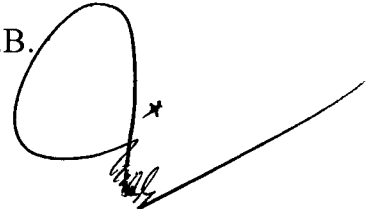


15.07.2022

Appellant in person present. Mr. Muhammad Adeel Butt, Additional Advocate General for the respondents present.


Written reply/comments on behalf of respondents not submitted. Learned Additional Advocate General seeks time to contact the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments on 15.09.2022 before S.B.

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line extending to the right.

(MIAN MUHAMMAD)  
MEMBER (E)

16.02.2022

Due to retirement of the Worthy Chairman, the Tribunal is defunct, therefore, case is adjourned to 11.05.2022 for the same as before.

  
Reader

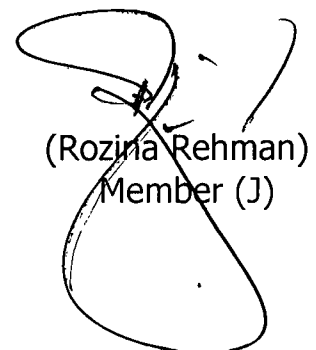
11.05.2022

Appellant present through counsel. Preliminary arguments heard. Record perused.

Points raised need consideration. Instant 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 respondents for submission of written reply/comments. To come up for reply/comments on 15.07.2022 before S.B.

*Rs-500/-*  
Appellant Deposited  
Security & Process Fee

*A. J. 16/5/22*

  
(Rozina Rehman)  
Member (J)

02.09.2021

Clerk of counsel for the appellant present.

Clerk of learned counsel for the appellant submitted an application for adjournment which is placed on file. Adjourned. To come up for preliminary hearing before the S.B on 18.10.2021.

  
(MIAN MUHAMMAD)  
MEMBER (E)

18.10.2021

Clerk of learned counsel for the appellant present.


Former requests for adjournment due to general strike of the Bar. Adjourned. To come up for preliminary hearing before the S.B on 21.12.2021.

  
(MIAN MUHAMMAD)  
MEMBER (E)

21.12.2021

Junior to counsel for appellant present.

Lawyers are on general strike, therefore, case is adjourned to 16.02.2022 for preliminary hearing before S.B.

  
(Rozina Rehman)  
Member (J)

19.11.2020

Counsel for appellant present.

Requests for adjournment as he is not in <sup>possession</sup> position of the brief which has been damaged due to heavy rains causing damage to his office.

Adjourned to 02.02.2021 before S.B.

  
Chairman

02.02.2021

Junior to counsel for the appellant present.

Requests for adjournment as learned senior counsel is not available today for attending this case.

On previous two occasions, the proceedings were adjourned on the request of learned counsel, therefore, the request is allowed but as last chance. Adjourned to 20.05.2021 for hearing before S.B.

  
Chairman

20.05.2021

Due to demise of the Worthy Chairman the Tribunal is defunct, therefore, case is adjourned to 02.09.2021 for the same as before.

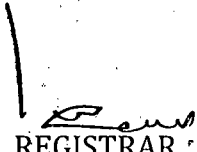

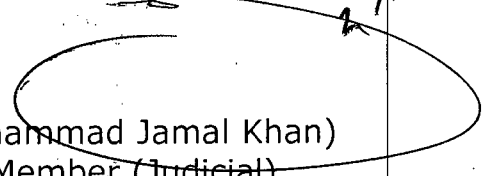
  
Reader

Form- A

FORM OF ORDER SHEET

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

Case No.- 8829/2020

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	05/08/2020	<p>The appeal of Mr. Saqib Waqas resubmitted today by Syed Mudassir Pirzada Advocate may be entered in the Institution Register and put up to the Worthy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>25/09/2020</u>.</p> <p style="text-align: right;"> CHAIRMAN</p>
25.09.2020		<p>Syed Mudassir Prizada, Advocate, for appellant is present and stated that he is not prepare to argue the instant appeal today. Requested for adjournment. Adjourned to 19.11.2020 on which to come up for preliminary arguments before S.B.</p> <p style="text-align: right;"> (Muhammad Jamal Khan) Member (Judicial)</p>

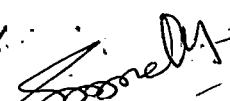
This is an appeal filed by Mr. Saqib Waqas against the order dated 26/11/2019 against which she preferred/made departmental appeal/ representation on 27.04.2020 the period of ninety days is not yet lapsed as per section 4 of the Khyber Pakhtunkhwa Service Tribunal Act 1974, which is premature as laid down in an authority reported as 2005-SCMR-890.

