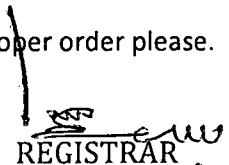


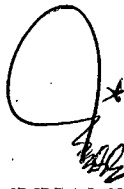


Form- A

FORM OF ORDER SHEET

Court of \_\_\_\_\_

Case No.- 7874/2021

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	15/12/2021	<p>The appeal of Mr. Muhammad Mubarak Zeb Gul resubmitted today by Mr. Saadullah Khan Marwat Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p> REGISTRAR</p>
2-	09.02.2022	<p>This case is entrusted to S. Bench at Peshawar for preliminary hearing to be put there on <u>09/02/22</u>.</p> <p> CHAIRMAN</p> <p>Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 25.04.2022 for the same as before.</p> <p> Reader</p>
	25.04.2022	<p>Counsel for the appellant present.</p> <p>Learned counsel for the appellant seeks adjournment as he has not prepared the brief. Adjourned. To come up for preliminary hearing on 10.05.2022 before S.B.</p> <p> (MIAN MUHAMMAD) MEMBER(E)</p>

SCANNED  
KPST  
Peshawar


The appeal of Mr. Muhammad Mubarak Zeb Gul, SI No.794/P, Capital City Police, Peshawar received today i.e. on 08.12.2021 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of the appeal is unsigned which may be signed by the appellant.
- 2- Checklist is not attached with the appeal.
- 3- Appeal has not been flagged/marked with annexure marks.
- 4- Copy of Impugned order is not attached with the appeal.
- 5- Departmental appeal and rejection order in respect of the appellant is not attached with the appeal.
- 6- Annexures referred to in the memo of the appeal are not attached with the appeal.
- 7- Four more copies/sets of the appeal along with annexures i.e. complete in all respect may also be submitted with the appeal.

No. 2436 /S.T,

Dt. 08/12 /2021

Saadeullah Khan Adv.

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Sir,

Re-submitted after removing  
the objections.



**BEFORE THE KPK SERVICE TRIBUNAL PESHAWAR**

S.A. No. 7874 /2021

Muhammad Mubarak Zeb Gul

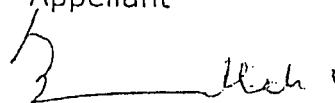
versus

CCPO & Another

**SCANNED  
KPST  
Peshawar**

**I N D E X**

S. No.	Documents	Annex	P. No.
1.	Memo of Appeal		1-5
2.	Regularization of service, 13-08-2014	"A"	6-7
3.	W.P. of colleagues dated 06-07-2018	"B"	8-19
4.	Judgment dated 24-04-2019	"C"	20-23
5.	Revised Seniority List from initial appointment dated 05-06-2020	"D"	24
6.	Subsequent Notification of regularization dated 01-07-2020	"E"	25-26
7.	Representation for F.S List, 24-07-2020	"F"	27-29
8.	Colleagues of appellant W.P. No. 3900/20, 07-09-20	"G"	30-34
9.	Circulation of seniority list of OSI/ASI dated 12-10-2020	"H"	35-40
10.	Promotion of appellant to rank of OSI with effect from 16-04-2014 dated 26-02-2021	"I"	41-42
11.	DPC of confirmation of service of mandatory period	"J"	43-44
12.	Confirmation Notification as SI of dated 16-03-2021	"K"	45-46
13.	Representation dated 14-04-2021	"L"	47-48

Appellant  
Through   
Saadullah Khan Marwat  
Advocate  
21-A, Nasir Mansion,  
Shoba Bazaar, Peshawar  
Ph: 0300-5872676

Dated 07-12-2021

**BEFORE KPK SERVICE TRIBUNAL PESHAWAR**

S.A No. \_\_\_\_\_ /2021

Muhammad Mubarak Zeb Gul,  
Sub-Inspector No. 794/P  
Capital City Police,  
Peshawar ..... Appellant

Khyber Pakhtunkhwa  
Service Tribunal  
Diary No. 8006  
Date: 08/12/2021

**Versus**

1. **Capital City Police Officer,**  
Peshawar.
2. **Provincial Police Officer,**  
KP, Peshawar ..... Respondents

⊕<=>⊕<=>⊕<=>⊕<=>⊕

*Filed to-day*  
*Registrar*  
*8/12/21*

**APPEAL U/S 4 OF SERVICE TRIBUNAL ACT, 1974**  
**AGAINST OFFICE NOTIFICATION NO. 3439 / EC-I,**  
**DATED 16-03-2021 OF R. NO. 01 WHEREIN**  
**APPELLANT WAS CONFIRMED IN THE RANK OF**  
**SUB INSPECTOR WITH PROMOTION TO LIST "F"**  
**WITH EFFECT FROM I.E. 24-02-2018 INSTEAD**  
**OF FROM THE DATE OF PROMOTION TO THE**  
**RANK OF OFFICIATING SUB INSPECTOR I.E. 16-**  
**04-2014 AND DEPARTMENTAL APPEAL DATED 14-**  
**04-2021 BEFORE R. NO. 02 WAS NOT HONORED**  
**TILL DATE:**

⊕<=>⊕<=>⊕<=>⊕<=>⊕

**Respectfully Sheweth:**

1. That appellant was initially appointed / recruited as Probationer Assistant Sub-Inspector on 26-03-2011.
2. That on 13-08-2014, services of appellant was regularized along with others but with immediate effect instead of from the date of initial appointment i.e. 26-03-2011 and was deprived for about 03 years from the benefits of rendered services. (Copy as annex "A")
3. That colleagues of appellant etc. filed W.P. No. 3720-P/18, "Qazi Muhammad Arif etc vs Govt. of KP & Others" to direct respondents to implement the decision of the Committee Board regarding fixation of seniority from the date of initial appointment which was allowed on 24-04-2019 by the hon'ble bench of the Peshawar High Court, Peshawar directing respondents to implement the recommendations of the Committee already admitted by the them in the comments in letter and spirit. (Copies as annex "B" & "C")
4. That in the pursuance of the judgment dated 24-04-2019 of the hon'ble Peshawar High Court, Peshawar, R. No. 01 revised List "E" of the colleagues of appellant etc. from the date of initial recruitment as ASIs vide Notification dated 05-06-2020. (Copy as annex "D")
5. That on 01-07-2020 subsequent Notification of appellant etc was issued by R. No. 01 and services of appellant etc were regularized from the date of their initial recruitment. The name of appellant was figured at S. No. 27. (Copy as annex "E")
6. That on 24-07-2020, colleagues of appellant etc submitted representation before R. No. 02 to finalize / issue seniority list with effect from the date of initial recruitment with other colleagues as promotion to the upper rank was took on place but in vain. (Copy as annex "F")
7. That on 07-09-2020, colleagues of appellant etc filed Writ Petition No. 3900-P/20 "Abdul Sattar, etc, vs CCPO & another" for direction to respondents to issue joint seniority list with others and to bring his name on list "F" with all back benefits. (Copy as annex "G")

8. That on 12-10-2020, R. No. 01 circulated Seniority List of Officiating Sub Inspectors and Assistant Sub Inspectors with List "E" wherein name of appellant was figured at S. No. 58 and his name was brought on List "E" from the date of appointment instead of with immediate effect as per court decision. (Copy as annex "H")
9. That on 26-02-2021, R. No. 01 issued Notification wherein on the recommendation of Departmental Selection Committee, appellant was promoted to the rank of Officiating Sub-Inspector with effect from 16-04-2014 and his name was placed at S. No. 31. (Copy as annex "I")
10. That in light of the Writ Petitions regarding promotion, confirmation and antedation, DPC was constituted who examined the cases and held therein that it was principally agreed to grant favour to incumbents of their SHO period served during acting charge basis period and those PASIs of the batches who had completed their mandatory period, prior to amendment shall be confirmed on old criteria while those who could not completed periods prior of SHO, etc shall be confirmed as SI after completion of mandatory period (SHO etc). However on completion of the said period left over's PASIs shall be confirmed and he be assigned seniority with their batch. (Copy as annex "J")
11. That in pursuance of the decision of the said DPC, R. No. 01 issued Notification on 16-03-2021 wherein appellant was confirmed in the rank of SI with effect from 24-02-2018, when he completed mandatory period provided in PR 13.02 and Standing Orders issued from time to time. The same of appellant is figured at S. No. 28 of the said Notification. (Copy as annex "K")
12. That appellant was never deputed by the department for completion of mandatory periods of SHO etc so he was not dealt with as per Notification dated 16-03-2021 of R. No. 01 with his colleagues. He was deprived from confirmation as SI from the date of promotion to the rank of Officiating SI, i.e. 16-04-2014, so on 14-04-2021, he submitted representation before R. No. 02 to treat

him at par with his colleagues and to confirm him from the date of promotion to the rank of Officiating SI, i.e. 16-04-2014 but in vain. (Copy as annex "L")

Hence this appeal, Inter Alia, on the following grounds:-

### **GROUND S**

- a. That appellant is serving the department with devotion and no complaint, whatsoever, was made against him in this respect.
- b. That appellant was deprived from confirmation as Sub Inspector for the sole reason that he has not gone through the mandatory periods of SHO, etc. which objection is incorrect and illegal for the reason that it was the duty of the respondents to depute him for the purpose and when the respondents did not do so, then who be made responsible for the same.
- c. That it was held time and again not only by this hon'ble Tribunal but also by the apex court that when the department failed to honor its objection, there no shall be hold responsible for the same and was give the relief sought for.
- d. That in the circumstances, appellant is entitled to be confirmed as SI from the date of promotion to the rank of Officiating Sub Inspector i.e. 16-04-2014.
- e. That Notification dated 16-03-2021 is liable to be modified with effect from 16-04-2014 instead of with effect from 24-02-2018.
- f. That in the circumstances, the impugned Notification to extent of not confirming appellant as Sub Inspector since 16-04-2014 is based on discrimination and malafide.


It is, therefore, most humbly prayed that on acceptance of the appeal, order dated 16-03-2021 of R. No. 01 be modified / reviewed and appellant be confirmed as Sub Inspector from the date of promotion to the rank of Officiating Sub Inspector i.e. 16-04-2021 with all service benefits instead of 24-02-2018 with such other relief as may be deemed proper.

  
Appellant

Through

  
Saadullah Khan Marwat

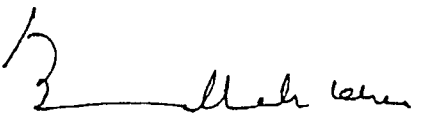
  
Arbab Saiful Kamal

  
Anjad Nawaz  
Advocates

Dated: 07-12-2021

**CERTIFICATE:**

As per instructions of my client, no such like Service Appeal has earlier been filed by the appellant before this Hon'ble Tribunal.

