

19.06.2019

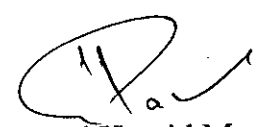
Counsel for the appellant and Mr. Muhammad Bilal, DDA alongwith Mr. Muhammad Nazeer, Assistant for respondent present. Written reply on behalf of respondents not submitted. Requested for adjournment. Adjourned. Case to come up for written reply/comments on 20.08.2019 before S.B at camp court Abbottabad.

Grievance has been granted, Mr. Nazeer, I withdraw instant appeal.
M. Aslam.
Aen

20.08.2019

Learned counsel for the appellant present. Mr. Muhammad Bilal learned Deputy District Attorney present. Learned counsel for the appellant stated that grievance of the appellant has been redressed and requested for withdrawal of the present service appeal.

In view of the above, the present service appeal is hereby dismissed as withdrawn. File be consigned to the record room.


(Muhammad Hamid Mughal)
Member
Camp Court A/Abad

Announced:
20.08.2019


Ergebnis: $\log_{10} 1000 = 3$
— $\log_{10} 100 = 2$
— $\log_{10} 10 = 1$
— $\log_{10} 1 = 0$
— $\log_{10} 0.1 = -1$
— $\log_{10} 0.01 = -2$
— $\log_{10} 0.001 = -3$

18.02.2019

Counsel for the appellant present. Preliminary arguments heard. It was contended by learned counsel for the appellant that the appellant is serving in Police Department as Officiating Sub-Inspector. It was further contended that the juniors to the appellant were confirmed after completing of two years officiating probation period vide order dated 24.05.2018 but the appellant was ignored for the reason that he was imposed minor penalty of reversion in pay for three years. It was further contended that the appellant filed departmental appeal on 25.06.2018 but the same was not responded hence, the present service appeal. It was further contended that due to minor punishment the appellant was ignored but the said punishment was also set-aside by the competent authority vide order dated 21.06.2018 therefore, the appellant is entitled for confirmation from the date when his junior colleagues were confirmed.


The contentions raised by the learned counsel for the appellant needs consideration. The appeal is admitted for regular hearing subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days, thereafter, notice be issued to the respondents for written reply/comments for 16.04.2019 before S.B at Camp Court Abbottabad.

Appellant Deposited
Security & Process Fee


(Muhammad Amin Khan Kundi)
Member
Camp Court Abbottabad

16.04.2019



Counsel for the appellant present. Mr. Muhammad Bilal, DDA alongwith Mr. Misal Khan, ASI for respondents present. Written reply not submitted. Requested for adjournment. Adjourned. Case to come up for written reply/comments on 19.06.2019 before SB at camp court Abbottabad.


(Ahmad/Hassan)
Member
Camp Court A/Abad

Form- A
FORM OF ORDER SHEET

Court of _____

Case No. 1349/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	26/10/2018	The appeal of Mr. Anas Khan presented today by Mr. Muhammad Aslam Khan Tanoli Advocate, may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.
2-	19-11-2018	<p style="text-align: right;"> REGISTRAR > 26/10/18</p> <p>This case is entrusted to touring S. Bench at A.Abad for preliminary hearing to be put up there on <u>18-02-2019</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Appeal No. 1349/18

Anas Khan, Sub Inspector No.116/H presently posted at Operational Wing Mansehar.

Appellant

VERSUS

1. The Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. The Regional Police Officer, Hazara Region, Abbottabad.

Respondents

SERVICE APPEAL

INDEX

S/N	Description of Document	Annexure	Page No.
1.	Appeal and application for condonation.		01-09
2.	Order dated 08-09-2015 promotion as SI	"A"	10-11
3.	Order dated 24-05-2018 confirmation of SIs	"B"	12-13
4.	Order dated 21-06-2018 penalty set aside	"C"	14
5.	Departmental Appeal dated 25-06-2018	"D"	15
6.	Letter dated 27-06-2018 .	"E"	16
7.	Wakalatnama		


Appellant

Through


(Mohammad Aslam Tanoli)
Advocate High Court
at Haripur

Dated: 2610-2018

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1567 Appeal No. 1349/18

Dated 26/10/18

Anas Khan, Sub Inspector No.116/H presently posted at Operational Wing Mansehar.

