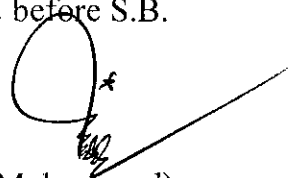


21.06.2022

Learned counsel for the appellant present. Mr. Arif Saleem. Stenographer alongwith Mr. Kabirullah Khattak, Additional Advocate General for the respondents present.

Reply/comments on behalf of respondents are still awaited. Representative of the respondents requested for time to submit reply/comments. Last opportunity is extended till the next date. In case, the respondents failed to submit reply/comments on the next date, their right for submission of reply/comments shall be deemed as struck off. Adjourned. To come up for reply/comments on 29.07.2022 before S.B.



(Mian Muhammad)
Member (E)

03.01.2022

Counsel for the appellant present. Preliminary arguments heard. Record perused.

Appellant Deposited
Security & Process Fee

3/1/22

Points raised need consideration. The appeal is admitted for 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 10.03.2022 before the S.B.

(Rozina Rehman)
Member (J)

10.03.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 30.05.2022 for the same as before.


Reader.

30th May, 2022

Counsel for the appellant present. Mr. Kabirullah Khattak, Additional Advocate General respondents present.

Written reply/comments not submitted. Learned AAG seeks time to submit written reply/comments on the next date. Granted but as a last chance. To come up for written reply/comments on 21.06.2022 before the S.B.



(Kalim Arshad Khan)
Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 7736 /2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	08/11/2021	<p>The appeal of Mr. Zia Ul Haq presented today by Mr. Fazal Shah Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put up there on <u>03/01/21</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

CHECK LIST

Case Title: Zia ul Haq v/s RPO & others

S#	CONTENTS	YES	NO
1	This Appeal has been presented by: Fazal Shah Mohmand, (ASC)	✓	
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?	x	✓
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: **FAZAL SHAH MOHMAND ASC**

Signature: _____

Dated: _____

(Handwritten Signature)
05/11/21

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No 7736 /2021

Zia Ul Haq.....Appellant

V E R S U S

RPO & others.....Respondents


I N D E X

S.No	Description of Documents	Annexure	Pages
1.	Service Appeal with Affidavit		1-4
2.	Copy of FIR	A	5-5/A
3.	Copy of order dated 13-02-2019 & Application dated 14-04-2020	B & C	6-7
4.	Copy of Show Cause Notice & reply	D & E	8-9
5.	Copy of Inquiry Report	F	10
6.	Copy of Order dated 19-01-2021 in Criminal Appeal No 379/2019	G	11-13
7.	Copy of Suspension Order dated 27-05-2021, Charge Sheet & Reply	H, I & J	14-17
8.	Copy of Order dated 29-06-2021	K	18
9.	Copy of Departmental appeal, Order dated 01-09-2021 & Application	L, M & N	19-21
10.	Wakalatnama		22

Dated: ⁰⁸~~05~~ 11-2021

Through


Appellant



FAZAL SHAH MOHMAND
ADVOCATE,
SUPREME COURT OF PAKISTAN.

OFFICE:-
Cantonment Plaza Flat# 3/B
Khyber Bazar Peshawar.
Cell:# 0301 8804841
Email:- fazalshahmohmand@gmail.com

- 1 -

BEFORE THE SERVICE TRIBUNAL KPK PESHAWAR

Service Appeal No _____/2021

Zia Ul Haq, Ex Constable, District Police Kurram, Son of Wali Jan
R/O Mir Bagh Central Kurram, District Kurram.....**Appellant**

V E R S U S

1. Regional Police Officer, Kohat Region Kohat.
2. District Police Officer, Kurram.
3. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
.....**Respondents**

**APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT
1974 AGAINST THE ORDER ISSUED VIDE NO
13774/EC DATED 01-09-2021 OF RESPONDENT NO 1
WHEREBY DEPARTMENTAL APPEAL OF THE
APPELLANT FILED AGAINST THE ORDER DATED 29-
06-2021 HAS BEEN DISMISSED.**

PRAYER:-

On acceptance of this appeal the impugned Order dated 01-09-2021 of respondent No 1 and order dated 29-06-2021 of respondent No 2 may kindly be set aside and the appellant may kindly be ordered to be reinstated in service with all back benefits.

Respectfully Submitted:-

1. That the appellant was initially appointed as Levy Sepoy in Kurram Levy Force on 29-01-2003 and after 25th Amendment in the Constitution of the Islamic Republic of Pakistan 1973, the erstwhile FATA areas were merged in the Province of Khyber Pakhtunkhwa. The provincial Assembly passed Act for the absorption of Levy and Khassadars Force into the Police and accordingly the appellant along with others were absorbed in the Khyber Pakhtunkhwa, Police. The appellant since enlistment performed his duties with honesty and full devotion and to the entire satisfaction of his high ups.
2. That on 09-01-2019, the appellant was falsely involved in murder case by his step brothers vide FIR No 11/2019 dated 09-01-2019 Under Section 302-PPC at Police Station Sehala, Islamabad and was arrested the same day. **(Copy of FIR is enclosed as Annexure A).**

