

03.03.2015

Appellant with counsel and Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Preliminary arguments heard and record perused.

Learned counsel for the appellant argued that appellant was appointed as Police Constable in District Police, Hangu in 2007. That on 10.06.2008 the appellant was on guard duty over the Bungalow of DPO Hangu from 8 PM to 10 PM. That after duty of the appellant, a bomb was blasted outside the Bungalow of DPO Hangu, consequent upon there was accrued a slight damages to the Bungalow of DPO, of which an FIR has been registered. That the DPO in this connection, suspended the appellant from duty but no suspension notice was served to the appellant. That vide order dated 03.09.2008 the appellant has been dismissed from service, against which he filed departmental appeal which was turned down vide order dated 29.01.2009 followed by another departmental appeal on 31.12.2013 which has not been responded. That the appellant filed Writ Petition No. 351-P/2014 before the Hon'able Peshawar High Court, Peshawar which was disposed off with the direction for early disposal of the said representation of the appellant to respondent No.1. That the silence of respondent No.1 in this regard was challenged in Re-Writ Petition No. 1565/2014 in the Hon'ble Peshawar High Court, Peshawar, as a result whereof the respondent No. 1 disposed off the representation/appeal of the appellant, giving no opportunity of hearing to the appellant. He further relied on 2004 PLC (C.S) 1014 and PLD 2003 Supreme Court 724, wherein it has been held that decision of cases on merit always to be encouraged instead of non-suiting of litigants on technical reason including ground of limitation.

The learned AAG while assisting the Court was of the view that the instant appeal is not maintainable in its present form being badly time barred before the appellate authority as well as this Tribunal. He relied on 2012 SCMR 195 and 1999 PLC (C.S) 510. He requested that the instant appeal may be dismissed in limine.

From arguments advanced by the learned counsel for the parties and perusal of record, the Tribunal is of the view that the

instant appeal is badly time barred before the appellate authority as well as this Tribunal. As such the present appeal being hopelessly time barred is dismissed in limine. File be consigned to the record.

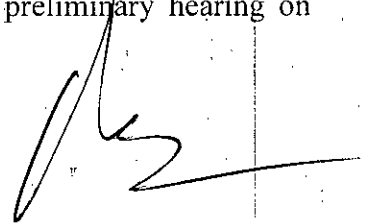
ANNOUNCED

03.03.2015


Member

3.
18.08.2014

Counsel for the appellant present. Preliminary arguments partly heard. The matter required further elucidation, therefore, pre-admission notice be issued to the learned GP to assist the Tribunal on next date. To come up for preliminary hearing on 21.10.2014.



Member

4.
21.10.2014

Counsel for the appellant and Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Counsel for the appellant requested for adjournment. Request accepted. To come up for preliminary hearing on 29.12.2014.



Member

5.
Reader Note:

29.12.2014

Counsel for the appellant and Mr. Kabirullah Khattak, Asst: Advocate General for the respondents present. Since the Tribunal is incomplete, therefore, case is adjourned 03.03.2015 for the same.





Reader

Form - A
Form of Order Sheet

Court of _____

Case No. 814/2014


S.No.	Date of order Proceedings	Order or other proceedings with signature of judge or Magistrate
1	2	3
1	09/06/2014	<p>The appeal of Mr. Noor-ul-Amin resubmitted today by Mr. Gul Daraz Khan Advocate, may be entered in the Institution register and put up to the Worthy Chairman for preliminary hearing.</p> <p style="text-align: right;"> REGISTRAR</p>
2	11-8-2014	<p>This case is entrusted to Primary Bench for preliminary hearing to be put up there on <u>18-8-2014</u></p> <p style="text-align: right;"> CHAIRMAN</p>

The appeal of Mr. Noor-ul-Amin son of Meher Dil Khan received today i.e. on 03.06.2014 is incomplete on the following score which is returned to the counsel for the appellant for completion and resubmission within 15 days.

- 1- Memorandum of appeal may be got signed by the appellant.
- 2- Affidavit may be got attested by the Oath Commissioner.
- 3- Annexures of the appeal may be attested.


No. 865 /S.T,

Dt. 03/6 /2014.


REGISTRAR
SERVICE TRIBUNAL
KHYBER PAKHTUNKHWA
PESHAWAR.

Mr. Gul Daraz Khan Adv. Pesh.

The score raised cleared.
and Resubmitted on 7-6-14


8/6

The car was crossed

and determined as a - P - 12

8/12

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 814 /2014

Noor ul Amin(Appellant)

VERSUS

I.G.P, Khyber Pakhtunkhwa, Peshawar

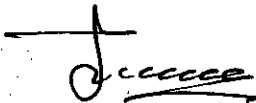
And others.....(Respondents)

I N D E X

S.No	Description of Documents	Annex	Pages
1.	Service Appeal		1-6
2.	Affidavit		7
3.	Application for condonation of delay		8-9
4.	Affidavit		10
5.	Addresses of the parties		11
6.	Copy of appointment order	A	12-14
7.	Copy of affidavit	B	15
8.	Copy of F.I.R	C	16
9.	Copy of order dated 03/09/2008	D	17
10.	Copy of appeal	E	18
11.	Copy of order	F	19
12.	Copy of representation/ appeal and registry/ receipt	G&H	20-22
13.	Copy of Writ Petition and order	I&J	23-24
14.	Copy of Re-Writ Petition Order of Peshawar High Court and order of respondent No. 1 dated 22/05/2014	K,L&M	35-39
15.	Wakalat Nama		40


Appellant

Through



Dated: 03/06/2014

Gul Daraz Khan
Advocate High Court,
Peshawar.
Cell No. 0333-9239831

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

Service Appeal No. 814 /2014

①

Noor ul Amin S/o Meher Dil Khan

R/o Bahadaer Banda, District Hangu.....(Appellant)

VERSUS

816
03/6/2014

1. I.G.P, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police Kohat Region Kohat.
3. District Police Officer Hangu.....(Respondents)

**SERVICE APPEAL U/S 4 OF NWFP (KPK)
SERVICE TRIBUNAL ACT, 1974 AGAINST
THE ORDER OF RESPONDENT NO. 01, WHO
DECIDED THE REPRESENTATION OF THE
APPELLANT ON THE DIRECTION OF
PESHAWAR HIGH COURT, PESHAWAR.**

Prayer in appeal:

1. *On acceptance of the instant Service Appeal, the orders of the respondents No. 1 dated 22/05/2014 and respondent No. 2 dated 29/01/2009 and the order of respondent No. 3 dated 09/03/2008 may graciously be set aside and the appellant may also be ordered to reinstate to his Service with full back benefits as well as other any remedy which this Hon'ble Tribunal deemed proper be ordered in favour of appellant.*

NO-SUBMITTED TO
and filed.