Appellant

VERSUS

1. The Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. The Regional Police Officer, Hazara Region, Abbottabad.

Respondents

SERVICE APPEAL UNDER SECTION-4 OF KPK SERVICE TRIBUNAL ACT 1974 AGAINST ORDER DATED 24-05-2018 OF THE REGIONAL POLICE OFFICER HAZARA REGION ABBOTTABAD WHEREBY IGNORING THE APPELLANT HIS COLLEAGUES AND JUNIORS HAVE BEEN CONFIRMED AS SUB INSPECTORS.

PRAYER: ON ACCEPTANCE OF INSTANT SERVICE APPEAL IMPUGNED ORDER DATED 24-05-2018 OF REGIONAL POLICE OFFICER HAZARA REGION ABBOTTABAD MAY GRACIOUSLY BE MODIFIED AND APPELLANT BE CONFIRMED ALONGWITH HIS COLLEAGUES AT RIGHT PLACE WITH ALL CONSEQUENTIAL SERVICE BACK BENEFITS.

Respectfully sheweth,

1. That appellant after having qualified Public Service Commission Examination was inducted in the Police Department as Assistant Sub Inspector on 02-07-2011.

②

2. That on successful completion of probation the appellant was confirmed as Assistant Sub Inspector alongwith his other colleagues.
3. That appellant being a confirmed ASI was promoted to the rank of officiating Sub Inspector along with his batch-mates vide order dated 08-09-2015 and his name stands at S/No. 35. **(Copy of order dated 08-09-2015 is attached as Annex-"A")**.
4. That appellant's colleagues/batch-mates, even his juniors, were confirmed as Sub Inspector by the Regional Police Officer, Hazara Range, Abbottabad vide his order dated 24-05-2018 ignoring the appellant. **(Copy of the order dated 24-05-2018 is attached as Annex-"B")**.
5. That though appellant had successfully completed his probation period and had become qualified for confirmation as Sub Inspector according to Rule 13-10(2) of Police Rules 1934 but was not considered for confirmation by the departmental promotion committee held on 23-05-2018 perhaps due to penalty of reversion in pay against him while the same had been set aside by appellate authority vide order dated 21-06-2018. **(Copy of order dated 21-06-2018 is attached as Annex-"C")**.

3

6. That appellant preferred an appeal dated 25-06-2018 against impugned order requesting his confirmation along with his colleagues which was forwarded ahead vide DPO Mansehra letter dated 27-06-2018 but the same was never responded within the statutory period. **(Copies of appeal dated 25-06-2018 and covering letter dated 27-06-2018 are attached as Annex-"D & E")**

Hence instant service appeal, inter alia, on the following grounds:-

GROUNDS:

- a) That impugned orders dated 24-05-2018 of the Regional Police Officer Hazara Region Abbottabad is void-ab-initio, illegal and has been passed slipshod in manner, against the facts and circumstances of the case, hence is liable to be modified to the extent of confirmation of appellant as Sub Inspector.
- b) That respondents have not treated the appellant in accordance with law, departmental rules & regulations and policy on the subject and have acted in violation of Article-4 of the constitution of Islamic Republic of Pakistan 1973 and unlawfully issued the impugned order, which is unjust, unfair and hence not sustainable in the eyes of law.

