

26.05.2022

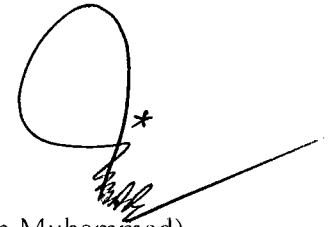
Miss Rabia Muzafar, Advocate for the appellant present. Preliminary arguments heard.

Learned counsel for the appellant while opening her arguments contended that the appellant is aggrieved of the impugned order of respondent No. 2 dated 21.12.2021 when major penalty of dismissal from service was imposed on the appellant. His Departmental appeal dated 12.01.2022 was rejected vide appellate order of respondent No. 1 dated 29.04.2022. Whereafter the Service Tribunal was approached on 13.05.2022 invoking jurisdiction of the Service Tribunal under Section 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974. Learned counsel for the appellant further contended that no proper procedure has been adopted in the laid down manner because no charge sheet/statement of allegations issued to the appellant. No Show Cause Notice has been issued to and served on the appellant. No opportunity of personal hearing has been afforded to the appellant and he has been condemned unheard in violation of the Fundamental Rights of fair trial before awarding punishment to the appellant. The impugned orders are therefore illegal in the eyes of law and are liable to be set aside, she concluded.

Points raised need consideration. The appeal is admitted to regular hearing, subject to all just and legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents for submission of written reply/comments. To come up for reply/comments before the S.B on 06.07.2022.

Rs 500/-
Appellant Deposited
Security & Process Fee

30/5/22



(Mian Muhammad)

Member (E)

06th July, 2022

Appellant alongwith his counsel present. Mr. Kabir Ullah Khattak, Additional AG for respondents present.

Respondents have not submitted written reply/comments. Learned AAG seeks time for submission of written reply/comments. Adjourned. To come up for written reply/comments on 07.09.2022 before S.B.





(Kalim Arshad Khan)
Chairman

Form- A

FORM OF ORDER SHEET

Court of _____

Case No.- _____ 789/2022

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	13/05/2022	<p>The appeal of Mr. Haleem Khan presented today by Mr. Fazal Shah Mohmand Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p>
2-	<p>23/5/22</p>	<p>This case is entrusted to Single Bench at Peshawar for preliminary hearing to be put there on <u>26-5-22</u>. Notices be issued to appellant and his counsel for the date fixed.</p> <p style="text-align: right;"> CHAIRMAN</p>

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No 789 /2022

Hakim KhanAppellant

V E R S U S

RPO & others.....Respondents


I N D E X

S. No	Description of Documents	Annexure	Pages
1.	Service Appeal with Affidavit		1-3
2.	Copy of Order dated 21-08-1998	A	4
3.	Copies of medical chits & application dated 21-06-2021	B & C	5-8
4.	Copy of disability certificate & application dated 17-08-2021	D & E	9-10
5.	Copy of inquiry report & order dared 21-12-2021	F & G	11-12
6.	Copy of Departmental appeal & Order dated 29-04-2022	H & I	13-17
8.	Vakalat Nama		18

Dated:-11-05-2022


Petitioner

Through


Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan

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

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
PESHAWAR

Service Appeal No _____/2022

Hakim Khan, Ex Constable No 2999, Mohmand Tribal District.
.....Appellant

V E R S U S

1. Regional Police Officer, Mardan.
2. District Police Officer, Mohmand Tribal District.
3. Provincial Police Officer, Khyber Pakhtunkhwa, Peshawar.
.....Respondents

APPEAL U/S 4 OF THE KPK SERVICE TRIBUNAL ACT 1974
AGAINST THE ORDER DATED 29-04-2022 OF RESPONDENT NO
1 WHEREBY DEPARTMENTAL APPEAL OF THE APPELLANT
FILED AGAINST THE ORDER DATED 21-12-2021 HAS BEEN
REJECTED/FILED.

PRAYER:-

On acceptance of this appeal the impugned Order dated 29-04-2022 of respondent No 1 and order dated 21-12-2021 of respondent No 2 may kindly be set aside and the appellant may kindly be ordered to be reinstated in service with all back benefits or the appellant may kindly be retired prematurely as per his request with all retiring benefits including pension etc.

