consolation that the services were valided but in vain hence feeling aggrieved the appellant preferred department representation before respondent no-2 which were referred to respondent no-3 again in which the reply were requesting to file the application(Copy of representation & reply of respondent No-3 is annexed as annexure C)

That upon the finding report of respondent No-3 the respondent No-2 without any personal hearing and without perusing the SMR report nor proper examine

the appellant directly tender the impugned order dated 10-08-2021 (Copy of Impugned order is annexed as annexure D)

That the impugned order is illegal void ab-notion on the basis there is no person cogent reason were explain with independent mind which is very much necessary as per the guidelines of superior courts.

That the appellant version regarding fitness were not recorded nor the statement were recorded of the appellant in respect of physical fitness and with out any logical conclusion directly issued the impugned order which is not legal nor just and ex-partly proceeding were conducted against the appellant.

That there is nothing is on the record which connect the appellant with the allegation of SRC report nor proved and the appellant is blessed with impugned order which is not warranted by law.

That an unjust has been done with the appellant by not giving ample opportunity personal hearing nor properly enquired the allegation and ex-partly proceedings conducted against the appellant without probing held not fit for service which is against to the prescribed service rules.

That the appellant dragged unnecessarily into litigation which is clearly mentioned in 2008 SCMR 725.

Grounds:

- a. That no proper interpretation of SMB report were ever been discussed nor explain in impugned order about the fitness of the appellant although it has been mentioned in the medical report that in future after six month again medical check up were conducted if required .
- b. That the appellant was not heard in person nor called in orderly room and also not mentioned in the impugned order that the appellant was called because the when the expertly proceedings were conducted then how could it possible that the appellant was heard and called for orderly room which does not appeal to a prudent mind .
- c. That without keeping in the mind the long fit service record of the appellant directly declare the appellant as in valided for service as the appellant as per medical report fit for resuming the service but still the referred letter and DSP legal remarks and covering letters for medical examination all were not corresponded by respondent No-2&3 but without any speaking order appellant were declared in valided for service .
- d. That the appellant is honest and dedicated one and leave no stone unturned to discharge his duties.
- e. That as per universal declaration of human rights 1948 prohibits the arbitral / discretion.

(3)

- f. That the Respondent No-3 has acted whimsically and arbitrary, which is apparent from the impugned order.
- g. That the impugned order is not based on sound reasons and same is not sustainable in the eyes of law. The same is based on wrong assumption of facts.
- h. That the departmental proceedings on subject matter above were not conducted according to the rules.
- i. That the impugned order is outcome of surmises and conjecture.

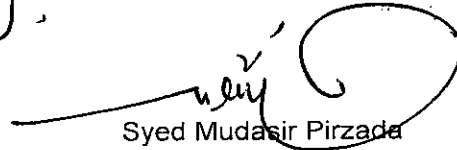
Pray:

In the view of above circumstances it is humbly prayed that the impugned order of Respondent No-2 & dated 10-08-2021 and 09-08-2021 Kohat may please be set aside for the end of justice and the appellant may please be graciously re-instate in service with all back benefits being fit and active person .

Date 10/9/2021

Through

فطرنہ ایپلنٹ
Appellant


Syed Mudasir Pirzada
Advocate HC Kohat
0345-0645854

Certificate:-

Certified that no such like appeal has earlier been filed in this Hon able Service tribunal as per instruction of my client.

List of Books

- 1:- Constitution of Pakistan 1973
- 2:- Police Rules
- 3:- Case Law according to need.

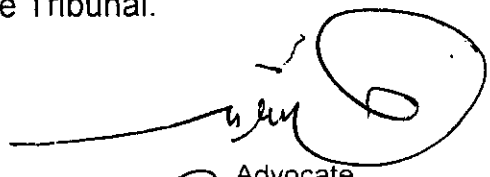
4

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal _____ 2020

AFFIDAVIT

I, Syed Mudasir Pirzada Advocate, as per instruction of my client do here by solemnly affirm and declare that all the contents of accompanying service appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Honorable Tribunal.


Advocate

(5)

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Muzaffar Iqbal Ex-Constable No:683 District Police Kohat .

