

03.08.2022

Clerk to counsel for the petitioner present. Mr. Kabir Ullah Khattak, Addl. AG for respondents present.

Reply on behalf of respondents submitted which is placed on file. Clerk to counsel seeks adjournment on the ground that learned counsel for petitioner is not available today. Last chance is given. To come up for preliminary hearing on 30.09.2022 before S.B.

Ω

(Kalim Arshad Khan)  
Chairman

28.01.2022

Learned counsel for the appellant present. Mr. Muhammad Adeel Butt, Addl: AG for respondents present.

Written reply on pre-admission notice not submitted. Learned AAG seeks time to contact the respondents for submission of written reply. Adjourned. To come up for reply/preliminary hearing on 30.03.2022 before S.B.

  
(Mian Muhammad)  
Member(E)

30.03.2022

Learned counsel for the petitioner present. Mr. Kabirullah Khattak, Addl: AG for respondents present.

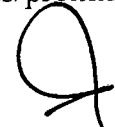
Written reply/comments on pre-admission notice not submitted. Notices be issued to the respondents for submission of written reply/comments. Adjourned. To come up for written reply/comments /preliminary hearing on 22.06.2022 before S.B.

  
(MIAN MUHAMMAD)  
MEMBER(E)

22<sup>nd</sup> June, 2022

Learned counsel for the petitioner present. Syed Naseer Ud Din Shah, Asst: AG for respondents present.

Written reply on behalf of the respondents not submitted. Respondents are directed through Asst: AG to submit written reply on the next date positively. To come up for written reply/comments/preliminary hearing on 03.08.2022 before S.B.

  
(Kalim Arshad Khan)  
Chairman

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 1498/2018

Date of Institution ... 18.12.2018

Date of Decision ... 30.04.2019

Hikmatullah Khan son of Taj Malook Khan Ex-Constable No. 1433 District Police  
Bannu R/O Nou Garhi, Mamashkel, Rahamdad, District Bannu.  
... (Appellant).

VERSUS

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

Present.

Mr. Inayatuillah  
Advocate.

... For appellant

MR. HAMID FAROOQ DURRANI,

... CHAIRMAN

JUDGMENTHAMID FAROOQ DURRANI, CHAIRMAN:-

1. The facts relevant to the appeal in hand are that the appellant was appointed as Constable on 25.04.2006 in Police Department, Khyber Pakhtunkhwa and was posted at Bannu. He was dismissed from service vide order dated 23.01.2009, w.e.f. 18.09.2008, on the charge of willful absence from duty. The appellant preferred a departmental appeal against the order of dismissal on 10.03.2016, which was declined vide order dated 23.01.2017. The appeal in hand was submitted on 18.12.2018.

2. I Have heard learned counsel for the appellant and have also gone through the available record.



Learned counsel for the appellant frankly conceded that there was considerable delay in submission of departmental appeal by the appellant, however, it was his argument that technicalities should not be made basis for non-suiting the litigant nor the limitation be considered as deciding factor in the cases, wherein, the civil servant is imposed upon major penalty of removal/dismissal from service. He further contended that in a matter like the one in hand full-fledged enquiry was mandatory which was not conducted in the case of the appellant. He also argued that the impugned order dated 23.01.2009 was given retrospective effect from 18.09.2008, which was not allowable under the law. In support of his arguments learned counsel relied on judgments reported as 2011-SCMR-1220, PLD 2003-Supreme Court-724, 1985-SCMR-1178, 2010-SCMR-1546, 2005-SCMR-1225, 1991-SCMR-1765 and 2000-SCMR-1743.

3. The record suggests that as many as 27 constables, including the appellant, were proceeded against on account of absence and the impugned order was passed against them on 23.01.2009. Their absence was with effect from 18.09.2008, therefore, the order of dismissal was given effect from the said date. It was also noted in the order that ex-parte proceedings were taken against the accused under the N.W.F.P Removal from Service (Special Powers) Ordinance 2000. The reason for ex-parte action was shown to be the non-participation of accused in the departmental proceedings. In the said manner, the argument of learned counsel regarding non-association of appellant in the departmental proceedings appears to be without any force.

4. The appellant submitted the departmental appeal to the Deputy Inspector General of Police, Bannu Range on 10.03.2016 i.e. after lapse of more than seven years. It was duly noted in the appeal that the father of appellant was severely ill

and no one in the family was available to look-after him. The appellant in order to overcome financial problem left the service without prior permission of the competent authority and went abroad, it was added. A request for rejoining the Khyber Pakhtunkhwa Police was also made in the appeal. This unequivocal admission of appellant through the departmental appeal regarding his absence from duty was a fact which could not be denied subsequently nor any defence in terms of non-participation in the departmental proceedings could be taken in departmental appeal. Even otherwise, the appeal of appellant was rejected on the ground of limitation as well as on merits on 23.01.2017, against which the appeal in hand was preferred on 18.12.2018. An application for condonation of delay was submitted alongwith the appeal, however, the ground taken therein was to the effect that the impugned order was passed against the appellant with retrospective effect, therefore, no limitation would run against the void order. In the said regard, while seeking guidance from judgment reported as 1998-SCMR-1890, it is held that in the case of prolonged absence of appellant, spreading over a period of more than seven years, the retrospective operation of the impugned order could not be termed as void.

5. In view of the above, the appeal in hand is without any merits calling for its admission for regular hearing. The same is, therefore, dismissed hereby. File be consigned to the record room.

  
(HAMID FAROOQ DURRANI)  
CHAIRMAN

ANNOUNCED  
30.04.2019

29.03.2019

Learned counsel for the appellant present. Heard.

In the present service appeal the appellant has assailed the order dated 23.01.2009 of his dismissal from service from the date of his absence i.e. 18.09.2008.

To meet the issue of limitation Learned counsel for the appellant pleaded that the punishment was awarded to the appellant retrospectively i.e. from the date of absence.

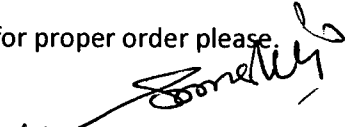



Learned counsel for the appellant was confronted with the principal laid down in 1998 SCMR page 1890 that in case of misconduct on the ground of absence from duty, the dismissal/termination/removal shall be from the date of absence from duty. Learned counsel for the appellant seeks adjournment for proper assistance. Adjourn. To come up for preliminary hearing on 30.04.2019 before S.B

  
Member

Form- A  
FORM OF ORDER SHEET

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

Case No. 1498/2018

S.No.	Date of order proceedings	Order or other proceedings with signature of judge
1	2	3
1-	18/12/2018	<p>The appeal of Mr. Hikmatullah Khan presented today by Mr. Inayatullah Khan 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-	24/12/18.	<p>This case is entrusted to S. Bench for preliminary hearing to be put up there on <u>21/01/2019.</u></p> <p style="text-align: right;"> CHAIRMAN</p>
	21.01.2019	<p>Clerk to counsel for the appellant present. Due to general strike of the bar, the case is adjourned. To come up for preliminary hearing on 22.02.2019 before S.B.</p> <p style="text-align: right;"> Member</p>
	22.02.2019	<p>Clerk to counsel for the appellant present. Clerk to counsel for the appellant seeks adjournment on the ground that learned counsel for the appellant is not available. Adjourn. To come up for preliminary hearing on 29.03.2019 before S.B.</p> <p style="text-align: right;"> Member</p>

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No. 1498/2018

**Hikmatullah Khan**..... Appellant

**Versus**

Inspector General of Police, Khyber Pakhtunkhwa,  
Peshawar & others..... Respondents

**I N D E X**

S.No. .	Description of documents.	Annexure	Pages.
1)	Grounds of appeal.		1-7
2)	Affidavit.		8
3)	Application for condonation of delay with affidavit.		9-10
4)	Addresses of the parties.		11
5)	Copy of service card.	A	<del>12</del>
6)	Copy of training certificate issued by police training college Hangu	B	13
7)	Copy of impugned original order dated 23.01.2009	C	14
8)	Copy of departmental appeal dated 10.03.2016 and impugned appellate order dated 23.01.2017	D-E	15-16
9)	Copy of mercy departmental appeal dated 27.11.2018 and impugned final order thereon dated 10.12.2018	F-G	17-18
10)	Copy of judgment of this Hon'ble Service Tribunal	H	19-21
11)	medical history/ record w.e.f. 1997 to 2011 of the appellant's father + Bachelor of Arts Degree	I	22-51

Dated: 15.12.2018

*Hikmat*

Appellant

**Hikmatullah Khan**

Constable Belt No.1433

Through

*Inayat Ullah Khan*

**Inayat Ullah Khan**

Advocate High Court

LL. M (U.K)

&

*Faheemullah Khan*

**Faheemullah Khan**

Advocate High Court

Peshawar.



BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

Service Appeal No. 1498 /2018

Khyber Pakhtunkhwa  
Service Tribunal

Diary No. 1763

Date: 18-12-2018

**Hikmatullah Khan** son of Taj Malook Khan  
Ex-Constable Belt No.1433, District Police Bannu  
R/O Nou Garhi, Mamashkhel, Rahamdad,  
Tehsil and District Bannu..... Appellant

**Versus**

- 1) Inspector General of Police, Khyber Pakhtunkhwa,  
Peshawar.
- 2) Regional Police Officer, District Bannu.
- 3) District Police Officer, Bannu..... Respondents

Appeal u/s 4 of the Khyber Pakhtunkhwa Service Tribunal Act, 1974 against the impugned original order No.OB-82 dated 23.01.2009 whereby the appellant was dismissed from his service **with retrospective effect from 18.09.2008** against which the appellant preferred his departmental appeal dated 10.03.2016 to D.I.G/ RPO District Bannu for reinstatement in service which was declined vide order No.293/17, dated Peshawar the 23.01.2017. The appellant again approached the D.I.G/ RPO District Bannu for reinstatement in service through mercy appeal dated 27.11.2018 but the same was filed/ rejected on 10.12.2018 by the RPO District Bannu against which the instant service appeal is filed within the stipulated period of 30 days, hence the appeal is within time.

Filed to  
Registrar  
18/12/18

Prayer:

On acceptance of this service appeal, the impugned original order No.OB-82 dated 23.01.2009, appellate order No.293/17, dated Peshawar the 23.01.2017 and final impugned order dated 10.12.2018 may kindly be set aside and the appellant be reinstated in service with all consequential back benefits.

Any other relief to whom the appellant is found entitled during course of hearing may also be granted.

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***Respectfully Sheweth;***

Brief facts giving rise to the instant appeal are as under:-

- 1) That the appellant was appointed on 25.05.2006 as constable in police department, KPK and posted as such at Bannu.

(Copy of service card is Annexure "A").

- 2) That the appellant after completing his training successfully at Police Training College, District Hangu. The appellant started the course on 01.04.2007 and the same was completed on 25.09.2007 by having secured 294.66 marks out of 435 and his overall passing percentage was 67.99.

(Copy of training certificate issued by police training college Hangu is attached as Annexure "B").

- 3) That the appellant performed his duties with honesty and dedication to the entire satisfaction of his immediate superiors and conducted many successful raids against anti-state elements which was highly praised by the respondents.

- 4) That the appellant vide original order No.**OB-82 dated 23.01.2009 was dismissed from service with retrospective effect from 18.09.2008** for charges of willful absence from duty by taking exparte action under the provisions of N.W.F.P., removal from service (Special Powers Ordinance) 2000.

(Copy of impugned original order dated 23.01.2009 is attached as Annexure "C").

- 5) That feeling aggrieved against the original impugned dismissal order referred to in para No.4 above, filed his departmental appeal before the DIG/ RPO, Bannu on 10.03.2016, which was declined, vide order dated 23.01.2017.

(Copy of departmental appeal dated 10.03.2016 and impugned appellate order dated 23.01.2017 are attached as Annexure "D and E").

- 6) That the appellant also preferred his mercy departmental appeal for reinstatement in service on 27.11.2018 but the same was filed/ rejected on 10.12.2018 by respondent No.2.

(Copy of mercy departmental appeal dated 27.11.2018 and impugned final order thereon dated 10.12.2018 are attached as Annexure "F & G").

- 7) That the appellant feeling aggrieved against the impugned orders as referred above, constrained to file the instant service appeal for his reinstatement in service on the following amongst other grounds:

GROUND'S FOR APPEAL:

- a) That the impugned exparte orders are against the law, facts and material available on record, hence not tenable in the eyes of law, which is violative of Article 4 of the Constitution of Islamic Republic of Pakistan.

**"All citizens shall be treated in accordance with law".**

- b) That the respondent No.2 has passed the impugned original order No.OB 82 dated 23.01.2009 **with retrospective effect from 18.09.2008 on charges of willful absence from duty**, which is void ab-initio, hence no limitation runs against a void order.

**Service of the appellant could not be dismissed with retrospective effect. (2011 SCMR 1220).**

No limitation runs against a void order. **(1985 SCMR 1178).**

It is pertinent to mention that this Hon'ble Tribunal vide **judgment dated 08.01.2018** reinstated the appellant and the impugned order was set aside as the same was passed with retrospective effect, which was declared as illegal, void ab-initio and not sustainable in the eye of law.

(Copy of judgment of this Hon'ble Service Tribunal is attached as Annex: "H").

- c) That the impugned order of dismissal was supposed to be passed **by the competent authority i.e. respondent No.3/ District Police Officer (DPO) Bannu but the same was directly passed by the appellate authority i.e. respondent No.2 i.e. RPO District Bannu**, which is illegal and the appellant is entitled to be reinstated in service alone on this ground.
- d) That the impugned orders are also violative of section 24-A of General Clauses Act as the competent authority and appellate authority failed to pass a speaking order with reasons viz-a-viz the allegations **without holding a regular inquiry.**

- e) That no **show cause notice/ statement of allegation/ charge sheet** was served upon the appellant nor the same was communicated to him, which factum is violative the principles of natural justice, due process of law and violative of the **mandatory provisions of Article 10-A of the Constitution of Pakistan.**

**Framing of charge and its communication to civil servant along with statement of allegations was not mere a formality but was a mandatory requisite which was to be followed. ----- principles ----- failure to follow the principle ----- the impugned penalty was set aside. (2000 SCMR 1743).**

- f) That competent authority has initiated the summary proceedings without providing an opportunity of hearing to justify his case by the appellant during course of a regular inquiry and the factum of illness of the appellant's father was altogether ignored by imposing the major penalty of dismissal from service upon the appellant without adhering to the principles of natural justice, which are part and parcel of all statutes and also violative of the mandatory provisions of Article 10-A of the Constitution of Pakistan, hence the impugned orders cannot be sustainable within the four corners of law.

**As stated by his lordship late Justice Kiyani "that authorities can kill a civil servant but must do so within the four corners of law and after killing a civil servant he should be properly buried by covering his body in a coffin from head to tow rather than the head of the civil servant is visible while his tow is covered could not be stated to be proper burial, therefore, in the same manner the authorities must adhere to the due process of law, otherwise, the action could not be justified".**

- g) That no initial show cause notice nor any final show cause notice was served upon the appellant before imposition of the major penalty of dismissal from service which factum

is against all the canons of justice, fair play and equity. Equity demands that sufficient opportunity of providing defence should have been provided by conducting a regular inquiry, which mandatory exercise has not been carried out, therefore, the impugned orders are bereft of any legal sanctity, which can be termed as void ab-initio.