3. That the appellant was suspended on account of involvement in criminal case vide order dated 13-02-2019 and his pay was stopped and was released on bail on 17-03-2020 and reported for duty on 20-03-2020. The appellant also requested for the release of his salaries vide Application dated 14-04-2020. **(Copy of order dated 13-02-2019 & Application dated 14-04-2020 is enclosed as Annexure B & C).**
4. That Show Cause Notice was issued to the appellant on the ground of involvement in Criminal case on 24-04-2020 which the appellant replied in detail refuting the allegations. **(Copy of Show Cause Notice & reply is enclosed as Annexure D & E).**
5. That an inquiry was also conducted wherein it was recommended to issue warning to the appellant and reinstate him in service vide Inquiry Report dated 11-05-2020. **(Copy of Inquiry Report is enclosed as Annexure F).**
6. That the appellant after being convicted by the learned ADJ East Islamabad, filed Criminal Appeal No 379/2019 and was acquitted on the basis of compromise by the learned Islamabad High Court, Islamabad vide Order dated 19-01-2021. **(Copy of Order dated 19-01-2021 in Criminal Appeal No 379/2019 is enclosed as Annexure G).**
7. That on 27-05-2021 the appellant was again suspended vide order dated 27-05-2021 and was issued Charge Sheet with Statement of Allegations on the same day which the appellant replied refuting the allegations. **(Copy of Suspension Order dated 27-05-2021, Charge Sheet & Reply is enclosed as Annexure H, I & J).**
8. That inspite of this, the appellant was dismissed from service by respondent No 2 vide Order dated 29-06-2021. **(Copy of Order dated 29-06-2021 is enclosed as Annexure K).**
9. That the appellant filed departmental appeal before respondent No 1 on 01-07-2021 which was dismissed vide order dated 01-09-2021, however copy of the same was provided upon application on 13-10-2021. **(Copy of Departmental appeal, Order dated 01-09-2021 & Application is enclosed as Annexure L, M & N).**
10. That both the impugned Orders dated 01-09-2021 & order dated 29-06-2021 are against the law, facts and principles of justice on grounds inter alia as follows:-

GROUNDS:-

-3-

- A.** That both the impugned Orders dated 01-09-2021 & order dated 29-06-2021 is illegal, unlawful and void ab-initio.
- B.** That the appellant has been denied his fundamental right of treatment in accordance with law and rules in violation of Article 4 and 25 of the Constitution.
- C.** That the impugned Orders are not tenable for the reason that action against the appellant was initiated and was dismissed from service on account of being involved in criminal case and after acquittal from the criminal charges, there is nothing for which the appellant could be dismissed from service.
- D.** That respondents badly violated the law on the subject, as no action has been taken against the appellant in accordance with the law on the subject.
- E.** That even the authority has acted in violation of the recommendations of the inquiry officer and that too without assigning any reason.
- F.** That even the inquiry officer has stated in categorical terms that there is nothing other charges against the appellant in Police Station and official duty, so the impugned orders are liable to be set at naught on this score alone.
- G.** That the appellant was proceeded in very strange manner alien to law and rules on the subject, as the appellant was suspended twice.
- H.** That the appellant was not afforded the opportunity of personal hearing, thus was not provided opportunity of fair trial as per Article 10-A of the Constitution of the land.
- I.** That even the alleged period of absence has been treated as leave without pay and as such too the appellant has been subjected to double jeopardy, on this score too the impugned order is liable to be set aside.
- J.** That even otherwise the allegations were never substantiated, as no evidence during the so called inquiry was collected.

- K. That the appellant has more than 18 years of service with unblemished service record and is jobless since his illegal dismissal from service.
- L. That the appellant seeks the permission of this honorable tribunal for further/additional grounds at the time of arguments.

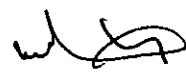
It is therefore prayed that appeal of the appellant may kindly be accepted as prayed for in the heading of the appeal.

Any other relief deemed appropriate and not specifically asked for, may also be granted in favor of the appellant.

Dated: ⁰⁸~~06~~-11-2021

Through


Appellant



FAZAL SHAH MOHMAND
ADVOCATE,
SUPREME COURT OF PAKISTAN.

LIST OF BOOKS

- 1. Constitution 1973.
- 2. other books as per need

CERTIFICATE:

Certified that as per instructions of my client, no other Service Appeal on the same subject and between the same parties has been filed previously or concurrently before this honorable Tribunal.


ADVOCATE

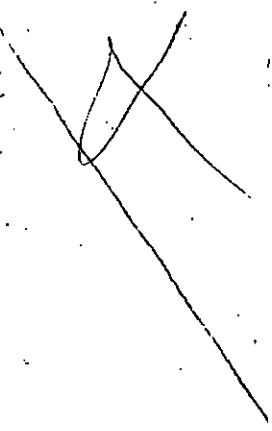
AFFIDAVIT

I, Zia Ul Haq, Ex Constable, District Police Kurram, Son of Wali Jan R/O Mir Bagh Central Kurram, District Kurram, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.


DEPONENT

-5/A-

تبدیل و دیوارچینی و ایوان افزودن کورسهای گسب و دروازه و لوله کشی ۶۱۸ در منطقه انزلی عقب لایحه
مدرسه ابتدایی محمد باقر خانی کورسهای گسب



دارت مسی ۲۵۸۸۸۸۸۸

۱۳۸۸

۰۹-۰۱-۱۹

۰۳۱۷-۵۳۷۵۴۷۶

پولیس فارم نمبر 24-5 (ا)

ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس رپورٹ شدہ زبردفعہ 154 مجموعہ ضابطہ فوجداری

نمبر 11/19، تھانہ سہالہ ضلع اسلام آباد تاریخ وقت وقوعہ 09/01/2019 بوقت 12/30 بجے دن

1	تاریخ و وقت رپورٹ : مورخہ 09/01/2019 وقت تھانہ سے روانگی کی تاریخ و وقت بذریعہ ڈاک
	08:30 بجے بحوالہ نمبر 38
2	نام و سکونت اطلاع دہندہ مستغیث
	استغاثہ مرتبہ مرسلہ محمد اقبال SI تھانہ سہالہ اسلام آباد برتھری
	درخواست ازاں ولی خان ولد ولی خان قوم سنجے احمد زہ میرہ زڑاک
	کرم ایجنسی
3	مختصر کیفیت جرم (معد دفعہ) اگر کچھ لیا گیا ہو۔
	302 تپ
4	جائے وقوعہ فاصلہ تھانہ سے اور سمت
	بحد رقبہ مواہری جھیک روادک بفاصلہ قریب 7 کلومیٹر جانب جنوب
	مشرق از تھانہ
5	کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں
	توقف ہوا ہو تو وجہ بیان کرو
	حسب آمد استغاثہ مقدمہ درج رجسٹر ہوا