(Appellant)

VERSUS

1. INSPECTOR GENERAL OF POLICE KPK PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

ADDRESS OF THE PARTIES

APPELLANT :-

Muzaffar Iqbal Ex-Constable No:683 District Police Kohat

RESPONDENTS

1. INSPECTOR GENERAL OF POLICE KPK PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT.

مظفر اقبال
Appellant

Through

Date 10 / 9 / 2021

Syed Mudasiq Pirzada
Advocate PHC
0345-9645854

Annexure A
P- (6)

R/Sir,

It is submitted that as per this office record it revealed that Constable Muzafar Iqbal No.683 was suffering from psychiatrist disease and unable to continue more active Police duty. He was appeared before the then DPO Kohat and was referred to Medical Supdt: KDA Hospital Kohat for proper Standing Medical Board.

The MS KDA Kohat has arranged a proper Standing Medical Board on 28.07.2020 and he was examined declared unfit for further Police service vide his letter No.2624/F-6 dated 14.07.2020. Therefore he was invalidated out of service w.e.f.28.07.2020.

The proceeding of Standing Medical Board is attached please.

DSP LEGAL

S.R.C.

22-04-2021

R/Sir The applicant may produce medical fitness certificate and after that the case should be removed with in accordance with the rules.
Substantial plea

Div. Superintendent
of Police Legal
Kohat 03/5

OS
03/03

ATTESTED

Officer of the P.S.D.
Legal, Kohat
No. 191/LB
Dated 03-05-21

Annexure
P—

3

7

**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communication should be addressed to the Director General Health Services
Peshawar and not to any official by name. Mail Address: P.D.F. Peshawar
Office No. 091-9210269 Fax No. 091-9210107, 9210196 E-mail: 091-9210230

NO. 11179/DM-SMB

Dated: 22/06/2021

Registered/Confidential

To

The Medical Superintendent
DHO Teaching Hospital,
KDA Kohat.

Subject - STANDING MEDICAL BOARD

Reference your letter No. 1958/F-06 dated 12-05-2021 on the subject
noted above.

Enclosed please find herewith proceeding of KP Appellate Medical Board
in respect of Ex-Constable Muzaffar Iqbal, No. 683 of District Police Office
Kohat, for information and further necessary action.

Muzaffar Iqbal
28/6/21

ADDL: DIRECTOR GENERAL (ADMN)
DIRECTORATE GENERAL HEALTH
SERVICES KHYBER PAKHTUNKHWA
PESHAWAR.

22/6/21

Copy forwarded to District Police Officer, Kohat for information.

ATTESTED

[Signature]



**DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR**

All communications should be addressed to the Director General Health Services
Peshawar and not to any official by name E-Mail Address K.P.K.dgsh@peshawar.com
Office # 091-9210269 Exchange # 091-9210187, 9210196 Fax # 091-9210230

(B) Annex
C

No. 4085 /M-SMB

Dated: 25/6/2021

PROCEEDING OF KP APPELLATE MEDICAL BOARD.

The Appellate Medical Board for psychiatric disorder and re-examining the Ex-Constable Muzaffar Iqbal No. 683, of District Police, Kohat having CNIC No 14301-9959366-5, was conducted at Directorate General Health Services, Peshawar on 17-06-2021 at 10:00 am under the Chairmanship of Dr Niaz Muhammad, Director General Health, Khyber Pakhtunkhwa, Peshawar.

The Standing Medical Board for Psychiatric illness is carried out at Services after proper approval from this Directorate but not at District Level. In contrary to that, the official concerned was referred for Medical Board by his controlling officer (DPO Kohat) to MS, DHQ Hospital Kohat, who conducted the proceeding of Medical Board at his own level without following the standard procedures. The controlling officer was supposed to refer the case to DGHS office for Standing Medical Board, therefore proceeding of Medical Board conducted at DHQ Hospital Kohat are not valid.

In the board examination, the official concerned was examined and the finding of the Appellate Medical Board is as under;

1. On current mental state examination, he is well composed.
2. His speech is normal and having no delusions and hallucination in any sense modality.
3. He has no thought disorder and his abstract thinking is normal.
4. He is having no major mental illness.
5. However keeping in view the opinion of previous medical board, the following recommendations are made:
 - i. He is advised light duty without weapon.
 - ii. He will be under observation for a period of six months and after that he will be reviewed by the Board.
 - iii. Currently the Board is of the opinion that he can resume his duty.