As such the instant appeal is returned in original to the appellant. The appellant would be at liberty to resubmit fresh appeal after maturity of cause of action and also removing the following deficiencies.

- 1- Copies of charge sheet, statement of allegations, show cause notice, enquiry report and replies thereto are not attached with the appeal which may be placed on it.
- 2- Annexures of the appeal may be attested.

No. 1231 /ST,

Dt. 15-06 /2020

  
REGISTRAR  
SERVICE TRIBUNAL  
KHYBER PAKHTUNKHWA  
PESHAWAR.

Mr. Mudassir Pirzada Adv. Kohat.

30/6/2020

جناب عالی

مقدمہ عنوان بالا میں نام کو complete  
کرنے کیلئے مزید وقت درکار ہے سزا سزا  
کہ مقدمہ عنوان بالا میں مزید وقت فراہم  
کی جائے  
30/6

P.T.O

⑮ days more cost of litigation.

*[Signature]*  
30/6/20

15/7/2020

Re-Submitted after completion,  
with request to entertain the case as  
required documents are not  
available with petitioner and  
the respondent / Depth is not  
providing the same to petitioner,  
hence the same will be placed  
later on if provided.

Mohe

Rize

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal 8899 2020

Saqib Waqas S/o Adin ullah Ex-Police Constable Police R/o Kahgazai Kohat.

(Appellant)

VERSUS

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

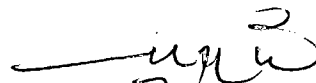
INDEX

Sr No	Description of Documents	Annexure	Page
1	Memo of Appeal		1-4
2	Affidavit		5
3	Address of the Parties <i>with Applications.</i>		6-6-A
4	Copy of impugned Order dated 26-11-2019	A	7
5	Copy of application dated 16-08-2019	B	8
6	Copy of Departmental representation	C	9-10
7	Copy of Medical reports <i>&amp; Application for Record.</i>	D	11-18
8	Wakalat Nama	E	20

  
Appellant

Through

Date 12/6/20

  
Syed Mudasir Pirzada  
Advocate P H C  
0345-9645854



BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Appeal No. 8829/2020

Saqib Waqas S/o Adin ullah Ex-Police Constable Police R/o Kahagazai Kohat.

(Appellant)

VERSUS

Khyber Pakhtukhwa  
Service Tribunal

Diary No. 5041

Dated 12/6/2020

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

(Respondent)

APPEAL AGAINST THE IMPUGNED ORDER DATED 26-11-2019 VIDE O.B NO 1499  
IN WHICH UPON THE EX-PARTE FINDINGS OF ENQUIRY OFFICER DIRECTLY IMPOSED THE  
MAJOR PUNISHMENT OF DISMISSAL FROM SERVICE WITHOUT ANY LAWFUL JUSTIFICATION  
AND THE APPELLANT PREFERRED DEPARTMENTAL REPRESENTATION WHICH WAS NOT  
CONSIDER AND THROUGH RELIABLE SOURCE THE APPELLANT ON 9-06-2020 THAT  
RESPONDENT NO 2 NOT ENTERTAIN AND REJECTED.

Pray:

In view of above submission it is requested, by accepting of instant service appeal impugned order of Respondent No-3 may please be set aside and the present appellant service may please be re-instate with all back benefits .

Respectfully Sheweth,

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

Facts:

Briefly facts as per impugned order are that as reported by SHO PS-city by DD-No-26 dated 17-08-2019 that the appellant was transferred from PS -Billitang to PS City but the appellant did not made arrival as yet and still absent .(Copy of impugned order is annexed as annexure A)

That the as per impugned order the appellant was served with charge sheet and FCN but same were not served to the appellant nor there is any proof regarding departmental enquiry proceedings .