  
Advocate

**AFFIDAVIT**

I, Muhammad Muḃarak Zeb Gul No. 794/P, Sub Inspector, Capital City Police Peshawar (appellant), do hereby solemnly affirm and declare that contents of **Service Appeal** are true and correct to the best of my knowledge and belief

  
DEPONENT



A 6

13-08-14

POLICE DEPTT:CCP PESHAWARFor Publication in the Khyber Pakhtunkhwa Police Gazette Part-II, Orders, by the Capital City Police Officer, Khyber Pakhtunkhwa, Peshawar.Notification

Dated 13.08.2014

No. 10848/EC-1, Confirmation in the Rank of Notification PASI & promotion to List "E", As per Recommendation of Departmental Promotion Committee meeting held on 12.06.2014, the following P/ASIs of Capital City Police Peshawar are hereby confirmed in rank of ASI from the date of their appointment as noted against each after completion of their three years prohibition period and course under police Rules 12.8 and 19.25 and brought their names on promotion to list E with immediate effect:-

S.No	Rank Name & No	Present Posting	Date of Confirmation
1.	Abdus Sattar No.746/P	CCP Peshawar/ Elite Force	20.01.2010
2.	Fazal Hadi No. 747/P	CCP Peshawar/ Elite Force	20.02.2010
3.	Manzoor Khan No.748/P	Operation Room CPO	20.02.2010
4.	Tahir Ali Khan No. 749/P	Charsadda	20.02.2010
5.	Bismillah Jan No. 750/P	Charsadda	20.02.2010
6.	Imran Ullah No.711/P	Charsadda	20.02.2010
7.	Wisal Khan No.753/P	Nowshera/ Elite Force	20.02.2010
8.	Muhammad Arif No.754/P	CCP Peshawar	20.02.2010
9.	Muhammad Umar No.755/P	CCP Peshawar	20.02.2010
10.	Masood Khan No.756/P	Peshawar/ Invest: Wing Ppl	13.03.2010
11.	Muhammad Tahir No.757/P	AIG/ Legal CPO CFMS	13.03.2010
12.	Aftab Khan No.758/P	AIG/ Legal CPO CFMS	13.03.2010
13.	Rehmatullah Khan No.759/P	Charsadda	01.04.2010
14.	Afzal Gul No.760/P	CCP Peshawar	01.04.2010
15.	Rjaz Ahmed No.761/P	CCP Peshawar	01.04.2010
16.	Afzal Khan No.766/P	CCP Peshawar	17.09.2010
17.	Nisan Ullah No.767/P	CCP Peshawar	17.09.2010
18.	Naveed Gul No.768/P	Charsadda	17.09.2010
19.	Babar Ali No.769/P	Charsadda	17.09.2010
20.	Muhammad Arshid No.770/P		17.09.2010
21.	Asif Khan No.771/P	Charsadda	17.09.2010
22.	Muhammad Rafique No. 772/P	CCP Peshawar	17.09.2010
23.	Tehseen Ullah No.773/P	CCP Peshawar	17.09.2010
24.	Laiq Zada No.774/P	CCP Peshawar	17.09.2010
25.	Irfan Ullah No.776/P	Charsadda	17.09.2010
26.	Wajid Khan No.777/P	CCP Peshawar	17.09.2010
27.	Akhtar Hussain No.778/P	CCP Peshawar	17.09.2010
28.	Azaz Alam Khan Khalil No.783/P	CCP Peshawar	26.03.20211
29.	Imtiaz Ahmad No.784/P	CCP Peshawar	26.03.20211
30.	Asif Ali Khan No.785/P	CCP Peshawar	26.03.20211
31.	Salcem Khan No.786/P	CCP Peshawar	26.03.20211
32.	Inam Ullah No.787/P	CCP Peshawar	26.03.20211
33.	Muhammad Asif Khan No.788/P	CCP Peshawar	26.03.20211
34.	Ayub Khan No.789/P	CCP Peshawar	26.03.20211
35.	Qazi Muhammad Arif No.790/P	CCP Peshawar	26.03.20211

36.	Mumtaz Khan No.791/P	CCP Peshawar	26.03.20211
37.	Bilal Hussain No.792/P	CCP Peshawar	26.03.20211
38.	Abdullah Jalal Khan No.793/P	CCP, Peshawar	15.03.2011
39.	Muhammad Mubarak Zeb Gul No.794/P	CCP, Peshawar	26.03.2011
40.	Saeed Jan No. 795/P	CCP, Peshawar	26.03.2011
41.	Muhammad Aslhaq No.796/P	CCP, Peshawar	26.03.2011
42.	Ahmadullah Khan No.797/P	CCP, Peshawar	26.03.2011
43.	Muhammad Waqas Yousaf No.798/P	District Nowshera	26.03.2011
44.	Muhammad Ayaz No.799/P	District Nowshera	26.03.2011
45.	Mamoon Rashid No.800/P	CCP, Peshawar	26.03.2011
46.	Adil Sayed No. 801/P	District Nowshera	26.03.2011
47.	Syed Asghar Khan No.802/P	District Nowshera	26.03.2011
48.	Nauman Khan No. 803/P	CCP, Peshawar	26.03.2011
49.	Lady Mughis No.804/P	CCP, Peshawar	26.03.2011
50.	Lady Sumaira Jabeen No.805/P	CCP, Peshawar	26.03.2011
51.	Lady Mehwish Bukhari No.807/P	CCP, Peshawar	26.03.2011
52.	Lady Nadia Shaheen No.808	CCP, Peshawar	26.03.2011

The following P/ASIs have been deferred from confirmation in the Bank of ASI and promotion to List E due to the reason as noted against each:-

1.	Ishfaq Ahmed No.775/P	Charsadda	Deferred from confirmation in the rank of ASI & promotion to list "D" due to incomplete "D" course and also non availability of ACRs 2011 and 2012.
2.	Saeeda Shahen No. 806/P	CCP Peshawar	Deferred from confirmation in the rank of ASI & promotion to list E due to incomplete "D" course.

Sd/  
Capital City Police Officer,  
Peshawar

No.10849-60/EC-I

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

1. Provincial Police Officer Khyber Pakhtunkhwa, Peshawar.
2. Addl: Inspector General of Police, Investigation Khyber Pakhtunkhwa Peshawar.
3. Addl: Inspector General of Police, Legal CPO, Peshawar.
4. Deputy Inspector General of Police, Legal CPO, Peshawar.
5. Director Anti Corruption Establishment, KPK, Peshawar
6. District Police Officer, Charsadda, Nowshera.
7. SSP/ Operation Investigation & traffic, Peshawar.
8. Asstt: Secret Branch & EC-II, CCP Peshawar.

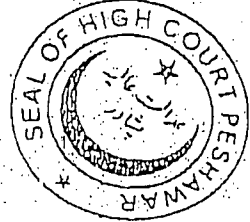
B

8

6-7-18

BEFORE THE HON'BLE PESHAWAR HIGH COURT  
PESHAWAR

W.P No. 3720 P /2018



1. Qazi Muhammad Arif S/o Qazi Ghulam Sarwar, belt No. 790-P R/o CCPO Peshawar.
2. Saced Jan S/o Ibrahim Khan, Belt No. 795-P R/o CCPO Peshawar
3. Aiza Alam S/o Mawaz Alam, Belt No. 783-P R/o CCPO Peshawar.
4. Asif Khan S/o Ghulam Muhammad, Belt No. 738-P R/o CCPO Peshawar
5. Muntaz Khan S/o Musharaf Khan, Belt No. 791-P R/o CCPO Peshawar.
6. Nauman Khan S/o Sharif Ahmad, belt No. 803-P R/o CCPO Peshawar
7. Muhammad Ishfaq S/o Zahirullah, belt No. 796-P R/o CCPO Peshawar
8. Muhammad Umar S/o Fazal Gul, belt No. 755-P R/o CCPO Peshawar
9. Ayub Khan S/o Mian Khan, belt No. 789-P R/o CCPO Peshawar
10. Masood Khan S/o Shah Muhammad, belt No. 756-P R/o CCPO Peshawar
11. Ahmadullah Khan S/o Kiramatullah, belt No. 797-P R/o CCPO Peshawar

FILED TODAY  
Deputy Registrar  
06 JUL 2018

FILED TODAY  
18 JUL 2018

TESTED  
EXAMINER  
Peshawar High Court

- 12. Inamullah S/o Haji Muhammad Khan, belt No. 787-P R/o CCPO Peshawar
- 13. Saleem Khan S/o Nowrang Khan, belt No. 786-P R/o CCPO Peshawar
- 14. Imtiaz Ahmad S/o Liaqat Ali, belt No. 784-P R/o CCPO Peshawar
- 15. Asif Ali Khan S/o Fazal Ali, belt No. 785-P R/o CCPO Peshawar
- 16. Abdullah Jalal Khan S/o Major (R) Javed Jalal, belt No. 793-P R/o CCPO Peshawar

..... Petitioners

VERSUS

- 1. Govt of Khyber Pakhtunkhwa through Chief Secretary, Khyber Pakhtunkhwa Peshawar.
- 2. Provincial Police Officer, Govt of Police Khyber Pakhtunkhwa Peshawar.
- 3. Additional Inspector General of Police Khyber Pakhtunkhwa Peshawar.
- 4. Chief Capital Police Officer, Peshawar.
- 5. District Inspector General Headquarter, Peshawar.

..... Respondents

WRIT PETITION UNDER ARTICLE 199 OF THE  
 CONSTITUTION OF ISLAMIC REPUBLIC OF  
 PAKISTAN 1973

FILED TODAY  
 Deputy Registrar  
 06 JUL 2018

ATTESTED  
 EXAMINER  
 Peshawar High Court

*[Handwritten signature]*

20  
Respectfully submitted:

1. That the Petitioners were appointed as Assistant Sub Inspectors on 26.03.2011 through Public Service Commission and subsequently on completion of satisfactory probation, were confirmed w.e.f 26.03.2011, from the date of appointment, But brought in the seniority/promotional list, i-e list E, after completion probationary period. (copy of appointment letter and confirmation letter are attached as annex A)
2. The Petitioners have been appointed as probationer AISs in the batches year 2010 and 2011, and till date performing their duties as such with full zeal and devotion to the entire satisfaction of their superiors without any complaint what so ever.
3. That the petitioners were placed in their own seniority list and not properly placed at the E list, which need to prepare and maintain to the candidates who can further sent for upper college course for promotion and placing in the regular list of SIs.
4. That placing and Admission to E list of the Petitioners has been kept secret and petitioners remained unaware of our actual position / seniority in the list but have come to know that number of rankers/promotes SIs, confirmed on the same

MAILED TODAY  
Deputy Registrar  
06 JUL 2011

ATTESTED  
EXAMINER  
Peshawar High Court

31  
status with the probationer ASIs, have been brought seniors on seniority list and detailed to upper course which is squarely against the constitutional rights and rules, applicable to police force.

5. That the petitioners represented to the respondents that since it was the duty of the respondents department that a proper seniority list should have been made after the conformation or after satisfactory completion of probation period, however if it was not done by them than how the petitioners could be punished, the representations so made were given deaf ear. (Copies of the representations is attached as annexure B)

6. That on representation of the petitioners the respondents department constituted committee regarding the fixation of the seniority, where as the committee duly constituted by the competent authority, recommended that E list be revised and the appellant/petitioners including others if any, be brought and placed at their due place, and the candidates who been officiating promotion may be brought on seniority list E after completion officiating /probation period according to police rule 13.18. (copy of committee report vide dated 31-08-2017 as annexure C)

FILED TODAY  
Deputy Registrar  
06 JUL 2010

*Handwritten signature*

TESTED  
EXAMINER  
Highway High Court

7. That the petitioners approached number of times to the respondents to implement the decision of the committee regarding the fixation of the seniority of the petitioners but quite malafiedly not implementing the clear directions of their own constituted committee for the purpose to accommodate their own blue eyes ones, which they doing it by sending the promote ASIs for the upper college course. (copies of the requests for implementation of committee decision are attached as annexure D)

8. That the secured and guaranteed rights of the petitioners have been violated, they were felt themselves aggrieved of the above acts and omission, and having no other remedy available in law is constrained to invoke the Constitutional Jurisdiction of this Honorable Court inter alia on the following grounds:-

GROUNDS:

A. That the petitioners have not been treated in accordance with law and his rights secured and guaranteed under the law have been violated.

B. That Non publishing of list 'E' as per rule 13.11 PR 1934 suggests, keeping us / other probationers ASIs in dark and to unaware of their actual position / status.

FILED TODAY  
Deputy Registrar  
06 JUL 2010

*[Handwritten signature]*

ATTESTED  
EXAMINER  
Postgraduate High Court

C. That as per rule list E of all Assistant Sub Inspectors, having been approved by DIG of the region and shall maintain in card index form, to be published in the police gazette annually in accordance with rule 13.11, Police Rules 1934. The entry of officers therein shall be made from date of confirmation, to be assessed from the date of appointment but with due apology, the said list has not been issued / circulated to officers concerned and with our personal efforts, the same has been obtained / requisitioned.

D. That list E has been prepared in deviation of rules, provided for upper subordinates hence illegal, arbitrary and void abenstio, therefore required to be corrected to meet the ends of justice, as per following criterion.

- Rule 12.2 Police Rules 1934, provides criterion for determining seniority of subordinates rank of police force as from dates of their confirmation.
- There is nothing in the language of rule 12.2(3) police rules 1934 which supports the contention; date of confirmation must necessarily be different from date of appointment.

FILED TODAY  
Deputy Registrar  
06 JUL 2018

*Handwritten signature*

APPEALED  
EXAMINER  
Punjab High Court



134  
It shall be unjustified if the confirmation of probationers also is delayed, in the admission to promotion list E.

E. That it is the basic principle that every appointment whether initial / direct recruitment or promotion is made against a sanctioned post hence when there is no sanctioned post, there shall be no appointment, detailed discussion whereof is as under:-

"Officiating promotion as per rules/Esta code is staff-gap arrangements. Such promotions are made against non sanctioned posts / no availability of permanent vacancy for which salary is drawn by someone else. For clear understanding, the relevant excerpt (Annex B) from Esta code is re-produced as under.