(ابتدائی اطلاع نیچے درج کرو)

عہدہ ASI

دستخط وارث علی

نوٹ: اطلاع کے نیچے اطلاع دہندہ کا دستخط یا مہر یا نشان انگوٹھا ہونا چاہیے اور افسر تحریر کنندہ (ابتدائی اطلاع کے دستخط بطور تصدیق ہونے چاہیے) بخدمت جناب SHO تھانہ سہالہ اسلام آباد جناب عالی گزارش ہے کہ سائل ولی خان ولد ولی جان سکنہ حال دوسہری جھیک روات ضلع اسلام آباد میں رہائش پذیر ہوں اور لیویز فورس پاراچنار میں ملازمت کرتا ہوں، آج کل چھٹی پر ہوں، آج بوقت قریب 12/30 بجے دن میرے بھانجے عرفان نے مجھے گھر آ کر اطلاع دی کہ میرا حقیقی بھائی سرکاؤ خان ولد ولی جان جو کہ روات سے اپنے موٹر سائیکل پر سوار ہو کر اپنے گھر دوسہری آ رہا تھا ضیاء الحق ولد ولی خان جو کہ ہمارا سوتیلا بھائی ہے گاؤں کے قریب بحد راستہ پر گھات لگائے ہوئے بیٹھا تھا جو نبی میرا حقیقی بھائی سرکاؤ خان کچے راستے پر پہنچا تو اچانک ضیاء الحق نے اسے روک کر یکے بعد دیگرے چھری کے وار کر کے شدید زخمی کر دیا اور ساتھ ہی چھری سے گردن بھی کافی حد کاٹ دی جس پر میرا حقیقی بھائی سرکاؤ ضربات کی تاب نہ لاتے ہوئے جان کی بازی ہار گیا میں اپنے بھائی اصیل خان کے ساتھ موقع پر پہنچا تو اپنے بھائی کی نعش کو بعد میں گھر لے گئے اور اپنے عزیز واقارب کو اطلاع دی بذریعہ درخواست ہذا استدعا ہے کہ میرے حقیقی بھائی سرکاؤ خان کو میرے تو لیے بھائی ضیاء الحق نے ناحق قتل کیا ہے وجہ عناد یہ ہے کہ کچھ دن قبل دونوں کے مابین توں تکرار ہوئی تھی دعویدار ہوں، کارروائی کی جائے العبد دستخط بحروف اُردو مثبت نشان انگوٹھا ولی خان ولد ولی جان قوم احمد زئی سکنہ سرباز ڈاکخانہ سوار تحصیل اپر کرم کرم ایجنسی حال دوسہری جھیک روات اسلام آباد 21203-2241305-3'0300-9190461 مورخہ 09/01/2019

کارروائی پولیس اطلاع وقوعہ پاکر من SI معہ ہماریاں ذوالفقار علی ASI، ملک وحید اختر 5759/C، سعید احمد 3141/C، شعبان 6519/C دوسہری جھیک روات ضلع اسلام آباد پہنچا تو درخواست تحریر سائل ولی خان ولد ولی جان نے پیش کی ہے اطلاع نسبت وقوعہ ہذا انسپکٹر انچارج ہیوی سائیڈ کوڈی گئی ہے جو PIMS روانہ ہو رہے، نعش مقتول برائے پوسٹ مارٹم زیر حفاظت ذوالفقار علی ASI ہمراہ ملک وحید

5759/C بذریعہ پرائیویٹ گاڑی PIMS ہسپتال اسلام آباد بھجوائی جا رہی ہے درخواست تحریری اور حالات واقعات سے سریدست صورت جرم 302 تپائی جا کر درخواست ہذا بشکل مراسلہ بغرض قائمی مقدمہ بدست اشتیاق 6550 ارسال تھانہ ہے مقدمہ درج رجسٹر کر کے نقل FIR بمراد تفتیش عقب انسپکٹر انچارج ہیوی سائیڈ بھجوائی جا رہی ہے میں موقع پر مصروف تفتیش ہوں اور موقع دوسہری جھیک روات ضلع اسلام آباد بوقت 7/50 شام مورخہ 09/01/2019 محمد اقبال SI تھانہ سہالہ اسلام آباد تھانہ حسب آمد اطلاع مجرم مذکور مقدمہ درج رجسٹر ہوا جناب SHO صاحب علاقہ تھانہ میں ہیں جن کو اطلاع بابت اندراج مقدمہ ہذا دی جا رہی ہے محرر تکمیل ریکارڈ بجا بجا مجاز افسران کو اسرل کرے اصل استغاثہ معہ نقل FIR روندہ کانسٹیبل عقب انسپکٹر انچارج ہیوی سائیڈ بمراد تفتیش ارسال ہے۔

وارث علی ASI تھانہ سہالہ

اسلام آباد

09/01/2019

0347-5395476

"B" - 6-

OFFICE OF THE
Deputy Commissioner, Kurram.

No. 1338-40 / Kurram Levy.

Dated 13 / 02 / 2019.

19

ORDER.

Lance Naik Zia ul Haq s/o Wali Jan resident of village Mir Bagh Cental Kurram is hereby suspended from service on account of his involvement in assassination of his brother.

During suspension period his pay and allowances is hereby stopped till the finding of inquiry.


Deputy Commissioner
Kurram Tribal District.

Endst: No. & date even.
Copy forwarded to the:-

1. Assistant Commissioner, Cental Kurram.
2. Subedar Major Kurram Levy Force.
3. Official Concerned.


Deputy Commissioner
Kurram Tribal District.