Respectfully Submitted:-

1. That the appellant belong to the tribal District Mohmand and on 21-08-1998 Khasadari was transferred in his name vide Order dated 21-08-1998. **(Copy of Order dated 21-08-1998 is enclosed as Annexure A).**
2. That after twenty fifth Constitutional amendment, the erstwhile Federally Administered Tribal Areas including, the then Mohmand Agency, were merged into the province of Khyber Pakhtunkhwa and through legislation the members of Khasadar Force were absorbed into Police Department Khyber Pakhtunkhwa and accordingly, the appellant being member of the then Khasadar force was also absorbed into Khyber Pakhtunkhwa Police and since then the appellant performed his duties with honesty and full devotion and to the entire satisfaction of his high ups.
3. That in the month of June 2021, the appellant fell ill and was also admitted to hospital and remained under treatment, the appellant duly submitted his medical prescriptions to respondent No 2 through son vide written application dated 21-06-2021. **(Copies of medical chits & application dated 21-06-2021 is enclosed as Annexure B & C).**
4. That the appellant being ill besides being disabled and being over 55 years of age, requested respondent No 2 for his premature

retirement from service vide written application dated 17-08-2021 which was duly processed. **(Copy of disability certificate & application dated 17-08-2021 is enclosed as Annexure D & E).**

5. That instead of accepting or rejecting request of the appellant, an ex-parte inquiry was conducted wherein the appellant was not associated, on the basis of which the appellant along with others were dismissed from service vide order dated 21-12-2021. **(Copy of inquiry report & order dated 21-12-2021 is enclosed as Annexure F & G).**
6. That the appellant preferred departmental appeal before respondent No 1 on 13-01-2022 which was rejected/filed vide order dated 29-04-2022. **(Copy of Departmental appeal & Order dated 29-04-2022 is enclosed as Annexure H & I).**
7. That the impugned Order dated 29-04-2022 and Order dated 21-12-2021, are against the law, facts and principles of natural justice on grounds inter-alia as follows:

GROUNDS:-

- A. That the impugned Orders are illegal and void ab-initio being passed without lawful authority.
- B. That mandatory provisions of law and rules have badly been violated and the appellant has not been treated according to law and rules and the appellant did nothing that amounts of misconduct.
- C. That the appellant never remained absent from duty except his ailment period regarding which the appellant had duly informed the respondents vide written application.
- D. That charge sheet and show cause notice were not issued to the appellant.
- E. That ex-parte inquiry was conducted and the appellant was never associated with the same.
- F. That no evidence what so ever was collected during the so called inquiry to substantiate the allegations, hence the impugned order is liable to be set aside.
- G. That the appellant was not provided with opportunity of personal hearing.
- H. That even the proceedings mandatory in case of willful absence as alleged by the respondents were not conducted.
- I. That the appellant was not provided fair opportunity of hearing as per Article 10-A of the Constitution.
- J. That the malafide of respondents is proved from the fact that as per letter of inquiry dated 22-11-2021, addressed to

respondent No 2, it was requested that there is no record, no contact number so they may be informed through media to report for duty otherwise departmental action may be initiated against the appellant, while respondent No 2 has dismissed the appellant instead of taking departmental action, as recommended by the inquiry officer.

- K. That the authority has recorded no reasons for not agreeing with the recommendations of the inquiry officer.
- L. That even otherwise the appellant had requested for his premature retirement but instead he was dismissed from service which speaks of anything but not fair and bonafide.
- M. That the appellant has about 25 years of service with unblemished service record and is jobless since his illegal dismissal from service.
- N. That the appellant seeks the permission of this honorable tribunal for further/additional grounds at the time of arguments.

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

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

Dated:-12-05-2022

Through


Petitioner


Fazal Shah Mohmand
Advocate,
Supreme Court of Pakistan

LIST OF BOOKS:

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

CERTIFICATE:

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


ADVOCATE

AFFIDAVIT

I, Hakim Khan, Ex Constable No 2999, Mohmand Tribal District, do hereby solemnly affirm and declare on oath that the contents of this **Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable Tribunal.


DEPONENT

OFFICE OF THE POLITICAL AGENT MOHMANDS AT GHALLANAI

ORDER

11/AM
-4-

In pursuance ⁶ of the recommendation of A.P.A Upper Mohmands, vide his letter No. 1991/APA(UM) dated 24.7.1998, the Khassadari of one Mangal Khan son of Malik Ajab Khan Kamali Halimzai is hereby transferred ⁶ to the name of Hakim Khan son of Iqbal Shah Khewezai with immediate effect subject to the production of age and medical fitness certificate.