"For example, a Head Clerk etc are being retired / on long leave or suspension shall be filled on officiating basis, till he/ they is /are regularly promoted. Substantive post is those which are sanctioned, in particular cadre, therefore the probationer ASIs are appointed through competitive exams, in regular cadre while ranker ASIs are promoted in a temporary way / mode hence the confirmation of probationer ASIs shall be counted from the date of appointment whereas the confirmation of ranker ASIs shall be reckoned from date of completion of

FILED TODAY  
Deputy Registrar  
06 JUL 2018

ASIA

ATTESTED

EXAMINER  
Punjab High Court

probation period i.e after 02 years as per rule 13.18 PR 1934 hence the rank promotion shall be junior against the direct recruitment"

In the case in hand, the Applicants have been appointed through initial / direct recruitments against available post by the KP Public Service Commission whereas the ranker officiated against the posts of ASIs, not available at the time. Therefore, there is no question of seniority between Applicants and rankers on list D, within the meaning of Police Rules 12.2(3) and 12.8 and 13.18 r/w section 7(5) of KP Civil servant Act 1973 (XVIII).

Worthy clarifying that section 7(5) of the KP civil servants act, 1973 (XVIII) is also applicable to the direct appointments of civil servants.

Officiating status of the rank promotion of ASIs, is well explained in rule 13.4(2) PR 1934 which clearly declares the said promotions as temporary appointments and not permanent, according to permanent sanctioned posts but just to overcome the work load to meet the requirements of the district amongst the suitable men on list D, therefore anti date confirmation is not

FILED TODAY  
Deputy Registrar  
06 JUL 2018

*[Handwritten signature]*

ATTESTED  
EXAMINER  
Peshawar High Court

criteria for the officiating status but to be confirmed w.e.f. the date of completion of 02 years probation for rankers.

F. That as per reported judgment of Services Tribunal 2002 PLC (CS) 1403, there is no rule lying down that confirmation would be a date different from date of appointment hence confirmation other than appointment shall be illegal in light of provision 12.2(3) Police Rules 1934. The confirmation date as date of appointment has been well supported by Supreme Court of Pakistan in his judgment 1999 SCMR 1594 (judgments enclosed), therefore, our seniority legally requires to be brought and adjusted on list B, on due places from date of appointment.

G. That Natural Justice demands that when a public servant is put to ab acid test qualifies that test, then any sort of punishment shall not only contrary to the norm of justice but also counterproductive, therefore the seniority probationers placing at par with the rankers, in the same meaning is not warranted rather unjustified.

H. That the Rank officers on D list, vide notification No. 16537/EC-1 dated 26.11.2009, numbering 180 Deputy Registrars have been confirmed from the date of officiating status w.e.f. 21.11.2009 which in fact in view of the

ATTESTED

EXAMINER  
Peshawar High Court

06 JUL 2018

FILED TODAY

Handwritten signature

above discussions / law points, the confirmation is strictly in deviation to the rules / law and they should have been confirmed w.e.f 21.11.2011 (on the completion date of probation period) list is enclosed as annex C, hence they are juniors to us as per above quoted rules / law.

I. That the petitioners have been assigned dud seniority in the seniority list from date of confirmation i.e 26.03.2011, therefore any other officers, promoting from HC and were required to be confirmed from the date of completion of promotion period, gets no bonafide right to be made senior and selected for upper course rather detailing to the course before us.

J. That the Officers as per rule of law, highlighted in the seniority list E, are juniors to us but have been placed seniors in the seniority lists, strictly in contravention to the rules / law on the seniority

K. That the Hon'ble Inspector General of police vide Order No 452/E-II dated 23.01.2017 has considered the prayer of probationer kohat division and revised seniority of probationer ASIs of kohat region in list E in accordance with the prescribed rules i.e 12.2(3), 12.8 and 13.18 of police rules 1934 (copy attached as annex F) thus attracting the principle / rule of consistency, directed by the Hon'ble Supreme Court

FILED TODAY  
Deputy Registrar  
08 JUN 2018

*[Handwritten signature]*

ATTESTED  
*[Signature]*  
EXAMINER  
Peshawar High Court

126

of Pakistan, in its judgment 2009 SCMR page 1 calling the mother judgment. On this score we also deserve / entitle for earlier confirmation and placement of seniority, above the ranker ASIs numbering 180 and others, if any.

L. That the petitioner seeks the permission of this Honorable Court to rely on additional grounds at the hearing of this Petition.

It is therefore prayed that On acceptance of this writ petition appropriate may please may be issued by directing the respondents to implement the decision of the committee Board regarding fixation of seniority, where as the seniority list "E" be revised and petitioners direct appointee through public service commission be brought and placed at their due place of seniority, and also to ensure the circulation of the seniority list, prepared in accordance with law rules lay down for the purpose, the reluctance on the part of the respondents by not implementing the decision of the committee board is illegal unlawful, without lawful authority, violative upon the rights of the petitioners. Or any other relief which is not specifically asked may also be allowed.

*[Handwritten signature]*

FILED TODAY  
Deputy Registrar  
06 JUL 2018

~~TESTED~~  
EXAMINER  
Peshawar High Court

INTERIM RELIEF:

As an interim Relief the respondents be directed to process the promotion of the petitioner and release it, they may subject it to the decision of this writ petition.

*[Signature]*  
Petitioners

Through

*[Signature]*  
ZARIAJ ANWAR  
Advocate Peshawar

CERTIFICATE

Certified that no writ petition on the same subject and between the same parties was previously or concurrently filed

PETITIONERS

LIST OF BOOKS:

1. Constitution of Islamic Republic of Pakistan, 1973
2. Any other law books according to need

ADVOCATE

FILED TODAY  
Deputy Registrar  
06 JUL 2018

*[Signature]*

ATTESTED

EXAMINER  
Peshawar High Court

C 20

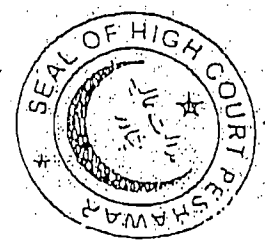
24-4-19

JUDGMENT SHEET  
PESHAWAR HIGH COURT, PESHAWAR  
JUDICIAL DEPARTMENT

WP No. 3720-P/2018

Qazi Muhammad Arif and others,  
vs

Government of Khyber Pakhtunkhwa through Chief  
Secretary, Khyber Pakhtunkhwa Peshawar.



Date of hearing: 23.04.2019

Petitioner (by) Zariq Anwar Khan Advocate

Respondents (by) Kamran Haqal Q.A.

JUDGMENT

*by law*

MUSAWWAT JUDICIAL Petitioner, Qazi, Muhammad  
Arif and others, through the instant writ petition under  
Article 199 of the Constitution of Islamic Republic of  
Pakistan, [1973], have prayed for issuance of directions to  
the respondents to implement the decision of the  
committee board regarding fixation of seniority whereas  
the seniority list "E" be revised and the petitioners direct  
appointee through Public Service Commission be brought  
and placed at their due place of seniority and also to  
ensure the circulation of the seniority list prepared in  
accordance with law and rules.

*Arif*

TESTED  
EXAMINER  
Peshawar High Court

2. In essence, it is the petitioners' case that they were appointed as Assistant Sub-Inspector on 26.03.2011 through Public Service Commission and subsequently on completion of satisfactory probation period, they were confirmed w.e.f 26.03.2011 from the date of appointment, but were placed in their own seniority list and not properly placed at "E" list which needs to be prepared and maintained to the candidates who can further sent for upper college course for promotion and placing in the regular list of SIs. It is alleged in the petition that the petitioner filed representation before the respondents department on which the competent authority constituted committee for the purpose of fixation of the seniority list, who recommended that "E" list be revised and the appellants/petitioners including others if any, be brought and placed at their due place and the candidates who being officiating promotion may be brought on seniority list "E" after completion of officiating/probation period according to police rules. For the purpose, petitioners approached several times to the respondents to implement the decision of the committee regarding the fixation of the

*man*

*[Handwritten signature]*

**TESTED**  
**EXAMINER**  
 Peshawar High Court



seniority of the petitioners but in vain. Feeling aggrieved, petitioner has filed the instant writ petition for redressal of their grievance.

Arguments heard and appended documents gone through.

1. The worthy AAG while taking us to para-6 of the comments submitted that pursuant to representation submitted by the petitioners, a committee was constituted by respondents on 10.08.2017 to thoroughly examine the stance of the petitioners in the light of relevant rules. He added that the committee submitted recommendations and the same have already been followed by the respondents in letter and spirit.

*Handwritten mark*

4. When confronted learned counsel for the petitioners with the above stated position, he submitted that though recommendations have been made by the committee but respondents have not yet implemented it.

5. In the circumstances, we direct the respondents to implement the recommendations of the

*Handwritten signature*

*Handwritten signature*  
ATTESTED  
EXAMINER  
Peshawar High Cou

committee already admitted by them in the comments in letter and spirit.

6. Accordingly, the instant writ petition is disposed of in the above terms.

JUDGE

Announced  
21.04.2019

JUDGE

No. 5236  
 Date of Presentation of Application: 22/8/20  
 No of Pages: 19  
 Copying fee: 700  
 Total: 700  
 Date of Preparation of Copy: 22/8/2020  
 Date of Delivery of Copy: 22/8/2020  
 Received By: [Signature]

[Signature]  
 EXAMINER  
 High Court, Patna  
 The District Judge, Patna

CERTIFIED TO BE TRUE COPY

22 AUG 2020

(M) Hon'ble Mr. Justice Ibrahimullah Khan  
Hon'ble Justice Musarrat Ali

Hon'ble Shri. P.S.

[Signature]  
[Signature]



24  
OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

Telephone No. 091-9210641 Fax No. 091-9212507

POLICE DEPTT:

CCP, PESHAWAR.

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II  
ORDERS BY THE CAPITAL CITY POLICE OFFICER KHYBER PAKHTUNKHWA PESHAWAR.

NOTIFICATION.

Dated 05/06/2020.

No. 7097 /EC-I, Revised "E" List seniority of PASIs:- In light of judgment passed by Peshawar High Court Peshawar in writ petition No. 3720-P/2018 Title: Qazi Muhammad Arif VS. Govt. of KPK & others as approved by the W/CCPO, Peshawar, the "E" list seniority of the following PASIs is hereby revised w.e from as noted against each:-

S#	Name & No	Date of list "E"	Date of Revised list "E"
1.	Offg; SI Masood Khan No. 756/P	13-08-2014	13-03-2010
2.	Offg; SI Muhammad Umer No. 755/P	13-08-2014	20-02-2010
3.	Offg; SI Ahmad Ullah Khan No. 797/P	13-08-2014	26-03-2011
4.	Offg; SI Abdullah Jalal Khan No. 793/P	13-08-2014	26-03-2011
5.	Offg; SI Nauman Khan No. 803/P	13-08-2014	26-03-2011
6.	Offg; SI Imtiaz Ahmad No. 784/P	13-08-2014	26-03-2011
7.	Offg; SI Saeed Jan No. 795/P	13-08-2014	26-03-2011
8.	Offg; SI Muhammad Ashfaq No. 796/P	13-08-2014	26-03-2011
9.	Offg; SI Azaz Alam Khan Khalil No. 783/P	13-08-2014	26-03-2011
10.	Offg; SI Qazi Muhammad Arif No. 790/P	13-08-2014	26-03-2011
11.	Offg; SI Asif Ali Khan No. 785/P	13-08-2014	26-03-2011
12.	Offg; SI Mumtaz Khan No. 791/P	13-08-2014	26-03-2011
13.	Offg; SI Saleem Khan No. 786/P	13-08-2014	26-03-2011
14.	Offg; SI Inam Ullah No. 787/P	13-08-2014	26-03-2011
15.	Offg; SI Muhammad Asif Khan No. 788/P	13-08-2014	26-03-2011
16.	Offg; SI Ayub Khan No. 789/P	13-08-2014	26-03-2011

Attested

CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

No. 7098-7104 /EC-I,

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

1. Addl: Inspector General of Police, Hqrs: Khyber Pakhtunkhwa, Peshawar.
2. AIG/legal, Peshawar.
3. SSP/Operation & Investigation, Peshawar.
4. DSP/Legal, Peshawar.
5. Asstt: Secret Branch, & EC-II, CCP, Peshawar.