That the appellant had tender application regarding his severe illness and also produce medical reports in original shape but this fact were ignored by respondent No-3 while awarding impugned punishment order (Copy of application along with medical reports is annexed as annexure B).

That the appellant is very dedicated keen and apprehensive towards his assign duty having long service upto ten years but this factor has not been appreciated while was blessing with impugned order.

Filed to day  
Registrar

Re-submitted to day and filed.  
Registrar

That after discharge from all treatment the appellant prefer representation before respondent No-2 and again un just done with the appellant by respondent No-2 by not entertaining the representation and through some reliable source inform the appellant that respondent No-2 given remarks on representation i.e seen no action (Copy representation is annexed as annexure C)

That the respondent No-3 were duty bound to verify all the medical reports from KDA Hospital regarding the ill ness of the appellant but the respondent No- 3 without any fair transparent enquiry directly impose the major punishment .

That the enquiry officer had not enquiry the actual crux of the facts and manipulate the facts as per the advise of the respondent No-3.

That the appellant feeling aggrieved from the impugned order of the respondent No-3 having no alternate remedy except this honorable tribunal on the following facts and grounds:-

1:- That there is nothing is on the record which connect the appellant with the allegation nor proved and the appellant is blessed with impugned punishment which is not warranted by law.

2:-That an unjust has been done with the appellant by not giving ample opportunity of cross examination as well as not heard in person nor properly enquired the allegation. Just on the basis of FIR held guilty the appellant without following the prescribed rules relating to enquiry proceedings as per Police Rules 1975 (amended 2014).

3:-That nothing has been proved beyond any shadow of doubt that the appellant remained will full absent from his lawful duty if the appellant remains will full absent then the why the appellant had served the department for ten years.

4:-That there numerous good entries in the service record of the appellant which could be verified but this fact has not been taken in consideration while awarding the major punishment which is against to the canon of justice.

5:-That the appellant was neither provided an opportunity to cross examine the witnesses nor to produce defense evidence and the enquiry proceedings accordingly defective. Furthermore the requirements of rules regarding enquiry have not been observed while awarding the impugned punishment.

6:- That no proper enquiry has been conducted nor any statement of medico legal record nor any statement provided any opportunity of personal hearing and all the departmental enquiry proceedings were conducted ex-partly which is apparent from the impugned order .

7:-That the fundamental rules of justice were not kept in sight during the enquiry and as well as at the time of awarding punishment to the appellant .

8:-That under Article 10 of constitution of Pakistan the has a fundamental rights of fair impartial and transparent enquiry /trial but unfortunately the competent authority ignored such an important aspect and thus the entire enquiry proceeding have become null and void .

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

9:-That while awarding the impugned major punishment the enquiry report has not been given to the appellant which is very much necessary as per 1991 PLC CS 706 & PLC 1991 584.

Grounds:

- a. That during so called enquiry none from the general public was examined in support of the charges leveled against the appellant. No allegation mentioned above are practiced by the appellant nor proved against any cogent reason against the appellant.
- b. That the appellant was neither intimated nor informed by any source of medium regarding enquiry proceedings for any disciplinary action which shows bias on the part of quarter concern.
- c. That the punishment is harsh in nature and the appellant is vexed for undone single offence which is against the constitution of Islamic republic of Pakistan 1973.
- d. That as per the Judgment of Superior Apex Court that the respondent department dragged the employee unnecessary into the litigation then the respondent department held responsible for the cost SCMR -2008 -725)
- e. That the bias of the respondent No-2 clearly shows by not entertaining the representation of the appellant , keeping in view the decision of apex court the respondent No-2 above were duty bound to record reason of rejection "when departmental appeal was submitted the competent authority was duty bound to decide same within reasonable time after application of independent mind ,by giving reason such was a requirement of law as well as of the principal of natural justice "2009 (PLC) (CS) 77.
- f. 6:- That the appellant never ever remained will full absent from his duties till date.
- g. 7:- That it is clearly mention in 2003 PLC CS 1468 that any instruction issued in violation of Rules would be illegal and void.
- h. That the appellant is honest and dedicated one and leave no stone unturned to discharge his duties.
- i. That as per universal declaration of human rights 1948 prohibits the arbitral / discretion.
- j. That the respondent No-3 has acted whimsically and arbitrary, which is apparent from the impugned order.
- k. That the impugned order is not based on sound reasons and same is not sustainable in the eyes of law. The same is based on wrong assumption of facts.