- h) That the allegations as contained in the impugned order are vehemently denied by the appellant, **for the reason that the appellant's absence from duty was not willful but due to the ailing/ critical condition of his father at that time as all his brothers and sisters were younger in age, which were not in position to take care of his father, hence it is settled law that the authorities cannot decline medical leave to a civil servant keeping in view of reported judgments, which will be produced at the time of hearing.**

It is pertinent to attach the entire medical history/ record w.e.f. 1997 to 2011 of the appellant's father for perusal of this Hon'ble Tribunal which is annexed as Annexure "I").

- i) That no ***opportunity of personal hearing*** was afforded by the competent authority nor by the appellate authority, which is another instance, which could be considered as a flagrant violation of the E&D Rules or any other concerned rules i.e. NWFP Removal from Service (Special Powers Ordinance), 2002 hence, the impugned orders are against the well recognized principles of natural justice, which by itself sufficient to vitiate the entire disciplinary proceedings carried out against the appellant at his back in his absence ***with retrospective effect.***
- j) That **additional grounds** will be raised at the bar with kind permission of this Hon'ble Tribunal.

Keeping in view, what has been stated above, it is, therefore, humbly requested the impugned original order No.OB-82 dated 23.01.2009, appellate order No.293/17, dated Peshawar the 23.01.2017 and final impugned order dated 10.12.2018 may kindly be set aside and the appellant be reinstated in service with all consequential back benefits.

Any other relief, which has not been specifically asked for and to whom the appellant is found entitled may also be granted.

Dated: 15.12.2018

*Hikmat*

Appellant  
**Hikmatullah Khan**  
Constable Belt No.1433

Through

*Inayat Ullah Khan*

**Inayat Ullah Khan**  
Advocate High Court  
LL. M (U.K)

&

*Faheemullah Khan*

**Faheemullah Khan**  
Advocate High Court  
Peshawar.

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No.\_\_\_\_/2018

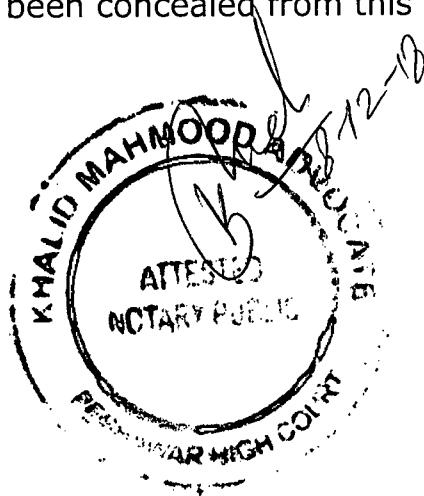
**Hikmatullah Khan**..... Appellant

**Versus**

Inspector General of Police, Khyber Pakhtunkhwa,  
Peshawar & others..... Respondents

**AFFIDAVIT**

I, **Hikmatullah Khan** son of Taj Malook Khan Ex-Constable Belt No.1433, District Police Bannu R/O Nou Garhi, Mamashkhel, Rahamdad, Tehsil and District Bannu do hereby affirm and declare on oath that the contents of the Appeal are true and correct to the best of my knowledge and belief and nothing has been concealed from this Hon'ble Tribunal.



*Hikmat*

Deponent



BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No. \_\_\_\_/2018

**Hikmatullah Khan**..... Appellant

**Versus**

Inspector General of Police, Khyber Pakhtunkhwa,  
Peshawar & others..... Respondents

ADDRESSES OF THE PARTIES

APPELLANT:

**Hikmatullah Khan** son of Taj Malook Khan  
Ex-Constable Belt No.1433, District Police Bannu  
R/O Nou Garhi, Mamashkhel, Rahamdad,  
Tehsil and District Bannu

RESPONDENTS:

- 1) Inspector General of Police, Khyber Pakhtunkhwa,  
Peshawar.
- 2) Regional Police Officer, District Bannu.
- 3) District Police Officer, Bannu

*Hikmat*

Appellant

through

Inayat Ullah Khan  
Advocate High Court  
LL.M (U.K)

Dated: 15.12.2018

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No.\_\_\_\_/2018

**Hikmatullah Khan**..... Appellant**Versus**Inspector General of Police, Khyber Pakhtunkhwa,  
Peshawar & others..... RespondentsAPPLICATION FOR CONDONATION OF DELAY***Respectfully Sheweth;***

- 1) That the above titled case is being filed before this Hon'ble Tribunal in which no date of hearing is fixed.
- 2) That the impugned original order dated 23.01.2009 was passed by an incompetent authority and that too with retrospective effect from 18.09.2008, hence no limitation runs against void order.
- 3) That the delay in filing the appeal was not willful but due to the fact that respondent did not decide the same within due time coupled with the fact that the father of appellant was seriously ill therefore, in the light of medical record annexed with the main appeal the delay, if any, may sympathetically condoned in the interest of justice, fair play and equity in the light reported judgment of Supreme Court of Pakistan, reported in PLD 2003 SC 724 that litigants should not be non-suited on the basis of technicality including limitation if otherwise case is made out on the basis of merits. Reported judgments will be produced at the time of hearing on this preposition.

It is, therefore, prayed that on acceptance of this application, the delay, if any, in filing the instant appeal may kindly be condoned in the interest of justice, fair play and equity and appeal may be decided on merits.

Dated: 15.12.2018

Appellant

**Hikmatullah Khan**

Constable Belt No.1433

Through


**Inayat Ullah Khan**

Advocate High Court

LL. M (U.K)

BEFORE THE PROVINCIAL SERVICE TRIBUNAL, KPK, PESHAWAR.

S.A.No.\_\_\_\_/2018

**Hikmatullah Khan**..... Appellant

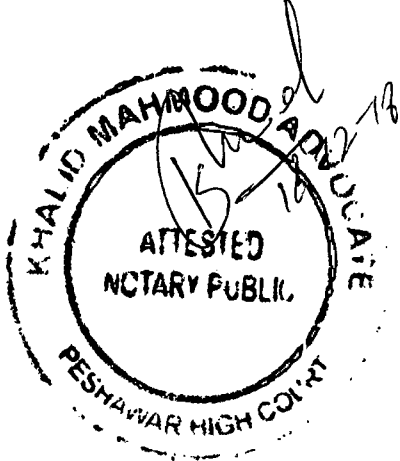
**Versus**

Inspector General of Police, Khyber Pakhtunkhwa,  
Peshawar & others..... Respondents


**AFFIDAVIT**

I, **Hikmatullah Khan** son of Taj Malook Khan Ex-Constable Belt No.1433, District Police Bannu R/O Nou Garhi, Mamashkhel, Rahamdad, Tehsil and District Bannu do hereby affirm and declare on oath 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.

*Hikmat*  
Deponent



Anx "A" (12)

 POLICE

Name: HIKMAT ULLAH

Designation: Constable

Distt. Bannu Stamp Seal

Sign Issuing Authority \_\_\_\_\_ Issuing Authority

Father's Name: TAJ MALOOK KHAN

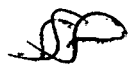
N.I.C. No.: 11101-3542914-7

Date of Appointment: 25-5-2006 Blood.G B+

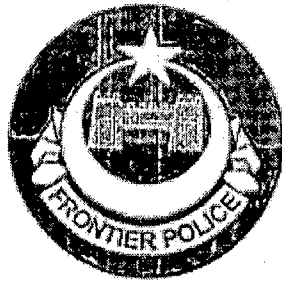
District: Bannu Teh: 0928500081

PIO Nagar marnash Khel Vill Kotra Rahimdad  
Bannu

Date of Issue: 25-6-2006 S.No: 1433

  
ARRESTED

# Police Training College Hangu



Estb 1935

## History Sheet / Detail Marks Certificate Recruit's Course

College Course	: Recruit	Name	: Hilmatullah
Rank	: Constable	Belt No.	: 1433
Compif	: A2585	District	: Bahru
Starting Date	: 01.04.2007	Ending Date	: 25.09.2007
Merit	: 63/1134		

LAW			DRILL			REMARKS
PPC	70	/100	SD	46	/70	
PPW/GPD	61	/100	RF	61	/80	
LSLQS	70	/100	SF	24	/35	
Sec. WT, PP, GK	68	/100	MD	23	/30	
CrPC	68	/100	TFC	13.00	/20	
IST/HR	75	/100	PT	13	/20	
PR	65	/100	UC	12.66	/20	
			BNT	7.00	/10	
			AC	95.00	/150	

Total: 477/700

Total : 294.66/435

G-Total: 771.66/1135

Over all % age is: 67.99

**Declared as PASSED**

Leave Obtained: 7 days

Medical Rest : Nil days

Absence: Nil days

Punishment : Nil

Reward: Nil

Commandant,  
 Police Training College Hangu.