Political Agent Mohmands,
Ghallanai

No 12306-07/KC, Dated Ghallanai the 21/08/1998

Copy to:-

1. The A.P.A Upper Mohmands, Ghallanai for information w/r to his letter cited above.
2. Khassadar Hakim Khan son of Iqbal Shah Khewezai.


Political Agent Mohmands,
Ghallanai



JINNAH TEACHING HOSPITAL

DISCHARGE SLIP

049

^{11B}
-5-

Patient's Name: Hafsa Khan Father/Husband Name: Abdul

Age: 45 Sex: F Bed No: 11 MR No: 1111

Date of Admission: 11/11/11 Date of Discharge: 12/11/11

Diagnosis: Hypertension

Case Summary:
Admitted with hypertension, treated with medication, patient is stable and fit for discharge.

Treatment in Hospital:
Antihypertensive therapy initiated.

Treatment in Home:
Continue with home medication.

Investigations:
BP 140/90 mmHg

Medical Rest if indicated: No

Revisit Notice: None

Signature: _____

Professor

Dr. M. Khan Wazir

M.B.B.S, M.C.P.S, F.C.P.S

Surgical Specialist



-6-

پروفیسر
سرجن ڈاکٹر محمد خان وزیر

ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس

Name:

HAKIM KHAN

Age:

54y

Sex:

M

Date:

15/6/21

Clinical Record

Rx

Pain Rt side

Testicular area

Δ Rt Hydrocele of testis

As Surgery.

Ref to Jinnah Teaching Hosp.

شام کلینک: کمرہ نمبر 1107 اکبر میڈیکل سنٹر

رامداس چوک ڈبگری گارڈن پشاور

0333-9167656

0333-9108136: رابطہ نمبر

0334-8889898

انچارج سرجیکل یونٹ گورنمنٹ نصیر اللہ خان بابر میموریل ہسپتال پشاور

دوبارہ معائنہ:

Professor

Dr. M. Khan Wazir

M.B.B.S, M.C.P.S, F.C.P.S



- 7 -

پروفیسر

سرجن ڈاکٹر محمد خان وزیر

ایم بی بی ایس، ایم سی پی ایس، ایف سی پی ایس

Surgical Specialist

Name: HAKIM KHAN Age: 5 Sex: M Date: 21/06/21

Clinical Record

Rx

(12)
① Lab Keluzo 600-
1-1 20
② Repa 05
1-1 20
③ Sialogenic extra
1-1

شام کلینک: کمرہ نمبر 1107 اکبر میڈیکل سنٹر
رامداس چوک ڈگری گارڈن پشاور
0333-9167656
0333-9108136: رابطہ نمبر
0334-8889898

انچارج سرجیکل یونٹ گورنمنٹ نصیر اللہ خان باہر میموریل ہسپتال پشاور

دوبارہ معائنہ

"C"

خدمت جناب DP صاحب منند

-8-

عنوان: میڈیکل سرٹیفکیٹ

جناب عالی! گزارش ہے کہ میں بیماریوں مختلف ڈاکٹر صاحبان سے علاج معالجہ کر رہا ہوں ساتھ ہی ہسپتال میں داخل ہوں ہر دفعہ درخواست لڈا ولف شدہ میڈیکل اسناد آپ جناب کی خدمت میں اطلاع دینی لازم ہے۔

نوٹ: میڈیکل اسناد لڈا ہے۔

حکیم خان
FC-2999
ولڈ اقبال شاہ
سکنہ کاکا فونزئی
ضلع منند.

مورخ 21-6-21

-9- "D"

**GOVERNMENT OF KHYBER PAKHTUNKHWA
DIRECTORATE OF SOCIAL WELFARE MERGED AREAS
OFFICE OF THE SOCIAL WELFARE DISTRICT MOHMAND (PCRD)**

Reg No. SSMC/DM/2020-2021 1-2985

Dated 14/11/2021

DISABILITY CERTIFICATE

1. Name: HAKHEEM KHAN 2. Father Name: TOBAL SHAH
3. Married / Un-married: Married 4. Spouse: Mushtare
5. Date of Birth: 01-01-1967 6. CNIC: 21402-5675429-1
7. Qualification: NIL 8. Nature of Disability: Physically Disabled.
9. Present Address: Kaka kor, Khawzai Tehsil Khawzai Distt Mohmand.
10. Permanent Address: As above
11. Recommendations of the Board for Disability Certificate: (Attached)