3/6/14
9/6/14

2. While the appellant is only source of income of livelihood or his poor family, the appellant may please be allowed to duty till the deposed of the instant appeal.

Respectfully Sheweth:

FACTS:

Short facts giving rise to the instant appeal are as under:

1. That the appellant was appointed as constable in District Police, Khyber Pakhtunkhwa Hangu in 2007. (Copy of appointment order is attached as annexure "A").
2. That the appellant performed his duty very efficiently and there was no complaint in regard to the duty of appellant to his superiors.
3. That on 10/06/2008 the appellant was on guard duty over the Bungalow of DPO Hangu from 8 P.M. to 10 PM.
4. That after completion of duty the appellant handed over the duty charge to one constable Hidayatullah on the same date at 10 PM. (Copy of affidavit is attached as annexure "B").
5. That after duty of the appellant, a bomb was blasted outside the Bungalow of DPO Hangu, consequent up on there was accrued a slight damages to the Banglow of DPO, of which an F.I.R has been registered. (Copy of F.I.R is attached as annexure "C").

6. That, the DPO in this connection, suspended the appellant from duty but no suspension notice was served to the appellant.
7. That, after passing of three four months DPO/Respondent No. 3 vide his letter No. OB No. 586 dated 03/09/2008, dismissed the appellant from service. (Copy of order dated 03/09/2008 is attached as annexure "D").
8. That the appellant filed appeal to the respondent No. 2 against the order of respondent No. 3. (Copy of appeal is attached as annexure "E").
9. That the said appeal was turn down with out giving cogent reasons and without given opportunity of hearing as respondent No. 3 to the appellant. (Copy of order is attached as annexure "F").
10. That the appellant submitted his representation/ appeal to respondent No. 1 on 31/12/2013 through registry. (Copy of representation/ appeal and registry/ receipt attached as annexure "G" and "H" respectively).
11. That respondent No. 1 neither accept no reject the departmental appeal/ representation of the appellant, for which the appellant filed W.P. before Peshawar High Court Peshawar, which was disposed off with the direction for early disposal of the said representation of

the appellant to respondent No. 1. (Copy of Writ Petition and order is attached as annexure "I" and "J" respectively).

12. That the silence of respondent No. 1 in this regard was challenged in Re-Writ Petition in the Hon'ble Peshawar High Court, Peshawar, consequent upon the respondent No. 1 disposed off the representation/ appeal of the appellant, giving no opportunity of hearing to the appellant. (Copy of Re-Writ Petition Order of Peshawar High Court and order of respondent No. 1 dated 22/05/2014 are attached as annexure "K", "L" and "M" respectively).
13. That, feeling aggrieved from the order of respondent No. 1 hence the instant appeal on the following grounds:

GROUND:

- A. That the order of respondent No. 1 is against the principal of law and natural justice as is liable to be set aside.
- B. That, the order of respondent No. 2 is also against the principle of law and principle of natural justice as is liable to be set aside.
- C. That order of respondent No. 3 is also against the law and facts on record while giving no show cause notice and no opportunity of hearing, no enquiry was conducted in this regard, hence liable to be set aside.

- D. That the appellant is quite innocent but malafidely dismissed from service by respondent No. 3.
- E. That the appellant neither called for inquiry by inquiry officer nor provided any copy of inquiry report to the appellant which act of the inquiry officer as well as dismissal order of the respondent No. 3 is against the existed provision of law, hence not tenable.
- F. That the appellant have small chandler and is so poor and jobless that he could not give sport of livelihood to his poor family while the appellant is only the source of livelihood/ income for his poor family.
- G. That if the appellant is not reinstated to his service, his poor family would be faced with great hardship in their life.

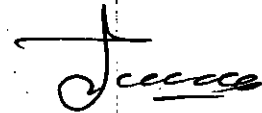
It is, therefore, most humbly prayed that on acceptance of this appeal, the orders of respondents may kindly be set aside and the appellant be ordered to reinstate to his duty with full back benefit as well as the appellant may allowed duty till the disposed of this appeal and other any remedy which this Hon'ble Tribunal deemed proper may also be ordered in favour of appellant.

Note:

In case, if the appeal is dismissed the appellant will reply the serials received to the respondent if this Hon'ble Tribunal defected on conclusion of the instant appeal. The appellant is ready to furnish an Affidavit in this regard for the satisfaction of this Hon'ble Tribunal.


Appellant

Through



Dated: 03/06/2014

Gul Daraz Khan
Advocate High Court,
Peshawar.

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

7

Service Appeal No. _____/2014

Noor ul Amin(Appellant)

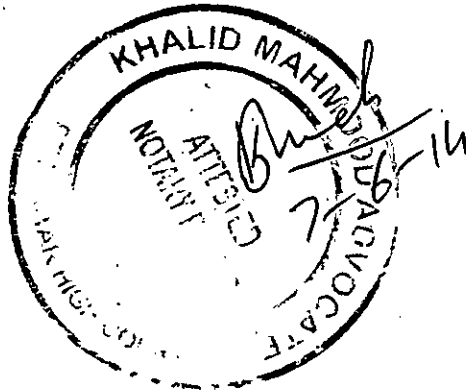
VERSUS

I.G.P, Khyber Pakhtunkhwa, Peshawar

And others.....(Respondents)

AFFIDAVIT

I, Noor ul Amin S/o Meher Dil Khan R/o Bahadaer Banda, District Hangu, do hereby solemnly affirm and declare that the contents of the **Service Appeal** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.




DEPONENT

8

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

C.M. No. _____/2014

In

Service Appeal No. _____/2014

Noor ul Amin(Applicant/Appellant)

VERSUS

I.G.P, Khyber Pakhtunkhwa, Peshawar

And others.....(Respondents)

**APPLICATION FOR CONDONATION
OF DELAY.**

Respectfully Sheweth:

1. That the above titled Service is filed by the applicant/ appellant in this Hon'ble Court in which no date of hearing is fixed.
2. That the applicant/ appellant requested for condonation of delay on the following grounds:

GROUND:

- A. That the applicant/ appellant is illiterate person in regard to the delay and have no knowledge in respect of any disadvantages of such like delay, while the delay is caused by the respondents giving hope to the appellant for put on duty.

- B. That the applicant/ appellant is belonging to such an area from which no one could easily approach to any where in the province.
- C. That the applicant/ appellant also misguided by the departmental authorities which resulted in cause of delay.
- D. That, if delay is not condoned, the applicant/ appellant as well as poor family of the applicant/ appellant will suffered an irreparable loss in the whole of their life.