(4)

- l. That the departmental enquiry was not conducted according to the rules.  
m. That the impugned order is outcome of surmises and conjecture.

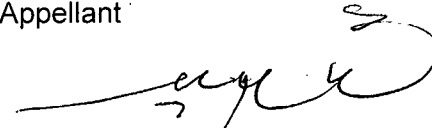
Pray:

In the view of above circumstances it is humbly prayed that the impugned order of respondent No-3 dated 26-11-2019 Kohat may please be set aside for the end of justice and the appellant may please be graciously re-instated in service with all back benefits.

  
Appellant

Through

Date \_\_\_\_/\_\_\_\_/\_\_\_\_

  
Syed Mudasir Pirzada  
Advocate HC  
0345-9645854

Certificate:-

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

List of Books

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

5

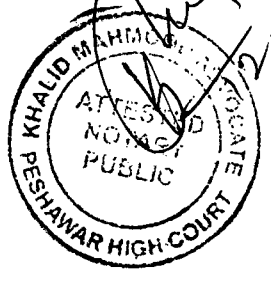
Service Appeal \_\_\_\_\_ 2020

AFFIDAVIT

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

•

*[Handwritten Signature]*  
Advocate

*[Handwritten Signature]*  
2-6-2020  


(6)

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Saqib Waqas S/o Adin ullah Ex-Police Constable Police R/o Kahagazai Kohat.

(Appellant)

VERSUS

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

ADDRESS OF THE PARTIES

APPELLANT :-

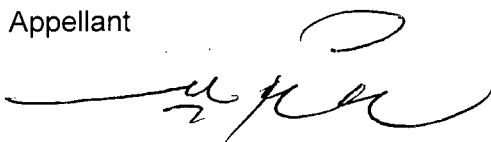
Saqib Waqas S/o Adin ullah Ex-Police Constable Police R/o Kahagazai Kohat.

RESPONDENTS

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

  
Appellant

Through

  
Syed Mudasir Pirzada  
Advocate PHC  
0345-9645854

Date \_\_\_/\_\_\_/\_\_\_

(6-A) (6)

BEFORE THE KHYBER PAKHTOON KHWA SERVICE TRIBUNAL PESHAWAR.

Service Appeal \_\_\_\_\_ 2020

Saqib Waqas S/o Adin ullah Ex-Police Constable Police R/o Kahagazai Kohat.

(Appellant)

VERSUS

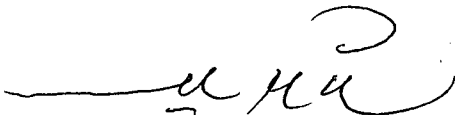
1. INSPECTOR GENERAL OF POLICE KPK PESHAWAR.
2. DEPUTY INSPECTOR GENERAL OF POLICE KOHAT REGION KOHAT
3. DISTRICT POLICE OFFICER KOHAT. (Respondent)

APPLICATION FOR CONDONATION OF DELAY DUE

- 1:-That the appellant representation was pending before respondent No-2.
- 2:-That the representation was not decided till to date and the appellant was given false consolation that the representation will be accepted by respondent No-2 but till date not accepted nor entertain .
- 3:- That all the leading roads and private transport were ban by Provincial Govt.
- 4:- That the petitioner area of resident were quarantine due to extreme covid-19 and local Police cordon the area due to lock down.
- 5:- That no lawyer were available to draft the appeal before the honourable tribunal .
- 6:-That the appellant also indulge in a chronic disease which direct effect with covid.
- 7:-That these circumstance were beyond the control of human being and were natural hence appellant were deprived form Justice .
- 8:- That it is there fore humbly prayed that the delay if any may please be condone for the end of justice.

  
Appellant

Through

  
Syed Mudasir Pirzada (Advocate)

0345-9645854.

**ORDER**

This order will dispose of departmental enquiry against Constable Saqib Waqas No 104 of this district Police under the Khyber Pakhtunkhwa, Police Rules, 1975 (amendment 2014).