Ch
Social Welfare Officer (SSMC)

Social Welfare Officer
District Mohmand
P.O. Box 40, Mandana, Mohmand

فونڈیشن ڈیپارٹمنٹ
The Director General
for Waqf
Department, Kerala

دفعہ 106573 کے تحت

پروگرام نمبر 106573
Belt no 2979

مقامی حکومت، کراچی

2021-08-17
ڈیپارٹمنٹ ڈائریکٹر جنرل
واکف ڈیپارٹمنٹ، کراچی

مقامی حکومت، کراچی

DPO/m
D. No 1513
Date = 17/8/21

مقامی حکومت، کراچی

55 سال

مقامی حکومت، کراچی

17/08/2021

پروگرام نمبر 106573

A "F"

-11-

TO

District police officer
Mohmand Tribal District

Subject: INQUIRY

Memorandum:

Reference your office letter No.Nill Dated 24-06-2021, regarding inquiry against the following police constables.

1, Abdul akbar Belt.No 2958, (2) jawad ahmad Belt No. 2959,(3) sartaj khan Belt No. 2964,(4) Muhammad Nazir Belt No.2965,(5) Bahadar Khan Belt No.2966, (6) Zaheer Ullah Belt No 2967, (7) Sultan Shah Belt No.2969, (8) Mir Nawaz Belt No. 2970, (9) Ihsan Ullah Belt No .3000, (10) Rawayat khan Belt No, 3047, (11) Hakim Khan Belt No .2999.

The Above police constables were summoned . They have not been appeared before the undersigned .This office have no record no contact No of the above personels .They may be informed through media to report to their respective stations otherwise strict disciplinary action may be intiated against them. It is to be noted that the above constables have not been reported till date after absorption in kpk police .

Submitted for your kind consideration please.

NO 298 SDPO(U/M)

W.A. Az
SDPO(U/M)

Dated 22 /11/2021

Order
29/11/2021 | The above mentioned Constables from S.NO I to S.NO 11 are hereby disonished from service due to long absence from lawful duties as after taking disciplinary action recommended by E.O.

W.A. Az
DPO/Mohmand
29/11/2021



OFFICE OF THE
DISTRICT POLICE OFFICER
MOHMAND TRIBAL DISTRICT GHALLANAI
Email: dpomohmand@gmail.com
Ph: 0924-290179 Fax: 0924-290056


"G" -12-

ORDER:

This order will dispose-off the inquiry proceeding against FC **Hakim Khan** No. **2999** with the allegations that he was time and again directed via district control room to report at respective training center for basic training. But he turned deaf ear to the orders and failed to report at the training center. Moreover, the delinquent official reluctant to appear before the inquiry officer in connection with inquiry.

To scrutinize the conduct of the delinquent official, he was issued charge sheet together with statement of allegation & inquiry was entrusted to Mr. **Ayaz Khan** (DSP Upper) vide this office letter No. 1079-82/PA. The inquiry officer after fulfilling all legal and codal formalities, the alleged constable was found at fault, however, recommended for **Major Punishment**.

Based on the above **I Salah-ud-Din Kundi, District Police Officer, Mohmand** being the competent authority and exercise of power vested in me under the Khyber Pakhtunkhwa, Government Servant (Efficiency & Discipline) rules 2011, hereby awarded him **Major Punishment of Dismissal from the service with immediate effect**.


District Police Officer,
Mohmand Tribal District

OB No. 1037
Dated: 21/12/2021

No. 3425-128/PA, dated Mohmand the: 21/12/2021

Copy forwarded to the:

- Regional Police Officer, Mardan for favor of kind information please.
- HC/EC/FMC
- Pay Officer

"H" -13-

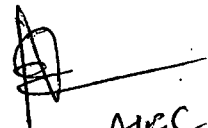
BEFORE THE REGIONAL POLICE OFFICER, MARDAN

Subject: DEPARTMENTAL APPEAL AGAINST THE ORDER
DATED 21/12/2021 OF THE DISTRICT POLICE
OFFICER, MOHAMNAD

Respected Sir,

1. That I belong to District Mohmand and on 21/08/1998 Khasadari was transferred in my name and since then I performed my duties honestly and full devotion. **(Copy of order is Annexure-A)**
2. That after 25th Constitutional Amendment and after legislation regarding the absorption of Khasadars Force into Police, the process for absorption of Khasadar Force into police was initiated and in phase-II the special Khasadar, were absorbed into District Police accordingly.
3. That I was thus absorbed into District Police Mohmand and in the meanwhile I fell ill and was admitted to the hospital and remained under treatment till date, I submitted copies of medical chits through my son to the DPO Office vide a written application. **(Copies of medical certificates and application are Annexure-B and C)**
4. That I being physically disable to which effect disability certificate dated 14/10/2021 has been issued to me, I submitted application to the DPO Mohmand for my retirement on 17/08/2021 which was duly received.