E 25

OFFICE OF THE  
CAPITAL CITY POLICE OFFICER  
PESHAWAR.

Telephone No. 091-9210641 Fax No. 091-9217597

POLICE DEPTT:

GCP, PESHAWAR.

FOR PUBLICATION IN THE KHAYBER PAKHTUNKHWA POLICE GAZETTE PART-II,  
ORDERS BY THE CAPITAL CITY POLICE OFFICER KHAYBER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION

Dated 1/12/2020

No. 5092 /EC-I. Revised "E" List seniority of PASIs:- In light of judgment passed by Peshawar High Court, Peshawar in writ petition No. 3720-P/2018 Title Qazi Muhammad Arif VS Govt. of KPK & others and recommendation of Departmental Promotion Committee meeting held on 23-06-2020 as approved by the CCPO, Peshawar, the "E" list seniority of the following PASIs of Capital City Police, Peshawar issued vide this office notification No. 10848/EC-I, dated 13-08-2014 is hereby revised w.e.f from as noted against each:-

S#	Name & No	Date of list "E"	Date of Revised list "E"
1.	PASI Now SI Abdul Sattar No. 746/P	13.08.2014	20.02.2010
2.	PASI Now SI Fazal Hadf No. 747/P	13.08.2014	20.02.2010
3.	PASI Now SI Manzoor Khan No. 748/P	13.08.2014	20.02.2010
4.	PASI Now SI Tahir Ali Khan No. 749/P	13.08.2014	20.02.2010
5.	PASI Now SI Bismillah Dan No. 750/P	13.08.2014	20.02.2010
6.	PASI Now SI Imran Ullah No. 651/P	13.08.2014	20.02.2010
7.	PASI Now SI Wisai Khan No. 753/P	13.08.2014	20.02.2010
8.	PASI Now SI Muhammad Arif 754/P	13.08.2014	20.02.2010
9.	PASI Now SI Muhammad Tahir 757/P	13.08.2014	13.03.2010
10.	PASI Now SI Rehmat Ullah Khan 759/P	13.08.2014	01.04.2010
11.	PASI Now SI Afzal Gul No. 760/P	13.08.2014	01.04.2010
12.	PASI Now SI Rizq Ahmad No. 761/P	13.08.2014	01.04.2010
13.	PASI Now SI Afzal Khan No. 766/P	13.08.2014	17.09.2010
14.	PASI Now SI Insan Ullah No. 767/P	13.08.2014	17.09.2010
15.	PASI Now SI Naveed Gul No. 768/P	13.08.2014	17.09.2010
16.	PASI Now SI Bahar Ali No. 769/P	13.08.2014	17.09.2010
17.	PASI Now SI Muhammad Arshid 770/P	13.08.2014	17.09.2010
18.	PASI Now SI Asif Khan No. 771/P	13.08.2014	17.09.2010
19.	PASI Now SI Muhammad Raliq No. 772/P	13.08.2014	17.09.2010
20.	PASI Now SI Tehseen Ullah No. 773/P	13.08.2014	17.09.2010
21.	PASI Now SI Lalq Zoda No. 774/P	13.08.2014	17.09.2010
22.	PASI Now SI Irfan Ullah No. 776/P	13.08.2014	17.09.2010
23.	PASI Now SI Wajid Khan No. 777/P	13.08.2014	17.09.2010
24.	PASI Now SI Akhtar Hussain 778/P	13.08.2014	17.09.2010
25.	PASI Now SI Ishaq Ahmad No. 775/P	19.08.2018	17.09.2010
26.	PASI Now SI Bilal Hussain No. 792/P	13.08.2014	26.03.2011
27.	PASI Now SI Muhammad Mubarak Zeb No. 794/P	13.08.2014	26.03.2011
28.	PASI Now SI Muhammad Waqas Yousuf No. 798/P	13.08.2014	26.03.2011
29.	PASI Now SI Muhammad Ayaz 799/P	13.08.2014	26.03.2011
30.	PASI Now SI Mumoon Rashid No. 800/P	13.08.2014	26.03.2011
31.	PASI Now SI Adil Syed No. 801/P	13.08.2014	26.03.2011

Notification

ested  
[Signature]

32.	L/PASI Now SI Syed. Asghar Khan-802/P	13.08.2014	26.03.2014
33.	L/PASI Now SI Mughis No. 804/P	13.08.2014	26.03.2014
34.	L/PASI Now SI Sumaira Jabeen-805/P	13.08.2014	26.03.2014
35.	L/PASI Now SI Mehwish Bukhari-807/P	13.08.2014	26.03.2014
36.	L/PASI Now SI Nadia Shaheen-808/P	13.08.2014	26.03.2014
37.	L/PASI Now SI Saeeda Shaheen-806/P	01-03-2017	26.03.2014

Sd/-  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

No. 9088-9/04 /EC-1.

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

1. Addl. Inspector General of Police, Hqs. Khyber Pakhtunkhwa, Peshawar.
2. AIG/legal, Peshawar.
3. SSP/Operation & Investigation, Peshawar.
4. DSP/Legal, Peshawar.
5. Asstt. Secret Branch & EC-19, CCP, Peshawar.

*Attended*  
*AMS*

*[Signature]*  
SSP (COORDINATION)  
FOR CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

To,

F 27

The Provincial Police Officer,  
Kyber Pukhtoonkhwa,  
Peshawar.

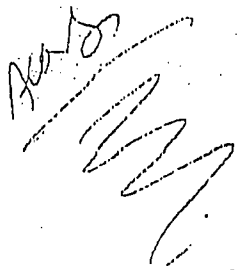
Subject:

APPEAL AGAINST OFFICE NOTIFICATION NO. 9097 / EC-I DATED 01-07-2020 OF THE CAPITAL CITY POLICE OFFICER PESHAWAR, WHEREBY POSITION OF THE APPELLANTS FROM THE DATE OF CONFIRMATION WAS REVISED FROM THE DATE OF INITIAL APPOINTMENT / RECRUITMENT BUT SENIORITY LIST WITH OTHER COLLEAGUES WAS NOT FINALIZED / ISSUED TO ACTUALIZED ORDER / SENIORITY WITH EFFECT FROM THE DATE OF INITIAL RECRUITMENT WITH OTHER COLLEAGUES.

Respectfully sir,

1. That applicants were initially appointed / recruited Probationer Assistant Sub-Inspectors in the year 2010/2011.
2. That services of all appellants were regularized on 13-08-2014 but with immediate effect and not from the date of initial recruitment.
3. That colleagues of the appellants filed Writ Petition No. 3720-P/18, "Qazi Muhammad Arif vs Govt. of KP & Others" which was allowed on 24-04-2019.
4. That on 05-06-2020, CCPO Peshawar revised order dated 13-08-2014 of the colleagues of the appellants from the date of their initial recruitment but till date, no Final Seniority List of their colleagues as well as of appellants was circulated by the department.
5. That on 01-07-2020, CCPO Peshawar only revised their recruitment from the date of initial appointment but no Final Seniority List with other colleagues was circulated by the respondents.



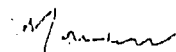
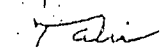
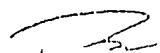

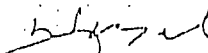
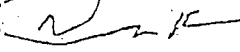
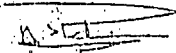
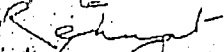
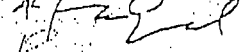
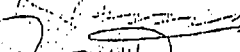
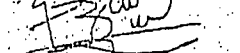


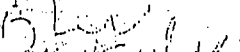
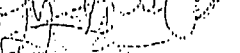
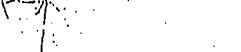
*Arif*

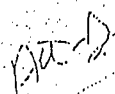


6. That though order dated 13-08-2014 of all the applicants was revised from the date of initial recruitment but till date no final seniority list with other colleagues was issued by the department.
7. That the department is going to promote incumbents on the old seniority list, being most juniors while appellants, being most seniors were ignored for the reason that fresh seniority list of the old and new incumbents was not issued till date.
8. That unless and until integrated seniority list is not issued the department will be promoting juniors by ignoring the seniors, so for the purpose direction of the hon'ble court to issue final integrated seniority list is required.

It is, therefore, most humbly requested that final integrated seniority list be issued of the old incumbents with the applicants and obliged.

All Appellants

- |                        |                |  |
|------------------------|----------------|--|
| 1. Abdul Sattar,       | Belt No. 746/P |  |
| 2. Fazal Hadi,         | Belt No. 747/P |  |
| 3. Manzoor Khan,       | Belt No. 748/P |  |
| 4. Tahir Ali Khan,     | Belt No. 749/P |  |
| 5. Bismillah Jahn,     | Belt No. 750/P |  |
| 6. Imran Ullah,        | Belt No. 651/P |  |
| 7. Wisal Khan,         | Belt No. 753/P |  |
| 8. Muhammad Arif,      | Belt No. 754/P |  |
| 9. Muhammad Tahir,     | Belt No. 757/P |  |
| 10. Rehmat Ullah Khan, | Belt No. 759/P |  |
| 11. Afzal Gul,         | Belt No. 760/P |  |
| 12. Riaz Ahmad,        | Belt No. 761/P |  |
| 13. Afzal Khan,        | Belt No. 766/P |  |
| 14. Ihsan Ullah,       | Belt No. 767/P |  |
| 15. Naveed Gul,        | Belt No. 768/P |  |
| 16. Behar Ali,         | Belt No. 769/P |  |
| 17. Muhammad Arshad,   | Belt No. 770/P |  |
| 18. Asif Khan,         | Belt No. 771/P |  |



G  
30

IN THE PESHAWAR HIGH COURT, PESHAWAR

W.P. No. 3900-P/2020

- |                         |                |
|-------------------------|----------------|
| 1. Abdul Sattar,        | Belt No. 746/P |
| 2. Fazal Hadi,          | Belt No. 747/P |
| 3. Manzoor Khan,        | Belt No. 748/P |
| 4. Tahir Ali Khan,      | Belt No. 749/P |
| 5. Bismillah Jan,       | Belt No. 750/P |
| 6. Imran Ullah,         | Belt No. 651/P |
| 7. Wisal Khan,          | Belt No. 753/P |
| 8. Muhammad Arif,       | Belt No. 754/P |
| 9. Muhammad Tahir,      | Belt No. 757/P |
| 10. Rehrnat Ullah Khan, | Belt No. 759/P |
| 11. Afzal Gul,          | Belt No. 760/P |
| 12. Riaz Ahmad,         | Belt No. 761/P |
| 13. Afzal Khan,         | Belt No. 766/P |
| 14. Ihsan Ullah,        | Belt No. 767/P |
| 15. Naveed Gul,         | Belt No. 768/P |
| 16. Behar Ali,          | Belt No. 769/P |
| 17. Muhammad Arshad,    | Belt No. 770/P |
| 18. Asif Khan,          | Belt No. 771/P |
| 19. Muhammad Rafiq,     | Belt No. 772/P |
| 20. Tehseen Ullah,      | Belt No. 773/P |
| 21. Laiq Zada,          | Belt No. 774/P |
| 22. Irfan Ullah,        | Belt No. 776/P |
| 23. Wajid Khan,         | Belt No. 777/P |
| 24. Akhtar Hussain,     | Belt No. 778/P |
| 25. Bilal Hussain,      | Belt No. 792/P |
| 26. Mamoon Rashid,      | Belt No. 800/P |

All Officiating Sub Inspectors

Capital City Police Peshawar

Petitioners

VERSUS



1. Capital City Police Officer,  
Peshawar.
2. Provincial Police Officer,  
KP, Peshawar. . . . . Respondents

◊ <=> ◊ <=> ◊ <=> ◊ <=> ◊

WRIT PETITION UNDER ARTICLE 199  
OF THE CONSTITUTION OF ISLAMIC  
REPUBLIC OF PAKISTAN, 1973.