Brief facts of the case are that as reported by SHO PS City vide DD No. 26 dated 17.08.2019, that he was transferred from PS Billitang to PS City, but he did not made his arrival as yet and still absent. His this act shows inefficiency & gross misconduct on his part.

From the above, allegation of the accused official, charge sheet alongwith statement of allegation was issued and SDPO Saddar Kohat was appointed as enquiry officer. Charge sheet alongwith statement of allegation was served upon him through local Police on his home address with the direction to submit written statement but he did not submit his reply within the stipulated period. Similarly, the enquiry officer called him on 13.09.2019 vide Notice No. 1878/R dated 13.09.2019 in connection with departmental enquiry, but he did not appeared before the enquiry officer nor produced any written statement in his defense. The enquiry officer submit finding report and recommend him for major punishment. Hence he was issued a Final Show Cause Notice to which he did not submitted reply.

He was called in O.F. through wireless control. But he did not appear before the undersigned, therefore, ex-parte action has been taken. I have gone through the record, which transpires that the defaulter official has earned numerous bad entries and he is a habitual absentee.

In view of above and available record, the undersigned reached to the conclusion that the defaulter constable has willfully absented from duty till date and there is no probability of his return/report. In such circumstances, retention of the defaulter in Police force will be burden on public exchequer. Therefore, in exercise of powers conferred upon me under the rules ibid I, Capt. © Wahid Mehmood, District Police Officer, Kohat award him a major of punishment of Dismissal from service from the date of his absence. Kit etc issued to the constable be collected and report.

DISTRICT POLICE OFFICER,  
KOHAT

26/11

OB No. 1499

Date 26-11-2019

N. 45286-88 PA dated Kohat the 26-11-2019.

CC -

R.I. Reader, Pay officer, SRC and OHC for necessary action.

ATTESTED



ATTESTED

16 08 / 80 91

Handwritten signature or name

Main body of handwritten text, likely a certificate or affidavit, written in Urdu script.

Handwritten text at the bottom left, possibly a date or reference number.

Handwritten text at the bottom of the page, possibly a signature or additional notes.

BEFORE THE DEPUTY INSPECTOR GENERAL OF POLICE  
KOHAT REGION KOHAT

Subject: APPEAL AGAINST THE ORDER OF DPO KOHAT ISSUED VIDE  
OB NO. 1499 DATED 26-11-2019 WHEREBY THE APPELLANT EX-  
CONSTABLE SAQIB WAQAS NO. 104 OF KOHAT DISTRICT  
POLICE WAS DISMISSED FROM SERVICE FROM THE DATE OF  
ABSENCE.

Respected Sir,

With veneration, the appellant submits the instant appeal for consideration on the basis of the following facts and grounds:

FACTS:

Briefly stated the facts are that the appellant was transferred from P.S Billitang to P.S City Kohat but he failed to report his arrival till 17-08-2019 as reported by SHO P.S City and remained absent till his dismissal from service by DPO Kohat vide OB No. 1499 dated 26-11-2019 by taking ex-parte action against the appellant. Hence this appeal.

GROUND:

- a) That the appellant failed to report his arrival immediately of his transfer due to sickness. He remained on bed but his condition deteriorated. On contacting the doctor, the appellant was medically treated and advised him bed / home rest with effect from 17-08-2019 to 16-09-2019. Once again the appellant was advised bed / home rest w.e.f. 17-10-2019 to 16-11-2019 and declared him to medically fit to resume his duty w.e.f. 27-11-2019. However the appellant was dismissed from service by DPO Kohat before he could resume his duty.

**ATTESTED**

P. 10

- b) That the non-submission of reply to the charge sheet, non-appearance before the enquiry officer and DPO Kohat was not intentional and deliberate but it was the result of severe backak, making the appellant unable to move from the bed.
- c) That the appellant has ten years of police service to his credit.
- d) That the appellant has no other source of income to nurish his family and is faced with starvation.
- e) That the appellant assures the police high ups that the appellant shall remain discipline in future if given a chance.
- f) That the appellant case may kindly be considered on humanitarian grounds.