PASSED

**ORDER.**

The following constables were selected for Elite Police Training scheduled to commence with effect from 12.09.2008 at Karachi but they instead of joining the course absented on their own sweet as reported vide DD No. 15 dated 18.09.2008 of Police Lines Bannu. They badly failed in the compliance of lawful order of the competent authority meaning thereby that have got no respect for the order of senior officer.

1. Constable Tahirullah No. 1322.
2. Constable Alam Zeb No. 1396
3. Constable Wahidullah No. 1511.
4. Constable Nahidullah No. 1443
5. Constable Jasim Khan No. 1527
6. Constable Tahsinullah No. 1601.
7. Constable Irfanullah No. 1783.
8. Constable Muhammad Nasir No. 1722.
9. Constable Jamshid Khan 1817
10. Constable Abidullah No. 866
11. Constable Asmatullah No. 1665
12. Constable Hikmatullah No. 1433
13. Constable Tariq Shah No. 1405
14. Constable Mir Nawaz No. 1373
15. Constable Rifatullah No. 25
16. Constable Zohibullah No. 821
17. Constable Mohammad Khalil No. 1569
18. Constable Muhammad Luqman No. 1562
19. Constable Ishaq No. 1499
20. Constable Imran No. 1477.
21. Constable Samiullah No. 1467
22. Constable Azam Khan No. 1334
23. Constable Zubirullah No. 1464
24. Constable Rizwanullah No. 1526
25. Constable Ihsanullah No. 1326
26. Constable Rizwan Ali Shah No. 1418
27. Constable Samiullah No. 1636

Proper charge sheets based upon statement of allegations were issued against the above mentioned officials and necessary information was conveyed through Moharir Phone of this office about the receipt of charge sheets but of no avail. They were repeatedly informed to report for duty and face the departmental proceeding but they do not pay any heed to the direction of the undersigned. Although some of the officials received the charge sheets but they are not ready to report for duty.

They are being found habitual absentees and often remain absent from Govt. duty through one pretext or the other. They are unwilling workers, incorrigible officials and have been proved like a dead wood for Police Department. They are burden on the shoulder of Police Department and their dormant behavior may influence the other Police Jawans. They are inefficient and have ceased to become good Police Officers. Their retention in Police Department is considered no longer productive.

Now therefore, I Muhammad Alam Shinwari District Police Officer, Bannu, in exercise of the powers vested in me under NWFP, Removal from Service (Special Powers Ordinance 2000), take exparte action against them. They are dismissed from service from the dates of their absence i.e. 18.09.2008. their absence period is treated as leave with out pay.

Order announced

OB No. 82  
Dated 23/09/2009

No. 619-211  
Copy to all concerned.

  
District Police Officer,  
Bannu.

cc Any (H) (15)

To,

The DIG Bannu.

Police Department Kpk.

**Subject: "Appeal for Reinstatement Police Department District Bannu".**

Respected Sir,

It is requested from your kind honor that I Mr. Hikmat Ullah Khan Ex-Constable Police Deptt District Bannu, was appointed as Constable in 25-MAY-2006 and has absented from duty in 12 September, 2008.

Sir the reason of my absenteeism was that my father became severe ill and I have no body among my brother and sisters (immature) to serve my father during his illness at that time and also there was financial problems and I left the service without prior permission of competent authority and went abroad to fulfill my financial needs. Now my father has been died and I want to Re-join K.P.K police Distt Bannu which is under your kind control.

Sir I will be very much thankful to you for Restoration/Reappointment in police as constable. Also your kindness will help me to support family financial problems in the un-employment Situation. Thanks & Regards

Ex-Constable

Hikmat Ullah Khan s/o Taj Malook Khan(Late).

CNIC: 11101-3542914-7

Date of Appointment: 25-05-2006, Date of Leaving: 12-09 2008.

Designation: Constable

S/no: 1433 Cell No: 03351326262, 03348311941 District Police Bannu K.P.K,  
Address: Nogarhi Mamash Khel Kotka Rukham Dad Bannu.

Dt: 10 - 03 - 2016

RECEIVED

Anx "E"

(16)



OFFICE OF THE  
INSPECTOR GENERAL OF POLICE  
KHYBER PAKHTUNKHWA  
PESHAWAR.



No. S/ 293 /17, dated Peshawar the 23/01/2017.

ORDER

This order is hereby passed to dispose of departmental appeal under Rule 11-A of Khyber Pakhtunkhwa Police Rule-1975 submitted by Ex-Constable Hikmat Ullah No. 1433. The appellant was dismissed from service w.e.f 18.09.2008 by DPO/Bannu vide OB No. 82, dated 23.01.2009 on the charge of absence from duty for 04 months and 05 days.

His appeal was rejected by RPO/Bannu vide office Note dated 25.03.2016.

Meeting of Appellate Board was held on 05.01.2017 wherein appellant was heard in person. During hearing petitioner contended that he was gone to Saudi Arabia for seeking livelihood.

The impugned order of dismissal from service of petitioner was passed vide order dated 23.01.2009 and his appeal was rejected vide order dated 25.03.2016. The instant review petition filed on 08.08 2016 is badly time barred. Thus his appeal is rejected on grounds of limitation and merit as well.

This order is issued with the approval by the Competent Authority.

*Najeeb*  
(NAJEEB-UR-REHMAN BUGVI)  
AIG/Establishment,  
For Inspector General of Police,  
Khyber Pakhtunkhwa,  
Peshawar.

No. S/ 294-300 /17.

Copy of the above is forwarded to the:

1. Regional Police Officer, Bannu.
2. District Police Officer, Bannu.
3. PSO to IGP/Khyber Pakhtunkhwa, CPO Peshawar.
4. PA to Addl: IGP/HQrs: Khyber Pakhtunkhwa, Peshawar.
5. PA to DIG/HQrs: Khyber Pakhtunkhwa, Peshawar.
6. Office Supdt: E-IV CPO Peshawar.
7. Central Registry Cell, CPO.

*EC*  
No 872/EC dt 08/3/17  
Copy to DPO Bannu for  
information + no action -  
Constable Hikmat Ullah No 1433  
be informed through local  
police accordingly

*[Signature]*  
R.P.O Bannu Region  
27/1/17

*[Handwritten signature]*



Anx "F" (17)

To

The RPO Bannu

KPK police.

Subject: "Departmental / Mercy Appeal for reinstatement in service."

Respected Sir.

With utmost regard the appellant submits as under.