Received.



AIEC
13-01-22

(Copies of disability certificate and application dated 17/08/2021 are Annexure-D & E)

- 5. That instead of processing my application, I was dismissed from service by the District Police Officer Mohmand vide order dated 21/12/2021. **(Copy of order dated 21/12/2021 is Annexure-F)**

- 6. That the impugned order dated 21/12/2021 is illegal, unlawful, against the principle, of justice on grounds: inter alia as follow:

Grounds:

- A. That the impugned order is illegal and void ab initio.

- B. That no charge sheet and show case notice was issued to me.

- C. That no inquiry was conducted in the matter as I was never associated with any inquiry.

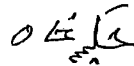
- D. That I was not afforded opportunity of personal hearing.

- E. That I submitted application for my retirement which was duly received but instead I was dismissed from service which speaks of any thing but not fair and bonafide.

- F. That under the law, retirement is the right of an employee from which he cannot be deprived.
- G. That treatment in accordance with law as per Article 4 and 25 of the Constitution has been denied thus the impugned order is liable to be set aside.
- H. That the malafide is proved from the fact that as per letter dated 22/11/2021 addressed to the DPO, Mohmand it was requested that there is no record, no contact number; so they may be informed through media to report for duty otherwise departmental action may be initiated against the appellant, while DPO has dismissed the appellant instead of taking departmental action on recommended by the SDPO Upper Mohmand. **(Copy of letter dated 20/11/2021 is Annexure-G)**

It is, therefore, requested that on acceptance of the appeal, the impugned order dated 21/12/2021 of the District Police Officer, Mohmand may kindly be set aside I may be retried from service having pensionable service.

Yours Obediently,



Hakim Khan

Ex-FC No. 2999

S/o Iqbal Shah

R/o Kaka Kor, Khewezai

District Mohamand

Cell# 0345-9397776

Dated: 12/01/2022

ORDER.

This order will dispose-off the departmental appeal preferred by Ex-93
Constable Hakeem Khan No. 2999 of Mohmand District against the order of District Police Officer, Mohmand, whereby he was awarded major punishment of dismissal from service vide OB. No. 1037 dated 21.12.2021 by the District Police Officer, Mohmand. The appellant was proceeded against departmentally on the allegations that he was selected for basic recruit course and in this regard he was time and again directed via District Control Room to report at respective training Centre for basic recruit training. But he turned a deaf ear to the orders and failed to report at the training center.

Proper departmental enquiry proceedings were initiated against him. He was issued Charge Sheet alongwith Statement of Allegations and Mr. Ayaz Khan Sub Divisional Police Officer, SDPO Upper Mohmand was nominated as Enquiry Officer. The Enquiry Officer after fulfilling codal formalities submitted his findings wherein he reported that the defaulter Officer was contacted time and again to appear before the enquiry Officer, but he failed and remained absent, which showed that he was no more interested in Police Service. He recommended the delinquent Officer for ex-parte action.

Therefore, after perusal of enquiry papers and recommendations of the enquiry Officers the delinquent Officer was awarded major punishment of dismissal from service by the District Police Officer, Mohmand vide his office OB. No. 1037 dated 21.12.2021.

Feeling aggrieved from the order of District Police Officer, Mohmand the appellant preferred the instant appeal. He was summoned and heard in person in Orderly Room held in this office on 14.04.2022.

From the perusal of the enquiry file and service record of the appellant, it has been found that allegations leveled against the appellant have been proved beyond any shadow of doubt. As the appellant has bitterly failed to produce any cogent reason to justify his absence because the appellant got absorbed in Police Department on 23.07.2020 and due to non performance of duties his salary was stopped and enquiry was initiated on 24.06.2021 and remained absent till order of his dismissal. Hence, the absence period i.e 01 year, 04 months & 28 days of the appellant clearly depicts the casual and lethargic attitude towards his official duties as the very conduct of appellant is unbecoming of a disciplined Police Officer. Hence, order passed by the competent authority does not warrant any interference.