It is, therefore, most humbly prayed that on acceptance of this application the delay, if any, in filing the above noted Service Appeal may kindly be condoned in the interest of justice.

[Handwritten Signature]

Applicant/ appellant

Through

[Handwritten Signature]

Gul Daraz Khan
Advocate High Court,
Peshawar.

Dated: 03/06/2014

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

10

C.M. No. _____/2014

In

Service Appeal No. _____/2014

Noor ul Amin(Applicant/Appellant)

VERSUS

I.G.P, Khyber Pakhtunkhwa, Peshawar

And others.....(Respondents)

AFFIDAVIT

I, Noor ul Amin S/o Meher Dil Khan R/o Bahadaer Banda, District Hangu, do hereby solemnly affirm and declare that the contents of the **Application** are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



DEPONENT

**BEFORE THE HON'BLE SERVICE TRIBUNAL, KHYBER
PAKHTUNKHWA, PESHAWAR**

(11)

Service Appeal No. _____/2014

Noor ul Amin(Appellant)

VERSUS

I.G.P, Khyber Pakhtunkhwa, Peshawar

And others.....(Respondents)

ADDRESSES OF THE PARTIES

APPELLANT:

Noor ul Amin S/o Meher Dil Khan


R/o Bahadaer Banda, District Hangu.....(Appellant)

RESPONDENTS:

1. I.G.P, Khyber Pakhtunkhwa, Peshawar.
2. Deputy Inspector General of Police Kohat Region Kohat.
3. District Police Officer Hangu.....(Respondents)


Appellant

Through


Gul Daraz Khan
Advocate High Court,
Peshawar.

Dated: 03/06/2014

ضلع سٹیٹر

نمبر

بھرتی کیا گیا

کوٹ لائن

فصلی تصدیق چال چلن رگروٹ تمام کوٹ لائن

تاریخ 2005ء سے اب تک

پیشہ / شغل / کثرت / ذات / نوعیت / عمل / سال / مقام / علاقہ / علاقہ / علاقہ

انسانیات خاصہ دائی قابل شناخت

قریبی رشتہ داران	نام	سابقہ	ملازمت			حالات	تعلیم
			دہلا ادارہ / شہر	رتبہ	سال		
علیہ العالی سکول سکول سکول سکول	علیہ العالی		دن	سال			
شاہزیادہ بابی	بابی						
مہرول خان	والد						10th
سکنہ سیٹیا پانڈی	والد						

گورنمنٹ میں ملازم قریبی رشتہ داران جو ملازم

کیس ٹیکر میں ہے یا تفصیل ایف اے وارث فراڈ یا آٹوں

کیس ٹیکر میں ہے یا تفصیل ایف اے وارث فراڈ یا آٹوں

ATTESTED
Date

1 مسیٰ محمود علی ولد نماز علی ذات افغان سکنہ فینٹون پانڈہ تھانہ منگر شملع ہا منگر
 2 مسیٰ بیار حسین ولد عینی جان ذات افغان سکنہ ابر اعظمی تھانہ منگر شملع ہا منگر
 ہم مسیان شملع دس 10 ہزار روپے دو 2 فزری ضمانت دیتے ہیں کہ
 بی گزر الزامی ولد سید دل جان ذات افغان سکنہ بہادر شاہ تھانہ منگر شملع ہا منگر
 جو کہ ملازم پولیس ہو چکا ہے اگر اس نے دوران ملازمت حکومت پاکستان کو کسی قسم کا
 نقصان پہنچایا تو ہم مسیان بالا ذمہ دار ہونگے۔

نام گواد شدہ: مسیٰ حسین
 ولدیت: عینی جان

العبد

مسیٰ محمود علی
 نام گواد شدہ: مسیٰ حسین
 ولدیت: نماز علی

ضلع زینت شاہ صاحب سیرٹنڈنٹ بہادر

بنام صاحب سیرٹنڈنٹ خاور پولیس ضلع
لکھنؤ کے نام پر پیسہ جمعہ ذیل امدادات کے
پاس سب انسپکٹر صاحب تھانہ

مورخہ

سیرٹنڈنٹ پولیس

<p>دپارٹمنٹ انٹرنیشنل ریپبلیکانی چال پان نسبت سزایابی اور ناٹلی (الروٹی) اور انٹرنیشنل قومیت اور دستخط جناب عالی</p>	<p>بیان نمبر اور ان نسبت سزایابی ملانہ بر ناٹلی (الروٹی) اور انٹرنیشنل قومیت دستخط</p>	<p>نام</p>
<p>کھانہ لبرٹال شات سید رضا سید لبرٹال سید رضا سید حسن لوڈ لبرٹال ولد سید رضا خان مسکت سید رضا سید رضا سید رضا اور سید رضا سید رضا سید رضا سید رضا سید رضا سید رضا</p>	<p>Yasir Muhammad General Councillor U.C. Kach Hangu</p>	<p>PIR AMIR FAISAL NAIB NAZIM U.C. KACH HANGU NIC: 14101-414577</p>

2-6-07

Handwritten signature

9

14

Name of Official Noor ul Amin
 Post or office AT Hangu
 Father's Name Mirdal Jan
 Residence Bahadur Bander, Dist and Tehsil Hangu
 Date of Birth 10-7-21
 Exact Height by Measurement 5-2 Chest 33" 35"
 Personal Mark of Identification NIL
 Signature of Official [Signature]
 Signature of Head of Office _____

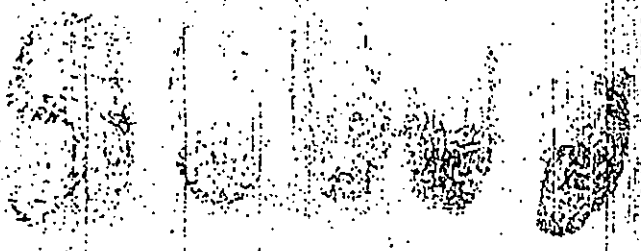
[Signature]
 Seal of Office

I do hereby certify that I have examined Mr. Noor ul Amin A Candidate
 for employment in the office of the DPO, Hangu and cannot discover that he had any
 disease communicable or other constitution affection or bodily infirmity expect _____

I do not consider disqualification for implement in the office of the Police
 His age according to his own statement (26) years and appears about (26) years

Left hand thumb and finger impressions

[Signature]
ATTESTED



[Signature]
 MEDICAL SUPERINTENDENT
 District Head Quarter Hospital,
 HANGU.