1. That the appellant was appointed as police constable vide order dated 25/05/2006.
2. That the appellant has served for the department to the best of my ability with honesty and dedication as no complaint was ever registered against me from any quarter.
3. That the appellant was dismissed from service on the ground absence from duty.
4. That the absence from duty of the appellant is not willful but due to the severe illness of my father for which I requested the concerned authorities to grant me leaves to take care of the treatment of my ailing father but the same was not approved/allowed.
5. That I was the elder brother amongst my brothers and sisters and there was no one except the appellant to take care of my father in the hospital hence I may kindly be reinstated in service on humanitarian and as well as legal grounds
6. That earlier the appellant filed departmental appeal to the RPO and review petition to the IGP but the same were declined hence presents this departmental appeal/review petition for sympathetic consideration of my request for reinstatement in service. Keeping in view what has been stated above, it is therefore, humbly requested to kindly reinstate me in service for which the appellant shall be highly grateful.

Thanks & Regards

Constable

Hikmat Ullah Khan s/o Taj Malook Khan (Late).

CNIC: 11101-3542914-7

Date of Appointment: 25-05-2006.

S/no: 1433

Cell No: 03351326262, 03348311941

District Police Bannu K.P.K, home Address: Nogarhi Mamash Khel Kotka Rukham Dad Bannu.

Dismissed date: 23.1.2009

Dt: 27/11/2018

File  
RPO Bannu  
10/12

RECEIVED

Anx "G" (18)

The RPO Bannu

KPK police.

Subject: "Departmental / Mercy Appeal for reinstatement in service."

Respected Sir,

With utmost regard the appellant submits as under.

1. That the appellant was appointed as police constable vide order dated 25/05/2006.
2. That the appellant has served for the department to the best of my ability with honesty and dedication as no complaint was ever registered against me from any quarter.
3. That the appellant was dismissed from service on the ground absence from duty.
4. That the absence from duty of the appellant is not willful but due to the severe illness of my father for which I requested the concerned authorities to grant me leaves to take care of the treatment of my ailing father but the same was not approved/allowed.
5. That I was the elder brother amongst my brothers and sisters and there was no one except the appellant to take care of my father in the hospital hence I may kindly be reinstated in service on humanitarian and as well as legal grounds.
6. That earlier the appellant filed departmental appeal to the RPO and review petition to the IGP but the same were declined hence presents this departmental appeal/review petition for sympathetic consideration of my request for reinstatement in service. Keeping in view what has been stated above, it is therefore, humbly requested to kindly reinstate me in service for which the appellant shall be highly grateful.

Thanks & Regards

Constable

Hikmat Ullah Khan s/o Taj Malook Khan (Late).

CNIC: 11101-3542914-7

Date of Appointment: 25-05-2006.

S/no: 1433

Cell No: 03351326262, 03348311941

District Police Bannu K.P.K, home Address: Nogarhi Mamash Khel Kotka Rukham Dad Bannu.

Dismissal date: 23.1.2005

Dt: 27/11/2018

File

RPO Bannu  
10/12

ACCEPTED

Any "H"

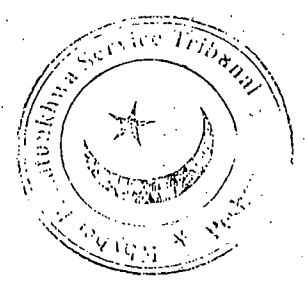
19

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR

Appeal No. 266/2017

Date of Institution ... 20.03.2017

Date of Decision ... 08.01.2018



Muhammad Umar Ex-Constable No. 273 of District Police Hangu.  
... (Appellant)

VERSUS

1. The Deputy Inspector General of Police, Khyber Pakhtunkhwa, Peshawar  
and 2 other. ... (Respondents)

MR. UZMA SYED,  
Advocate --- For appellant.

MR. MUHAMMAD RIAZ PAINDA KHIL,  
Assistant Advocate General --- For respondents.

MR. AHMAD HASSAN, ... MEMBER (Executive)  
MR. MUHAMMAD HAMID MUGHAL ... MEMBER (Judicial)

JUDGMENT

AHMAD HASSAN, MEMBER.- Arguments of the learned counsel for the  
parties heard and record perused.

FACCS

2. The brief facts are that the appellant was serving as Constable. Disciplinary  
proceedings were initiated against the appellant and upon culmination major penalty  
of dismissal was imposed on him vide impugned order dated 28.05.2011. That he  
preferred departmental appeal which was rejected on 26.06.2011 and was not  
communicated to the appellant. When he got the knowledge preferred petition under  
Rule-11-A of Police Rules which was also rejected on 21.02.2017, hence, the instant  
service appeal on 20.30.2017.

ATTESTED

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal  
Peshawar

ACCEPTED

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instant

ARGUMENTS

3. Learned counsel for the appellant argued that on account of absence from duty disciplinary proceedings were initiated and upon culmination major penalty of dismissal from service was imposed vide impugned order dated 26.06.2011. Prescribed procedure laid down in the rules was not followed in the appeal in hand and as such the appellant was condemned unheard. Absence from duty was not deliberate and intentional but circumstances were beyond his control. Statements of witnesses were not recorded nor the appellant was afforded an opportunity to cross examining the witnesses. Impugned order was passed with retrospective effect which is void ab-initio.

4. On the other hand learned Deputy District Attorney General argued that all formalities were observed before passing the impugned order. He was treated according to law and rules, hence, there is no illegality in the said order. The appeal is not maintainable and be dismissed.

CONCLUSION.

5. Without touching the merits of the case the impugned order was passed with retrospective effect, hence, the same is illegal, void ab-initio and not sustainable in the eyes of law.

6. As a sequel to above, the appeal is accepted and the impugned order is set aside. The intervening period may be treated as leave without pay. However, the respondents are at liberty to conduct de-novo enquiry within a period of 90 days after receipt of this Judgment. In case the de-novo enquiry is conducted then the issue of payment of back benefits shall be subject to outcome of the de-novo

**ATTESTED**

EXAMINER  
Khyber Pakhtunkhwa  
Service Tribunal,  
Peshawar

ATTESTED

(21)

proceedings. Parties are left to bear their own costs. File be consigned to the record room.