4

- c) That neither proper scrutiny of the record pertaining to confirmation of appellant was made nor was his case considered by the competent authority as well as appellate authority while passing impugned order whereby appellant has been badly affected in service and deprived of his legitimate and lawful right of confirmation alongwith his colleagues at right place without any justification, reason and rhyme.
- d) That even the law, departmental rules and regulations have not been followed by the departmental authorities while carrying out the confirmation process of Sub Inspectors who are colleagues/batch mates or even juniors of the appellant and passing impugned order, ignoring the appellant without any reason and rhyme.
- e) That the appellate authority has also failed to abide by the law and even did not take into consideration the grounds taken in the memo of appeal. Thus the impugned order of the authority is contrary to the law as laid down in the KPK Police Rules 1934, other departmental rules regulations read with section 24-A of the General Clause Act 1897 read with Article 10A of the Constitution of Islamic Republic of Pakistan 1973.
- f) That appellant fulfils the criteria and all requirements of confirmation as Sub Inspector and deserves to be confirmed as Sub Inspector from the date his colleagues were conformed at the right place in seniority.

5


PRAYER:

It is, therefore, humbly prayed that on acceptance of instant appeal the impugned orders dated 24-05-2018 of the Regional Police Officer, Hazara Region, Abbottabad may graciously be modified to the extent of appellant and he be confirmed as Sub Inspector. from the date his colleagues were confirmed at right place according to seniority with all consequential service back benefits.

Any other relief which this Honour Tribunal deems fit in the circumstance of the case may also graciously be awarded.

THROUGH


APPELLANT


(MOHAMMAD ASLAM TANOLI)
ADVOCATE HIGH COURT
HARIPUR

Dated 26-10-2018

AFFIDAVIT

I, Anas Khan appellant do hereby solemnly declare and affirm on oath that the contents of instant appeal are true and correct to the best of my knowledge and nothing has been concealed therefrom.

Dated: 26-10-2018


Deponent/Appellant

6

BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Anas Khan, Sub Inspector No.116/H presently posted at
Operational Wing Mansehar.

Appellant

VERSUS

1. The Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. The Regional Police Officer, Hazara Region, Abbottabad

Respondents

SERVICE APPEAL

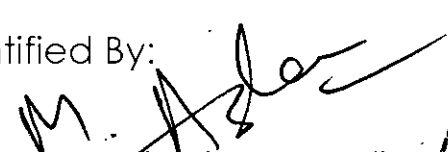
AFFIDAVIT:

I, Anas Khan appellant do hereby solemnly declare and affirm on oath that the contents of the instant Service Appeal are true and correct to the best of my knowledge and belief and nothing has been suppressed from this Honourable Service Tribunal.


Deponent/Appellant

Dated: 20-10-2018

Identified By:


Mohammad Aslam Tanoli
Advocate High Court
At Haripur




Appellant



BEFORE HONOURABLE KHYBER PAKHTUNKHWA
SERVICE TRIBUNAL PESHAWAR

Anas Khan, Sub Inspector No.116/H presently posted at Operational Wing Mansehar.

Appellant

VERSUS


1. The Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. The Regional Police Officer, Hazara Region, Abbottabad.

Respondents

SERVICE APPEAL

CERTIFICATE

It is certified that no such Appeal on the subject has ever been filed in this Honourable Service Tribunal or any other court prior to the instant one.


APPELLANT

Dated: 20-10-2018

8

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR

Anas Khan, Sub Inspector No.116/H presently posted at Operational Wing Mansehar.

Appellant

VERSUS

1. The Provincial Police Officer, Khyber Paktunkhwa, Peshawar.
2. The Regional Police Officer, Hazara Region, Abbottabad.

Respondents

SERVICE APPEAL

APPLICATION FOR CONDONATION OF DELAY IN FILING THE
APPEAL BEFORE THIS HONOUR SERVICE TRIBUNAL.