Noor ul Amin
DPO and others

Versus

Appellant

Respondents: Anex. (B)
(15)

Affidavit of Hidayat Ullah no. 609 s/o Moht Anwar

A. Gulshan colony

Hidayat Ullah s/o Moht Anwar r/o Gulshan colony do hereby solemnly affirm by oath that Noor ul Amin performed his duty from 6PM TO 10 PM and thereafter the charge was given to me I performed my duty from 10 TO 2 AM AND THEREAFTER THE BOMB WAS BLASTED AT THAT TIME THE DUTY OF THE NOOR ul Amin was off.

Deponent
Hidayat

[Signature]

ATTESTED

Noor ul Amin.....(Appellant)

VERSUS

DPO and others.....(Respondents)

Affidavit of Hidayat Ullah No. 609 s/o Moin Anwar R/o Gulshan Colony.

Hidayat Ullah S/o Moin Anwar r/o Gulshan Colony do hereby solemnly affirm by oath that Noor ul Amin performed his duty from 6 PM to 10 PM and thereafter the charge was given to me I performed my duty from 10 to 2 AM and thereafter the bomb was blasted at that time the duty of the Noor ul Amin was off.

Deponent


ATTESTED

نام نمبر ۲۴۵۰۱۱

ابتدائی اطلاعی رپورٹ

پیس سوپر سٹرکٹام نمبر ۲۷

کنٹر (فائل) ابتدائی اطلاع نسبت جرم قابل دست اندازی پولیس باورڈ میں شدہ نمبر رقم ۱۵۴ مجموعہ منسلک فوری

منسلح کتھر

تھانہ ننگو

تاریخ و وقت وقوع ۶/۱۵/۲۰۱۰

نمبر 373

<p>تاریخ و وقت رپورٹ 6/15/2010</p>	<p>انسٹیکٹر سپر خان S.H.C</p>
<p>نام و سکونت اطلاع دہندہ و مستفیض</p>	<p>EXP SUBSET 3/4</p>
<p>مختص کیفیت جرم (موردہ) حال اگر کچھ لیا گیا ہو</p>	<p>مزور کپور جانب شمال سترخان DPo مہلت بنگر</p>
<p>جائے وقوع فاصلہ تھانہ سے اور سمیت</p>	<p></p>
<p>نام و سکونت ملزم</p>	<p>با سپر سٹرکٹام سید علی محمد ریشل الہ آباد دہلی</p>
<p>کارروائی جو تفتیش کے متعلق کی گئی اگر اطلاع درج کرنے میں توقف ہو تو وجہ بیان کرو۔</p>	<p>میسور سیکل لکچر</p>
<p>تھانہ سے روانگی کی تاریخ و وقت</p>	<p></p>

ابتدائی اطلاع پہلے درج کروائے گئے جرم کا مراسم ملتان سید خان انسٹیکٹر 5/40
 تھانہ ننگو موصول ہو کر تفصیل ذیل ہے ایف آئی اے تھانہ ننگو میں ملتان سید خان انسٹیکٹر 5/40
 کی آواز سن کر تھانہ ننگو میں تھانہ ننگو میں ملتان سید خان انسٹیکٹر 5/40
 DPo مہلت بنگر کے جانب شمال دیوار دروازہ پر ڈھکے پڑے ہوئے ڈاک کے ڈاکٹریں کی صورت میں
 کے تھی ڈیوار میں دھماکہ خیز حاتی آتشیں اسلحہ سے تھانہ ننگو میں ملتان سید خان انسٹیکٹر 5/40
 سراخ ہو گیا ہے دیوار کے تھانہ ننگو میں ملتان سید خان انسٹیکٹر 5/40
 اور اس کے ساتھ کو تھانہ ننگو میں ملتان سید خان انسٹیکٹر 5/40
 جائے وقوعہ کے نزدیک کوئی مسیہ نہ پایا گیا وقوعہ سے مہلت بنگر کے جانب شمال
 معلوم ملزم، ملزمان جرم بالا مراسم ارسال تھانہ ننگو میں ملتان سید خان انسٹیکٹر 5/40
 مراسم عب RIR میرا تفتیش حوالہ ملتان انسٹیکٹر 5/40
 تھانہ ننگو میں ملتان سید خان انسٹیکٹر 5/40
 یہ ملزم ملتان سید خان انسٹیکٹر 5/40
 رپورٹ گزار رہے

ملتان سید خان انسٹیکٹر 5/40
 15/6/10

Invested

FER 255/08

Annex. (D) ⁽¹⁾
~~(H)~~ (15)

ORDER.

This order will dispose of the inquiry initiated against Constable Noor-ul-Amin No.467 on the basis of allegations that some unknown accused planted an IED near the DPO's House. Constable Noor-ul-Amin No.467 was deputed for guard duty at DPO Office on 10.1.2008, the defaulter constable said the he has performed his duty 0600 upto 1000 hrs and handing over his charge to other constable Hidayat Ullah No.609. In the morning time he heard an explosion.

He was served with Charge Sheet and Statement of Allegations to which he reply to enquiry committee SDPO Hangu Muhammad Irshad and Incharge Complaint Cell Mirza Ali, were appointed as Enquiry committee to conduct Departmental Enquiry against him under N.W.F.P Removal from Service (SPECIAL POWERS) Ordinance, 2000. The Enquiry committee submitted their finding on 31.7.2008 and held the defaulter constable guilty of the charges as he is attended the enquiry committee. Furthermore, the enquiry committee came to the conclusion that charges leveled against Constable Noor-ul-Amin No. 467 for correct and found guilty.

Thereafter, a Final Show Cause Notice was served upon the defaulter but the reply received by him was found unsatisfactory.

Keeping in view the findings of the Inquiry Committee and having gone through available record, I, Muhammad Idrees, District Police Officer, Hangu in exercise of the power conferred upon me hereby award him major punishment of Removal from service from the date of 2.9.2008.

OB No. 586
Dated 03/19/2008.

(MUHAMMAD IDREES) PSP
DISTRICT POLICE OFFICER,
HANGU.

Idrees
TESTED

OFFICE OF THE DISTRICT POLICE OFFICER, HANGU.

No. 1992-96 /PA, Dated Hangu, the 03/9/2008.

Copy of above is submitted to the Deputy Inspector General of Police, Kohat Region, Kohat for favour of information please.

2. PO / SRC / OHC / Reader for necessary action.

Advs. Dept.

(MUHAMMAD IDREES) PSP
DISTRICT POLICE OFFICER,
HANGU.