Handwritten notes on the right margin: "19", "D. M.", "PO", "18/02", "and", "D. M.", "13/02/19".

A

"C"

- 7 -

9600080

ذباب والا شاہ D.P.O صاحب خیر ضلع کراچی
درخواست وار علی بن علی منظوران کراچی

بجورفہ 01/02/2019 تا 14/04/2020 سے سزا
مقررہ کے دائرے میں بند کیا گیا ہے

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15/04

ذباب والا
گورنمنٹ ہسپتال - سائل عدالت کراچی۔ کہ میں
تحتیماً پولیس فورس میں رجسٹرڈ رہا تھا اور
ڈیوٹی پیمانہ پر تھیں۔ پھر میں نے سزا
رہا تھا۔ میرا گھریلو مال بھی ضبط کیا گیا اور
میں رات بے سوزی گھر میں رہا تھا اور
پیش آن میں نے تھیں۔ پھر میں نے سزا
چھٹی ہے۔ گھر میں آکر 02/01/2019
جلد لیا گیا۔ گھر میں رہا تھا۔ پھر میں
میں بجورفہ 09/01/2019 پر جیل گیا۔ اور
بجورفہ 17/03/2020 پر جیل سے رہا ہوا۔ اور
بجورفہ 20/03/2020 پر رہا ہوا۔ پھر میں
تھیں۔ پھر میں نے سزا
18 اپریل 2020 کو جیل سے رہا ہوا۔
672099 ہے۔ جو آپ صاحبان کے پاس موجود ہے
کیونکہ میں بال بچہ دار ہوں۔ ذریعہ معاش بالکل بند
لگا رہتا ہے۔ میں بال بچہ کو تنہا چھوڑ کر
دوبارہ ڈیوٹی پر تعینات کیا گیا۔ سزا
میں رہا ہوا ہے۔
بجورفہ 14/04/2020

po
For leg
and

سائل / ضلعی عدالت کراچی

15/04

جناب والا شان DPO صاحب ضلع کرم

سرکار درخواست بمراء عطا یگی منظوری تنخواہیں کھولنے بمورخہ 01/02/2019 تا 14/04/2020 سے سرکار معزز کی طرف سے بند کیا گیا ہے۔

جناب عالی! زارش ہے کہ سائل عرض کرتا ہے کہ میں بحیثیت پولیس فورس میں بطور لانس ٹائیک اپنا ڈیوٹی بمقام تھانہ صدہ لوئر کرم سرانجام دے رہا تھا میرا گھر بال بچ بمقام ضلع اسلام آباد میں واقع ہے میری گھر میں اچانک ضرورت پیش آئی میں نے تھانہ صدہ لوئر کرم سے سرکاری چھٹی پر گھر اسلام آباد بمورخہ 02/01/2019 چلا گیا گھر میں اچانک واقعہ پیش آیا جس میں میں بمورخہ 09/01/2019 پر جیل گیا، آخر کار بمورخہ 17/03/2020 پر جیل سے رہا ہو گیا اور بمورخہ 20/03/2020 پر اپنی ڈیوٹی حاضر کرنے کیلئے تھانہ صدہ لوئر کرم حاضر ہو گیا، میرا عرصہ سروس 18 سال ہے، میرے سروس بک کا نمبر 672099 ہے، جو آپ صاحبان کے پاس موجود ہے کیونکہ میں بال بچہ دار ہوں، ذریعہ معاش بالکل نہیں ہے، لہذا استدعا ہے من سائل کو تنخواہیں کھولنے اور دوبارہ ڈیوٹی پر تعینات کرنے کا حکم صادر فرما دے۔

مورخہ 14/04/2020

سائل دعا گو ہے گا

سائل / ضیاء الحق ولد ولی جان قوم غلجے سکنہ مہرباغ

"D" -8-



OFFICE OF THE
DISTRICT POLICE OFFICER
KURRAM, KHYBER PAKHTUNKHWA
Tel/Fax:0926-311354*Email:policekurram@gmail.com
No. 87-90.....Dated Parachinar. 24.4.2020.

SHOW CAUSE NOTICE.

I, Mr. Muhammad Quraish Khan, District Police Officer, Kurram being the competent authority, under KP Police Rules 1975 (Amended-2017) do hereby serve upon you Constable Zia ul Haq s/o Wali Jan Caste, Ghilji resident of village Mir Bagh Cental Kurram as follow:-

- 1) That you have found involved in the murder of your brother namely Sakao Khan s/o Wali Jan without any cogent reason and have gained very bad name to the Department vide FIR No0002803 dated 09/01/2019 Police Station Rawat Syala Islamabad.
- 2) That being responsible Government officials you found involved in the cited criminal offence which tantamount to misconduct and render you liable for disciplinary action under the relevant law/rules
- 3) That you are therefore, called upon to explain reasons as to why action under aforesaid rules should not be taken against you.

As a result thereof, I being a competent authority have tentatively decided to impose upon you the penalty of dismissal from service under the Rules.

You are, therefore required to show cause as to why the aforesaid penalty should not be imposed upon you and also intimate whether you desire to be heard in person.

If no reply to this notice is received within seven days of its delivery, in the normal course of circumstances, it shall be presumed that you have no defense to put in, and in that case an expert action shall be taken against you.


Mr. Zarif Khan DSP (HQs) is appointed as inquiry officer with the direction to probe into the allegations leveled against him and submit his recommendation/findings with in stipulated period of (15) days to this office for onward proceedings.


District Police Office,
Kurram.

No. & date is even.

Copy forwarded to:-

- 1 The Superintendent of Police (HQs) for information and n/action.
- 2 The OASI, District Kurram,
- 3 The Official concerned.


District Police Office,
Kurram.