Respectfully Sheweth:

1. That the Applicant/Appellant has today filed the Service Appeal, which may be considered as part and parcel of this application, against the order dated 24-05-2018 whereby appellant has been deprived of his legitimate right of confirmation as Sub Inspector alongwith his colleagues and his departmental appeal has not been responded within statutory period against the departmental rules and regulations and against the facts of the matter.
2. That as the appellant has been deprived of his legal, lawful and factual right of confirmation as Sub Inspector alongwith his colleagues at a right place therefore the orders passed by the departmental authority is illegal and in sheer violation of mandatory statutory provisions of law thus being void ab-initio is ineffective against the rights of Applicant/Appellant.
3. That Applicant/appellant for the review of the aforesaid illegal order submitted a departmental appeal to the Appellate Authority but the same has not been responded and appellant's grievance is still



unsettled which will cause a recurring loss in future with an ultimate loss in pension as well.

4. That as the order of departmental authority is void, being passed in sheer violation and derogation of the statutory provisions governing the terms and condition of service of the appellant, therefore the same is a nullity in the eyes of law and being a void and unlawful order, causing a recurring cause of action to the Applicant/Appellant can be challenged and questioned irrespective of a time frame.
5. That instant application is being filed as an abundant caution for the condonation of delay, if any.
6. That the impugned order is illegal, void ab-initio, a nullity in the eyes of law thus liable to be modified in the interest of justice.

It is, therefore, respectfully prayed that on acceptance of the instant application the delay, if any, in the filing of the above titled appeal may graciously be condoned.

Through:


Applicant/Appellant

(Mohammad Aslam Tanoli)
Advocate High Court
At District Bar Haripur

Dated: 26-10-2018

AFFIDAVIT:

It is solemnly declare and affirm on oath that the contents of the instant application/appeal are true and correct to the best of my knowledge and belief.

Dated: 26-10-2018




Applicant/Appellant



2015

Phone No. 0992-9310021
Fax No. 0992-9310023

By Fax

Annex. A

ORDER

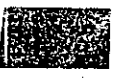
Consequent upon the recommendation of promotion board held in the office of the undersigned on 27-08-2015, the following confirmed ASIs on list "E" were found suitable for promotion as such they are hereby promoted to the rank of officiating Sub-Inspectors with immediate effect.

Their promotion will take effect from the date of taking over the charge of higher responsibility:-

S #	NAME AND NO.	PRESENT POSTING
✓01	ASI Mehboob-ur-Rehman 352/H	CTD Mansehra
✓02	ASI Zakir Hussain Shah No.372/H	Investigation Wing Abbottabad
✓03	ASI Muhammad Aslam No.373/H	CTD Battagram
✓04	ASI Wajid Ali No.374/H	Operational Wing Lower Kohistan
✓05	ASI Abdul Jalil No.375/H	Operational Wing Haripur
✓06	ASI Amjad Ali No.376/H	Operational Wing Battagram
✓07	ASI Dil Pazi No.377/H	Operational Wing Abbottabad
✓08	ASI Muhammad Pervez No.378/H	Operational Wing Abbottabad
✓09	ASI Arshad Khan No.379/H	Operational Wing Haripur
✓10	ASI Muhammad Bilal No.380/H	Operational Wing Torghar
✓11	ASI Muhammad Razaq .381/H	CTD Mansehra
✓12	ASI Safdar Zaman No.382/H	CTD Haripur
✓13	ASI Muhammad Nawaz No.383/H	Investigation Wing Mansehra
✓14	ASI Hajab Khan No.384/H	CTD Torghar
✓15	ASI Faisal Hafeez No.159/H	Operational Wing Abbottabad
✓16	ASI Nadir Khan No.127/H	Operational Wing Abbottabad
✓17	ASI Noman Javed No.121/H	Operational Wing Haripur
✓18	ASI Sardar Tahir Saleem No.131/H	Operational Wing Abbottabad
✓19	ASI Aamir Hussain No.37/H	Operational Wing Mansehra
✓20	ASI Khizar Khan Jadoon No.158/H	Investigation Wing Abbottabad
✓21	ASI Wajid Hussain No.141/H	Operational Wing Abbottabad
✓22	ASI Shehryar No.289/H	Operational Wing Haripur
✓23	ASI Shahzad Khan No.142/H	Elite Force Peshawar
✓24	ASI Mehtab Nazir No.144/H	Operational Wing Abbottabad
✓25	ASI Muhammad Saddique 161/H	Operational Wing Haripur
✓26	ASI Ejaz Ali No.212/H	Operational Wing Haripur
✓27	ASI Syed Asim Imam Bukhari No.57/H	Operational Wing Mansehra
✓28	ASI Yasir No.60/H	Operational Wing Mansehra
✓29	ASI Assad No.62/H	Operational Wing Mansehra
✓30	ASI Syed Imtiaz Ali Shah .292/H	Operational Wing Battagram
✓31	ASI Muhammad Imtiaz Khan No.293/H	CTD HQs Hazara