◊ <=> ◊ <=> ◊ <=> ◊ <=> ◊ =

Respectfully Sheweth:

1. That petitioners were initially appointed / recruited as Probationer Assistant Sub-Inspectors in the year 2010/2011. The dates of recruitment have been figured against their names.
2. That on 13-08-2014, after serving successfully and devotedly for years, services of all petitioners were regularized with immediate effect and not from the date of initial recruitment. (Copy as annex "A")
3. That colleagues of the petitioners filed W.P. No. 3720-P/18, "Qazi Muhammad Arif vs Govt. of KP & Others" which was allowed on 24-04-2019 by the honorable court. (Copies as annex "B" & "C")
4. That on 05-06-2020, R. No. 01 revised order dated 13-08-2014 of the colleagues of the petitioners from the date of their initial recruitment but till date, no Final Seniority List of their colleagues as well as of petitioners was circulated by the department. (Copy as annex "D")
5. That on 01-07-2020, R. No. 01 only revised their recruitment orders from the date of initial appointment but no Final Seniority List with other colleagues was circulated by the respondents to bring them at par. (Copy as annex "E")

- 6. That on the other hand, respondents are promoting incumbents from the previous Seniority List who have by now become most juniors than petitioners but petitioners are ignoring from promotion to the next higher grade / post for the reason that integrated seniority list of the former Incumbents viz-a-viz petitioners was neither finalized nor circulated till date amongst them.
- 7. That for the aforesaid purpose, petitioners submitted representation before R. No. 02 on 24-07-2020 to issue integrated seniority list of the former incumbents along with petitioners but of no avail till date, while on the other hand respondents are promoting incumbents from the former seniority list, despite the fact that petitioners are quite seniors than the former incumbents. (Copy as annex "F")

Hence this Writ Petition, inter alia, on the following grounds:-

G R O U N D S.

- a. That respondents are not treating petitioners at par with other colleagues as they are much seniors than others.
- b. That as and when services of incumbents were confirmed / regularized after completing of probationer period, they were confirmed with immediate effect and not from the date of initial recruitment.
- c. That it was incumbent upon the respondents to confirm after successfully completing probationary period from the date of initial recruitment and not with immediate effect. In the case in hand, services of petitioners were confirmed with immediate effect instead of their initial date of recruitment; thus they were put to lose not only from further promotion but also other benefits of services.
- d. That unless and until revised integrated seniority list is not issued by the respondents of the colleagues viz-a-viz petitioners, they would suffer further promotion as well as other benefits of service and would remain juniors to them.

- e. That by not issuing integrated seniority list of petitioners and others, their vested rights are infringed and respondents are not redressing their grievances for no legal reason but with malafide and discrimination.

It is therefore, most humbly prayed that on acceptance of the Writ Petition, in exercise of the extraordinary constitutional jurisdiction, this hon'ble Court may graciously be pleased to:-

- a. Direct respondents to issue Integrated Seniority List of petitioners viz-a-viz their colleagues hence forthwith with all consequential benefits.
- b. Direct further respondents to bring the petitioners on List "F" with all back benefits;

AND/OR

- c. Any other writ/order/direction deem proper and just in the circumstances of the case, be also issued/ordered/given.

INTERIM RELIEF:

By keeping in view the aforesaid facts and circumstances of the case, authority be directed to not make further promotion of the junior colleagues of petitioners till the issuance of integrated Seniority List till the decision of the case.

Petitioners :

Through

Saadullah Khan Marwat

Arbab Saif-ul-Kamal

Amjad Nawaz  
Advocates

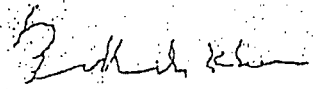
Dated 07-09-2020

LIST OF BOOKS

1. Constitution
2. Police Rules

CERTIFICATE:

Certified that as per instruction of petitioner, no such petition was filed before this Hon'ble court. (D.B Case)

  
Advocate.



OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

Telephone No. 091-9210641 Fax No. 091-9212597

SENIORITY LIST OF OFFG: SUB-INSPECTORS AND ASSISTANT SUB-INSPECTORS ON LIST "E" OF CAPITAL CITY POLICE, PESHAWAR AS STOOD ON 08-10-2020.

S#.	Rank, Name and No	Date of Birth	Date of Enlistment	Education	D/O Promotion as Offg: ASI	D/O Admission to list "E"	Date of Offg: SI	Upper College Course	Remarks
1.	Offg: SI Saif-ur-Rehman No. 20/P	20-01-1971	21-12-1994	FSc	PASI 21.12.1994	09.12.1998	20-09-2000	10-10-1998	
2.	Offg: SI Jehanzeb No. 365/P	10.11.1967	31.12.1987	M.A	08.01.1999	05.04.2008	21-04-2008	19.07.2007	Selected For Upper From Motorway
3.	Offg: SI Sajjad Ali No. 380/P	01-01-1963	14-02-1981	10 <sup>th</sup>	20.05.2004	05.04.2008	21-04-2008	20-03-2009	
4.	Offg: SI Shah Jehan No. 442/P	01.12.1961	02.09.1980	10 <sup>th</sup>	29.01.2005	05.04.2008	21-04-2008	20-09-2009	
5.	Offg: SI Khalid Khan No. 454/P	30.03.1962	06.05.1981	10 <sup>th</sup>	25.05.2005	05.04.2008	21-04-2008	20-09-2009	
6.	Offg: SI Bad Shah Khan No. 474/P	14-04-1969	15-09-1987	10 <sup>th</sup>	25.05.2005	05-04-2008	21-04-2008	20-09-2009	
7.	Offg: SI Abdur Rehman No. 476/P	11-11-1969	31-05-1980	BA	25.05.2005	05.04.2008	21-04-2008	20-09-2009	
8.	Offg: SI Muqarab Khan No. 488/P	01-02-1964	05-02-1983	10 <sup>th</sup>	25.05.2005	05-04-2008	21-04-2008	20-03-2011	
9.	Offg: SI Mir Alam Khan No. 491/P	28-02-1963	07-12-1981	10 <sup>th</sup>	28.09.2005	05.04.2008	21-04-2008	U/W for ever	
10.	Offg: SI Nasir Khan No. 501/P	12-11-1968	29-08-1988	BA	28.09.2005	05-04-2008	21-04-2008	20-09-2009	
11.	Offg: SI <del>_____</del> Khan No. <del>_____</del>	15-04-1965	31-12-1987	FA	28.09.2005	05.04.2008	21-04-2008	20-09-2010	
12.	Offg: SI Hazrat Ullah No. 516/P	05-01-1961	15-06-1980	10 <sup>th</sup>	28.09.2005	05-04-2008	21-04-2008	20-09-2009	
13.	Offg: SI Zakir Ullah No. 525/P	23-11-1962	05-08-1981	FA	28.09.2005	05-04-2008	21-04-2008	31-01-2016	
14.	Offg: SI Fakhre Alam No. 529/P	06-01-1961	05-08-1981	10 <sup>th</sup>	28.09.2005	05.04.2008	21-04-2008	20-09-2009	
15.	Offg: SI Liaqat Ali No. 531/P	08-04-1954	24-11-1979	10 <sup>th</sup>	28.09.2005	05.04.2008	21-04-2008	U/W for ever	
16.	Offg: SI Muhammad Ali No. 533/P	18-10-1967	25-03-1983	10 <sup>th</sup>	28.09.2005	05-04-2008	21-04-2008	31-01-2016	
17.	Offg: SI Inayat Ullah No. 537/P	11-04-1962	22-09-1986	FA	28.01.2005	05.04.2008	21-04-2008	20-03-2010	
18.	Offg: SI Sadr Ali No. 544/P	01-01-1963	05-11-1981	10 <sup>th</sup>	28.01.2005	05.04.2008	21-04-2008	20-09-2011	
19.	Offg: SI Muhammad Alam No. 545/P	15.09.1961	14-10-1981	10 <sup>th</sup>	28.01.2006	05.04.2008	21-04-2008	20-03-2010	
20.	Offg: SI Haizer Muhammad No. 606/P	20-04-1964	12.02.1980	FA	28.01.2006	05.04.2008	21-04-2008	20-09-2014	
21.	Offg: SI Iqbal No. 611/P	01-05-1964	31-12-1987	10 <sup>th</sup>	03.09.2007	05-04-2008	21-04-2008	30.09.2015	
22.			24-03-1984	FA	03.09.2007	18-11-2009	18-11-2009	20-03-2011	
23.						18.11.2009	16.11.2009	20-09-2010	

*[Handwritten signatures and initials]*

12-10-20

35

4

36

24.	Offg: SI Amin Said No. 628/P	09-10-1967	31-12-1987	FA	03.09.2007	18-11-2009	18-11-2009	20-09-2010	
25.	Offg: SI Faridoo No. 641/P	28-04-1961	30-10-1979	10 <sup>th</sup>	03.09.2007	18.11.2009	18.11.2009	30.09.2015	Lien transferred from Mardan
26.	Offg: SI Nawar Khan No. 653/P	17-11-1960	20-01-1979	8 <sup>th</sup>	24.08.2007	18.11.2009	18.11.2009	30.09.2015	Lien transferred from Mardan
27.	Offg: SI Masood Ali No. 658/P	10-01-1962	04-10-1980	10 <sup>th</sup>	21.08.2007	18.11.2009	18.11.2009	20.03.2011	Lien transferred from Mardan
28.	Offg: SI Nasrullah No. 659/P	20-04-1968	20-09-1987	F.A	21.08.2007	18.11.2009	18.11.2009	20-12-2018	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.9097/EC-I, dated 01.07.2020.
29.	Offg: SI Abdus Sattar No. 746/P	22-09-1980	20-02-2010	FA	PASI 20-02-2010	20-02-2010	12-02-2019	20-12-2018	-do-
30.	Offg: SI Fazal Hadi No. 747/P	14-02-1993	20-02-2010	FA	PASI 20-02-2010	20-02-2010	12-02-2019	20-12-2018	-do-
31.	Offg: SI Manzoor Khan No. 748/P	01-06-1976	20-2-2010	10 <sup>th</sup>	PASI 20-02-2010	20-02-2010	12-02-2019	20-12-2018	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification No:7097-7104/EC-I, dated 05.06.2020.
32.	Offg: SI Masood Khan No. 756/P	11-03-1975	13-03-2010	F.A	PASI 13-03-2010	13-03-2010	12-02-2019	20-12-2018	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.9097/EC-I, dated 01.07.2020.
33.	Offg: SI Muhammad Tahir -757/P	01-06-1977	13-3-2010	FA	PASI 13-3-2010	13-3-2010	12-02-2019	20-12-2018	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.7097-7104/EC-I, dated 05.06.2020.
34.	Offg: SI Muhammad Umer: 755/P	01-01-1979	20.02.2010	FA	PASI 20.02.2010	20.02.2010	12-02-2019	20-02-2019	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.7097-7104/EC-I, dated 05.06.2020.
35.	Offg: SI Tahir Ali No. 749/P	12-08-1973	20.02.2010	FA	PASI 20.02.2010	20.02.2010	12-02-2019	20-12-2018	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.9097/EC-I, dated 01.07.2020.
									-do-
36.	Offg: SI Wisal Khan No. 753/P	28-05-1977	20.02.2010	FA	PASI 20.02.2010	20.02.2010	12-02-2019	20-12-2018	-do-
37.	Offg: SI Afzal Gul No. 760/P	26-10-1986	01-04-2010	FA	PASI 01-04-2010	01-04-2010	12-02-2019	20-12-2018	-do-
38.	Offg: SI Bismillah Jan No. 750/P	01-05-1984	20.02.2010	FA	PASI 20.02.2010	20.02.2010	12-02-2019	20-12-2018	-do-