کشمیر سب ڈی ای ڈی

سلسلہ 586-OB No صرف 3/9/2008
تعمیر از دفتر DPO سب ڈی ای ڈی (نیشنل شولہ)

درخواست براد دو بارہ تعمیراتی سب ڈی ای ڈی کا نیشنل
درجہ اولیہ

جناب عالی ایڈوائسز

سب ڈی ای ڈی کے بارے میں نیشنل سب ڈی ای ڈی کارپوریشن
کا سالانہ رپورٹ 2007 میں سب ڈی ای ڈی کے بارے میں
پروگرام کا نیشنل نمبر 467

سب ڈی ای ڈی کو صرف 10/11/2008 کو DPO کا سب ڈی ای ڈی
کا نیشنل نمبر 609 کے تحت
اور اس کے ذریعے اس کے تحت سے سرکاری
سب ڈی ای ڈی کو صرف 10/11/2008 کو
سرانجام دینے کے لئے جو نیشنل تبدیل ہوئی۔
تو اس کے ذریعے سب ڈی ای ڈی کا نیشنل
نمبر 609 کے تحت ہے۔

سب ڈی ای ڈی کو 10/6/2008 کو DPO کا سب ڈی ای ڈی
کا نیشنل نمبر 373 صرف 10/6/2008 کو
Act: Govt: Exp: 3/4 Fil: 12
سب ڈی ای ڈی کے تحت ہے۔ اس کے تحت سے
نیشنل سب ڈی ای ڈی کے تحت ہے۔

سب ڈی ای ڈی کے دوران سب ڈی ای ڈی کے تحت سے
کا نیشنل نمبر 609 کے تحت ہے۔ اس کے تحت سے
نیشنل سب ڈی ای ڈی کے تحت ہے۔ اس کے تحت سے
نیشنل سب ڈی ای ڈی کے تحت ہے۔ اس کے تحت سے
نیشنل سب ڈی ای ڈی کے تحت ہے۔ اس کے تحت سے

Handwritten signature and stamp

- ۹ - ...
- ۱۰ - ...
- ۱۱ - ...
- ۱۲ - ...
- ۱۳ - ...
- ۱۴ - ...

...
 ...
 ۱۸/۳/۲۰۱۳

...
 ...

...
 ...

...

F/1-16/04

Anex. 'F'

POLICE DEPARTMENT

KOHAT REGION

(19)

ORDER

This order will disposed off the Mercy Petition of Ex Constable Noor-ul-Amin No.457 of Hangu District, requesting therein for setting-aside the punishment order of DPO Hangu vide his O.B No.586 dated 03.09.2008. In the said order the petitioner was Removed from service.

Brief facts of the case are that on 10.06.2008 unknown miscreant planted in IED at the rear side of DPO's house Hangu, which blasted at morning. At the eventful time the petitioner was deployed for duty but he failed to perform his duty which resulted the unfortunate incident.

He was heard in person during the orderly room held in this office on 24.11.2009. But he could not give any satisfactory reply in his defence, therefore the appeal is filed.

ORDER ANNOUNCED

(QUDRATULLAH KHAN MARWAT)
Dy: Inspector General of Police
Kohat Region, Kohat

No. 6 /EC, dated Kohat the 29/11 /2009

Copy of above is forwarded to District Police Officer, Hangu for information with reference to his office Memo: No.5594/Legal dated 25.11.2008. His Service record received with your above quoted Memo: is returned herewith for record.

(QUDRATULLAH KHAN MARWAT)
Dy: Inspector General of Police
Kohat Region, Kohat

ATTESTED

(Better Copy)

KOHAT REGIONPOLICE DEPARTMENT:ORDER

This order will disposed off the Mercy Petition of Ex Constable Noor-ul-Amin No. 467 of Hangu District, requesting therein for setting-aside the punishment order of DPO Hangu vide his O.B No. 586 dated 03.09.2008. in the said order the petitioner was Removed from service.

Brief facts of the case are that on 10.06.2018 unknown miscreapents planted in IED at the rear side of DPOs house Hangu. Which blasted at morning time on the eventful time the petitioner was deployed for duly but he failed to performing his duty which resulted the unfortunate incident.

He was heard in person during the orderly roon held in this office on 24/01/2009. But he could not give any satisfactory reply in his defence. Therefore the appeal is filed.

ORDERS ANNOUNCED

(Qudratullah Khan Marwat)
Dy: Inspector General of Police
Kohat Region, Kohat

No. 680/EC, Dated Kohat the 29/1/2009

Cop of above is forwarded to District Police Officer Hangu for information with reference of his office Memo, No. 5594/Legal dated 25/11/2008. His Service record received with your above quoted Memo: is returned herewith for record.


ATTESTED

(Qudratullah Khan Marwat)
Dy: Inspector General of Police
Kohat Region, Kohat

اپیل برخلاف حکم و فیصلہ مورخہ 29/01/2009

از جناب D.I.G صاحب، کوہاٹ

جناب عالی! اپیلانٹ حسب ذیل غرض رساں ہے۔

- 1- یہ کہ اپیلانٹ 2007ء میں محکمہ پولیس میں بحیثیت کنسٹیبل بھرتی ہوا تھا۔
- 2- یہ کہ اپیلانٹ بطور کنسٹیبل نمبر 467، DPO ہنگو کے بنگلے پر ڈیوٹی سرانجام دے رہا تھا۔
- 3- یہ کہ مورخہ 10/06/2008 کو اپیلانٹ DPO ہنگو کے بنگلے پر اپنی ڈیوٹی انجام دے رہا تھا کہ جب ڈیوٹی ختم ہوئی تو مذکورہ چارج کنسٹیبل ہدایت اللہ کو 10/06/2008 کو دیتے ہوئے گھر چلا گیا، اس بابت ہدایت اللہ کنسٹیبل کا بیان حلفی لف ہے۔
- 4- یہ کہ 10/06/2008 کو DPO صاحب کے بنگلے کے باہر دھماکہ ہوا جس کی بابت من اپیلانٹ کو کوئی علم نہ تھا، کیونکہ اپیلانٹ کی ڈیوٹی کے دوران یہ واقعہ نہ ہوا تھا جس کی F.I.R No. 373 مورخہ 10/06/2008 تھا نہ ہنگو زیر دفعہ 3/4 Exp Act درج ہوا ہے۔ (نقل F.I.R لف ہے)۔
- 5- یہ کہ مورخہ 03/09/2008 کو DPO صاحب نے من اپیلانٹ کو نوکری سے نکال دیا جب اپیلانٹ نے پتہ کیا تو DPO صاحب نے فیصلہ دے دیا تھا، جس میں جتنے واقعات و الزامات بیان کردہ ہیں سب بے بنیاد ہیں، من اپیلانٹ سے الزامات کی بابت کوئی پوچھ گچھ نہ کی گئی ہے۔ اور نہ اپیلانٹ کو سننے کا موقع دیا گیا ہے۔
- 6- یہ کہ اپیلانٹ نے DPO کے فیصلے کے خلاف DIG کوہاٹ ریجن کو اپیل کی گرا نہوں نے بھی من اپیلانٹ کی اپیل کو سننے بغیر ہی خارج کر دیا۔
- 7- یہ کہ اس فیصلے سے اپیلانٹ کو تکلیف ہوئی، بدیں وجہ آپ صاحبان سے مندرجہ ذیل وجوہات کی