Handwritten signature and initials.

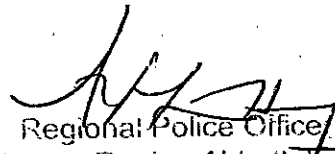
9c





- ✓32 ASI Amir Ashfaq No.72/H
- ✓33 ASI Hadi Paristan No.86/H
- ✓34 ASI Nasir Khan No.94/H
- ✓35 ASI Anas No.116/H
- ✓36 ASI Tahir Iqbal No.118/H
- ✓37 ASI Khaiil-ur-Rehman No.295/H
- ✓38 ASI Muhammad Nawaz No.296/H
- ✓39 ASI Rustam Khan No.385/H
- 40 ASI Muhammad Riaz No.387/H
- 41 ASI Zahir Khan No. 388/H
- 42 ASI Muhammad Nawaz No.390/H

Operational Wing Mansehra
Operational Wing Mansehra
Operational Wing Mansehra
Operational Wing Mansehra
Operational Wing Mansehra
Operational Wing Abbottabad
Operational Wing Mansehra
CTD Hazara
CTD Haripur
CTD Kohistan
/C Mini Operation Room RPO Office


Regional Police Officer,
Hazara Region Abbottabad
(AEC Dilawar)

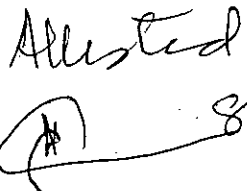
No. 14529-41 /E, dated Abbottabad the 08-09-2015

Copy of above is forwarded for information and necessary

action to the:-

1. Additional Inspector General of Police / Commandant Elite Force Khyber Pakhtunkhwa Peshawar.
2. Deputy Inspector General of Police CTD Khyber Pakhtunkhwa Peshawar.
3. All District Police Officers. in Hazara Region.
4. Superintendents of Police Investigation Abbottabad & Mansehra.
5. Superintendent of Police CTD Hazara Abbottabad.
6. Superintendent of Police ^{Elite Force} Hazara Abbottabad.

(Necessary Gazette Notification may be issued accordingly)



12

Amey B

Phone No. 0992-9310021
Fax No. 0992-9310922

ORDER

As approved by the Departmental Promotion Committee held on 23-05-2018 in the office of the undersigned the following officiating Sub Inspectors who have completed their two years officiating / probation period and fulfilled the laid down criteria for substantive rank under Police Rules. 13-1, 13-10 (2) and 13-18 are hereby confirmed as Sub Inspectors with immediate effect.