APPELLATE BOARD EXAMINATION.

1. Dr. Muslim Khan, ... Member
Sr: District Specialist,
Sharhad Hospital for Psychiatric Disease,
Peshawar.
2. Dr. ASIF IZUM, Member
Medical Specialist of Services Hospital,
Peshawar.
3. Dr. Noor Ullah, Member
Deputy Director (Medical)
DGHS office, Peshawar.
4. Dr. Fahim Hussain, Member
Addl: Director General (Admin)
DGHS Office Peshawar.
5. Dr. Niaz Muhammad... Chairman
Director General Health Services,
Khyber Pakhtunkhwa, Peshawar.

ATTESTED



DIRECTORATE GENERAL HEALTH SERVICES
KHYBER PAKHTUNKHWA PESHAWAR.

Communications should be addressed to the Director General Health Services
Peshawar and not to any official by name E-Mail Address K.P.Kdghs@yahoo.com
Office # 091-9210269 Exchange # 091-9210187, 9210196 Fax # 091-9210230

9

No. /M-SMB

Dated: / /2021

Registered/confidential

OFFICE ORDER

As per Health Department Notification No. SOH-I/HD/3-12/2020 dated 25/11/2020, a committee comprising of the following Officers is hereby constituted to re-examine the patient Ex-Constable Muzaffar Iqbal No. 683, office of the District Police Officer, Kohat to examine the decision of SMB in the following schedule, date and time at DGHS Office on 17/06/2021 at 10:00 am:-

- | | |
|--|------------------|
| 1. Director General Health Services KPK. | Chairman/Member |
| 2. Addl: Director General (Admin). | Member/Secretary |
| 3. Deputy Director (Medical) | Member |
| 4. Medical Specialist of Services Hospital. | Member |
| 5. District Specialist of the Psychiatric Specialty. | Member |

Sdxxx
DIRECTOR GENERAL HEALTH
SERVICES, KHYBER PAKHTUNKHWA,
PESHAWAR.

No. 3193-97/Medical

dated 09/6/2021

Copy forwarded to the-

1. The Medical Superintendent, Services Hospital, Peshawar, with the request to nominate Medical Specialist & Psychiatric Specialist to attend the above meeting on the schedule, date and time.
2. All members of the Committee for information and necessary action.
3. The Medical Superintendent, DHQ Teaching Hospital Kohat w/r his letter No.1958/F-06 dated 12-05-2021 with the request to direct Ex-Constable Muzaffar Iqbal No. 683 attached to DPO Kohat to appear before the Committee of Appellate Board at DGHS Office, Peshawar alongwith relevant record
4. DPO Kohat for information & similar necessary action w/r to his letter No. 6273/SRC dated 05-05-2021.
5. PA to DGHS, KPK, Peshawar.
6. MS, Sahwal Hospital for Psychiatric Disease, Peshawar for report of n/a pl.

DIRECTOR GENERAL HEALTH
SERVICES, KHYBER PAKHTUNKHWA,
PESHAWAR.

ATTESTED

10
OFFICE OF THE
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KDA; KOHAT

No. 1926 /F-06

Dated Kohat the 12 /05/2021

To

The Director General Health Services
Khyber Pakhtunkhwa, Peshawar.

Subject:- STANDING MEDICAL BOARD

Enclose find herewith a copy of letter No.6273/SRC dated 05.05.2021 on the subject cited above, addressed to this office from the District Police Officer Kohat in respect of Ex-Constable Muzzafar Iqbal No.683, for convening of Standing Medical Board.

Endst: No. and date even:-

Copy forwarded to the District Police Officer Kohat for information w/r to his office No. quoted above.

M/11/21
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT
11/5/2021

M/11/21
MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT
11/5/2021

TESTED

TESTED



OFFICE OF THE
DISTRICT POLICE OFFICER,
KOHAT

Tel: 0922-9260116 Fax 9260125

No. 6773 /SRC dated Kohat the 11/3 /2021.

To: The Medical Superintendent,
District Hqrs: Hospital,
KDA, Kohat.

Subject: STANDING MEDICAL BOARD

It is submitted that Ex-Constable Muzzafar Iqbal No. 683 of this District Police has preferred an application requesting therein for re-joining his services in Police department.