ATTESTED

بناء پر اپیلانٹ دونوں فیصلوں کی منسوخی اور نوکری پر دوبارہ بحال کئے جانے کی استدعا کرتا ہے۔

وجوہات:

99

الف۔ یہ کہ اپیلانٹ ایک غریب آدمی ہے اور دوسرا کوئی زر بیجہ معاش نہیں ہے، جبکہ اپیلانٹ کے بوڑھے والدین اور چھوٹے چھوٹے بچے ہیں۔

ب۔ یہ کہ DPO صاحب کا فیصلہ غلط اور قانون و انصاف کے اصولوں کے خلاف ہے، اس لئے قابل منسوخی ہے۔

ج۔ یہ کہ فیصلے ماتحت افسران کے فیصلے قانون فطرت کے بھی خلاف ہیں کیونکہ اپیلانٹ کو کسی بھی فورم پر نہ سنا گیا ہے۔

ج۔ یہ کہ اپیلانٹ کو آپ صاحب سے انصاف کی امید ہے اس لئے اپیل ہذا دائر کی جا رہی ہے۔

د۔ یہ کہ اگر اپیلانٹ کو بحال نہ کیا گیا تو اپیلانٹ کو ناقابل تلافی نقصان پہنچ جائے گا جس کا بادی النظر میں ازالہ ناممکن ہوگا۔

لہذا استدعا ہے کہ بمنظوری اپیل ہذا ماتحت افسران کے فیصلوں کو معطل کر کے من اپیلانٹ کو نوکری پر بحال کرنے کے احکامات حسب ضابطہ صادر فرمائے جائیں۔

نوٹ: اپیل میں دیری اپیلانٹ کو صحیح راستہ نہ دکھائے جانے کی وجہ سے ہوئی۔


المرقوم: 31/12/2013

اپیلانٹ



نور الامین کنسٹیبل نمبر 467 پولیس لائنز ہنگو

ولد مہر دل جان سکنہ بہادر بانڈہ، ہنگو

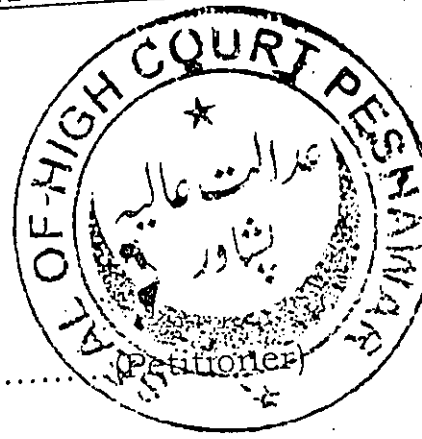

ATTESTED

20 Ex (1) 23

BEFORE THE HON'BLE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. 351-P 2014

Noor ul Amin S/o Meher Dil Khan
R/o Bahadur Banda, District Hangu..... (Petitioner)



V E R S U S

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. D.I.G Kohat Region, District Kohat.
3. District Police Officer, District Hangu.
.....(Respondents)

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

Respectfully Sheweth:

Facts giving rise to the present writ petition are as under:

1. That the petitioner was appointed as Constable in District Police Khyber Pakhtunkhwa, Hangu in 2007.
(Copy of appointment letter is attached as annexure "A").

FILED TODAY
Deputy Registrar
12 APR 2014

ATTESTED

ATTESTED
EXAMINER
Peshawar High Court
12 APR 2014

21

26

2. That the petitioner was performing his duty very efficiently and there was no complaint in regard to the duty of petitioner to his superiors.
3. That, on 10/06/2008, the petitioner was on Guard duty over the Bungalow of D.P.O Hangu from 08:00 PM to 10:00 PM.
4. That, after completion of duty, the petitioner handed over the duty charge to one Constable Hidayat Ullah on the same date at 10:00 PM. (Copy of affidavit is attached as annexure "B").
5. That, after duty of the petitioner, a bomb was blasted outside the Bungalow of D.P.O Hangu, consequent upon there was occurred slight damages to the Bungalow of D.P.O, of which F.I.R has been registered. (Copy of F.I.R is attached as annexure "C").
6. That, the D.P.O in this connection suspended the petitioner from duty.


ATTESTED

ATTESTED
EXAMINER
Peshawar High Court;
12 APR 2014

Deputy Magistrate
31 JAN 2009

7. That, after passing of there four months D.P.O vide his leter No. OB No. 586 dated 03/09/2008, dismissed the petitioner from service. (Copy of order dated 09/03/2008 is attached as annexure "D").

8. That the petitioner filed appeal to the respondent No. 2 i.e. D.I.G Kohat Region Kohat against the order of respondent No. 3 i.e. D.P.O Hangu. (Copy of appeal is attached as annexure "E").

9. That the said appeal was turndown with outgiving cogent reason and without giving opportunity of hearing. (Copy of order is attached as annexure "F").

10. That the petitioner submitted his representation/ appeal to respondent No. 1 i.e. I.G.P K.P.K Peshawar on 31/12/2013 through registry. (Copies of representation/ appeal and registry receipt are attached as annexure "G" & "H" respectively).

11. That respondent No. 1 i.e. I.G.P Khyber Pakhtunkhwa Peshawar, neither accept nor reject uptil now, consequently the present constitutional petition on the following grounds:

Ju
ATTESTED

ATTESTED
EXAMINER
Peshawar High Court.
12 APR 2014

GROUNDS:

⑤ 27 26

- A. That the petitioner is quite innocent but malafidely dismissed from service by respondent No.3.
- B. That the order of the respondent No. 3 is against the principle of law and principle of natural justice, hence liable to be set aside.
- C. That the respondent No. 3 neither issued showcase notice nor given opportunity of hearing to the petitioner over the subject matter.
- D. That the petitioner neither called for inquiry by inquiry officer nor provided any copy of inquiry report to the petitioner which act of the inquiry office as well as dismissed authority is against the existed provision of law.
- E. That the petitioner filed an appeal to the respondent No. 2 against the said order but he also reject the same without given opportunity of hearing.

FILED TODAY
Deputy Registrar
31 JAN 2014

[Signature]
ATTESTED

ATTESTED
EXAMINER
Peshawar High Court
12 APR 2014

[Signature]

50

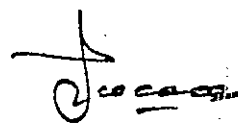
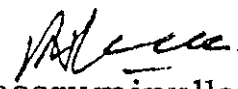
29

F. That lastly, the petitioner field representation to the respondent No. 1 but he also keep silent up till now.

G. That the petitioner have small children and is so poor and jobless, that he could not give sport livelihood to his poor family while the petitioner is only the source of livelihood/ income for his poor family.