37

39.	Offg; SI Muhammad Arif No. 754/P	10-6-1981	20.02.2010	BA	PASI 20.02.2010	20.02.2010	12-02-2019	20-12-2018	-do-
40.	Offg; SI Imran Ullah No.751/P	15-09-1980	20.02.2010	MA	PASI 20.02.2010	20.02.2010	12-02-2019	20-12-2018	-do-
41.	Offg; SI Rehmat Ullah Jan -759/P	12-02-1979	01-04-2010	FA	PASI 01-04-2010	01-04-2010	12-02-2019	20-12-2018	-do-
42.	Offg; SI Riāz Ahmad No. 761/P	05-02-1974	01-04-2010	FA	PASI 01-04-2010	01-04-2010	12-02-2019	20-12-2018	-do-
43.	Offg; SI Afzāl Khan No.766/P	20-04-1986	17-09-2010	BA	PASI 17-09-2010	17-09-2010	12-02-2019	20.08.2019	-do-
44.	Offg; SI Ihsan Ullah No.767/P	14-03-1989	17-09-2010	FA	PASI 17-09-2010	17-09-2010	12-02-2019	20-12-2018	-do-
45.	Offg; SI Bahar Ali No.769/P	07-02-1980	17-09-2010	FA	PASI 17-09-2010	17-09-2010	12-02-2019	20-12-2018	-do-
46.	Offg; SI Muhammad Arshid- 770/P	03-03-1985	17-09-2010	FA	PASI 17-09-2010	17-09-2010	12-02-2019	20-04-2019	-do-
47.	Offg; SI Asif-Khan No.771/P	10-03-1990	17-09-2010	FA	PASI 17-09-2010	17-09-2010	15-04-2019	20-12-2018	-do-
48.	Offg; SI Muhammad Rafique -772/P	18-01-1989	17-09-2010	FA	PASI 17-09-2010	17-09-2010	12-02-2019	U/Willing	-do-
49.	Offg; SI Tehseen Ullah No.773/P	28-06-1986	17.09.2010	FA	PASI 17.09.2010	17.09.2010	12-02-2019	20.08.2019	-do-
50.	Offg; SI Lalq Zada No.774/P	28-06-1988	17.09.2010	FA	PASI 17.09.2010	17.09.2010	12-02-2019	20-12-2018	-do-
51.	Offg; SI Irfan Ullah No.776/P	15-03-1991	17.09.2010	FA	PASI 17.09.2010	17.09.2010	12-02-2019	20-12-2018	-do-
52.	Offg; SI Wajid Khan No.777/P	09-04-1989	17.09.2010	FA	PASI 17.09.2010	17.09.2010	12-02-2019	20-12-2018	-do-
53.	Offg; SI Akhtar Hussain No.778/P	15-8-1982	17.09.2010	BA	PASI 17.09.2010	17.09.2010	12-02-2019	20-12-2018	-do-
54.	Offg; SI Ishfaq Ahmed No.775/P	01.01.1989	17-09-2010	B.A	PASI 17-09-2010	17-09-2010	12-4-2019	20.08.2019	-do-
55.	Offg; SI Ahmad Ullah Khan-797/P	06-03-1981	26-03-2011	BA/LLS	PASI 26-03-2011	26-03-2011	12-02-2019	20.08.2019	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.7097-7104/EC-I, dated 05.06.2020.
56.	Offg; SI Abdullah Jalal Khan -793/P	11-08-1966	26-03-2011	BA/LLB.	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	-do-
57.	Offg; SI Nauman Khan No. 803/P	03-03-1990	26-03-2011	BA	PASI 26-03-2011	26-03-2011	12-02-2019	20-12-2018	-do-
58.	Offg; SI M.Mubarak Zeb Gul-794/P	03-06-1979	26-03-2011	BA	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.9097/EC-I, dated 01.07.2020.
59.	Offg; SI Imtiaz Ahmad No. 784/P	15-03-1965	26-03-2011	FSE	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.7097-7104/EC-I, dated 05.06.2020.
60.	Offg; SI Saeed Jan No. 795/P	04-12-1981	26-03-2011	10 <sup>th</sup>	PASI 26-03-2011	26-03-2011	12-02-2019	20-12-2018	-do-

2020 Seniority E list




61.	Offg; SI Muhammad Ashfaq No. 796/P	08-04-1989	26-03-2011	Msc	PASI 26-03-2011	26-03-2011	12-02-2019	31.12.2019	-do-
62.	Offg; SI Azaz Alam Khan Khalil No.783/P	12-12-1986	26-03-2011	MA	PASI 26-03-2011	26-03-2011	12-02-2019	20.08.2019	-do-
63.	Offg; SI Qazi Muhammad Arif No. 790/P	23-05-1985	26-03-2011	BA	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	-do-
64.	Offg; SI Asif Ali Khan No.785/P	20-04-1980	26-03-2011	BA	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	-do-
65.	Offg; SI Mumtaz Khan No.791/P	25-02-1985	26-03-2011	FS.c	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	-do-
66.	Offg; SI Saleem Khan No.786/P	10-12-1982	26-03-2011	10 <sup>th</sup>	PASI 26-03-2011	26-03-2011	12-02-2019	20.08.2019	-do-
67.	Offg; SI Muhammad Waqas Yousaf - 798/P	10-05-1988	26-03-2011	B.com	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.9097/EC-I, dated 01.07.2020.
68.	Offg; SI Inam Ullah No.787/P	02-04-1980	26-03-2011	M.A	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.7097-7104/EC-I, dated 05.06.2020.
69.	Offg; SI Muhammad Ayaz No.799/P	23-01-1982	26-03-2011	B.A	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.9097/EC-I, dated 01.07.2020.
70.	Offg; SI Muhammad Asif Khan No. 788/P	30-10-1984	26-03-2011	BSc	PASI 26-03-2011	26-03-2011	12-02-2019	20.06.2019	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.7097-7104/EC-I, dated 05.06.2020.
71.	Offg; SI Ayub Khan No.759/P	03-01-1984	26-03-2011	MA	PASI 26-03-2011	26-03-2011	12-02-2019	20.08.2019	-do-
72.	Offg; SI Bilal Hussein No.792/P	11-04-1986	26-03-2011	BA	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	Revised "E" list from the date of appointment instead of with immediate effect as per court decision vide Notification NO.9097/EC-I, dated 01.07.2020.
73.	Offg; SI Ramoon Rashid No.800/P	16-05-1983	26-03-2011	B.Com	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	-do-

38

*[Handwritten signature]*

*[Handwritten signature]*



74.	Offg: SI Adil Sayed No.801/P	17-07-1987	26-03-2011	B.A	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	-do-
75.	Offg: SI Syed Asghar Khan No. 802/P	01-12-1979	26-03-2011	B.A	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	-do-
76.	Offg: L/SI Mughis No.804/P	20-02-1986	26-03-2011	MSc	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	-do-
77.	Offg: L/SI Sumaira Jabeen No. 805/P	19-09-1983	26-03-2011	B.A	PASI 26-03-2011	26-03-2011	12-02-2019	20-04-2019	-do-
78.	Offg: L/SI Mehwish Bukhari No. 807/P	12-03-1980	26-3-2011	10 <sup>th</sup>	PASI 26-3-2011	26-03-2011	12-02-2019	20-04-2019	-do-
79.	Offg: L/SI Nadia Shaheen No. 808/P	07-05-1985	26-3-2011	10 <sup>th</sup>	PASI 26-3-2011	26-03-2011	12-02-2019	20-04-2019	-do-
80.	Offg: L/SI Saeda Shaheen No. 806/P	14-04-1982	26-03-2011	BA	PASI 26-03-2011	26-03-2011	24-01-2020	31-12-2019	-do-
81.	Offg: SI Hazrat Ali No. 813/P	10-09-1965	28-12-1985	10 <sup>th</sup>	28.01.2006	27.09.2011	27-09-2011	20.03.2012	Deferred from "E" list On 5-4-2008
82.	Offg: SI Inayat Ullah No. 820/P	21-04-1962	21.05.1980	10 <sup>th</sup>	09.04.2008	27.09.2011	27-09-2011	20.09.2014	
83.	Offg: SI Nadir Shah No. 834/P	03-09-1963	10-11-1983	9 <sup>th</sup>	09.04.2008	27.09.2011	27-09-2011	30-09-2015	
84.	Offg: SI Hanif Ullah No. 850/P	14-09-1965	03-03-1984	10 <sup>th</sup>	09.04.2008	27.09.2011	27.09.2011	U/W for ever	
85.	Offg: SI Naseem Khan No. 852/P	09-09-1965	13-08-1985	F.A	09.04.2008	27.09.2011	27.09.2011	20.03.2012	
86.	Offg: SI Waris Khan No. 855/P	02-03-1962	06-01-1981	F.A	09.04.2008	27.09.2011	27.09.2011	20.03.2012	
87.	Offg: SI Abdul Qayum No. 861/P	20-07-1965	17-03-1983	10 <sup>th</sup>	09.04.2008	27.09.2011	27.09.2011	31.05.2015	
88.	Offg: SI Fazal Dad No. 867/P	13-10-1963	02-03-1982	10 <sup>th</sup>	01.02.2008	27.09.2011	27.09.2011	20.09.2012	Lien transferred from Mardan
89.	Offg: SI Nasrat Ali No. 869/P	20-04-1961	12-01-1981	10 <sup>th</sup>	09.04.2008	27.09.2011	27.09.2011	30.09.2015	
90.	Offg: SI Shamroz Khan No. 873/P	03-10-1957	31-12-1987	10 <sup>th</sup>	09.04.2008	27.09.2011	27.09.2011	20.03.2013	
91.	Offg: SI Abdul Ghafor No. 876/P	01-12-1963	23-02-1983	10 <sup>th</sup>	03.03.2008	27.09.2011	27-09-2011	20.09.2014	Lien transferred from Mardan.
92.	Offg: SI Aman Ullah No. 884/P	01.01.1965	24.03.1986	B.A	09.04.2008	27.09.2011	27-09-2011	20.03.2013	
93.	Offg: SI Jehangir Khan No.894/P	15.04.1964	21.02.1982	10 <sup>th</sup>	09.04.2008	27.09.2011	27-09-2011	Selected/Failed	
94.	Offg: SI Qasmat Bali No.895/P	20.03.1966	18.06.1986	10 <sup>th</sup>	26.08.2008	27.09.2011	27-09-2011	20.09.2012	Lien transferred from Mardan
95.	Offg: SI Tilawat Shah No.898/P	01.01.1968	31.12.1987	10 <sup>th</sup>	09.04.2008	27.09.2011	27-09-2011	20.09.2012	
96.	Offg: SI Sher Alam No.904/P	04.02.1961	22.11.1981	10 <sup>th</sup>	09.04.2008	27.09.2011	27-09-2011	Selected	
97.	Offg: SI Malang Jan No.906/P	21.10.1960	04.09.1980	10 <sup>th</sup>	09.04.2008	27.09.2011	27-09-2011	30-09-2015	
98.	Offg: SI Ajan Sher No. 907/P	08.09.1964	17.03.1983	10 <sup>th</sup>	09.04.2008	27.09.2011	27-09-2011	U/W for ever	
99.	Offg: SI Jamshed Khan No.913/P	02.01.1963	02.09.1985	10 <sup>th</sup>	26.08.2008	27.09.2011	27-09-2011	31.01.2015	Lien transferred from Mardan
100.	Offg: SI Arshullah No.916/P	12.04.1955	16.12.1985	F.A	09.04.2008	27.09.2011	27-09-2011	20.03.2013	
101.	Offg: SI Muhammad Iqbal No.924/P	01.05.1964	05.01.1986	F.A	03.05.2008	27.09.2011	27-09-2011	20.09.2014	
102.	Offg: SI Khial Badshah No.933/P	10.02.1964	11.10.1986	10 <sup>th</sup>	03.05.2008	27.09.2011	27-09-2011	20.09.2014	
103.	Offg: SI Shad Muhammad No.1116/P	15.10.1969	13.08.1989	10 <sup>th</sup>	26.11.2009	27.09.2011	16.04.2014	31.05.2015	Lien transferred from Mardan
104.	Offg: SI Hiamat Gul No.937/P	02.05.1967	31.03.1990	F.A	03.05.2008	27.09.2011	27-09-2011	20.09.2013	

39

FC-1

*[Handwritten signature]*

482.	ASI Farooq Shah No.431/P	19-03-1971	04-08-1991	10 <sup>th</sup>	22.05.2018	23-05-2020			
483.	ASI Noor Muhammad No.432/P	02-05-1974	01-09-1992	FA	22.05.2018	23-05-2020			

*[Signature]*  
o/c CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

No. 16707-33 JEC-I, dated Peshawar the, 12 / 10 2020.

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

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. Inspector General of Police NH & Motorways Police Islamabad.
3. Addl: Inspectors General of Police, HQrs:, Investigation, Special Branch & Elite Force, Khyber Pakhtunkhwa, Peshawar.
4. Deputy Inspectors General of Police, HQrs:, CTD & Traffic KPK, Peshawar.
5. Regional Police Officers, Mardan, Hazara, Malakand, Kohat, D.I Khan and Banuu.
6. Commandants FRP, Khyber Pakhtunkhwa, Peshawar & PTC Hangu.
7. Directors Anti Corruption Establishment & Ehtesab Commission KPK.
8. SSSP/Operations, Investigation & Traffic, Peshawar.
9. Commandant CPC University Campus, Peshawar.
10. EC-II CCP, Peshawar.
11. I/C Emergency Control (15) Peshawar.

They are requested to inform all the officers serving under their command. Any officer who has any objection regarding his seniority, missing of name/date of birth etc, he must submit his representation within 10 days after the issuance of the list, otherwise no representation will be Entertained after the specific period.