PRAYER:

In view of the above, it is humbly prayed that the impugned order of DPO Kohat may kindly be set aside and the appellant re-instated in service w.e.f. the date of his dismissal from service. The period of absence may be considered as leave without pay please.

Note:

The medical documents are enclosed herewith.

Yours Obediently



Ex. Constable Saqib Waqas No. 104  
S/o Adin Ullah Khan  
R/o Kaghazai Kohat  
Dated 27-04-2020

**ATTESTED**

P 11

# CHING HOSPITAL KDA KOHAT

OUT DOOR PATIENT TICKET

OPD No: 484

*[Handwritten signature]*

Age:

Sex:

Husband's Name:

Date

Clinical Finding / Investigation / Treatment / Referral / Test Findings

17-8  
2019

LBP

mus - k/ spine  
AP - cat

UM

Drupa Medw!

cup

Sahi Ca. 1000

200

1/2 m. stool

Run

one month

DHQU, Kohat

**ATTESTED**

p-12

GOVERNMENT OF KHYBER PAKHTUNKHWA  
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient [Signature]

Certified that Mr./Ms. Saqib Waqas S/D/W/O Adnan (Coh)

resident of \_\_\_\_\_  
Designation Constable Department Police  
having CNIC No. 14301-6841084-1 has been examined in this hospital vide  
Emergency / O.P.D / Admission No. 4501 dated 17/8/2019

He / She is suffering from Lump  
and is advised bed / home rest alongwith the medications prescribed for a period of 04 weeks  
w.c.f. 17/8/2019 to 16/9/2019 for the restoration of his / her health.

[Signature]  
D.H.Q. Hospital Kohat

Signature [Signature]  
Name of Doctor \_\_\_\_\_  
Designation D.H.Q. Hospital Kohat  
PM&DC No. \_\_\_\_\_  
Official Seal \_\_\_\_\_

[Signature]  
**ATTESTED**

ATTESTED

*[Handwritten signature]*

*Handwritten notes*

*Handwritten notes*

*Handwritten signature*

17/9/2019

Clinical Finding / Investigation / Treatment / Referral / Test Findings

Father's / Husband's Name

Age: \_\_\_\_\_ Sex: \_\_\_\_\_

OPD No: 5011

CHING HOSPITAL KDA KOHAT


OUT DOOR PATIENT TICKET

*Handwritten mark*

P-14

GOVERNMENT OF KHYBER PAKHTUNKHWA  
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient ✓ 

Certified that Mr./Ms. Saqib Waqas S/D/W/O Adnanullah  
resident of \_\_\_\_\_


Designation Constable Department Police

having CNIC No. 74361-6841084-1 has been examined in this hospital via

Emergency / O.P.D / Admission No. 5011 dated 17/9/2019

He / She is suffering from Acute Scurvy

and is advised bed / home rest alongwith the medications prescribed for a period of (04) Weeks  
w.c.f. 17/9/2019 to 16/10/2019 for the restoration of his / her health.

  
Medical Officer  
D.H.Q Hospital Kohat

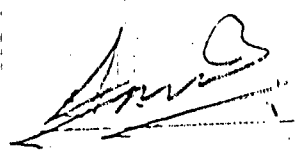
Signature

Name of Doctor

Designation

PM&DC No.

Official Seal



D.H.Q Hospital Kohat

  
**ATTESTED**

P-15

GOVERNMENT OF KHYBER PAKHTUNKHWA  
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT

MEDICAL LEAVE CERTIFICATE

Signatures and Thumb Impression of Patient \_\_\_\_\_

Certified that Mr./Ms. Saqib Waqas S/D/W/O Adniullah

resident of \_\_\_\_\_

Designation Constable

Department Police

having CNIC No. 14301-6841084-1

has been examined in this hospital vide

Emergency / O.P.D / Admission No. 6144

dated 17/10/2019

He / She is suffering from LBP

and is advised bed / home rest alongwith the medications prescribed for a period of 04 weeks  
w.e.f. 17/10/2019 to 16/11/2019 for the restoration of his / her health.