It is therefore requested that a Standing Medical Board may be constituted to examine the official and legal opinion thereof as to whether he is fit for Police service or otherwise.

407
11/3/2021

[Signature]
DISTRICT POLICE OFFICER,
KOHAT

[Signature]
11/3/2021

ATTESTED
[Signature]

4 to the
3. quote



NO. 4109-10/M-SMB
Dated 05/05/2021

The District Police Officer
Kohat

STANDING MEDICAL BOARD

Subject:
Memo:

Reference your office letter No. 6273/SRC dated 05.05.2021 and this office letter No. 1928/F-6 dated 12.05.2021 on the subject cited above.

Enclose please find herewith a copy of letter No. 4109-10/M-SMB dated 28.06.2021 along with Proceeding of KP Appealate Medical Board in respect of Ex-Constable Muzaffar Iqbal No. 683 received from Director General Health Services Khyber Pakhtunkhwa, Peshawar for further necessary action.

Encl: as above.

MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

Copy forwarded to Director General Health Services Khyber Pakhtunkhwa, Peshawar for information with reference to his office letter No. quoted above.

SRE/OME
21/06/21
District Police Officer
Kohat

MEDICAL SUPERINTENDENT
DHQ TEACHING HOSPITAL
KOHAT

4664
27/7/21
KOHAT

ATTESTED

13

جنسور جناب ڈی آئی جی صاحب کوھاٹ

6613

جناب عالی 26/7/21

مؤدبانہ گزارش ہے کہ سائل نے میڈیکل بورڈ کروایا تھا۔ بیماری کے بعد اب سائل تندرست ہے۔ اور نوکری کے قابل ہے۔ سائل نے آپ جناب کو درخواست کی تھی کہ اب میں نوکری کر سکتا ہوں۔ DIG صاحب نے سائل کی درخواست جناب DPO صاحب کوھاٹ کو بھیجی۔ جناب DPO صاحب کوھاٹ نے DSP لیگل کو سائل کی درخواست مارک کی۔ DSP لیگل نے DPO صاحب کوھاٹ کے ساتھ سائل کی درخواست ڈسکس کی اور سائل کو درخواست کے ساتھ ہسپتال بھیجا گیا۔ ہسپتال میں سائل کا میڈیکل چیک اپ کیا گیا۔ اور پشاور ہسپتال کے بورڈ ڈاکٹروں نے سائل کو چیک کر کے تندرست قرار دیا۔ کہ کنفیٹیل مظفر اقبال نمبر 683 اب ڈیوٹی کے قابل ہے۔ لہذا اس کو ڈیوٹی پر بحال کیا جاوے۔ سائل کی میڈیکل رپورٹ مورخہ 06-07-2021 سے DPO آفس میں وصول ہوئے ہیں۔ لیکن تاحال ان پر کوئی کارروائی نہیں کی گئی۔

سائل کی درخواست کے ساتھ ڈائریکٹر جنرل ہیلتھ کے میڈیکل کاغذات لف ہذا ہیں۔ لہذا سائل کی درخواست پر ہمدردانہ غور کیا جاوے۔
عین نوازش ہوگی

مورخہ 26.7.2021

EC
26/7/21

11513/EC
res
28/7/21

مظفر اقبال

العارض

مظفر اقبال پبلک نمبر 683

موبائل نمبر 0336-1991904

DPO Kohat
For detail report.

کوھاٹ

SPE
26/7/21

DIP POLICE
KOHAT
26/7

5129
29/7/21

District Police Officer
28/7/21

ATTESTED



14

Office of the
District Police Officer,
Kohat

Ph: 0922-9260116 Fax: 0922-9260125

No. 9812 /SRC

dated Kohat the 9-8 /2021

To: The Regional Police Officer, Kohat.

Subject: **APPLICATION (EX-CONST: MUZAFAR IQBAL NO. 683)**

Memo: Kindly refer to your office Endst: No. 11513/EC dated 28.07.2021.

2. It is submitted that earlier an application of applicant was received vide your good office Endst: No. 5113/EC dated 19.05.2021 with remarks "For disposal as per rules / policy".