They are allotted new Region numbers as noted against each their

names:-

S #	NAME AND NO.	PRESENT POSTING	ALLOTTED NEW REGION NUMBER
01	SI Abdul Qayyum No.254/H	Karakoram Patrol Force Kohistan	H/03
02	SI Azhar Khan No.97/H	CTD Khyber Pakhtunkhwa	H/04
03	SI Mian Liaqat Ali Khan No.271/H	Elite Force Khyber Pakhtunkhwa	H/08
04	SI Asif Hussain No.287/H	Kolai Pallas Kohistan District	H/09
05	SI Tasleem Shah No.301/H	Torghar District	H/10
06	SI Khan Bahadar No.333/H	Abbottabad District	H/12
07	SI Sakhi Sultan No.336/H	Special Branch Khyber Pakhtunkhwa	H/13
08	SI Ilafeez-ur-Rehman No.339/H	Mansehra District	H/14
09	SI Naseer Ahmed No.342/H	Mansehra District	H/15
10	SI Muhammad Ilyas No.350/H	Battagram District	H/16
11	SI Mehboob-ur-Rehman No.352/H	Abbottabad District	H/17
12	SI Sokhraj No.364/H	CTD Khyber Pakhtunkhwa	H/18
13	SI Muhammad Raziq No.367/H	Upper Kohistan District	H/19
14	SI Gul Samar No.368/H	Upper Kohistan District	H/22
15	SI Zakir Hussain Shah No.372/H	PTC Hangu	H/23
16	SI Dil Pazir No.377/H	Mansehra District	H/24
17	SI Arshad Khan No.379/H	Upper Kohistan District	H/25
18	SI Faisal Hafeez No.159/H	Haripur District	H/27
19	SI Norman Javed No.121/H	Haripur District	H/142
20	SI Sardar Tahir Saleem No.131/H	Elite Force Khyber Pakhtunkhwa	H/28
21	SI Aamir Hussain No.37/H	Mansehra District	H/43
22	SI Khizar Khan Jadoon No.158/H	Abbottabad District	H/76
23	SI Wajid Hussain No.141/H	Abbottabad District	H/86
24	SI Shehryar No.289/H	Abbottabad District	H/94
25	SI Shahzad Khan No.142/H	Abbottabad District	H/110
26	SI Mehtab Nazir No.144/H	Elite Force Khyber Pakhtunkhwa	H/113
27	SI Muhammad Saddique No.161/H	Haripur District	H/114
28	SI Syed Asim Imam Bukhari No.57/H	Upper Kohistan District	H/115
29	SI Yasir No.60/H	Mansehra District	H/118
30	SI Assad No.62/H	Haripur District	H/119
31	SI Syed Imtiaz Ali Shah No.292/H	Battagram District	H/121
32	SI Muhammad Imtiaz Khan No.293/H	Lower Kohistan District	H/122
33	SI Amir Ashfaq No.72/H	Mansehra District	H/124
34	SI Hadi Paristan No.86/H	Haripur District	H/125

Attested
[Signature]

13

Phone No. 0992-9310021
Fax No. 0992-9310023

35	SI Nasir Khan No.94/H	Kolai Pallas Kohistan District	H/126
36	SI Tahir Iqbal No.118/H	Mansehra District	H/128
37	SI Muhammad Haque Hashmi No.294/H	Upper Kohistan District	H/131
38	SI Khalil-ur-Rehman No.295/H	Lower Kohistan District	H/132
39	SI Muhammad Nawaz No.296/H	Lower Kohistan District	H/133
40	SI Chanzeb No.394/H	Haripur District	H/135
41	SI Muhammad Farooq No.410/H	Abbottabad District	H/141

[Signature]
Regional Police Officer,
Hazara Region Abbottabad
(AEC Dilawar)

No. 15100-120 /E, dated Abbottabad the 24-05 /2018.

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

1. Provincial Police Officer, Khyber Pakhtunkhwa Peshawar.
2. Additional Inspector General of Police, Elite Force Khyber Pakhtunkhwa Peshawar.
3. Additional Inspector General of Police, Special Branch Khyber Pakhtunkhwa Peshawar.
4. Deputy Inspector General of Police, CTD Khyber Pakhtunkhwa Peshawar.
5. Commandant, Police Training College Hangu.
6. All District Police Officers in Hazara Region.
7. All Superintendents of Police Investigation in Hazara Region.
8. Superintendent of Police Elite Force Hazara Abbottabad.
9. Superintendent of Police CTD Hazara Abbottabad.
10. Superintendent of Police KPF at Battagram.
11. OS/AS Region Office Abbottabad.