It is, therefore, most humbly prayed that on acceptance of this Constitutional Writ Petition, the order of respondent No. 3 may kindly be order to set aside and the petitioner be order to reinstate to his duty, or the respondent No. 1 be directed to consider and decide the representation/ appeal sympathetically with in a short time in favour of petitioner.

Dated: 28/01/2014

Petitioner
Through 
Gul Daraz Khan
& 
Nassruminullah
Advocates High Court,
Peshawar.


ATTESTED

FILED TO
Deputy Registrar
31 JAN 2014

ATTESTED
EXAMINER
Peshawar High Court
11 APR 2014

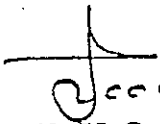
CERTIFICATE:

Certified on instructions of my client that petitioner has not previously moved this Hon'ble Court under Article 199 of the Constitution of Islamic Republic of Pakistan, 1973 regarding the instant matter.


ADVOCATE

LIST OF BOOKS:

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


ADVOCATE

ATTESTED
EXAMINER
Peshawar High Court.
12 APR 2014


ATTESTED

① 20

BEFORE THE HON'BLE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. 351-P 2014

Noor ul Amin.....(Petitioner)

V E R S U S

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
and others.....(Respondents)

AFFIDAVIT

I, Gul Daraz Khan Advocate Peshawar, as per instructions of my client, do hereby solemnly affirm and declare that the contents of the Writ Petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Gul Daraz Khan
ADVOCATE

7352-

I, Gul Daraz Khan Advocate Peshawar, do hereby solemnly affirm and declare that the contents of the Writ Petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Sworn and verified on solemnly affirmation before me on this 31st day of Jan 2014 at Peshawar.

Gul Daraz Khan
Advocate Peshawar

Say

Date 31.1.14
Peshawar High Court

Say
ATTESTED

ATTESTED
EXAMINER
Peshawar High C.
12 APR 2014

FILED TODAY
Deputy Registrar
31 JAN 2014

(30)

BEFORE THE HON'BLE PESHAWAR HIGH COURT PESHAWAR

Writ Petition No. 351 2014

Noor ul Amin.....(Petitioner)

V E R S U S

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
and others.....(Respondents)

ADDRESSES OF THE PARTIES

PETITIONER:

Noor ul Amin S/o Meher Dil Khan
R/o Bahadur Banda, District Hangu

RESPONDENTS:

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. D.I.G Kohat Region, District Kohat.
3. District Police Officer, District Hangu.

Petitioner

Through

J. Daraz

Gul Daraz Khan

& *N. Aminullah*
Nassruminullah
Advocates High Court,
Peshawar.

Dated: 31/01/2014

Deputy Registrar

31 JAN 2014

RECEIVED
PETITIONER
Peshawar High Court.

12 APR 2014

~~31~~ (31)

BEFORE THE HON'BLE PESHAWAR HIGH COURT, PESHAWAR.

C.M. No. _____/2014

In

W.P. No. 351/2014

Noor ul Amin.....(Petitioner)

V E R S U S

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
and others.....(Respondents)

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth:

1. That the above titled Writ Petition is filed by the petitioner in this Hon'ble Court in which no date of hearing is fixed.
2. That the petitioner requested for condonation of delay on the following grounds:

[Signature]
ATTESTED

GROUND:

- A. That the petitioner is illiterate person and have no knowledge in respect of any disadvantages of such like delay.

LED TODAY
Duty Registrar

31 JAN 2014

REGISTERED
EXAMINER
PESHAWAR HIGH COURT
11 APR 2014

2

(5/8) (39)

B. That the petitioner is belonging to such an area from which no one could easily approach to any where in the province.

C. That the petitioner also misguided by the departmental authorities which resulted in cause of delay.

D. That, if delay is not condoned, the petitioner as well as poor family of the petitioner will suffered an irreparable loss in the whole of their life.

It is, therefore, most humbly prayed that on acceptance of this application the delay, if any, in filing the above noted Writ Petition may kindly be condoned in the interest of justice.

Dated: 31/01/2014

Through

Petitioner

Jeece

Gul Daraz Khan
Advocate High Court,
Peshawar.

the
ATTESTED

FILED TODAY
Deputy Registrar
31 JAN 2014

S/C

33

BEFORE THE HON'BLE PESHAWAR HIGH COURT, PESHAWAR.

C.M. No. _____/2014

In

W.P. No. 351/2014

Noor ul Amin.....(Petitioner)

VERSUS

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
and others.....(Respondents)

AFFIDAVIT

I, Gul Daraz Khan Advocate Peshawar, as per instructions of my client, do hereby solemnly affirm and declare that the contents of the Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

[Signature]
ATTESTED

[Signature]
ADVOCATE

7353

I, Gul Daraz Khan Advocate Peshawar, do hereby solemnly affirm and declare that the contents of the Application are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Court.

Signature: *[Signature]* Gul Daraz Khan Advocate Peshawar

He was identified by: *[Signature]*

Who is personally known to me:

[Signature]
Cath. Commissioner
Peshawar High Court, Peshawar.

[Signature]
ATTESTED
CATH. CLERK
PESHAWAR HIGH COURT
2014

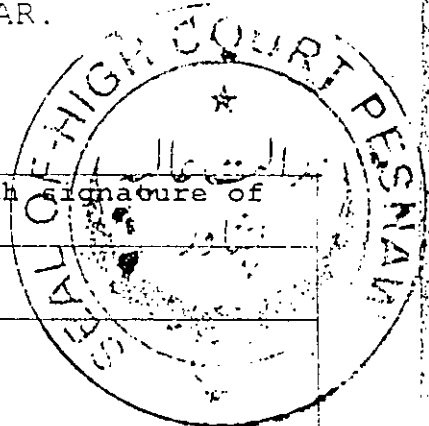
351/2014

34

Annex J

PESHAWAR HIGH COURT, PESHAWAR.