S.D

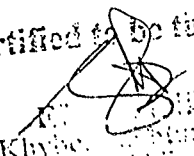
(AHMAD HASSAN)  
MEMBER

S.D

(MUIHAMMAD HAMID MUGHAL)  
MEMBER

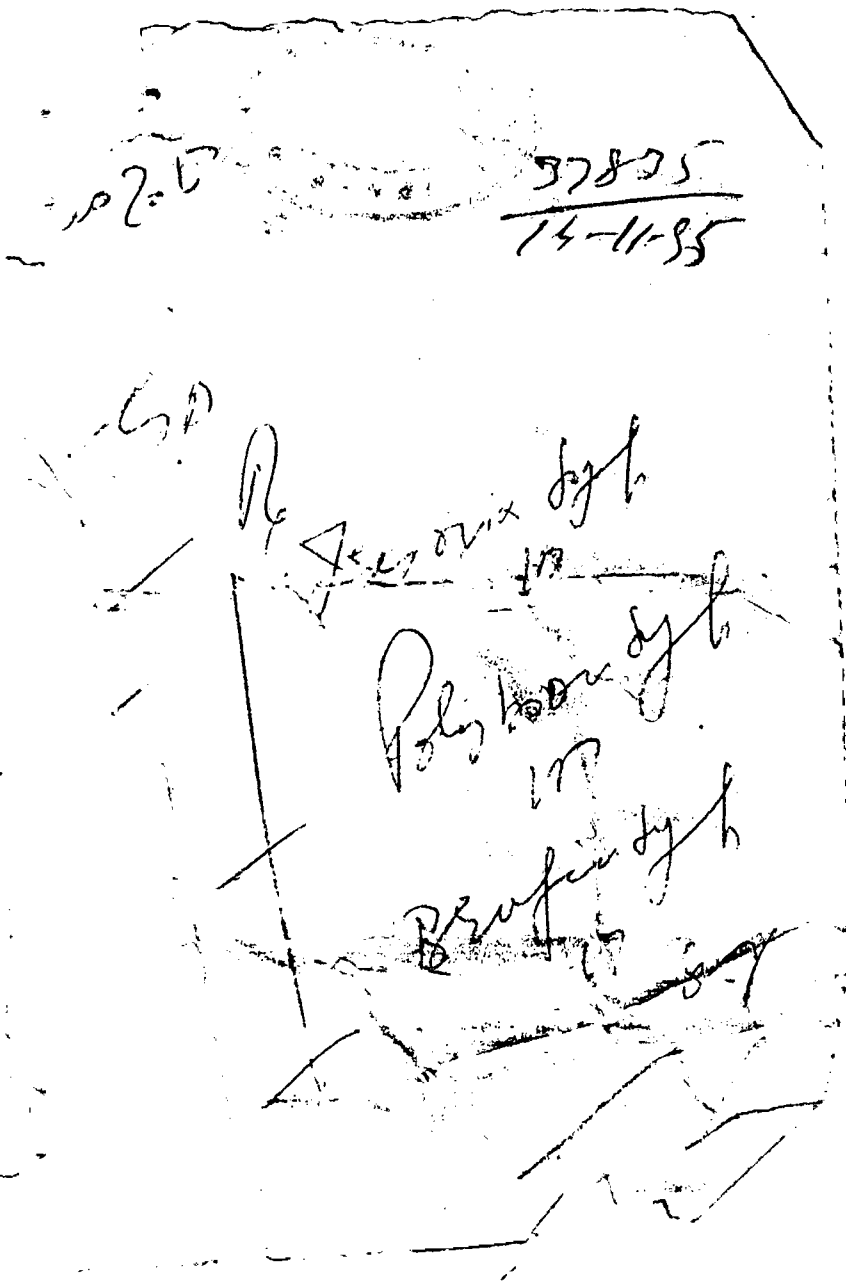
ANNOUNCED  
08.01.2018

Certified to be true copy

  
MEMBER  
Khyber Pakhtunkhwa  
Services Tribunal,  
Peshawar

S  
ACCEPTED

(26)



J  
ACCESSED

(27)

425  
E 2917  
BO 22/1/57

11A

TRANS NVAVASCOM

TRANS New-148  
(copy)

4/20/57  
1 M

9  
Accessed

HOSPITAL DISCHARGE SLIP

To  
CO ..... 9/0 med SQU .....  
(Patient's unit)  
No. .... Rank CM2 Name TAJ. Maleuk

of your unit was admitted in CMH/MH BANNU  
on 22-10-10 and was disch on 27-10-10

Disease while in hosp was .....  
DM HIN-CVA

which was\*/was not\* beyond his/her con RTA

Sick Leave 02 WKS

Date 27-10-10

Signature .....  
MO IC case  
Rank & appt .....

\*Strike out whichever  
not applicable

COUNTERSIGNED

Date 27-10-2010

OC  
Hosp  
To be MED W/

ACCEPTED



(29)

ACF/89 <sup>P</sup> 75367

Receipt No. 4

Book No. G \_\_\_\_\_

L.C. No. 161464

Date 15/3/2012

L.F. No. \_\_\_\_\_



ZTBL

Zarai Taragiyati Bank Ltd.

Branch, \_\_\_\_\_

Received with thanks from Mr/M/s *[Handwritten Name]*

a sum of Rupees *one lac only*

on account of \_\_\_\_\_

Rs. = 100000

L.T.I./Sig. of Depositor

*[Handwritten Signature]*

Nisar Khan

OGI/MCO  
Signature with Seal  
ZTBL

*S*  
ACCESSED



**Dr. Mohammad Kausar Dawar**  
 M.D.B.S. (Pesh) M.Sc. (Moscow)  
 D.B.V. (London) D.D.M (London)  
 D. Res. Laser Therapy Training (London)



**ڈاکٹر محمد کوثر داوڑ**

ایم۔ بی۔ بی۔ ایس (پشاور) ایم۔ ایس۔ سی (اسکو)  
 ڈی۔ ڈی۔ وی (انگلینڈ) ڈی۔ ڈی۔ ایم (انگلینڈ)  
 بی۔ ٹیک لیزر تھراپی ٹریننگ (انگلینڈ)  
 جلد اسپیشلسٹ اینڈ لیزر تھراپیسٹ  
 رہائش گاہ: ڈی۔ ایچ۔ کیو ہسپتال بنوں  
 ماہر امراض جلد و منیات (مخصوصہ)

Skin & Laser Specialist

Res: D.H.Q. Hospital Bannu  
 Ph: 0928-313335

Patient's Name Tayyab malook Age \_\_\_\_\_ Sex M Date 17 MAR 2010

Clinical Record



① 11/11/10 - 11/11/10

⑦ 11/11/10 - 11/11/10

7 دن

30 دن

①  
 Tab - Hasty Fort

1 + 1  
 Tab - Cerebrox 500 p

①  
 Penicillin H

D - Nitro plus H

Synalac - M.O.D.

mykes Hand Bar

S  
 ATTESTED

Handwritten signature

# جرمن ہومیوپیتھک کلینک اینڈ ہسپتال

## ہومیوپیتھک کلینک

## ڈاکٹر شیر دراز

ڈی۔ ایچ۔ ایم۔ ایس۔ پنجاب  
آر۔ ایچ۔ ایم۔ پی (پاک)  
ڈی۔ ایچ۔ ایم۔ پنجاب  
آر۔ ایچ۔ ایم۔ پی  
ڈی۔ آئی۔ ہوم (برطانیہ)

کاحر امراض  
معدہ - گردہ - پتہ  
جھڑل کادد - بواسیر  
مردانہ و زنانہ پوست بیماریہ و  
امراض اطفال

ڈیرہ فون نمبر 712206  
بنوں فون نمبر 612342

Patient Name علی ولد Age 27 Sex M Date 11-11-11

### CLINICAL RECORD

13/2

18/2  
11/3

Handwritten notes and signatures in the clinical record section.

کلینک - بازار توپوالہ نزد الحیب ہوسٹل ڈیرہ اسماعیل خان

ATTESTED

**RADIOIMMUNOSSAY LABORATORY**  
IRNUM - PESHAWAR.

**DIRECTOR**

**Dr. Sher M. Khan**  
M.B.B.S., M.Sc. (London)  
F.R.C.P. (London)

**CLINICAL SCIENTISTS:**

**Dr. Amjad Aziz**  
M.B.B.S., M.Sc. (Nuc. Med)

**Dr. Aakif Ullah Khan**  
M.B.B.S., M.Sc. (Nuc. Med)

**Dr. Shoaib Shah**  
M.B.B.S., M.Sc. (Nuc. Med)

**Dr. Mohammad Rauf**  
M.B.B.S., M.Sc. (Nuc. Med)

**BASIC SCIENTIST:**

★ **Gul Nawab**  
M.Sc. M.Phil (Pesh)

**TECHNOLOGIST:**

**Mr. Javid Khan**  
Tech (II)

Interpretation & Comments

★ Please Discuss if 41

*S*  
**ATTESTED**

(416)

Name & Address				
<i>Yaj Malooks.</i>				
RECORD NO.	M/F	AGE	TESTS REQUIRED	DATE
<i>9833</i> <i>20.</i>	<i>M</i>	<i>49</i>	T3, T4, TSH,	<i>5/9/2007</i>
HORMONES	PATIENT RESULTS		NORMAL RANGES	
T3	<i>1.3</i> nmol/L		0.8 ————— 2.7 nmol/L	
T4	<i>114</i> nmol/L		62 ————— 165 nmol/L	
TSH	<i>1.3</i> miu/L		0.5 ————— 5.0 miu/L	

*K*  
**Assayed by:**

**Quality Control Checked by: GUL NAWAB**

**Principal Scientific Officer**  
**Incharge Radioimmunosay**  
**Laboratory IRNUM.Pesh.**

Cash Memo

Date 21.11.98

3461

فون

ایبڈ سنٹر



(34)