*[Handwritten signature]*  
D.H.Q. Hospital Kohat

Signature \_\_\_\_\_

Name of Doctor \_\_\_\_\_

Designation \_\_\_\_\_

PM&DC No. \_\_\_\_\_

Official Seal \_\_\_\_\_

*[Handwritten signature]*  
D.H.Q. Hospital Kohat

**ATTESTED**



p-16

# ACHING HOSPITAL KDA KOHAT

OUT DOOR PATIENT TICKET

OPD No: 6164

Name: \_\_\_\_\_

Age: \_\_\_\_\_

Sex: \_\_\_\_\_

Father's / Husband's Name: \_\_\_\_\_

Date

Clinical Finding / Investigation / Treatment / Referral / Test Findings

17/10/19

Pain left leg.

mg: Mrs Cori

Cap: Zeegas 75mg  
- Nitro ①

Las: Tramal plus

- LTI  
Las: Mettycosal

Rest on weaks.

Medical  
DHQ Hospital

ATTESTED

TESTED

Medical Officer  
 D H Q Hospital Kohat

Mr. B. B. Mehta	-	7.5
Daman	-	7.5
N. S. Malik	-	7.5
D. S. Malik	-	9.0
D. S. Malik	-	9.0
M. S. Malik	-	9.0
M. S. Malik	-	9.0
M. S. Malik	-	9.0

17/2019

**HOSPITAL KDA KOHAT**

DOOR PATIENT TICKET

OPD No: 7244

Age: \_\_\_\_\_

Sex: \_\_\_\_\_

Investigation / Treatment / Referral / Test Findings

P-17

**GOVERNMENT OF KHYBER PAKHTUNKHWA  
DISTRICT HEADQUARTERS TEACHING HOSPITAL KOHAT**

**MEDICAL LEAVE CERTIFICATE**

Signatures and Thumb Impression of Patient \_\_\_\_\_

Certified that Mr./Ms. Saqib Waqas S/D/W/O Adnan Ishaq

resident of \_\_\_\_\_ Department Police

Designation Constable

having CNIC No. 14301-6841084-1 has been examined in this hospital vide

Emergency / O.P.D / Admission No. 7244 dated 17-11-2019

He / She is suffering from \_\_\_\_\_

and is advised bed / home rest alongwith the medications prescribed for a period of (10) Days

w.c.f. 17/11/2019 to 26/11/2019 for the restoration of his / her health.

[Signature]  
Medical Superintendent  
D H Q Hospital Kohat

Signature \_\_\_\_\_  
Name of Doctor \_\_\_\_\_  
Designation D H Q Hospital Kohat  
PM&DC No. \_\_\_\_\_  
Official Seal \_\_\_\_\_

**ATTESTED**

ATTESTED

*[Handwritten signature]*

21 July 1954

*[Handwritten signature]*

*[Handwritten signature]*

*[Handwritten signature]*

*[Large handwritten signature]*

*[Large handwritten signature]*

P-18

*[Handwritten signature]*

20

شہزادہ

20



APPENDIX

2641

ایڈویکیٹ اور دستخط:

بار کونسل ابار ایسوسی ایشن نمبر:

رابطہ نمبر: 0345-9645854

کوہاٹ بار ایسوسی ایشن، خیبر پختونخواہ

بعدالت جناب: خیبر پختونخواہ سروس ٹریڈنگ کمپنی کتاورد

دعویٰ:	مخانب: مساجل / مہینہ / اربلاٹ
علت نمبر:	کما حقہ و خاص
مورخہ:	بنام
تھانہ:	KPK، 19/10/20

## باعت تحریر آنکہ

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ آن مقام خیبر پختونخواہ سروس ٹریڈنگ کمپنی کے سربراہان اور اس کے کوکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ بر حلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از ہر قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار قانونی کو اپنے ہمراہ یا اپنے بجائے تقرر کا اختیار ہوگا اور صاحب مقرر شدہ کو بھی وہی جملہ مذکورہ اختیارات حاصل ہوں گے اور اس کا ساختہ پر داختم منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جانہ التوائے مقدمہ کے سبب سے ہوگا وہ وکیل موصوف وصول کرنے کا حقدار ہوگا کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے۔

المرقوم

الـ جـ و ا ہ ش د الـ جـ و ا ہ ش د

شہزادہ کما حقہ و خاص

**BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL,**  
**PESHAWAR**

Service Appeal No.8823/2020

Saqib Waqas. .... Appellant

**V E R S U S**

I.G.P & others. .... Respondents

**APPLICATION FOR ADJOURNMENT**

**Respectfully Sheweth:**

1. That the above titled appeal is pending adjudication before this Hon'ble Tribunal and is fixed for today i.e. 02.09.2021.
2. That the counsel for appellant injured due to road accident and due to injuries, he is unable to appear before this Hon'ble Tribunal.