3. Short facts are that the applicant was invalidated out of service vide OB No. 587/ SRC dated 19.07.2020 on the request of applicant and opinion of Standing Medical Board, who opined as under:-

- *I assessed Mr. Muzafar Iqbal s/o Shoaib Jan CNIC No. 14301-9959366-5 and looked into his previous record. He seems to me suffering from chronic mood disorder with Psychotic Symptoms.*
- *He therefore, seems to me unfit for the job.*
- *He is not fit for further service.*

4. The applicant intends to rejoin the service, for which his, the Standing Medical Board tendered below opinion on his previous Medical Board record:-

- i. *He is advised light duty without weapon.*
- ii. *He will be under observation for a period of six months and after that he will be reviewed by the Board.*
- iii. *Currently the Board is of the opinion that he can resume his duty.*

5. In view of prevailing situation and meager strength, Police department is need of active men for active service while, there is already a number of injured personnel and other suffering from different kind of deceases and deployed on light duties. Furthermore, the application shall open a Pandora box, hence his application was filed.

6. It is also added that the applicant has already availed / enjoy all financial / pensionary benefits. Thus his re-enrollment is unjustified under the circumstances and will be burden on public exchequer. Hence, the application is not considered under the facts / circumstances and may kindly be filed, please.

ATTESTED


DISTRICT POLICE OFFICER,
KOHAT

Phone No: 9260112.

Fax No: 9260114.

From: - The Regional Police Officer,
Kohat Region, Kohat. 15

To: - The District Police Officer, Kohat.

No. 12590 /EC, Dated Kohat the 10/8 /2021.

Subject: - APPLICATION (EX CONST: MUZAFAR IOBAL NO. 683).

MEMO:

I am directed to refer to your office letter No. 9812/SRC, dated 03.08.2021 on the subject quoted above and to state that the W/RPO has examined and filed the instant case please.


Regional Police Officer,
Kohat Region

10/8


ATTESTED

(16)

Amman

بعدالت جناب محترم محترم مسرور محترم کنستبل

کورٹ فیس

NP Poffamt ۲۰۲۱ء پنجاب

مقدمہ علت نمبر جرم زیر دفعہ مورخہ تھانہ

باعث تخریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی وجوابدہی کل کاروائی متعلقہ آل مقام کے لیے کنستبل محترم کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا اختیار ہوگا۔ نیز وکیل صاحب کو کرنے راضی نامہ و تقرر ثالث و فیصلہ برحلف دینے جواب دہی اور اقبال دعویٰ اور بصورت ڈگری کرانے اجراء وصولی چیک در روپیہ اور عرضی دعویٰ اور درخواست ہر قسم کی تصدیق زراس پر دستخط کرنے کا اختیار ہوگا۔ نیز بصورت عام پیروی یا ڈگری ایک طرفہ یا اپیل کی برآمدگی اور منسوخی و نیز دائر کرنے اپیل نگرانی نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ اور بصورت ضرورت مقدمہ مذکور کے کل یا جزو کارروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنی بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا۔ دوران مقدمہ میں جو خرچہ و ہرجانہ التوائے مقدمہ کے سبب سے ہوگا اس کے مستحق کیا صاحب موصوف ہوں گے نیز بقایا خرچہ کی وصولی کرنے کا بھی اختیار ہوگا۔ اگر کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکور کریں۔ لہذا وکالت نامہ لکھ دیا کہ سندر ہے۔

المقوم ۲۰۲۱

مکتوبہ تخریر

مقام کورٹ کنستبل کے لیے منظور ہے

Attested
Accepted

Before the Honorable Tribunal
Peshawar.

Put up to the Court with
relevant appeal.

Service Appeal No 7560

Order 17/11/22.

Muzzaffar Iqbal v/s IGP etc.

Application for Adjournment due
to absence of Council on the
following basis.

Respectfully sheweth,

Appellant Council Submits
As Under.

- i) That the above title appeal is fixed
for preliminary hearing on dated. 18⁰⁵/₂₂.
- ii) That the Council is engaged in another
service appeal namely Rabia Mansoor
v/s FDO at federal service tribunal.
- iii) That it is therefore kindly requested
that the date fixed of above appeal
may graciously be allowed.

DA: 17⁰⁵/₂₂.

Appellant
Council
Syed Mudasir Pirzada
Advocate
0345-9645854