کیمسٹ و ڈرگسٹ، اندرون لکی گیٹ، بہون

Name *S. P. ...*

Qty	PARTICULARS	RATE	AMOUNT	
			Rs	Ps
1b	Ceclor sup 1.25		133	-
1b	Novelgen LA		22	-
1b	Headache LA		16	50
1b	Acidul		10	-
	<b>Total</b>		181	50

S  
ATTESTED

# PHARMAX DRUG STORE

CIVIL HOSPITAL BANNU  
Prop: BADI-UZ-ZAMAN

No 938

Date 24/8/87

M/s

26

35

Qty.	Particulars	Rate	Amount	
			Rs.	Ps.
10	Tab. Cortec 10mg	3.55	35	50
8	Tab. Norvasc 5mg	13.75	106	-
5	Tab. Meclizine	1.2	6	-
10	Tab. Noctapril 80mg	11.1	111	-
			258	
			25	
Total			232	

ڈسکاؤنٹس

ہر مریض کے کیش ممبر پر 7/2 سے 15 فی صد ڈسکاؤنٹس ہوں  
جو شکایت ہوں وہ لارمیکس اچارج کو پیش کریں

Signature

ATTESTED

# H. RAHMAN BROTHERS

Chemist & Druggist  
1/S Lalki Gate Bannu Ph: 611288

(36)

No. .... 1173... Date 17-09-2008

Name .....

Qty.	PARTICULARS	Rate	Rs.	Ps.
20	ventolin SR47			
20	Thougpad TS		24	64
20	Asthmatifer TS		28	00
20	clarenin 2507 TS		28	66
20			540	00
20	prednisolone TS		8	00
1	Bandazol Sp		15	37
	Total		647	67

Signature 647-67

9  
ACCEPTED

(38)

OFFICE OF THE EXECUTIVE DISTRICT OFFICER ( E & S ) EDUCATION BANNU:  
NO: 1175/AE-I(M,Secy,) dt: 5/10/2011.

TO:

The Director,  
(E & S) Education Khyber Pakhtunkhwa Peshawar:

SUBJECT:-

MEDICAL LEAVE:

REF:-

Enclosed please find herewith an application along with other necessary Medical documents in R/O Mr. Anj MAX Gulak Kher (E&S) Civics GESS Mamash Kher Bannu requesting for Medical leave with effect from 03-09-2011 to 06-10-2011 and from 07-10-2011 to 05-01-2012 for further necessary action please.

*[Signature]*  
EXECUTIVE DISTRICT OFFICER  
(E & S) EDUCATION BANNU:

Encl: NO: \_\_\_\_\_ /AE-I(M,Secy,) dated: \_\_\_\_\_ /10/2011:

Copy for information :-

C1:- Principal GESS Mamash Kher Bannu:

EXECUTIVE DISTRICT OFFICER  
(E & S) EDUCATION BANNU:

*[Signature]*  
ATTESTED

Dated 14/9/11  
15-11-2011



(39)

OFFICE OF THE PRINCIPAL  
GHSS: MAMASH KHEL BANNU.  
No. 324 dt: 19-10-2011.

To:-

The Executive Distt: Officer,  
BSE, Bannu.

SUBJECT:-

CANTONMENT OF MEDICAL LEAVE WITH FULL PAY  
AND LEAVE SALARY.

Memor:-

Enclosed please find herewith the application,  
documents attached, in respect of Mr. Taj Malook Khan SS(Civics)  
of the school for sanction of 4 months work: 8-9-2011 to 5-1-12  
leave & leave salary.

Principal,  
GHSS: Mamash Khel Bannu.  
Principal,  
G.H.S. Mamash Khel  
Bannu.

*Received on 25/10/2011*

*[Signature]*  
25/10/2011

*[Signature]*  
ACCEPTED

(40)

APPLICATION FOR LEAVE

Note: - Item 1 to 9 must be filled in by all applicants. Item 12 applies only in the case of Government servants of Grade 16 and above.

1. Name of applicant: **Taj Malook Khan**  
 2. Leave Rules applicable: **1980**  
 3. Post held: **BS BPS 17 (Subject Specialist)**  
 4. Particulars of the post: **Education**  
 5. Pay: **Basic Pay Rs-110000/- BPS (17)**  
 6. Has the applicant any compensatory allowances or other compensatory allowances drawn in present post?

7. (a) Nature of leave applied for: **"Medical Leave"**  
 (b) Period of leave in days: **one month**  
 (c) Date of commencement: **08/09/2011**

8. Particular Rules/Rules under which leave is admissible  
 9. (a) Date of return from last leave: **07/10/2011**  
 (b) Nature of leave: **"Medical Leave"**  
 (c) Period of leave in days: **thirty days**  
 Date: **02/09/2011**

Signature: **Taj Malook Khan**  
 Designation: **Subject Specialist**

10. Report and recommendation of the Controlling Officer.

11. (a) Has this leave applied for is admissible under Rule ... and necessary

Date: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Designation: \_\_\_\_\_

Report of Audit Officer:  
 Date: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Designation: \_\_\_\_\_

12. Date of the sanctioning authority certifying that on the expiry of leave the applicant likely to these posts carrying the compensatory allowances being drawn by him

Date: **02/09/2011**  
 Signature: **Taj Malook Khan**  
 Designation: **Subject Specialist**  
 Certify that leave on **Medical Ground** for **30 days** on full pay is admissible to him.

ATTESTED

(41)

NO.

NO.

Rn 3/

COOPERATIVE DEPARTMENT.

NAME 1922

HEARLO NO. 39010

DATE 6/9/14

CLASS Joint

DM + CVA (R)

PAGE VALUE RUBBES 5.

VE TO CIVIL SERVANT

All personnel examination of case, whose signature is given below is period of leave on medical ground

In Hospital 15/17

They received 6

keep hospital 6/22

keep hospital 6

WJ

Address of  
with wife 6/9/14

Asst. Secy to Govt. Secy  
D. J. K. D. D. D.

ATTESTED

(42)

MEDICAL CERTIFICATE FOR LEAVE TO CIVIL SERVANT

I Dr. Abdul Razzaq after care full personnel examination of case, hereby certify that Mr. Taj Malook Khan whose signature is given below is suffering from DM + CVA I consider that a period of leave on medical ground with effect from 06/09/11 to 06/10/11 is absolutely necessary for the restoration of his/her health.

Opd No. 390/10 (39010)

Dated: 06/09/11

Taj Malook  
Signature of Civil Officer

Musad  
Govt Medical Officer  
Member  
Academy Professor (Medicine),  
BMSIKGNTM, Bahawalpur

8  
ACCEPTED

(43)

Medical Certificate For Leave To Civil Servant

I, Amjad Mustafa after care full personal examination of case, here by certify that Mr. Fayyaz Malik Khan whose signature is given bellow suffering from DM consider that a period of rest on medical ground with effect from 10/10/11 to 5/11/11 is absolutely necessary for the restoration of his/her health.

OPD NO: 23716

Dated: 10/10/11

Fayyaz Malik Khan  
11101-207-2650-3  
Signature of civil servant

[Signature]  
Medical Superintendent  
DHQ Hospital Bannu.  
Medical Superintendent,  
DHQ Teaching Hospital  
Bannu

Amjad Mustafa  
10/10/11  
[Stamp]

ATTESTED

(44)

APPLICATION FOR LEAVE.