(Necessary Gazette Notification may be issued accordingly).

o/c

[Signature]

14

Annex - C

ORDER

This order is hereby passed to dispose off departmental review/ mercy petition under Rule 11-A of Khyber Pakhtunkhwa Police Rules 1975 submitted by *SI Anas Khan* Haripur District against the order of punishment i.e. "Reversion in pay for 03 years" awarded to him by the DPO Haripur vide OB No: 25, dated 11.01.2018.

Facts leading to punishment awarded to him are that while undergoing for upper college course, at PTC Hangu, he is involved in immoral activities, and have relation with narcotics peddlers and drug dealers which not only defaced the image of local police but also created embarrassment for department, being Police Officer his attitude is not like a professional Police Officer.

After receiving his appeal, comments of DPO were obtained and perused, the undersigned called appellant in O.R on 20.06.2018 and heard in person where he explained convincing reasons in his defence and also stated his domestic financial problems. He also promised in future giving no chance of complain to his superior officers. Therefore, keeping in view his prolonged service and being only the source of income of his family, I take lenient view and punishment awarded to him by the DPO Haripur "Reversion in pay for 03 years" is set aside. He is reprimanded with a warning to be careful in future.

REGIONAL POLICE OFFICER
Hazara Region Abbottabad

No. 2813 /PA Dated Abbottabad the 21/6 /2018.

Copy of above is forwarded to the District Police Officer, Haripur vide his office Memo: No: 1793, dated 07.03.2018 for information and necessary action.

Service Roll of appellant containing enquiry file is returned herewith for your office record.

REGIONAL POLICE OFFICER
Hazara Region Abbottabad

Attested
[Signature]

(15)

Annex-D

ایس کنفرینس - TPC

تاریخ عالی

گزارش قبیلہ سائل مورخہ 23/05/2018 کو سید والی

DPC (ایس کنفرینس) سے ڈیفینس سائلوں کی وجہ سے سزا دہلی۔

اب سائل کی سزا و بحالہ و ID صاحب ہزارہ بحوالہ آرڈر نمبر

2813/PA میں صاف نکلتا ہے۔ لہذا میری فرمائش سائل کو اسے

کوٹنگ کے ساتھ کنفرینس سٹاٹس ٹائم سائل کو اپنا حق ملتا

آجمناب کی عین فوارش ہوگی۔ (مخالی آرڈر پراہ لیا جاتا)

الحاصل

السید شاہ SI-SHA معینہ تقا نہ مانغان صلح مانا ہے۔
116-H

25-06-2018

Attested

[Signature]



16

- Annex - E

POLICE DEPARTMENT

DISTRICT MANSEHRA

Office of the DPO, Mansehra No 8134 /SRC, dated Mansehra the 27/06/2018

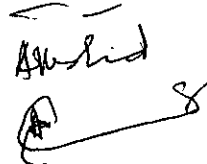
From The District Police Officer,
Mansehra.

To The Regional Police Officer,
Hazara Region, Abbottabad.

Subject: APPLICATION.
Memorandum.

Enclosed kindly find an application in respect of: SI Anas Khan No. 116/H of this district is submitted herewith for favour of kind perusal and consideration, please.


District Police Officer,
Mansehra.

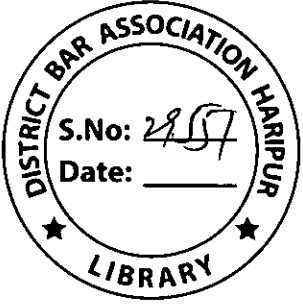


DBA No: 206
BC No: 10-1875
Name of Advocate: محمد اسلم تنوی

S.No: 29551



وکالت نامہ



بعدالت: جن صاحب منہجہ کتبہ تنوی ریسٹوریشن اور
عنوان: انسداد
منجانب: ایڈووکیٹ
نوعیت مقدمہ: سرکاری
باعث تحریر آنکھ:

مقدمہ مندرجہ بالا عنوان میں اپنی طرف سے واسطے پیروی و جوابدہی برائے پیشی یا تصدیقہ مقدمہ بمقام ریجنل جج کے لیے
کمر کے تحت عمل کو روک دینے کے لیے