Keeping in view the above, I, Yaseen Farooq, PSP Regional Police Officer, Mardan, being the appellate authority, find no substance in the appeal. herefore, the same is rejected and filed, being devoid of merit.

Order Announced.



Regional Police Officer,
Mardan.

No. 3303 /ES, Dated Mardan the 29/04 /2022.

Copy forwarded to District Police Officer, Mohmand for information and necessary action w/r to his office Memo: No. 316/DPO/M dated 18.02.2022. His Service Record is returned herewith.

(*****)

-18-

VAKALATNAMA
BEFORE THE KPK SERVICE TRIBUNAL, PESHAWAR.

Appeal No. _____/2022

Hakeem KhanAppellant

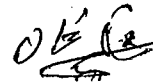
VERSUS

RPO & othersRespondent(s)

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

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


AND I hereby agree to ratify whatever the Advocate or his substitute shall do in the above matter. I also hereby agree not to hold the Advocate or his substitute responsible for the result of the said matter in consequence of his absence from the Court when the said matter is called up for hearing. I further hereby agree that in the event for the whole or any part of the fee to be paid to the Advocate remaining unpaid, he shall be entitled to withdraw from the above matter. Received by me on 2/5/22

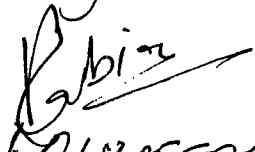


CLIENT(s)

Hakeem Khan.

ACCEPTED BY:


FAZAL SHAH MOHMAND
ADVOCATE,
SUPREME COURT OF PAKISTAN.

Accepted by

RABIA MUZAFFAR
ADVOCATE

"B"

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

No. **789** **22**

Ata Kim Khan of 20

R- P-O Mardan Appellant/Petitioner

..... **1** Respondent

Regional Police Officer Mardan
Response No.

Notice to: —

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

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

Copy of appeal is attached. Copy of appeal has already been sent to you vide this office Notice No.....dated..... **3 12**

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

Day of.....20 .

for Reply

Registrar,
Khyber Pakhtunkhwa Service Tribunal,
Peshawar.

Note: 1. The hours of attendance in the court are the same that of the High Court except Sundays and Gazetted Holidays.
 2. Always quote Case No. While making any correspondence.

Бөгөөд
Кыргыз Республикасынын Судын Төрийн
Газартай холбоотой асуудлыг зохицуулах тухай

for [Signature]

Day of 20

Given under my hand and the seal of the Court of the Republic of Kyrgyzstan, this

office notice is hereby issued

3 IF

Copy of the present is hereby notified to you and the

the present petition
office notice to the present is hereby notified to you and the present petition
address given in the present is hereby notified to you and the present petition
address. If you wish to present your petition, you should do so on the date fixed for
the present petition and the date fixed for the present petition.

present petition will be heard and decided in your presence.
default of your appearance on the date fixed and in the manner mentioned, the
together with any other documents than which you may wish also take notice that in
this Court at least seven days before the date of hearing a copy of written statement
advocate, duly supported by you, power of attorney, or any other document required to the
the case may be presented either in person or by authorized representative or by any
present petition. You are hereby notified to do so on the date fixed or any other day to which
on at 8:00 A.M. If you wish to take anything against the
present petition that the said present petition is fixed for hearing before the
the above date of the petition in this Court and notice has been ordered to issue, you are
Provisional Republic of Kyrgyzstan, 1991 has been presented registered for consideration in

WHENEVER an present petition under the provision of the Kyrgyz Republic

Notice to: —

[Signature] Justice Officer [Signature]

15-10 [Signature]

[Signature]

88

55

REPUBLIC

JUDICIAL COMPLEX (OLD) KYRGYZ GOVT

Кыргыз Республикасынын Судын Төрийн Газартай холбоотой асуудлыг зохицуулах тухай

88

"B"

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

No.