بیان منیاء الحق ولد ولی جان تم علی سلنہ میریاع CK

بیان کیا کہ میں ^{کشت} لانس ٹائیک کرم ایوی فورسی میں
 ڈیوٹ کر رہا تھا۔ میں چھوٹ پر اپنے گھر واقعہ دولت داؤلنگ
 گیا تھا۔ عودہ $\frac{51}{519}$ کو میرے بھائی سرکاؤ خان کا قتل ہوا۔
 ہمیں میں FIR نمبر 2803 نافر ہوا۔ میں نے صحت جسم سے
 انکار کیا تھا۔ میں نے عدالت میں کٹ پستی کی۔ آخر کار
 پیارے گھر کے بڑوں نے آپسی میں رابطہ قائم کر لیا اور
 میں عدالت سے برک ہو گیا۔ عدالت فیصلے میں نو شرائط
 رکھے ہیں میں ان پر عمل عمل کرونگا اور ہر وقت
 عدالت فیصلہ کا پابند رہونگا۔ میں استعا کرتا ہوں کہ
 میری لو کرک بحال کیا جائیں اور تنخواہیں میں بھی
 فراہم کی جائیں لو دیا لو رہونگا۔

عورث $\frac{05}{2020}$

21302-0134476-1

المنیاء الحق

Attested



(Signature)

Jawid
DSP-HQ
05-05-2020

"F" -10-F



OFFICE OF THE DEPUTY SUPERINTENDENT OF POLICE
HEADQUARTER KURRAM, KHYBER PAKHTUNKHWA

No. 43 Dated Sadda 11-05-2020

To.

The District Police Office,
District Kurram, at Parachinar.

Subject: INQUIRY AGAINST POLICE PERSONNEL ZIA UL HAQ S/O WALI JAN
CASE GHALJI R/O MIR BAGH CENTRAL KURRAM .

INTRODUCTION.

The subject inquiry against mentioned above is received from the office of the worthy District Police officer Kurram vide letters No. 87-90 dated 24/04/2020.

ALLEGATION

That he has found involved in the murder of brother namely Sakaw Khan s/o Wali Jan vide FIR No. 0002803 dated 09/01/2019 Police Station Rawat Sihala Islamabad.

PROCEEDINGS

The undersigned on the receipt of the inquiry summoned accused Zia ul Haq and recorded his statement about the involvement in major criminal offence of murder of his brother. Wherein he stated that he has not killed his brother. Besides the allegation he has also made a compromise with the legal heirs of his brother namely Sakaw Khan.

Further, the Court order Criminal Appeal No. 379/2019 Islamabad High Court Islamabad has perused in detail wherein the Honorable Court has also been accepted the compromise made by the Council. And fixed a Diyat of Rs. 2320202/- on the request of the legal heirs of deceased. On the request of the accused Rs: 32856/- per month installment to be paid to the legal heirs of deceased through banking channel. The accused released on bail bound of Rs: 50000/- with one surety.


FINDINGS

After perusal of the statement, Compromise and Honorable Court Judgment of the alleged constable, he has been released on bail and there is nothing other charges against him in Police Stations Kurram and official duty. Further inquiry of the case is not needed.

RECOMMENDATIONS

In view of the above Zia ul Haq Police constable may be strictly issued warning and reinstated into the service with the direction to the pay officer to make it ensue the proper payment of installments of Diyat to the deceased family from his salary.

The inquiry report (01) page and the file containing (10) sheets is submitted, please


Deputy Superintendent Of Police
Headquarter, Kurram

"G" -11-

(X)

9

IN THE ISLAMABAD HIGH COURT, ISLAMABAD

Crl. Appeal No. ³⁷⁹ /2019

Zia-ul-Haq son of Malik Wali Jan Caste Hamazai Resident of Mir Baz Tehsil F.R. Kurram Agency, present address: Dhok Taami, Village and P.O. Rawat P.O. Sihala, Tehsil and District Islamabad presently confined in Central Jail Adiala, Rawalpindi.

...Appellant

Versus

The State

...Respondent

CASE FIR NO.11/2019 DATED 09.01.2019

OFFENCE U/S 302 PPC

P.S. SIHALA, ISLAMABAD

DATE OF DECISION: 31.10.2019

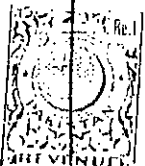
CRIMINAL APPEAL U/S 410 OF Cr.P.C. READ WITH OTHER ENABLING PROVISIONS OF LAW AGAINST THE JUDGMENT DATED 31.10.2019, PASSED BY THE COURT OF RAJA ASIF MAHMOOD, LEARNED ADDITIONAL SESSIONS JUDGE/JUDGE MCTC EAST ISLAMABAD, WHEREBY THE APPELLANT IS CONVICTED AND SENTENCED TO LIFE IMPRISONMENT WITH FINE OF RS.300,000/- AND IN DEFAULT IN PAYMENT OF FINE, THE APPELLANT HAS TO FURTHER UNDERGO SIX MONTHS SIMPLE IMPRISONMENT

PRAYER IN APPEAL: On acceptance of this appeal, the conviction and sentence of the appellant/judgment dated 31.10.2019 be set aside and the appellant/convict may graciously be acquitted from the charge.

Respectfully Sheweth:

1. That the appellant was tried in the above mentioned FIR.
2. That the learned trial court while passing the impugned judgment has not appreciated the evidence of the prosecution in accordance with the principles laid down by the superior courts and has passed the impugned judgment in a very slipshod manner, while ignoring the facts and circumstances of the case.

3. That the impugned judgment is contrary to law and facts and is not sustainable under the law.



For Private Use

26 JUN 2021

Examiner
Copy Supply Section
Islamabad High Court
Islamabad

19734
13-11-19

11.00 AM
19642
12-11-19

- 12 -

ORDER SHEET.
IN THE ISLAMABAD HIGH COURT, ISLAMABAD.
JUDICIAL DEPARTMENT.