کو حسب ذیل شرائط پر وکیل مقرر کیا ہے کہ میں ہر پیشی پر خود یا بذریعہ مختار خاص رو بروعدالت حاضر ہوتا رہوں گا اور بروقت
پکارے جانے مقدمہ وکیل صاحب موصوف کو اطلاع دے کر حاضر عدالت کروں گا۔ اگر پیشی پر مظہر حاضر نہ ہو اور مقدمہ میری
غیرحاضری کی وجہ سے کسی طور پر میرے خلاف ہو گیا تو صاحب موصوف اس کے کسی طور پر ذمہ دار نہ ہوں گے نیز وکیل صاحب
موصوف صدر مقام پکھری کے علاوہ کسی جگہ یا پکھری کے اوقات سے پہلے یا پیچھے یا بروز تعطیل پیروی کرنے کے ذمہ دار نہ
ہوں گے اور مقدمہ پکھری کے علاوہ کسی اور جگہ سماعت ہونے پر یا بروز تعطیل یا پکھری کے اوقات کے آگے پیچھے پیش ہونے
پر مظہر کو کوئی نقصان پہنچے تو اس کے ذمہ دار یا اس کے واسطے کسی معاوضہ کے ادا کرنے یا محتانہ کے واپس کرنے کے بھی صاحب
موصوف ذمہ دار نہ ہوں گے۔ مجھ کو کل ساختہ پر داخستہ صاحب موصوف مثل کردہ ذات منظور و مقبول ہوگا اور صاحب موصوف کو
عرض دعویٰ یا جواب دعویٰ اور درخواست اجراءے ڈگری و نظر ثانی اپیل نگرانی و ہر قسم درخواست پر دستخط و تصدیق کرنے کا بھی
اختیار ہوگا اور کسی حکم یا ڈگری کرانے اور ہر قسم کاروبار وصول کرنے اور رسید دینے اور داخل کرنے اور ہر قسم کے بیان دینے اور
اس کے ثالثی و راضی نامہ و فیصلہ برحلف کرنے اقبال دعویٰ دینے کا بھی اختیار ہوگا اور بصورت جانے بیرونجات از پکھری صدر
اپیل و برآمدگی مقدمہ یا منسوخی ڈگری یکطرفہ درخواست حکم امتناعی یا قرتی یا گرفتاری قبل از گرفتاری و اجراءے ڈگری بھی صاحب
موصوف کو بشرط ادائیگی علیحدہ محتانہ پیروی کا اختیار ہوگا۔ اور بصورت ضرورت صاحب موصوف کو یہ بھی اختیار ہوگا کہ مقدمہ
مذکور یا اس کے کسی جزو کی کاروائی کے یا بصورت اپیل کسی دوسرے وکیل کو اپنے بجائے یا اپنے ہمراہ مقرر کریں اور ایسے وکیل کو
بھی ہر امر میں وہی اور ویسے اختیارات حاصل ہوں گے جیسے صاحب موصوف کو حاصل ہیں اور دوران مقدمہ جو کچھ ہر جانہ
التوا پڑے گا وہ صاحب موصوف کا حق ہوگا۔ اگر وکیل صاحب موصوف کو پوری فیس تاریخ پیشی سے پہلے ادا نہ کروں گا تو صاحب
موصوف کو پورا اختیار ہوگا کہ وہ مقدمہ کی پیروی نہ کریں اور ایسی صورت میں میرا کوئی مطالبہ کسی قسم کا صاحب موصوف کے
برخلاف نہیں ہوگا۔

Accepted by

لہذا وکالت نامہ لکھ دیا ہے کہ سندر ہے۔

مضمون وکالت نامہ سن لیا ہے اور اچھی طرح سمجھ لیا ہے اور منظور ہے۔ مورخہ: 26 دن 10 ماہ 2018 سال

انسداد