Appeal No. 789 of 20 22

Hakim Khan Appellant/Petitioner

R. P-O Mardam Respondent

Respondent No. 2

Notice to: —

Distt: Police Officer, Mohmand Tribal
 Distt:

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 6/7/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

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

Given under my hand and the seal of this Court, at Peshawar this 3th

Day of June 20 22

for Reply

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

REGISTRAR
Khyber Pakhtunkhwa Service Tribunal
REGISTRAR

Handwritten signature

Date of *June 30 22*

Given under my hand and the seal of this Court at Peshawar, this *31*

office notice No. dated

~~Copy of appeal is attached. Copy of appeal has been filed by you and the~~

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

appeal petition will be heard and decided in your absence. In default of your appearance on the date fixed and in the manner aforementioned, the alongwith any other documents upon which you rely. Please also take notice that in this Court at least seven days before the date of hearing 4 copies of written statement advocates duly supported by your power of attorney, you are, therefore, required to file in the case may be postponed either in person or by authorized representatives or by any appeal petition. You are at liberty to do so on the date fixed, or any other day to which you are hereby informed that the said appeal petition is fixed for hearing before the Tribunal the above case by the petitioner in this Court and notice has been ordered to issue. You are Province Service Tribunal Act, 1974, has been presented/registered for consideration in

WHEREAS an appeal petition under the provision of the Khyber Pakhtunkhwa

Notice to: - *Distt. Judge Office Mardan*
Respondent No. *5*

MORDAN
Respondent

HEMIR KHOW
Appellant/Petitioner

of No. *50 22*

PESHAWAR
JUDICIAL COMPLEX (OGD), KHAZLI BOND
KHYBER PAKHTUNKHWA SERVICE TRIBUNAL PESHAWAR

2022

“B”

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

No.

789

22

Appeal No. of 20 ..

Flakim Khan

Appellant/Petitioner

R. P.O. Meedan

3 Respondent

Respondent No.

Provincial Police Officer KPK
 Peshawar.

Notice to: —

WHEREAS an appeal/petition under the provision of the Khyber Pakhtunkhwa Province Service Tribunal Act, 1974, has been presented/registered for consideration, in the above case by the petitioner in this Court and notice has been ordered to issue. You are hereby informed that the said appeal/petition is fixed for hearing before the Tribunal *on 6/7/22 at 8.00 A.M. If you wish to urge anything against the appellant/petitioner you are at liberty to do so on the date fixed, or any other day to which the case may be postponed either in person or by authorised representative or by any Advocate, duly supported by your power of Attorney. You are, therefore, required to file in this Court at least seven days before the date of hearing 4 copies of written statement alongwith any other documents upon which you rely. Please also take notice that in default of your appearance on the date fixed and in the manner aforementioned, the appeal/petition will be heard and decided in your absence.

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

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

office Notice No. dated 3/11

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

June 22

Day of 20 ..

for Reply

20-6-22

Registrar,
 Khyber Pakhtunkhwa Service Tribunal,
 Peshawar.

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

PROVINCE
KHARAKI BAKHTIYARZI SEVAICH TRIBUNAL
HOSHTAN

Handwritten signature

Date of 30
Given under my hand and the seal of this Court at Hoshtan, the
7th 25

Office Notice No. 311

Copy of appeal is returned. Copy of appeal has already been sent to you and this
the appeal petition
notice has been to the appellant by registered post with receipt and in person to the appellant
and also by air in the appeal petition with receipt and to the appellant by registered post and in person
and also by air to the appellant with receipt and in person to the appellant by registered post and in person
to you by registered post with receipt and in person to the appellant by registered post and in person
Notice of my resignation in the appeal filed for removal of this appeal petition with re-

appeal petition with receipt and decided in your presence
of your resignation on the date fixed and in the manner mentioned in the
petition and other documents upon which you rely. Hence you are hereby notified that in
this Court at least seven days before the date of hearing, a copy of written statement
advocate duly supported by your books of accounts, you are requested to file in
the case and be positioned either in person or by authorized representative of the
appellant/petitioner. You are hereby notified to do so on the date fixed or any other day to which
you at 8:00 AM. If you fail to file anything against the
order mentioned in the said appeal petition is fixed for removal before the Tribunal
the above case by the petitioner in this Court and notice has been ordered to issue to you via
Province Sevaich Tribunal Act 1974 has been presented registered for consideration in
WHEREAS an appeal petition under the provision of the Kharaki Bakhtiaryar

Notice to: —
Handwritten: Hoshtan
Hoshtan Office NK

3 Hoshtan
K. B. O. Hoshtan

Handwritten: Hoshtan
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Handwritten: NK

PROVINCE
JUDICIAL COMPLEX (O.D.) KHARAKI BAKHTIYARZI
SEVAICH TRIBUNAL HOSHTAN

Handwritten initials