*[Signature]*  
B.C.T.



OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

POLICE DEPTT:

Telephone No. 091-9210041 Fax No. 091-9212327  
CCP, PESHAWAR.

FOR PUBLICATION IN THE KHYDER PAKHTUNKHWA POLICE GAZETTE PART-II  
ORDERS BY THE CAPITAL CITY POLICE OFFICER KHYDER PAKHTUNKHWA, PESHAWAR.

NOTIFICATION.

no. 4210 /EC-I, REVISED DATE OF DPC OF CONFIRMATION IN THE RANK OF ASI AND PROMOTION TO THE RANK OF OFFICER SI:- In light of the decision dated 20-02-2021 of Departmental Promotion Committee constituted in the backdrop of Writ Petition No. 3900/P in CM No. 2171/P filed by Abdul Sattar and others, date of DPC for confirmation in the rank of ASI and promotion to the rank of Offg. Sub-Inspector for the PASI batches 2010 & 2011 is hereby revised as noted against each:-

Date 26/1/2021

Sr	Name & No	Date of appointment	Date of confirmation as ASI	Date of revised DPC for confirmation in the rank of ASI	Date of list "B"	Date of revised list "B" from date of appointment	Date of promotion as Offg. SI	Date of revised promotion as Offg. SI
1.	PASI Now SI Abdul Sattar No. 746/P	20.02.2010	20.02.2010	10-09-2013	13-0-2014	20.02.2010	12-02-2019	16-04-2014
2.	PASI Now SI Fazal Hadi No. 747/P	20.02.2010	20.02.2010	10-09-2013	13-0-2014	20.02.2010	12-02-2019	16-04-2014
3.	PASI Now SI Manzoor Khan No. 748/P	20.02.2010	20.02.2010	10-09-2013	13-0-2014	20.02.2010	12-02-2019	16-04-2014
4.	Offg. SI Masood Khan No. 750/P	13-03-2010	13-03-2010	10-09-2013	13-0-2014	20.02.2010	12-02-2019	16-04-2014
5.	PASI Now SI Muhammad Tahir-757/P	13.03.2010	13.03.2010	10-09-2013	13-0-2014	13.03.2010	12-02-2019	16-04-2014
6.	Offg. SI Muhammad Umar-755/P	20.02.2010	20.02.2010	10-09-2013	13-0-2014	20.02.2010	12-02-2019	16-04-2014
7.	PASI Now SI Tahir Ali Khan No. 749/P	20.02.2010	20.02.2010	10-09-2013	13-0-2014	20.02.2010	12-02-2019	16-04-2014
8.	PASI Now SI Wajid Khan No. 753/P	20.02.2010	20.02.2010	10-09-2013	13-0-2014	20.02.2010	12-02-2019	16-04-2014
9.	PASI Now SI Afzal Gul No. 760/P	01.04.2010	01.04.2010	10-09-2013	13-0-2014	01.04.2010	12-02-2019	16-04-2014
10.	PASI Now SI Usman Khan No. 750/P	20.02.2010	20.02.2010	10-09-2013	13-0-2014	20.02.2010	12-02-2019	16-04-2014
11.	PASI Now SI Muhammad Amir-754/P	20.02.2010	20.02.2010	10-09-2013	13-0-2014	20.02.2010	12-02-2019	16-04-2014
12.	PASI Now SI Imran Ullah No. 651/P	20.02.2010	20.02.2010	10-09-2013	13-0-2014	20.02.2010	12-02-2019	16-04-2014
13.	PASI Now SI Rehnat Ullah Khan-759/P	01.04.2010	01.04.2010	10-09-2013	13-0-2014	01.04.2010	12-02-2019	16-04-2014
14.	PASI Now SI Riaz Ahmad No. 761/P	01.04.2010	01.04.2010	10-09-2013	13-0-2014	01.04.2010	12-02-2019	16-04-2014
15.	PASI Now SI Afzal Khan No. 766/P	17.09.2010	17.09.2010	10-09-2013	13-0-2014	17.09.2010	12-02-2019	16-04-2014
16.	PASI Now SI Usman Ullah No. 767/P	17.09.2010	17.09.2010	10-09-2013	13-0-2014	17.09.2010	12-02-2019	16-04-2014
17.	PASI Now SI Bahar Ali No. 769/P	17.09.2010	17.09.2010	10-09-2013	13-0-2014	17.09.2010	12-02-2019	16-04-2014
18.	PASI Now SI Muhammad Arshad-770/P	17.09.2010	17.09.2010	10-09-2013	13-0-2014	17.09.2010	12-02-2019	16-04-2014
19.	PASI Now SI Gul No. 760/P	17.09.2010	17.09.2010	10-09-2013	13-0-2014	17.09.2010	12-02-2019	16-04-2014
20.	PASI Now SI Asif Khan No. 771/P	17.09.2010	17.09.2010	10-09-2013	13-0-2014	17.09.2010	12-02-2019	16-04-2014
21.	PASI Now SI Muhammad Rafiq No. 772/P	17.09.2010	17.09.2010	10-09-2013	13-0-2014	17.09.2010	12-02-2019	16-04-2014
22.	PASI Now SI Tahir Ullah No. 773/P	17.09.2010	17.09.2010	10-09-2013	13-0-2014	17.09.2010	12-02-2019	16-04-2014
23.	PASI Now SI Latif Zada No. 774/P	17.09.2010	17.09.2010	10-09-2013	13-0-2014	17.09.2010	12-02-2019	16-04-2014
24.	PASI Now SI Irfan Ullah No. 776/P	17.09.2010	17.09.2010	10-09-2013	13-0-2014	17.09.2010	12-02-2019	16-04-2014
25.	PASI Now SI Wajid Khan No. 777/P	17.09.2010	17.09.2010	10-09-2013	13-0-2014	17.09.2010	12-02-2019	16-04-2014
26.	PASI Now SI Akhtar Hussain-778/P	17.09.2010	17.09.2010	10-09-2013	13-0-2014	17.09.2010	12-02-2019	16-04-2014
27.	PASI Now SI Ishaq Ahmad No. 775/P	17-09-2010	17-09-2010	10-09-2013	13-0-2014	17-09-2010	12-02-2019	16-04-2014
28.	Offg. SI Amjad Ullah Khan-757/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
29.	Offg. SI Abdullah Jalal Khan-743/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
30.	Offg. SI Nauman Khan No. 803/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
31.	PASI Now SI Muhammad Mubarak Zeb No. 794/P	26.03.2011	26.03.2011	27-03-2014	13-0-2014	26.03.2011	12-02-2019	16-04-2014

Notification

42 42

32	Offg: SI Imliaz Ahmad No. 784/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
33	Offg: SI Saeed Jan No. 795/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
34	Offg: SI Muhammad Ashfaq No. 796/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
35	Offg: SI Azaz Alim Khan Khalil No. 783/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
36	Offg: SI Qazi Muhammad Arif No. 790/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
37	Offg: SI Asif Ali Khan No. 785/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
38	Offg: SI Mumtaz Khan No. 791/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
39	Offg: SI Saleem Khan No. 786/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
40	PASI Now SI Muhammad Waqas Yousof No. 798/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
41	Offg: SI Inam Ullah No. 787/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
42	PASI Now SI Muhammad Ayaz No. 799/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
43	Offg: SI Muhammad Asif Khan No. 780/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
44	Offg: SI Ayub Khan No. 784/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
45	PASI Now SI Mehmood Rasheed No. 800/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
46	PASI Now SI Adil Syed No. 801/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
47	PASI Now SI Syed Asghar Khan No. 802/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
48	L/PASI Now SI Mughis No. 804/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
49	L/PASI Now SI Sumaira Jabeen No. 805/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
50	L/PASI Now SI Mehwish Bukhari No. 807/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
51	L/PASI Now SI Nadia Shahcen No. 808/P	26-03-2011	26-03-2011	27-03-2014	13-0-2014	26-03-2011	12-02-2019	16-04-2014
52	L/PASI Now SI Saeeda Shahcen No. 806/P	26-03-2011	26-03-2011	27-03-2014	01-03-2017	26-03-2011	20-01-2020	16-04-2014

Sd/-  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

No. 4211-20/EC-I.

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

1. Addl: Inspector General of Police, HQrs., Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police, HQrs., KPK, Peshawar.
3. Asstt: Inspector General of Police, Establishment KPK, Peshawar.
4. SSsP/Operation, Investigation & Traffic, Peshawar.
5. AIG, Legal, KPK, Peshawar.
6. DSP/Legal Peshawar.
7. Asstt: Secret, & EC-II, CCP, Peshawar.

FOR CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

J 43

**DEPARTMENTAL SELECTION COMMITTEE FOR PASIS BATCH 2010-11**

Departmental Selection Committee has been constituted in the backdrop of Writ Petition No. (Sic) in CM No.2171/P filed by Abdul Sattar & others for their revised seniority and information in the rank of Sub Inspector after their names were brought on List E from the date of confirmation in light of the judgment in Writ Petition No.3720-P/2018. DSC had several directing on different dates and petitioners were also called in every meeting to hear their point of view. DSC comprised of the following officers:

1. SSP CO Ordination (Chairman)
2. SP HQrs
3. SP Security
4. SP Cantt Traffic
5. DSP legal
6. Office Sudpt

Petitioners were aggrieved of the following:-

- A. Their confirmation date in the rank of ASI shall be revised as DPC for both the batches was held late enough and if the same had been called on the due date i.e. after 03 years of completion of probation, they would have availed promotions chances and got eligibility in time for mandatory periods/ courses.
- B. They should have been promoted as Offg. SI in April 2014 when first DPC after the completion of their probation was held and petitioners be made senior to the promotees.
- C. They be confirmed on old criteria of SI confirmation which was applicable prior to 30.06.2018.
- D. Their nomination as per Form 13.15 Police Rules shall be sent to Central Police Office recommending their names to be included in List F from revised date.

Committee had threadbare discussion over the specific issue and relevant laws/ rules were perused. Committee after mutual consultation agreed on the following recommendations.

1. As far as the grievance A of the petitioners regarding revision of their confirmation in the rank of ASI is concerned it appears to be based on valid reason. PR 12.08 states that directly recruited ASIs should be on probation for 03 years but in the present case of petitioners, the probation period exceeded by 03 years. The DPC date is required to be revised and they may be confirmed on completion of 03 years probation. PASIs of batch 2011 were appointed on same date i.e. 26.03.2011 but PASIs of batch 2010 were appointed on different dates, therefore their confirmation may be made from their dates of enrollment after completion of three years probation period.
2. As far as point B is concerned, after their confirmation in the rank of ASI is revised and comparing that date with that of the DPC for promotion of Offg SI held in April (sic)

Who were promoted through DPC held on 16.4.2014. Committee is of the opinion that petitioner's revised promotion shall be made from 16.4.2014 instead of 03.03.2017 & 12.02.2019.

3. After their revised promotion as Offg SI next question before committee was the confirmation of the petitioners in the rank of SI. As there are certain courses and mandatory periods prior to confirmation in the rank of SI as provide in PR

2324

13.10 and some standing orders. PR 13.10 has been amended and a one year mandatory course has been introduced in 30.6.2018. Petitioners have been promoted on Acting Charge Basis on 24.07.2015 much prior to their regular promotion in the year 2017 and 2019. It was principally agreed to grant the favor to petitioners of their SMO period served during Acting charge basis period. Among these PASIs of 2010 and 2011 batches who had completed their mandatory period prior to the amendment in 30.06.2018 shall be confirmed on old criteria while those who could not complete mandatory periods prior to amendment in PR 13.10, they shall be confirmed as SI after they complete the mandatory period as provided in amended PR 13.10. However on completion of period and after confirmation these leftover PASIs shall be assigned seniority with their batch.

4. Amended PR 13.10(2) makes it mandatory for every SI to go through Upper College course before being confirmed in the rank. Petitioners were deputed for upper college course in year 2019 because their seniority was not properly adjusted. Now as their seniority is being revised and as per revised seniority they would have completed the subject course much earlier to the amendment, therefore committee is of the view that one time waiver may be granted to the batches of 2010-J1 by not considering the date of completion of Upper College Course at the time of confirmation. This decision is being suggested specifically in the present circumstances and it may not be made precedent in future.