FORM 'A'
FORM OF ORDER SHEET



S.No.	Date of order	Order or other proceedings with signature of the Judge
1	2	3
	9-4-2014	<p>W.P.No.351-P/2014.</p> <p>Present: Mr.Gul Daraz Khan, Advocate for the petitioner._____</p> <p><u>YAHYA AFRIDI,J.</u> Mian Arshad Jan, AAG present in Court in other cases. accepts notice in this case. After going through the recorded, the learned AAG undertakes that the pending appeal/representation of the petitioner shall be decided at the earliest.</p> <p>In view of the undertaking rendered by the learned AAG, this petition is disposed of.</p> <p><i>sd/- Yahya Afridi.</i> <i>J</i></p> <p><i>sd/- Musabbat Hicabi.</i> <i>J</i></p> <p>CERTIFIED TO BE TRUE COPY</p> <p>Examiner Peshawar High Court, Peshawar Authorised Under Article 57 of The Qanun-e-Shahadat Order 1988</p> <p>12 APR 2014</p> <p><i>J</i></p> <p>ATTESTED</p>

16530
12P
24.00

11-4-14

12-4-14

12-4-14

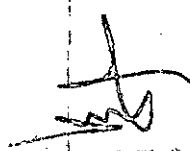
12-4-14

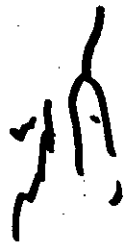
sd/- Dabagh

5-2009A

2




OFFICIAL



2133/13

87/6

BEFORE THE HON'BLE PESHAWAR HIGH COURT PESHAWAR

①

Ann (K)

35

0 RS.

Re: Writ Petition No. 565/2014

Noor ul Amin S/o Meher Dil Khan
R/o Bahadur Banda, District Hangu.....



VERSUS

1. Inspector General of Police, Khyber Pakhtunkhwa, Peshawar.
2. D.I.G Kohat Region, District Kohat.
3. District Police Officer, District Hangu.
.....(Respondents)

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

May
EX
Peshawar High Court
2 & MAY 2014

Respectfully Sheweth:

Facts giving rise to the present writ petition are as under:

1. That the petitioner was appointed as Constable in District Police Khyber Pakhtunkhwa, Hangu in 2007. (Copy of appointment letter is attached as annexure "A").

FILED TODAY
Deputy Registrar
19 MAY 2014

ATTESTED

(36)

IN THE HON'BLE PESHAWAR HIGH COURT, PESHAWAR.

C.M. No. _____/2014

In

W.P. No. 351/2014

Noor ul Amin.....(Petitioner)

V E R S U S

Inspector General of Police, Khyber Pakhtunkhwa, Peshawar
and others.....(Respondents)

APPLICATION FOR CONDONATION OF DELAY

Respectfully Sheweth:

1. That the above titled Writ Petition is filed by the petitioner in this Hon'ble Court in which no date of hearing is fixed.
2. That the petitioner requested for condonation of delay on the following grounds:

ATTESTED
May
EXAMINER
Peshawar High Court.
28 MAY 2014

GROUND:

- A. That the petitioner is illiterate person and have no knowledge in respect of any disadvantages of such like delay.

LED TODAY
uty Registrar
5.1 JAN 2014

St

ATTESTED

Annex (L)

37

PESHAWAR HIGH COURT, PESHAWAR
FORM "A"
FORM OF ORDER SHEET.

Court of
Case No.....

Serial No of order or proceeding	Date of Order or Proceeding	Order or other proceedings with Signature of judge or Magistrate and that of parties or counsel where necessary
1	2	3
	22.5.2014.	<p><u>W.P.No.1565/2014.</u></p> <p><u>Present:-</u> Mr.Guldaraz Khan Advocate for the petitioner.</p> <p>~~~~~</p> <p><u>MUSARRAT HILALI, J:-</u> Petitioner Noor-ul-Amin has sought the constitutional jurisdiction of this Court seeking:-</p> <p><i>“that on acceptance of this Constitutional writ petition, the order of respondent No.3 may kindly be ordered to set aside and the petitioner be ordered to reinstate him to his duty or respondent No.1 be directed to consider representation of the petitioner within specific period.”</i></p> <p>Mr.Qaisar Ali Shaḥ A.A.G. present in Court in connection with other cases was put to notice who on instructions has confirmed that the departmental representation of the petitioner has been decided and the copy thereof shall be delivered to the petitioner within seven days.</p> <p>In view of the statement rendered by</p>

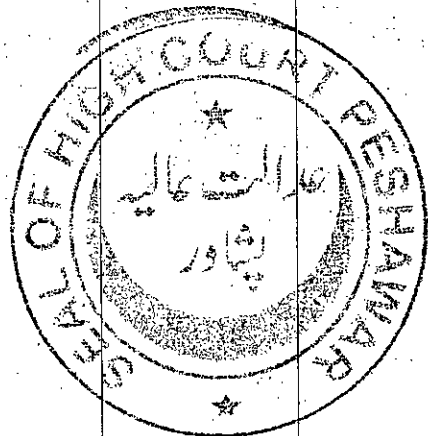
ATTESTED
EXAMINER
Peshawar High Court
28 MAY 2014

ATTESTED

the learned A.A.G., this Court finds that the prayer of the petitioner has been addressed, thus the instant petition has served its purpose and is disposed of accordingly. However, if the petitioner is aggrieved of the order of departmental authority, he may seek remedy before the appropriate forum.

Chief Justice Yaqub Azzidi - J

Chief Justice Musarat Hilali - J



Amir
 CERTIFIED TO BE TRUE COPY
 Examiner
 Peshawar High Court, Peshawar
 Authorised Under Article 87 of
 The Qanun-e-Shahadat Order 1984

28 MAY 2014

No. 19370
 Date of Presentation of Application 24/5/14
 No of Pages 1
 Copying fee 0
 Urgent Fee 0
 Total 0
 Date of Preparation 28/5/14
 Date Given For Delivery 28/5/14
 Date of Delivery of Copy 28/5/14
 Received By [Signature]

[Signature]
 27/5/14

Anex (M)

39

From: - The Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

To: - The District Police Officer,
Hangu.

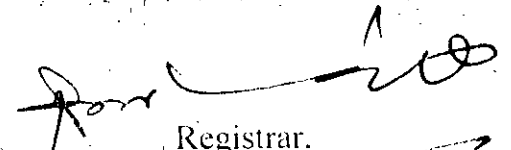
No. 2894 /E-IV, Dated Peshawar the, 22-5 /2014.

Subject:- APPEAL AGAINST THE ORDER OF DIG KOHAT RANGE KOHAT DATED 29.01.2009.

Memo:-

Reference your office memo No. 692/LB dated 11.02.2014, on the subject noted above.

Competent authority has filed the representation of Noor-ul-Amin Ex-Constable No. 467 as the representation was badly time barred. The same was filed after five years after the rejection of his representation by Deputy Inspector General of Police Kohat Region Kohat 29.01.2009. Furthermore, disciplinary rules do not allow second departmental representation. Copy of this order may be served on Noor-ul-Amin Ex-Constable.



Registrar,
For Provincial Police Officer,
Khyber Pakhtunkhwa, Peshawar.

22/5/14