Cri.Appeal No.379/2019

Zia-u-Haq

Versus

The State

. No. of order/ proceedings	Date of order/ Proceedings	Order with signature of Judge and that of parties or counsel where necessary.
	19.1.2021.	Mr.Ourangzeb Khan, Advocate for the appellant. Appellant in person. Miss.Sana Tariq, Advocate on behalf of State Counsel. Mr.Wali Jan in person.

Learned counsel for the appellant contends that compromise in terms of section 345(2) Cr.P.C has been effected between the parties, therefore, instant matter is required to be disposed of. Learned counsel for the appellant has placed on record copies of Bank challan whereby different installments of Diyat have been deposited in compliance of order of this Court dated 26.2.2020.

2. There is no denial to the proposition that parties have settled the issued in case FIR No.11 dated 09.1.2019 under section 302 PPC PS Sihala, Islamabad in terms of section 345(2) Cr.P.C and compromise has been recorded between the parties, affidavit of compromise has been placed on record whereby, statement of legal heirs have been confirmed by the learned trial Court. As per compromise, Diyat amount shall be paid through 36 equal installments on behalf of the appellant to the legal heirs of the deceased. The appellant has

Certified to Be True Copy

26 JAN 2021

Examined
Copy Supply Section
Authorised Under Article-87 of
Qanoon-e-Shahadat Order 1984
Islamabad High Court
Islamabad

partially paid certain Diyat amount through installments.

3. In view of above position when parties have already amicably settled the matter and offence has been compounded under the law. The only thing left is the remaining Diyat installments, which have to be paid by the accused/appellant as per his commitment, hence there is nothing left for further determination, therefore, the appeal is allowed and appellant Zia-ul-Haq present in the Court is acquitted from the charge of case FIR No.11 dated 09.1.2019 under section 302 PPC P.S. Sihala (with condition). The appellant shall keep on depositing the amount in compliance of order dated 26.2.2020 failing which he shall be proceeded in accordance with law and his surety shall also be proceeded accordingly. The complainant or legal heirs of the deceased may approach this Court again for payment of installments of Diyat if any default is made out on behalf of the appellant.


(MOHSIN AKHTAR KAYANI)
JUDGE

M.S.Zaki

Certified to Be True Copy
26 JAN 2021
Examined
Copy Submitted
Authorised Under Rule-67 of
Qanoon-e-Shahadat Order 1984
Islamabad High Court
Islamabad



"H" -14- H
OFFICE OF THE
DISTRICT POLICE OFFICER
KURRAM, KHYBER PAKHTUNKHWA

Tel: 0926-312208 Fax: 0926-311354

Email: policekurram@gmail.com

No. 1581 A Dated Parachinar 27.05.2021

OFFICE ORDER

Constable Zia-ul-Haq is hereby suspended as charged in FIR No. 0002803 dated 09.01.2019 u/s 302 PPC PS Rawat Sihala Islamabad with immediate effect.

District Police Officer
Kurram

No. & date is even:

Copy to the:

1. Regional Police Officer Kohat Region Kohat.
2. All DSPs in Kurram.
3. All SHOs in Kurram.
4. OASI Kurram Police.
5. Officials concerned.

District Police Officer
Kurram



672099-15-19

OFFICE OF THE
DISTRICT POLICE OFFICER
KURRAM, KHYBER PAKHTUNKHWA

Tel/Fax: 0926-311354*Email:policekurram@gmail.com

No. 1684 A /PA Dated Parachinar 27.05.2021

DISCIPLINARY ACTION.

Mr. Tahir Iqbal District Police Officer as competent authority am the opinion that you Constable Zia-ul-Haq have rendered yourself liable to be proceeded against departmentally under Khyber Pakhtunkhwa Police Rule 1975 (amended 2014) as you have committed the following act.

STATEMENT OF ALLEGATIONS

That you have charged in murder case vide FIR No. 0002803 dated 09.01.2019 PS Rawat Sihala Islamabad The same act is gross misconduct on your part as Police official. You have earned bad name for Police and tarnish the image of Police which resulted to lost confidence of the public upon the Police.

For the purpose of conduct inquiry with reference to the above allegations DSP Investigation is appointed as Inquiry officer. The inquiry officer shall in accordance with the provision of the Police Rule 1975 (amended 2014), provide reasonable opportunity of hearing to the above official within (07) days of the receipt of this order, recommendations as to punishment or other appropriate action against the official.

The official shall join the proceeding on the date, time and place fixed by the inquiry officer.

District Police Officer
Kurram

Copy to the:

1. Inquiry Officer for initiating proceedings against the official under the provision of Police Rule 1975.
2. Official with the direction to appear before the Inquiry Officer on the date, time and place fixed by him for the purpose of inquiry proceedings.

District Police Officer
Kurram

Handwritten signature and notes at the bottom of the page.

-16-



OFFICE OF THE
DISTRICT POLICE OFFICER
KURRAM, KHYBER PAKHTUNKHWA

Tel/Fax: 0926-311354*Email:policekurram@gmail.com

No. 1684.B.1/PA Dated Parachinar. 27.05.2021

CHARGE SHEET

Mr. Tahir Iqbal District Police Officer as competent authority under Khyber Pakhtunkhwa Police Rule 1975 (amended 2014), am the opinion that you Constable Constable Zia-ul-Haq had rendered yourself liable to be proceeded against as you have committed the following act within the meaning of the Police Rules 1975 amended 2014.

That you have charged in murder case vide FIR No. 0002803 dated 09.01.2019 PS Rawat Sihala Islamabad The same act is gross misconduct on your part as Police official. You have earned bad name for Police and tarnish the image of Police which resulted to lost confidence of the public upon the Police.

By reason of the above, you appear to be guilty of misconduct under the Police Rule 1975 (amended 2014) and have rendered yourself liable to all or any of the penalties specified in the Police Rules.