*sd/-*  
Superintendent of Police Headquarters, *sd/-* Superintendent of Police Cantt, Traffic

*sd/-*  
Superintendent of Police Security, *sd/-* Deputy Supdt of Police, Legal



OFFICE OF THE  
CAPITAL CITY POLICE OFFICER,  
PESHAWAR.

Telephone No. 091-9210841 Fax No. 091-9212597

POLICE DEPTT:

CCP, PESHAWAR.

FOR PUBLICATION IN THE KHYBER PAKHTUNKHWA POLICE GAZETTE PART-II,  
ORDERS BY THE CAPITAL CITY POLICE OFFICER KHYBER PAKHTUNKHWA,  
PESHAWAR.

NOTIFICATION

Dated 16/03/2021.

No. 3439 /EC-1 CONFIRMATION IN THE RANK OF SI:- In light of the recommendation of Departmental Promotion Committee meeting dated 20-02-2021 constituted in the backdrop of Writ Petition No. 3900/P in CM No. 2171/P filed by Abdul Sattar and others, consequently upon revised notification in the rank of Offg. SI promoted w.e from 16.04.2014 the following Offg. SIs of Capital City Police, Peshawar are hereby confirmed in the rank of SIs w.e from the dates on which they completed mandatory periods provided in the P.Rules 13.10(2) and Standing orders issued from time to time.

They are allotted new CCP, Peshawar number.

S#	Name & No	Place of posting	New CCP, Peshawar Number	Date of confirmation in the rank of SI
1.	Offg. SI Abdul Sattar No. 746/P	CTO	P/172	16-04-2016
2.	Offg. SI Faizal Hadi No. 747/P	Special Branch	P/173	16-04-2016
3.	Offg. SI Muhammad Umer-755/P	Elite/GPD	P/174	16-04-2016
4.	Offg. SI Tahir Ali Khan No. 749/P	Special Branch	P/178	16-04-2016
5.	Offg. SI Wisal Khan No. 753/P	Special Branch	P/179	16-04-2016
6.	Offg. SI Imran Ullah No. 751/P	CCP, Peshawar	P/181	16-04-2016
7.	Offg. SI Rizal Ahmad No. 761/P	Legal Branch	P/184	16-04-2016
8.	Offg. SI Saeed Jan No. 795/P	ACE	P/186	16-04-2016
9.	Offg. SI Muhammad Ashfaq No. 796/P	Elite Force	P/187	16-04-2016
10.	Offg. SI Ahmad Ullah Khan-797/P	Special Branch	P/202	28-04-2016
11.	Offg. SI Rehmat Ullah Khan-759/P	Special Branch	P/303	02-09-2016
12.	Offg. SI Mumtaz Khan No.791/P	CCP, Peshawar	P/328	19-09-2016
13.	Offg. SI Nauman Khan No. 803/P	Elite Force	P/366	20-10-2016
14.	Offg. SI Bismillah Jan No. 750/P	CCP, Peshawar	P/413	01-12-2016
15.	Offg. SI Irfan Ullah No. 776/P	Charsadda	P/462	02-12-2016
16.	Offg. SI Abdullah Jalal Khan -793/P	Elite Force	P/463	08-12-2016
17.	Offg. SI Asif Ali Khan No.785/P	FRP KPK	P/464	14-12-2016
18.	Offg. SI Ihsan Ullah No. 767/P	CCP, Peshawar	P/465	15-02-2017
19.	Offg. SI Ishfaq Ahmad No. 775/P	Charsadda	P/466	22-02-2017
20.	Offg. SI Inam Ullah No.707/P	Special Branch	P/467	28-02-2017
21.	Offg. SI Mamoon Rashid No.800/P	FRP KPK	P/468	28-02-2017

Notification

Attested  
[Signature]

46

22.	Offg; SI Afzal Khan No. 766/P	Elite Force	P/469	27-04-2017
23.	Offg; SI Qazi Muhammad Arif No. 790/P	Elite Force	P/470	03-05-2017
24.	Offg; SI Muhammad Asif Khan No. 700/P	Police school of Investigation	P/471	11-05-2017
25.	Offg; SI Imtiaz Ahmad No. 784/P	Elite Force	P/472	28-08-2017
26.	Offg; SI Afzal Gul No. 760/P	CCP, Peshawar	P/474	10-11-2017
27.	Offg; SI Waheed Khan No. 777/P	Elite Force	P/475	20-12-2017
28.	Offg; SI Now SI Muhammad Mubarak Zeb 794/P	CCP, Peshawar	P/476	24-02-2018
29.	Offg; SI Manzoor Khan No. 748/P	CCP, Peshawar	P/477	31-03-2018
30.	Offg; SI Azaz Alam Khan Khalil No. 783/P	Elite Force	P/478	11-04-2018
31.	Offg; SI Saleem Khan No. 786/P	CCP, Peshawar	P/479	21-01-2021

Sd/-  
**CAPITAL CITY POLICE OFFICER,  
 PESHAWAR.**

No. 3440-55 /EC-I,

Copy of above is forwarded for information and necessary action to

the:-

1. Addl. Inspector General of Police, HQs, Inv. Elite Force & Special Branch Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police, HQs, CTD KPK, Peshawar.
3. Commandant FRP, KPK, Peshawar.
4. Asstt. Inspector General of Police, Establishment KPK, Peshawar.
5. SSSP, Operation, Investigation & Traffic, Peshawar.
6. AIG, Legal, KPK, Peshawar.
7. Director Anti-Corruption Establishment, Peshawar.
8. DSP/Legal, Peshawar.
9. Asstt. Secret, & EC-II, CCP, Peshawar.

*[Signature]*  
 FOR CAPITAL CITY POLICE OFFICER,  
 PESHAWAR.

Attested  
*[Signature]*

Notification



To,

L 47  
The Provincial Police Officer,  
Khyber Pakhtunkhwa,  
Peshawar.

Subject:

APPEAL AGAINST OFFICE NOTIFICATION NO, 3439 / EC-I  
DATED, 16-03-2021 OF THE CAPITAL CITY POLICE OFFICER  
PESHAWAR, WHEREBY THE INCUMBENTS MENTIONED THEREIN  
WARE CONFIRMED AS ASI'S FROM THE DATE OF THEIR INITIAL  
APPOINTMENT AND PROMOTED FURTHER TO THE RANK OF SUB  
INSPECTOR WITH EFFECT FROM THE DATE, THEY COMPLETED  
MANDATORY PERIODS PROVIDED IN THE POLICE RULES 13.10(2).

Respectfully Sir,

1. That appellant etc were initially appointed/ recruited probationer Assistant Sub-Inspector in the year 2010/2011.
2. That services of all appellant etc were regularized on 13-08-2014 but with immediate effect and not from the date of initial recruitment.
3. That appellant etc filed writ petition No. 3720-P/18, "Qazi Muhammad Arif vs Govt. of KP & Others" which was allowed on 24-04-2019.
4. That on 05-06-2020 and 01-07-2020, CCPO Peshawar revised their recruitment from the date of initial appointment.
5. That on 26-02-2021, Notification in pursuance of the pending writ petitions was issued through DPC wherein the incumbents mentioned therein were confirmed in the rank of ASI's and promoted to the rank of Officiating Sub-Inspectors and seninty of the batches 2010 and 2011 was revised. In his Notification 52 personnel's were mentioned.
6. That on 16-03-2021 the Worthy CCPO issued subsequent Notification wherein the incumbents mentioned their ware confirmed in the rank of Sub-Inspectors with effect from the date of completion of mandatory period ,s provided in police rules 13. 11 (2).

48

Here it ought be not out of place to mention that at srno 28 I was confirmed with immediate effect from 24.02.2018 , after completion of mandatory period and not with my other batchmates contrary to the DPC Minutes.

7. That here it is pertinent to mention that the appellant , I was never deputed / posted for completion of Police Rules 13.10 (2) at the right time .  
So I was wrongly confirmed on 24-02-2018 and not with my other batch mates who were right fully confirmed no 16-04-2016 .
8. That in the Minutes of the meeting of the DPC , it was decided the leftover incumbents shall be assigned seniority with their other batch mates batch .  
That it was incumbents upon the authority to confirm the appelat in the rank of Sub-Inspector from the date of appoint to the rank of officiating SI along with his other batchmates .
10. That not only the Hon'ble Service Tribunal and the Apex Supreme Court of Pakistan held in plethora of judgments that no one can be deprived from benefits of confirmation / promotion to the next rank when the same is not one,s part.
11. That appellant was discriminated for no legal reasons but due to the lapses of the department/ authority. Such act is based on ueterior motive.

It is, therefore, most humbly requested that Notification dated 16-03-2021 be kindly reviewed / modified and the appellant be confirmed in the rank of Sub Inspector with his other batch mates .

Obliged .

Appellant .



Si M . Mubarak zeb Gul NO 794/P

CCP Peshawar

• CELL no :. 03018838688

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR**

Misc. A. No. \_\_\_\_\_/2021

IN

S. A. No \_\_\_\_\_/2021

Muhammad Mubarak Zeb Gul                      versus                      CCPO & Another

**APPLICATION FOR CONDONATION OF DELAY:**

**Respectfully Sheweth,**

1. That applicant filed the subject appeal before this Hon'ble Tribunal today.
2. That colleagues of the appellant had also filed similar appeals before this hon'ble Tribunal which were admitted to regular hearing.
3. That the subject appeal is in all affairs of the state is similar in nature and requires admissions in the interest of justice to decide the same along with the colleagues appeals of appellant.

It is, therefore, most humbly requested that the delay, if any, be condoned in the interest of justice and the case be decide on merit rather on technicality.

  
Applicant

Through

  
Saadullah Khan Marwat  
Advocate

Date: 07-12-2021

**BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR**

Misc. A. No. \_\_\_\_\_/2021

Muhammad Mubarak Zeb Khan versus CCPO & Another

**AFFIDAVIT**

I, Muhammad Mubarak Zeb Khan, Applicant do hereby solemnly affirm and declare that contents of **Application** are true and correct to the best of my knowledge and belief.

  
DEPONENT

یعدالت چٹائی سسرولس ٹریڈ پورٹل صوبہ سندھ ایسٹ اور

مخواب اصلاحات

عزیز صاحب سب گل بنام محمد علی گولیس

دعویٰ اپیل

باسمہ تعالیٰ

© ————— ©

مقررہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی وکل کاروائی متعلقہ آن مقام ایسٹ اور  
کیسٹ ایسٹ اسٹاٹس خانہ سرورٹس ایڈووکیٹس ہائی کورٹ کو وکیل مقرر کر کے ایڈووکیٹ کیا جاتا ہے کہ صاحب  
مذکورہ کو مقدمہ کی وکل کاروائی کا کامل اختیار ہوگا نیز وکیل صاحب کو کرنے دہنی نامہ و آڈیٹ ٹالسٹا و دیسٹریکٹ  
یہ جواب دہی اور ایڈووکیٹ اور ایڈووکیٹ ڈگری کرنے اجازت اور دہولی چیک و ڈریہ اور مرضی دعویٰ اور درخواست  
ہر قسم کی تقدیر اور اس پر دستخط کرنے کا اختیار ہوگا نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی  
اور دستخطی اختیار کرنے اپیل نگران و نظر ثانی و پیروی کرنے کا اختیار ہوگا اور بصورت ضرورت مقدمہ مذکور  
کے وکل یا پیروی کاروائی کے واسطے اور وکیل یا ایڈووکیٹ قانونی کو اپنے ہمراہ یا اپنی بجائے تقدیر کا اختیار ہوگا  
اور وہ اس پر مقرر شدہ کو بھی وہی ہوگا مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پرواختہ منظور  
قبول ہوگا اور دوران مقدمہ میں جو خرچہ و ہرجانہ التوا منظور کرے سبب سے ہوگا اس کے مستحق وکیل صاحب  
مذکورہ ہوں گے نیز بقایا و فرسبہ کی وصولی کرنے کا بھی اختیار ہوگا اگر کوئی تاریخ پیشی مقامی روبرو  
پیر ہو یا عدسے باہر ہو تو وکیل صاحب یا ہمارے ہوں گے کہ پیروی مذکور کریں۔

لہذا وکالت نامہ رکھ دیا کہ مندر ہے۔

المرقوم 21-12-06

التعبید

التعبید

التعبید

11

ارباب سب انکمال  
ایڈووکیٹ

محمد علی گولیس  
ایڈووکیٹ

محمد علی گولیس

محمد علی گولیس  
ایڈووکیٹ