Notes: - Item 1 to 9 must be filled in by all applicants. Item applies only in the case of

1. Name of applicant: **Taj Malook Khan**  
 2. Leave Rules applicable: **"Medical Leave"**  
 3. Post held: **Subject specialist (S.S)**  
 4. Department or office: **Education**  
 5. Pay: **Basic Pay: 40000/-**  
 6. House Rent Allowance/conveyance allowance or other compensatory allowances drawn in present post:

7. (a) Nature of leave applied for: **"Medical Leave"**  
 (b) Period of leave in days: **Ninty day (90)**  
 (c) Date of commencement: **7th Oct 2011 to 5th January 2012**  
 8. Particular Rule/Rule number which leave is admissible:  
 9. (a) Date of return from last leave: **6th January 2012**  
 (b) Nature of leave: **Medical Leave**  
 (c) Period of leave in days: **Ninty days (90)**

Date: **10/10/2011**

10. Remarks and recommendation of the Controlling Officer  
 11. Certified that leave applied for is admissible under Rule  
 conditions fulfilled

**Taj Malook**  
 Signature  
 Designation

Dated: .....

Signature  
Designation

12. Report of Audio Officer

Dated: .....

Signature  
Designation

13. Orders of the sanctioning authority certifying that on the expiry of leave the applicant is likely to be **re-employed** carrying the compensatory allowances being drawn by him.

**DA/BA/14 Leave for 90 days on Medical ground**  
 Dated: **7/10/11 to 5/1/12** Signature: **DA/BA/14**

Accessed



46

GOVT. OF KHYBER PAKHTUNKHWA  
ELEMENTARY & SECONDARY EDUCATION DEPARTMENT

Dated Peshawar the December 14, 2011

NOTIFICATION

NO.AO E.&SE/7-14/Leave/Bannu/05. Ex-post facto sanction is hereby accorded to grant of Medical leave w.e.f.06-09-2011 to 05-01-2012 (122 days) on full pay in favour of Mr. Taj Malook Khan, SS (H/C), GHSS Mamash Khel District Bannu.


2. The District Accounts officer Bannu has certified that leave applied for is admissible to the officer concerned under the Revised leave Rules, 1981.

Secretary to Govt. of Khyber  
Pakhtunkhwa Elementary &  
Secondary Edu: Department


Endst: Even NO. & Date.

Copy forwarded to:-

1. The Director Elementary & Secondary Education, Peshawar w/r to his letter No.478/F.No.1/M/Leave dated 03-12-2011.
2. The District Accounts officer Bannu.
3. Mr. Taj Malook Khan, SS (H/C), GHSS Mamash Khel District Bannu.

  
(MUHAMMAD YOUNAS)  
SECTION OFFICER (ACCOUNTS)

MADE (ND)

  
ACCEPTED



(47)

OFFICE OF THE PRINCIPAL  
GHSS:MAMASH KHEL BANNU.

No. 3257 dt: 27-12-2011.

To:-

The Executive Distt:Officer,  
Finance & Planning Bannu.

SUBJECT:-

DEMAND OF L/SALARY IN R/O TAJ MALOOK.  
SS(CIVICS)BPS#17GHSS:MAMASH KHEL BXU.

Memo:-

Enclosed please find herewith the  
Demand of L/Salary for Mr. Taj Malook Khan SS(Civics) B-17  
GHSS:Memash Khel Bannu, is as under:-

Sub:Head.	Sub:required Budget.	Period.	Total.
A-01278-L/Salary.	190000/-	M/Leave w.e.f, 6-9-2011 to 5-1-2012 (122days)	190000/-
Total:-			190000/-

*D. Khalil*  
Principal,  
GHSS:Memash Khel Bannu.  
Principal,  
GHSS:Memash Khel  
Bannu

*J*  
ACCEPTEED

(48)

To

The Director Education,  
Khyber Pukhtunkhwa .

Subject: "Two month earn leave".

Sir,

I have the honor to state that on account of some domestic problem , I cannot attend the institution.

Therefore, your kind honor is requested to grant me two months from 8 January to 10 March 2011 earned and oblige.

Date: 04/01/2011

Thank you.

Yours Obediently,

Mr. Taj Malook Khan

s/o Gul Sahib Jan

Job Title : S.S( subject specialist BPs 17),

G.H.S.S Mamash Khel Bannu

Recommended and Forwarded to  
EDO (E/SE) Bannu for necessary  
action.

Aman  
5/11/11 g/c

Principal,  
Mamash Khel

ACCESSED

49

OFFICE OF THE PRINCIPAL  
GHSS:MAMASH KHEL BANNU.

No. 3238 dated 15-10-2011.

To:-

The District Accounts Officer,  
Bannu.

SUBJECT:-

MEDICAL LEAVE.

Memo:-

Enclosed please find herewith the  
the proforma in respect of Mr. Taj Meelook Khan SS(Civics)  
the subject cited perpose for necessary entries.

*Jm 15/10/11*  
Principal,  
GHSS: Mamash Khel Bannu.

Principal,  
GHSS: Mamash Khel  
Bannu.

*J*  
ACCEPTED



# GOMAL UNIVERSITY

## DERA ISMAIL KHAN

(N.W.F.P) PAKISTAN

50



(Session 2007 ANNUAL )

IKMAT ULLAH KHAN. SON of TAJ MALOOK KHAN.

and a student of GOVT. COLLEGE, BANNU

having passed the prescribed examination in JUNE/JULY, 20 07,

this day admitted by the GOMAL UNIVERSITY to the DEGREE of

### BACHELOR OF ARTS

the SECOND Division HE Passed also in                                          

~~Optional Subject~~ / Pakistan Studies and Islamiyat as Compulsory Subjects.

The Examination was taken ~~as a whole~~ in parts.

Registered No. 9676-B-04

Roll No. 15902

Result declared on SEPTEMBER 11, 2007

Countersigned

Hamidullah  
Controller of Examinations

Munir  
Vice-Chancellor

9  
ATTESTED

Before the Provincial <sup>بعد االت</sup>

Service Tribunal  
K.P. Peshawar

2018ء منجانب

Hikmatullah Khan I.G.P. KPK

موزخہ

مقدمہ

دعویٰ

جرم

باعث تحریر آئندہ

مقدمہ مشدرجہ عنوان بالا میں اپنی طرف سے واسطے پیروی و جواب دہی و کل کارروائی متعلقہ  
آن مقام Inayatullah Khan Adu Peshawar کے اقرار کیا جاتا ہے۔

مقرر کر کے اقرار کیا جاتا ہے۔ کہ صاحب موصوف کو مقدمہ کی کل کارروائی کا کامل اختیار ہوگا۔ نیز

دیکل صاحب کو راضی نامہ کرنے و تقرر ثالثتہ فیصلہ بر حلف دیئے جواب دہی اور اقبال دعویٰ اور

بصورت ڈگری کرنے اجراء اور صولی چیک و روپیہ ارضی دعویٰ اور درخواست ہر قسم کی تصدیق

زرائیں پر دستخط کرانے کا اختیار ہوگا۔ نیز صورت عدم پیروی یا ڈگری یکطرفہ یا اپیل کی براندگی اور منسوخی

نیز دائر کرنے اپیل نگرانی و نظر ثانی و پیروی کرنے کا اختیار ہوگا۔ از بصورت ضرورت مقدمہ مذکور

کے کل یا جزوی کارروائی 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 بالا اختیارات حاصل ہوں گے اور اس کا ساختہ

پر داخستہ منظور قبول ہوگا۔ دوران مقدمہ میں جو خرچہ ہر جانب التوائے مقدمہ کے سبب سے ہوگا۔

کوئی تاریخ پیشی مقام دورہ پر ہو یا حد سے باہر ہو تو وکیل صاحب پابند ہوں گے۔ کہ پیروی

مذکورہ کریں۔ لہذا وکالت نامہ لکھد یا کہ سند ہے۔

انمرقوم 18 \_\_\_\_\_ 12 \_\_\_\_\_ 2018

Accepted by

Inayatullah Khan Adu Peshawar I.G.P. (K.P.)

Faheemullah