You are, therefore, required to submit your written statement within (03) days of the receipt of this charge sheet to the inquiry officer. Your written defense if any should reached the inquiry officer within the specified period, failing which it shall be presumed that you have no defense to put in and ex-parte action shall be taken against you. A statement of allegation is enclosed.

District Police Officer
Kurram

ذات التوقيع / فیس



"K" -18-

OFFICE OF THE
DISTRICT POLICE OFFICER
KURRAM, KHYBER PAKHTUNKHWA

Tel/Fax: 0926-311354*Email:policekurram@gmail.com
No. 2025-29/PA Dated Parachinar. 29-6-20

ORDER

This order is passed on the Charge Sheet against Constable Zia-ul-Haq personal No.672099 under the Khyber Pakhtunkhwa, Police Rules, 1975 (Amendment 2014).


Brief of the fact is that constable Zia-ul-Haq has been charged in murder case vide FIR No. 0002803 dated 19.01.2019 u/s 302 PPC PS Rawar Schal Islamabad duly served charge sheeted vide No. 1684 A/PA dated Parachinar dt 27.05.2021.

That consequent upon the completion of inquiry conducted against Zia-ul-Haq by the inquiry officer for which constable Zia-ul-Haq was given opportunity vide this office No. 1684A/PA dated Parachinar the 27.05.2021 and charge sheet No. 1684B/PA dated Parachinar the 27.05.2021.

Concluded through the findings and recommendations of the inquiry officer, the material on record and other connected papers including defense to inquiry officer I am satisfied that constable Zia-ul-Haq has committed the acts charged against him.

I have heard Constable Zia-ul-Haq personally in office but he could not produce any cogent reason to prove his innocence.

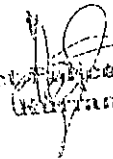
In view of the above I, Tahir Iqbal District Police Officer Kurram exercise of the powers conferred upon me, hereby award him a major punishment "Dismissal from Service" under the Khyber Pakhtunkhwa, Police Rules, 1975 (Amendment 2014) with immediate effect.


District Police Officer
Kurram

No. & date is even:

Copy forwarded to the:

1. Regional Police Officer Kohat Region Kohat.
2. District Account officer Kurram.
3. All DSPs/SIOs in Kurram
4. Pay Officer Kurram.
5. Concerned.


District Police Officer
Kurram

BETTER COPY OF THE PAGE NO. 18

OFFICE OF THE
DISTRICT POLICE OFFICER
KURRAM, CHIYUEI PAKUTUNKUWA
Tel/Fax 0920 31354 Email: policekurra magmail.com
No. 2025-29/PA Dated Parachinar 29-06-2020

ORDER

This one is passed on the Charge Sheet against Constable Zia-ul-Haq personal No 72099 under the Khyber Pakhtunkhwa, Police Rules, 1975 (Amendment 2014).

Brief of the fact that constable Zia ulHaq has been charged in murder casevide HR No. 0002803 dated 19.01.2019 / 302 PPC PS Rawat Sehala Islamabad duly served change Sheeted vide No. 1684 A/PA dated Parachinar the 27.05.2021.

Thatconsequent upon the completion of inquiry conducted against Zia-Ul-Haqby the inquiry officer for which constable Zia-ul-Haq was given opportunity vide this once No. 1084A/PA dated Parachinar the 27.05.2021 and charge Sheet No. 1684-B/PA date Parachinar the 27.05.2021.

Concluded through the findings and recommendations of the inquiry officer, the material on record and other connected papers including defense to inquiry officer I am satisfied that constable Zia ulHaq has committed the acts charged against him.

I have heard Constable Zia ul Haq personally in office but he could be produce any cogent reason to prove his innocence.

In view of the above, I, TahirIqbal District Police Officer Kurram exercise of the powers conferred upon me, hereby award him a major punishment "Dismissal from Service" under the Khyber Pakhtunkhwa, Police Rules, 1975 (Amendment 2014) with immediate effect.

District Police Officer,
Kurram

No. & date is even:

Copy forwarded to the:

- 1 Regional Police Officer Kat Region kohat.
- 2 District Account officer Kurram.
3. All DSPs/SHOs in Kurram
4. Pay Officer Kurram.
5. Concerned.

District Police Officer,
Kurram

"L"

۲۰

10236 / 154
5/7/21

19- جنرل جناب DIG صاحب کوہاٹ

D.P.O. KUVVARI
For Comments & also
Provide his service
Accessories/enquiry
File

5876
1-7-21
جناب عالی!

مودبانہ گزارش ہے کہ میں ایک غریب گھرانے سے تعلق رکھتا ہوں۔ مجھ پر کسی نے جھوٹے مقدمے کی FIR کروائی تھی۔ جس بندے کی مجھ پر FIR ہوئی وہ میرا بڑا بھائی تھا۔ اور جس پر EIR کی بنیاد پر مجھے نوکری سے فارغ کیا گیا تھا وہ سراسر جھوٹی و بے بنیاد تھی۔ اور جب میرا کیس عدالت میں گیا تو میرے خلاف عدم ثبوت کی موجودگی میں مجھے بری کر دیا گیا۔ لہذا آپ صاحبان سے میری استدعا ہے کہ میرے بوڑھے والدین ہیں اور چھوٹے چھوٹے بچے ہیں۔ جن کا تمام کا تمام بوجھ میرے کندھوں پر ہے۔ لہذا آپ سے گزارش ہے کہ مجھے نوکری پر بحال کیا جائے تاکہ میں اپنے گھر والوں کا گزر بسر اس تنخواہ سے کر سکیں۔

لہذا استدعا کی جاتی ہے کہ میری درخواست پر ہمدردانہ گور فرمایا جائے۔

EC
01/07/21

SPC
for approval
العارض
ذیاء الحق ولد ولی جان سکنتہ سنٹر کرم میر باغ تحصیل ضلع کرم صدہ۔
01/07/21

شناختی کارڈ نمبر: 1-0134476-21302
موبائل نمبر: 03000954493

Office of The District Police Officer
Dy No. 1710
D. 7-7-21
District Murrum

District Police Office
Murrum

"M" -20-

ORDER

This order will dispose of a departmental appeal moved by Ex-Constable Zia-ul-Haq of district Kurram, against the punishment order, passed by DPO Kurram vide order Endst: No. 225-29/PA, dated 29.06.2021 whereby he was awarded major punishment of Dismissal from Service on the allegations of his involvement in criminal case vide FIR No. 0002803, dated 19.01.2019 w/s 302 PPC PS Rawat Sehail Islamabad.