It is, therefore, respectfully prayed that on acceptance of this application, the titled case may kindly be adjourned.

Through Appellant



**Syed Mutahir Shah**  
Clerk of  
**Syed Mudassir Pirzada**  
Advocate High Court  
Cell: 0313-9921335

Dated: 02.09.2021

“A”

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

No. Regd

APPEAL No. 8829 of 20 20

SB

Saqib Waqas

Appellant/Petitioner

Versus

Inspector general Police kPk Peshawar

RESPONDENT(S)

Respondent (2)  
Notice to Appellant/Petitioner  
of Police Kohat Region Kohat  
Deputy inspector general

Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 15/07/2022 at 9:00 AM.

You may, therefore, appear before the Tribunal on the said date and at the said place either personally or through an advocate for presentation of your case, failing which your appeal shall be liable to be dismissed in default.

For Reply  
Copy Attached

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.

**"A"**

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

No.

APPEAL No..... 8829 ..... of 20 21

SB

Saqib Wajid

Appellant/Petitioner

Versus

Inspector general Police k.Pk Peshawar  
RESPONDENT(S)

Notice to Appellant/Petitioner <sup>Respondent (2)</sup> Inspector general Police  
k.Pk Peshawar




Take notice that your appeal has been fixed for Preliminary hearing, replication, affidavit/counter affidavit/record/arguments/order before this Tribunal on 15/07/2022 at 9:00 AM

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For Reply  
Copy Attached

Registrar,  
Khyber Pakhtunkhwa Service Tribunal,  
Peshawar.



قیمت 50 روپے	123871			
ایڈویکیٹ: _____		پشاور بار ایسوسی ایشن، خیبر پختونخواہ		
بار کونسل / ایسوسی ایشن نمبر: _____				
رابطہ نمبر: 0311-9440376				

بعدالت جناب: KP Service Tribunal Peshawar

منجانب: <b>Appellant</b>	دعویٰ: _____
	علت نمبر: _____
	مورخہ: _____
	جرم: _____
	تھانہ: _____

**باعث تحریر آنکہ**

مقدمہ مندرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی کاروائی متعلقہ

آن مقام حیدرآباد کے عظیم الشان عدالت عالیہ کو وکیل مقرر کر کے اقرار کیا جاتا ہے کہ صاحب موصوف کو مقدمہ کی کل کاروائی کا کامل اختیار ہوگا، نیز وکیل صاحب کو راضی نامہ کرنے و تقرر ثالث و فیصلہ برحلف دینے جواب دعویٰ اقبال دعویٰ اور درخواست از چہرہ قسم کی تصدیق زریں پر دستخط کرنے کا اختیار ہوگا، نیز بصورت عدم پیروی یا ڈگری کی طرف یا اپیل کی برآمدگی اور منسوخی، نیز دائر کرنے اپیل گمرانی و نظر ثانی و پیروی کرنے کا مختار ہوگا اور بصورت ضرورت مقدمہ مذکورہ کے کل یا جزوی کاروائی کے واسطے اور وکیل یا مختار کو اپیل کو اپنے ہمراہ لے جانے کے لئے اختیار ہوگا اور صاحب مقرر شدہ کو وہی جملہ مذکورہ بالا اختیارات حاصل ہوں گے اور اس کا ساختہ پر داخلہ منظور و قبول ہوگا دوران مقدمہ میں جو خرچہ ہر جاندا تو ائے مقدمہ کے سبب سے ہوگا۔ کوئی تاریخ پیشی مقام دورہ یا حد سے باہر ہو تو وکیل صاحب پابند نہ ہوں گے کہ پیروی مذکورہ کریں، لہذا وکالت نامہ لکھ دیا تاکہ سند رہے

المرقوم: \_\_\_\_\_

المقام: \_\_\_\_\_