Comments as well as relevant record were requisitioned from DPO Kurram and perused. The appellant was also heard in person in O.R held in this office on 30.08.2021. During hearing the appellant did not advance any plausible explanation in his defense to prove his innocence.

Record gone through which indicates that the allegations leveled against the appellant are fully proved duly established by the E.O in his findings. Therefore, in exercise of the power conferred upon the undersigned under Rules 11-A, his appeal being devoid of merits is hereby dismissed *repealed and dismissed*

Order Announced
30.08.2021

Mohammad Zafar Ali
(MOHAMMAD ZAFAR ALI) PSP
Regional Police Officer,
Kohat Region.

No. 13774 /EC, dated Kohat the 1-08- /2021.

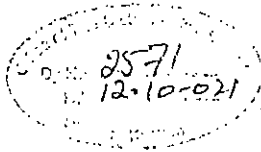
Copy to District Police Officer, Kurram for information and necessary action w/r to his office Memo: No. 544, dated 28.07.2021. His Service Book is returned herewith, please.

Encl:
S/Book = 2
English file = 1

Mohammad Zafar Ali
(MOHAMMAD ZAFAR ALI) PSP
Regional Police Officer,
Kohat Region.

OABI/SRE

Place on file.



DPO Kurram
12.10.2021.

فہرست نامیہ کے نام پر

درخواست برائے سٹیٹ بینک افغانستان
کاغذات نامیہ کے نام پر
پیشگی در اسٹیم آباد یا نیوٹورٹ

src
for machine as
per copy

[Signature]
D/O - M

13.10.2021-

فہرست نامیہ کے نام پر
درخواست برائے سٹیٹ بینک افغانستان
کاغذات نامیہ کے نام پر

فہرست نامیہ کے نام پر
درخواست برائے سٹیٹ بینک افغانستان
کاغذات نامیہ کے نام پر

کاغذات نامیہ کے نام پر
درخواست برائے سٹیٹ بینک افغانستان

کاغذات نامیہ کے نام پر
درخواست برائے سٹیٹ بینک افغانستان

13/10/21

[Signature]
D/O - M

کاغذات نامیہ کے نام پر
درخواست برائے سٹیٹ بینک افغانستان
کاغذات نامیہ کے نام پر

VAKALATNAMA
BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,
PESHAWAR.

Service Appeal No. _____/20

Zia ul HaqAppellant

VERSUS

RPO 9 & othersRespondent(s)

I, the undersigned, do hereby appoint and constitute,

Fazal Shah Mohmand Advocate Supreme Court & **Rabia Muzaffar** Advocate. To act, appear and plead in the above-mentioned matter and to withdraw or compromise the said matter or submit to arbitration any differences or dispute that shall arise touching or in any manner relating to the said matter and to receive money and grant receipts therefore and to do all other acts and things which may be necessary to be done for the progress and the course of the prosecution of the said matter.

1. To draft and sign files at necessary pleadings, applications, objections, affidavits or other documents as shall be deemed necessary and advisable for the prosecution of the said matter at all its stages.
2. To employ any other Legal Practitioner, authorizing him to exercise the power as conferred on the undersigned Advocate, wherever he may think fit to do so.

AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the above matter. I also hereby agree not to hold the Advocate or his substitute responsible for the result of the said matter in consequence of his absence from the Court when the said matter is called up for hearing. I further hereby agree that in the event for the whole or any part of the fee to be paid to the Advocate remaining unpaid, he shall be entitled to withdraw from the above matter. Received by me on 05/11/21

فزاہی
CLIENT(S)
[Signature]

ACCEPTED BY:

[Signature]
FAZAL SHAH MOHMAND
ADVOCATE,
SUPREME COURT OF PAKISTAN.

&

ACCEPTED BY:
[Signature]
RABIA MUZAFFAR
ADVOCATE PESHAWAR

"B"

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

No. 5

Appeal No..... 7736 of 20 21

Zia ul Haq Appellant/Petitioner

Versus

R-P-O Kohat Region Kohat Respondent

Respondent No..... 1

Notice to: —

Regional Police Officer Kohat Region
Kohat.

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on..... at 8.00 A.M. If you wish to urge anything against the 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 alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this..... 11/16

Day of..... Jan 20 22

(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.

8B

No.

Appeal No. of 20

7736

21

Zia ul Haq

Appellant/Petitioner

R-P-O Kohat Region Kohat

Respondent

Respondent No.

3

Notice to: —

Provincial Police Officer UPK Peshawar

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

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

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

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

11/15

Day of..... 20

Jan 22

(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.

13-01-2022

“B”

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

No.

Appeal No. 7736 of 20 21

Zia ul Haq Appellant/Petitioner

Head
 R.P.O Kohat Region Kohat Respondent

Versus

Respondent No. 2

Notice to: — Distt. Police Officer Kurram.

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 10/3/22 at 8.00 A.M. If you wish to urge anything against the appellat/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

Given under my hand and the seal of this Court, at Peshawar this 11th Day of Jan 20 22

(For Reply)


 Registrar,

Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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